

Pillar III Disclosures
On a consolidated basis
Report for June 30, 2026

Alpha bank

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List of Abbreviations

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

Abbreviation	Definition
ICS	Internal Control System
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 authorizations 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 the 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") as amended by Regulation 2024/1623 (CRR3) 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 ") as amended by Directive 2024/1619 (CRD VI).

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, the European Banking Authority (EBA) published its final draft Implementing Technical Standards (ITS) on the Pillar 3 Data Hub (P3DH) for large and other institutions, which centralized 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 Capital Requirements Regulation (CRR3) and Capital Requirements Directive (CRD6).

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

In addition to the above, the EBA published an onboarding plan for large and other institutions, setting out the steps required for accessing and submitting information to the new P3DH – the EBA's centralized platform for public disclosures under the CRR3.This initiative is a significant milestone in the EBA's commitment to enhancing transparency and consistency in Pillar 3 disclosures across the EU financial system and promoting market discipline.

On 6 August 2025, the EBA published a no-action letter on the application of the ESG Pillar 3 disclosure requirements under the EBA disclosure ITS. This no-action letter aimed 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. The EBA also updated its ESG risk dashboard.

On 4 November 2025, the EBA released several updates to ensure consistency with the latest regulatory and reporting framework developments. These included 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 was enhanced to align with the most recent changes in regulatory reporting.

On 17 December 2025, the EBA published clear guidance for banks on how to manage enhanced reporting requirements for operational risk, following the postponement of the first reference date under the amended ITS. This move came after the European Commission adopted Regulation (EU) 2025/2475, which delays the application of new operational risk reporting obligations to the end of June 2026.

On 28 January 2026, the EBA announced the go-live of its P3DH, marking the first time prudential information from all EEA institutions is made publicly accessible through a single, harmonized digital platform. The hub discloses the data that large and other institutions began submitting on 26 January, and significantly enhances the availability, usability and comparability of prudential information across the EU. By boosting transparency and supporting market discipline, the hub contributes to further strengthening the resilience and soundness of the European financial system.

On 22 June 2026, EBA published its final draft ITS amending the Pillar 3 disclosure framework on ESG risks and introducing disclosure requirements on equity and shadow banking exposures. The package finalizes the implementation of the disclosure requirements introduced by CRR3. Developed in line with the EU's simplification agenda and the Omnibus package, the ITS streamline existing requirements, and enhance usability and consistency. The ITS are aligned with the European Sustainability Reporting Standards (ESRS) and with the EBA draft ITS on ESG reporting requirements, which are currently under consultation. They should, therefore, be read in conjunction with this Consultation paper to ensure a comprehensive understanding of the overall ESG framework and to support informed feedback.

On 02 July 2026, the EBA published the results of its targeted Peer Review on the supervision of compliance with the Capital Requirements Regulation (CRR) and the Bank Recovery and Resolution Directive (BRRD) provisions aiming to facilitate market discipline through bank disclosure. The Review found that the competent authorities under review have fully or largely embedded Pillar 3 requirements into their supervisory frameworks and that their practices are efficient overall. Consistency across jurisdictions could, however, improve.

On 24 July 2026, the EBA published a draft technical package for version 4.4 of its reporting and disclosure framework, covering IFRS 18 reporting, Pillar 3 ESG disclosures and other technical amendments**.** This early release is intended to support reporting entities in preparing for upcoming changes ahead of the final publication, scheduled for September 2026. The draft technical package for release 4.4 includes validation rules, the Data Point Model (DPM) and XBRL taxonomies, and introduces the following new reporting requirements:

- Amendments to the ITS on Pillar 3 disclosures on ESG risks, equity and shadow banking exposures published here. The first reference date is 31/12/2026;
- Technical amendments to DPM and taxonomy related to Resolution Planning, MREL decisions and Pillar 3 disclosure templates. The first reference date is 31/12/2026;

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 submits directly the Pillar III report to the EBA, within the applicable deadlines, via the EUCLID Regulatory Reporting Platform (ERRP) in order to be published to the EDAP public portal by the EBA without undue delay after submission. The P3DH, as established under the CRR requirement, is the primary source of Pillar 3 information. This means that any individual publication by the Bank shall not occur before the respective submission to the EBA. The Bank publishes the report in its website including a link to the EDAP public portal in the EBA website, where the prudential information is made available on a centralized manner. 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, established under Council Regulation (EU) No 1024/2013, on a standalone and consolidated basis. For the purposes of this document, the term Alpha Bank Group refers to the prudentially consolidated group as defined under the applicable Capital Requirements Regulation (CRR) 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 0.25% applicable from 1 October 2025 (Act 235/1/07.10.2024). On 06.10.2026, Bank of Greece announced that sets the CCyB rate at 0.50%, effective from 1 October 2026 (Act 248/1/06.10.2026).

    - other systemically important institutions (O-SII) buffer, which stands at 1.00% for 2026.On 15.10.2026, Bank of Greece announced that sets the O-SII buffer rate for 2027 at 1.00% for Alpha Bank S.A., effective from 1 January 2027(Act 4/130.09.2026).

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 2025 Supervisory Review and Evaluation Process (SREP) decision, ECB notified Alpha Bank SA that for Q2 2026 it is required to meet the minimum limit for consolidated Overall Capital Requirements (OCR), of at least 14.84% (OCR includes for Q2 2026 the CCB Capital Buffer of 2.5% the O-SII buffer of 1% and the CCyB of 0.44%). 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 (2.9%), 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).
- The EBA published the final technical package of Reporting Framework 4.2 on 25 November 2025 with expected application from Q4 2025. The framework constitutes an enhancement of the existing supervisory reporting requirements, incorporating updates to the Data Point Model (DPM) and taxonomy, as well as new and revised reporting templates. Key changes under Framework 4.2 include a comprehensive revision of resolution planning reporting,

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 letter of BoG, regarding the implementation of SRB’s Decision (SRB/EES/2025RPC/59) on 18 December 2025, Alpha Bank received the binding Minimum Requirement of Own Funds and Eligible Liabilities (MREL), according to which the Bank needs to meet from 18 December 2025 on a consolidated basis an MREL requirement of 23.58% of Total Risk Exposure Amount (TREA) and 5.91% of Leverage Exposure (LRE). The Decision also sets out that the binding target of Alpha Bank S.A. 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 3.94% as of 30.06.2026. Minimum requirements for own funds and eligible liabilities (MREL), are subject to annual review/approval from SRB.

On 30 June 2026, the Bank’s MREL ratio on a consolidated basis stood at 29.3%, which is above the binding target of 27.52% of the Total Risk Exposure Amount (TREA) (including CBR). The ratio includes the profit of the financial reporting period that ended on 30 June 2026 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.

[1] Market Confidence Charge

2.3 Significant Developments

2.3.1 NPE Plan/NPE Initiatives

NPE Plan (Update)

In March 2026 the Bank submitted an updated NPE Business Plan covering the period 2026-2028. Based on the submitted NPE Business plan, the NPE stock is expected to display a slight increase for 2026. Continuous monitoring of the evolution of NPE stock is performed for any negative developments/deviations in order to be counterbalanced by mitigating actions.

The Bank will implement the necessary mitigation actions (including enhanced collections and recoveries, restructuring solutions, collateral-based recoveries and other portfolio management initiatives) in order to contain the impact of these inflows on asset quality metrics. Through these actions, the Bank aims to maintain asset quality and cost of risk levels broadly aligned with the standards observed across other European banks, while preserving a satisfactory capital position above minimum regulatory capital requirements.

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.

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

Moreover, Alpha Bank focused on the implementation of its accelerated NPE deleveraging plan through inorganic actions has successfully completed significant transactions of c. 9 billion total disposed portfolio value within the previous years, among which the following within the year 2026:

- ✓ Project Andros: Disposal of NPE Leasing portfolio of Euro 0.24 billion GBV, which forms an integral part of Alpha Leasing's transformation. The transaction was completed in January 2026
- ✓ Project Athena: Sale of a mainly secured portfolio of Small Businesses and Mortgage NPE exposures of Euro 0.2 million GBV. The transaction was completed on 25.9.2026
- ✓ Project Sky II: Non-Performing Cypriot exposures with a carrying value before impairments of c. Euro 0.1 billion as of 30.06.2025. The transaction was completed on 3.7.2026
- ✓ On 14.7.2026, the Group completed the sale of non-performing wholesale loan portfolio of a total gross book value of € 75.

As regards securitization transactions which make use of Hellenic Asset Protection Scheme for the retained senior tranche, namely Galaxy, Cosmos and Gaia, the outstanding amount of the senior notes as of 30.6.2026 amounts to Euro 4.957billion.

2.3.2 Strategic execution & business growth

During 2026,in line with the Strategic Plan, the Group proceeded with the following actions;

Merger & Acquisition and strategic partnerships

- ✓ On 23.1.2026, the reorganization of the Group's subsidiary, Alpha Leasing S.M.S.A. was effectuated by way of a common demerger and dissolution of the company, completed in accordance with all applicable laws and regulations and approved by the General Commercial Registry (GEMI). Through the Demerger, the performing leasing contracts of Alpha Leasing along with the related real estate interests were transferred to the newly established and licensed leasing company of the Group, Alpha Leasing Single Member S.A. (ex. Alpha Erevna Agoras SMSA). Further, a selected perimeter of mainly non-performing financial leases along with the related real estate interests with a Gross Book Value of approximately Euro 0.24 billion, was transferred to Hellas Capital Leasing Single Member Société Anonyme ("HCL"), in exchange of newly issued shares in HCL (the "Temporary HCL Shareholding Interest") to Alpha Holding S.A., which was the sole shareholder of Alpha Leasing. Furthermore, certain other real estate assets of Alpha Leasing were transferred to two newly established Group companies, namely ALPHA Ependytikis Periousias Andros Monoprosopi S.A. and Epangelmatikon Akiniton Andros Single Member Societe Anonyme. Following the completion of the Demerger, Alpha Holding S.A., proceeded with the sale and transfer of the Temporary HCL Shareholding Interest, to HCL's main shareholder.
- ✓ On 6.4.2026, the Bank submitted a voluntary tender offer to the shareholders of ALPHA TRUST HOLDINGS S.A. for the acquisition of the total number of their shares. On 30 June 2026, through the acceptance of the tender offer, the Bank acquired 96.95% of the company's shares, as well as its wholly owned subsidiaries, "ALPHA TRUST Single-Member Mutual Fund and Alternative Investment Fund Management Company S.A.", headquartered in Greece, and "Alpha Trust Luxemburg S.à r.l.", headquartered in Luxembourg.
- ✓ On 26.05.2026, the Alpha Bank's competent corporate body approved a reorganization of the Group's corporate structure relating to its real estate activities, in line with the Group's strategy to achieve a more effective organization and management of the relevant activities. The reorganization entails (i) the establishment of a dedicated Investment Properties Sector under Alpha Bank SA, and (ii) the consolidation of the Group's Real Estate Owned ("REO") portfolio under dedicated holding entities.
- ✓ On 10.6.2026, the Bank increased its stake in the company Prodea Real Estate Investment Company Societe Anonyme to 9,90% by receiving 1,071,200 new shares after an exchange with bonds.
- ✓ On 26.6.2026 the General Meeting approved the distribution in cash of the amount of Euro 148,005,238.21 to the Shareholders of the Bank.

- ✓ Since the beginning of 2025, Alpha Bank's strategic partnership with UniCredit in the distribution of investment funds has continued to progress successfully. Under the terms of the collaboration, Alpha Bank distributes UniCredit's onemarkets Fund, alongside other funds managed by UniCredit and its affiliated asset management entities, through its nationwide distribution network in Greece. Assets under management in onemarkets Fund amounted to Euro 1.7 billion by end June 2026, up from Euro 1.1 billion by end 2025 and Euro242 million at the end of 2024. The continued growth of assets under distribution underscores strong client demand for an expanded, diversified and selectively curated range of mutual fund solutions. The offering includes funds managed by internationally recognised asset managers, such as Fidelity International, Rockefeller AM and Capital Group, several of which are available to investors in Greece exclusively through Alpha Bank. Strong client engagement across the Private Banking and Alpha Gold Personal Banking segments, combined with a series of joint initiatives, including investment insight publications, targeted marketing campaigns, the dedicated onemarkets.gr platform, and exclusive client events, has supported the continued expansion of the onemarkets Fund franchise. This growth has been achieved despite ongoing volatility and uncertainty across global financial markets. Looking ahead, Alpha Bank remains committed to further enhancing its collaboration with UniCredit through the introduction of additional investment solutions in 2026, including Certificates and exclusive propositions from the Alternatives investments space, while continuing to leverage co-branded marketing activities and thematic client events to strengthen client awareness and engagement. This strategic partnership complements Alpha Bank's open-architecture investment model, which provides clients with access to a broad and diversified range of high-quality investment solutions, encompassing both the Bank's proprietary asset management offerings and carefully selected third-party products.
- ✓ In November 2025, ABG established Alpha Holdings Luxembourg S.A, a subsidiary incorporated in Luxembourg, which is currently undergoing the regulatory process required to obtain a banking licence. Upon obtaining the necessary regulatory approvals, the entity is expected to transition into a licensed banking institution offering wealth management and private banking services, with a particular focus on Greek and Cypriot clients. The bank is expected to commence operations in the second quarter of 2027.
- ✓ On 1.7.2026, the Bank announced that its wholly owned subsidiary Alpha International Holdings S.A. signed a definitive share purchase agreement with the shareholders of Altius Insurance Ltd (“Altius”) for the acquisition of 100% of Altius’ share capital. This development followed the Bank’s announcement of December 2025, regarding the agreement reached on the key commercial and legal terms for a strategic combination of insurance activities in Cyprus between Universal Life Insurance Public Company Ltd and Altius.
- ✓ On 9.7.2026, the Bank’s subsidiary, ABINVEST I S.A., acquired 100% of the shares of the company KREVIX SINGLE MEMBER S.A.

- ✓ On 20.7.2026, it was announced that the four systemic Greek banks will make a new contribution totaling € 160 for the redevelopment of facilities and university infrastructure at the National and Kapodistrian University of Athens (NKUA), Aristotle University of Thessaloniki (AUTH), and the National Technical University of Athens (NTUA). This initiative forms part of the major national university modernization program “Academia 2030”, which aims to create modern, accessible, and internationally competitive campuses at the country's three largest universities. The new contribution is expected to be provided over a three-year period. For 2026, the four systemic banks will contribute a total of € 20 million. The remaining amount will be disbursed, subject to further evaluation, taking into account the progress of the project’s implementation and prevailing financial conditions.
- ✓ On 21.7.2026, following the approval of the Ordinary General Meeting of the Shareholders held on 26.6.2026 and by virtue of the decision of the Ministry of Development on 21.7.2026, regarding the amendment of article 5 of the Bank's Articles of Incorporation, the Bank proceeded with the cancellation of 59,018,043 treasury shares. As a result, its share capital was reduced by the amount of € 17, treasury shares were reduced by € 211, and the remaining amount of € 194 was recorded in Retained Earnings.
- ✓ On 23.7.2026, the Bank’s subsidiary, ABINVEST I S.A., acquired 100% of the shares of the company HREH 6 S.M.S.A.
- ✓ Between 30.6.2026 and 23.7.2026, the Bank acquired an additional 96,011 shares of Alpha Trust Holdings (including shares resulting from the exercise of the company stock options), increasing its total participation to approximately 98% of the issued share capital.
- ✓ On 16.7.2026, Alpha Bank submitted a request to the Hellenic Capital Markets Commission to exercise its squeeze-out right for the acquisition of the remaining shares of Alpha Trust Holdings. Following the acquisition of 100% of the share capital, the Bank will proceed with the delisting of the Company’s shares from the Athens Exchange, pursuant to Article 17 of Greek Law 3371/2005 and other applicable laws.
- ✓ On 28.09.2026, Alpha Bank announced the completion of the disposal of a pool of primarily secured Non-Performing Loans with a total gross book value of approximately Euro 0.2 billion (the “Portfolio”) to Tritos Financial Investor Designated Activity Company, an entity established by funds managed by affiliates of Fortress Investment Group (the “Transaction”). The servicing of the Portfolio will be undertaken by “Cepal Hellas Financial Services Single Member Société Anonyme Servicing of Receivables from Loans and Credits”, which has been licensed and is supervised by the Bank of Greece pursuant to Greek Law 5072/2023. The Transaction has a neutral impact on the Bank’s capital position and is part of its strategy for the active management of Non-Performing Exposures.

Issuances | Access to Markets

- ✓ On 10.2.2026, Alpha Bank successfully completed the issuance of a Euro 750 million Senior Preferred Bond due in February 2033, callable after six years and carrying a coupon of 3.50%. At the same time, Alpha Bank offered to the bondholders of a current bond issuance with a nominal value of Euro 450 million and a coupon of 7.50%, with a call date in June 2026, to exchange their bonds for cash and a parallel right to participate in the new issuance.

- ✓ On 6.5.2026, Alpha Bank successfully completed the issuance of a Euro 600 million Senior Preferred Green Bond due in May 2032, callable after five years and carrying a fixed coupon of 3.75%. In line with Alpha Bank's Green Bond Framework, the proceeds raised will be directed towards the financing of eligible green investments, in alignment with the Bank's strategic commitment to advancing sustainable development and financing the green transition of the Greek economy.

2.3.3 EU-Wide 2027 Stress test

On June 11, 2026 the European Banking Authority (EBA) published for informal consultation its draft methodology, templates, and template guidance for the 2027 EU-wide stress test. This step marks the beginning of the dialogue with the banking industry and builds upon the methodology used in the 2025 exercise, with improvements reflecting new insights and regulatory changes. According to the EBA, the 2027 exercise introduces significant simplifications to improve efficiency and risk sensitivity, while preserving the robustness and comparability of results. Key changes include a substantial reduction in data requirements, the alignment of information with harmonized supervisory reporting, and the integration of climate risks into the EU-wide stress test. A total of 63 banks from the EU and Norway, including 47 from the euro area, will participate, covering 75% of the EU banking sector.

2.3.4 2026 Geopolitical Reverse Stress Test

The ECB launched in December the geopolitical risk reverse stress test on 110 directly supervised banks, including the Bank, which is ongoing. By conducting this thematic stress test, the ECB aims to obtain insights into the geopolitical risk-related scenarios that could materially affect banks, who should identify relevant geopolitical events and quantify their impact.

Geopolitical risk is a cross-cutting risk driver that can have an impact on banks' traditional risk categories, as it cuts across credit, market, liquidity, business model, governance and operational risks. It can also affect banks through multiple channels, including financial markets, the real economy and the safety and security of banks' operations. As a key driver of macroeconomic uncertainty, it remains at the centre of the ECB's supervisory priorities for 2026-28.

Banks have been requested to provide a reverse stress test simulation, with a three-year horizon, assuming a geopolitical risk materialization that would lead to a decline in their Common Equity Tier 1 (CET1) according to a predefined target, supplemented by ex post mitigating actions. Specifically, each bank was asked to identify the most relevant geopolitical risk events that could lead to at least a 300-basis point depletion in its CET1 capital. In addition to reporting on how the geopolitical risk scenario would affect their solvency positions, banks were also asked to provide information on how this might affect their liquidity and funding conditions.

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.

Main elements impacting Capital and Liquidity

- ✓ The Group's CET 1 Capital base stood at €5bn, resulting in a CET1 ratio of 14.35%, post dividend accrual of 63bps in the quarter including the profit of the financial reporting period that ended on 30 June 2026 as well as the impact of DTC acceleration.
- ✓ The Group's Loan to Deposit Ratio stands at 78% while the Group's Liquidity Coverage Ratio (LCR) stood at 197% vs 176% in Q1 2026, far exceeding regulatory thresholds and management targets.
- ✓ As of June 2026, ECB financing stood at €2.7bn. The Bank's blended funding cost increased slightly to 98 bps in the quarter, up from 96bps in Q1 2026, due to higher wholesale funding volumes and cost of deposits.

Shareholder Remuneration

Alpha Bank S.A. has updated its shareholder remuneration policy, which was approved by the Board of Directors (BoD) on the Meeting of 29.01.2026. The Policy sets the framework (legal, accounting, regulatory) under which shareholder distributions may be made 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.

On 18.10.2025 approval was granted for an interim cash distribution of €111 million to its shareholders for the financial year 2025. Furthermore, the Group applied and received on 08.06.2026 the approval for the additional distribution of €407million based on FY 2025 profits to its shareholders, with a combination of cash and share buyback. Additionally, on 26.6.2026 part of € 407m was approved by General Meeting to be distributed in the form of cash dividend of €148m. On 30.9.2026 based on the profitability of H1 2026, the BoD of the Bank approved an interim cash distribution of € 124m, which is subject to regulatory approval.

From 2025 onwards, the Group applies an accelerated amortization of Deferred Tax Credits (DTC) for prudential purposes by voluntarily deducting it from regulatory capital ahead of the scheduled timeline. The acceleration of DTC is set equal to 29% of planned total amount of ordinary shareholder payouts (cash dividend and/or share buyback).

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.

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.

On 04 June 2026, the European Commission has introduced targeted, time-limited amendments to its implementation of the new market risk capital framework for banks in order to ensure that the EU banking sector benefits from a level playing field with international competitors, The measures will apply for three years from 1 January 2027.

The delegated act C (2026) 3647 will now be reviewed by the European Parliament and the Council, with a three-month scrutiny period (extendable by a further three months). If no objection is raised, the measures will enter into application on 1 January 2027, for a period of three years.

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 30.06.2026, Group's CET1 stood at €5.0 billion and the total Regulatory Capital at €6.7 billion, while the total RWAs amounted to €34.8billion resulting in a CET1 ratio of 14.35%, and total Capital Adequacy Ratio of 19.33% mainly due to the H1 2026 profitability which includes also a provision for the distribution of a total amount of Euro c.273 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
	30.06.2026	**31.03.2026**
Capital Type		
CET1	4,997	5,032
Tier 1 Capital	5,697	5,732
Tier 2 Capital	1,037	1,024
Total Regulatory Capital for C.A.R. calculation	6,734	6,756
Risk Weighted Assets	34,833	33,530
Capital Ratios		
CET1 Ratio	**14.35%**	**15.01%**
Tier 1 Ratio	**16.36%**	**17.10%**
Capital Adequacy Ratio (Tier 1 + Tier 2)	**19.33%**	**20.15%**

(*) 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 30June 2026, the eligible amounts not "relying on future profitability" according to the CRD Directive stood at €2.18 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 (*)

		a	b	B	d	e
		30.06.2026	31.03.2026	31.12.2025	30.09.2025	30.06.2025
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) Capital	4.997	5.032	4.986	4.959	4.921
2	Tier 1 capital	5.697	5.732	5.686	5.659	5.621
3	Total capital	6.734	6.756	6.702	6.664	6.638
	Risk-weighted exposure amounts					
4	Total risk-weighted exposure amount	34.833	33.530	32.482	30.985	30.604
4a	Total risk exposure pre-floor	34.833	33.530	32.482	30.985	30.604
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	14,35%	15,01%	15,35%	16,01%	16,08%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	14,35%	15,01%	15,35%	16,01%	16,08%
6	Tier 1 ratio (%)	16,36%	17,10%	17,51%	18,26%	18,37%
6b	Tier 1 ratio considering unfloored TREA (%)	16,36%	17,10%	17,51%	18,26%	18,37%
7	Total capital ratio (%)	19,33%	20,15%	20,63%	21,51%	21,69%
7b	Total capital ratio considering unfloored TREA (%)	19,33%	20,15%	20,63%	21,51%	21,69%
	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 (%)	2,90%	2,90%	3,00%	3,00%	3,00%
EU 7e	of which: to be made up of CET1 capital (percentage points)	1,63%	1,63%	1,69%	1,69%	1,69%
EU 7f	of which: to be made up of Tier 1 capital (percentage	2,18%	2,18%	2,25%	2,25%	2,25%
EU 7g	Total SREP own funds requirements (%)	10,90%	10,90%	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 (%)	0,44%	0,46%	0,43%	0,21%	0,21%
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 (%)	3,94%	3,96%	3,93%	3,71%	3,71%
EU 11a	Overall capital requirements (%)	14,84%	14,86%	14,93%	14,71%	14,71%
12	CET1 available after meeting the total SREP own funds requirements (%)	8,18%	8,88%	9,16%	9,82%	9,89%
	Leverage ratio					
13	Leverage ratio total exposure measure	83.309	81.058	79.265	75.738	74.581
14	Leverage ratio	6,84%	7,07%	7,17%	7,47%	7,54%
	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%

		a	b	B	d	e
		30.06.2026	31.03.2026	31.12.2025	30.09.2025	30.06.2025
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	17.068	16.559	16.334	16.086	16.156
EU 16a	Cash outflows - Total weighted value	9.811	9.564	9.279	9.215	9.323
EU 16b	Cash inflows - Total weighted value	699	726	838	888	944
16	Total net cash outflows (adjusted value)	9.112	8.838	8.441	8.327	8.379
	Liquidity coverage ratio (%) (adjusted values) (**)	187,7%	188,0%	193,7%	193,4%	193,1%
17	Liquidity coverage ratio (%)	197,2%	176,4%	183,4%	194,7%	194,0%
	Net Stable Funding Ratio					
18	Total available stable funding	59.948	57.353	57.299	54.575	53.200
19	Total required stable funding	47.451	45.726	45.665	43.616	43.265
20	NSFR ratio (%)	126,3%	125,4%	125,5%	125,1%	123,0%

(*) 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)

	30.06.2026	31.03.2026
Share capital	671	671
Share premium	4.578	5.910
Own Shares	(503)	(229)
Retained Earnings and Other Reserves	2.849	1.273
o/w FVOCI reserves	(0)	(6)
Period results	229	90
Common equity tier 1 capital before regulatory adjustments 1-5	**7.825**	**7.715**
1.PVA	(4)	(4)
2.Intangible assets	(480)	(434)
3.DTA amortization	(1.880)	(1.806)
4.Irrevocable payment commitment	(30)	(30)
5.Other Adjustments	(435)	(409)
Total regulatory adjustments to common equity tier 1	**(2.828)**	**(2.683)**
Common equity tier 1 capital (CET1) (1)	**4.997**	**5.032**
Additional Tier I instruments	700	700
Additional Tier I before regulatory adjustments	**700**	**700**
Additional Tier I	**700**	**700**
Tier I Capital (CET1 + AT1)	**5.697**	**5.732**
Subordinated loan	1.037	1.024
Tier II capital before regulatory adjustments	**1.037**	**1.024**
Tier II capital	**1.037**	**1.024**
Total Capital (TC = Tier I + Tier II)	**6.734**	**6.756**
Total RWA	**34.833**	**33.530**
Common equity tier 1 Ratio	**14,35%**	**15,01%**
Tier I Ratio	**16,36%**	**17,10%**
Capital Adequacy Ratio (Tier I + Tier II)	**19,33%**	**20,15%**

(*) 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 30.06.2026

(Amounts in millions of Euro)

		a	b	c
		Balance sheet as in published financial statements	**Under regulatory scope of consolidation**	**Reference**
		30.06.2026		
Assets - *Breakdown by asset classes according to the balance sheet in the published financial statements*				
1	Cash and balances with central banks	3.873	3.873	
2	Due from financial institutions	2.645	2.645	
3	Trading securities	186	186	
4	Derivative financial assets	460	460	
5	Loans and advances to customers	45.851	45.851	
6	Investment securities	-	-	
	- Measured at fair value through other comprehensive income	1.235	1.235	
	- Measured at amortised cost	17.631	17.612	
	- Measured at fair value through profit or loss	222	222	
8	Investments in associates and joint ventures	560	555	(g)
9	Investment property	583	583	
10	Property, plant and equipment	676	676	
11	Goodwill and other intangible assets	557	557	(d)
12	Deferred tax assets	4.811	4.811	(e)
13	Other assets	1.091	1.089	
14	Assets classified as held for sale	1.633	253	
15	**Total assets**	**82.014**	**80.608**	
Liabilities - *Breakdown by liability classes according to the balance sheet in the published financial statements*				
1	Due to banks	6.345	6.345	
2	Derivative financial liabilities	690	690	

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		30.06.2026		
3	Due to customers	58.467	58.479	
4	Debt securities in issue and other borrowed funds	4.517	4.557	(f)
5	Liabilities for current income tax	17	17	
6	Deferred tax liabilities	44	44	€
7	Employee defined benefit obligations	25	25	
8	Other liabilities	1.290	1.292	
9	Provisions	167	167	
10	Liabilities related to assets classified as held for sale	1.402	-	
11	**Total liabilities**	72.964	71.616	
Equity				
1	Share Capital	671	671	(a)
2	Share premium	4.578	4.578	(a)
3	Merege Reserve	-	-	
5	Other equity instruments	700	700	(h)
6	Reserves	102	93	
7	Amounts directly recognized in equity and associated with assets classified as held for sale	(15)	-	
8	Retained earnings	3.213	3.151	(b)
9	Treasury shares	(220)	(220)	(a)
10	Non-controlling interests	20	20	
11	**Total equity**	9.049	8.993	

Template 4b: EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements as of 31.12.2025

(Amounts in millions of Euro)

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		31.12.2025		
Assets - *Breakdown by asset classes according to the balance sheet in the published financial statements*				
1	Cash and balances with central banks	3.469	3.469	
2	Due from financial institutions	2.793	2.793	
3	Trading securities	104	104	
4	Derivative financial assets	445	445	

		a	b	c
		Balance sheet as in published financial statements	**Under regulatory scope of consolidation**	**Reference**
		31.12.2025		
5	Loans and advances to customers	43.483	43.483	
6	Investment securities			
	- Measured at fair value through other comprehensive income	1.157	1.157	
	- Measured at amortized cost	16.176	16.157	
	- Measured at fair value through profit or loss	237	237	
7	Investments in associates and joint ventures	576	576	(g)
8	Investment property	574	574	
9	Property, plant and equipment	595	595	
10	Goodwill and other intangible assets	516	516	(d)
11	Deferred tax assets	4.816	4.817	(e)
12	Other assets	975	973	
13	Assets classified as held for sale	1.542	267	
14	**Total assets**	**77.458**	**76.163**	
Liabilities - *Breakdown by liability classes according to the balance sheet in the published financial statements*				
1	Due to banks	6.536	6.536	
2	Derivative financial liabilities	718	718	
3	Due to customers	55.084	55.096	
4	Debt securities in issue and other borrowed funds	3.804	3.840	(f)
5	Liabilities for current income tax	11	11	
6	Deferred tax liabilities	35	35	(e)
7	Employee defined benefit obligations	25	25	
8	Other liabilities	1.000	1.000	
9	Provisions	140	140	
10	Liabilities related to assets classified as held for sale	1.281		
11	**Total liabilities**	**68.634**	**67.401**	
Equity				
1	Share capital	671	671	(a)
2	Share premium	5.909	5.909	(a)
3	Merger Reserve	(1.125)	(1.125)	
4	Other Equity Instruments	700	700	(h)
5	Reserves	(7)	(16)	
6	Amounts directly recognized in equity and are associated with assets classified as held for sale	(14)		
7	Retained earnings	2.777	2.710	(b)
8	Treasury shares	(106)	(106)	(a)
9	Non-controlling interests	19	19	
10	**Total Equity**	**8.824**	**8.762**	

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.
  On 04 June 2026, the European Commission has introduced targeted, time-limited amendments to its implementation of the new market risk capital framework for banks in order to ensure that the EU banking sector benefits from a level playing field with international competitors, The measures will apply for three years from 1 January 2027.
  The delegated act C (2026) 3647 will now be reviewed by the European Parliament and the Council, with a three-month scrutiny period (extendable by a further three months). If no objection is raised, the measures will enter into application on 1 January 2027, for a period of three years.

- ✓ **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 30.06.2026 (*)

(Amounts in millions of Euro)

		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		a	b	c
		30.06.2026	31.03.2026	30.06.2026
1	**Credit risk (excluding CCR)**	**29.952**	**28.636**	**2.396**
2	Of which the standardised approach	29.952	28.636	2.396
3	Of which the foundation IRB (FIRB) approach			
4	Of which slotting approach			-
EU 4a	Of which equities under the simple riskweighted approach			-
5	Of which the advanced IRB (AIRB) approach	-		-
6	**Counterparty credit risk - CCR**	**181**	**214**	**14**
7	Of which the standardised approach	166	189	13
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	9	8	1
9	Of which other CCR	7	17	1
10	Credit valuation adjustments risk - CVA risk	36	37	3
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	36	37	3
EU 10c	Of which the simplified approach	-	-	-
15	**Settlement risk**	**-**		**-**
16	**Securitisation exposures in the non-trading book (after the cap)**	**582**	**658**	**47**
17	Of which SEC-IRBA approach			-
18	Of which SEC-ERBA (including IAA)	274	271	22
19	Of which SEC-SA approach	308	387	25
EU 19a	Of which 1250%			-
20	**Position, foreign exchange and commodities risks (Market risk)** (**)	**615**	**519**	**49**
21	Of which the Alternative standardised approach (A-SA)			
21a	Of which the Simplified standardised approach (S-SA)	318	286	25
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**	**3.466**	**3.466**	**277**
EU 24a	Exposures to crypto-assets	**-**	**-**	
25	**Amounts below the thresholds for deduction (subject to 250% risk weight)** (for information)	**1.819**	**1.793**	**146**
26	Output floor applied (%)	0	0	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	**Total**	**34.833**	**33.530**	**2.787**

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

(**) As of 30.06.2026, 615mn of which SA 318mn and IMA 217mn,due to postponement of FRTB implementation until 01.01.2027

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 € 74 million as of June 30, 2026, 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 € 88 million as of June 30, 2026, 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 2026, the Bank of Greece, as the National Competent Authority, will set the countercyclical buffer at 0.5% from 0.25%.

Key driver of the rise of the CCyB requirements is the increase of the respective exposures in Greece (0.25%).

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

Template 6a: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 30.06.2026

(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	Greece	31.023		34	77.383	3.687	112.128	1.452	52	47	1.551	19.387	73%	0,30%
	Cyprus	2.566					2.566	132			132	1.646	6%	1,50%
	United Kingdom	1.682					1.682	85			85	1.059	4%	2,00%
	Romania	868					868	62			62	776	3%	1,00%
	Ireland	478					478	29			29	365	1%	1,50%
	France	383					383	22			22	270	1%	1,00%
	Netherlands	316					316	17			17	208	1%	2,00%
	Other	4.192					4.192	231			231	2.882	11%	
	Total	41.508		34	77.383	3.687	122.613	2.029	52	47	2.127	26.594	100%	

Template 6b: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 31.12.2025

(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	Greece	29.296		33	74.125	4.774	108.228	1.337	41	55	1.433	17.907	74%	0,25%
11	Cyprus	2.462					2.462	130			130	1.623	7%	1,00%
12	United Kingdom	1.701					1.701	86			86	1.075	4%	2,00%
13	Romania	794					794	53			53	667	3%	1,00%
14	Ireland	374					374	25			25	312	1%	1,50%
15	Netherlands	335					335	18			18	230	1%	2,00%
16	France	332					332	19			19	236	1%	1,00%
17	Other	3.132					3.132	174			174	2.174	9%	
18	Total	38.426		33	74.125	4.774	117.358	1.842	41	55	1.938	24.224	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 30.06.2026

(Amounts in millions of Euro)

		a
		30.06.2026
1	Total risk exposure amount	34.833
2	Institution specific countercyclical capital buffer rate	0,44%
3	Institution specific countercyclical capital buffer requirement	154,7

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 31.12.2025

(Amounts in millions of Euro)

		a
		31.12.2025
1	Total risk exposure amount	32.482
2	Institution specific countercyclical capital buffer rate	0,43%
3	Institution specific countercyclical capital buffer requirement	139,8

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 30.06.2026 on consolidated basis was 6.84%, exceeding by 2.28x 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 30.06.2026

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	82.014
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(1.405)
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	1.234
9	Adjustment for securities financing transactions (SFTs)	10
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	4.154
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	(2.697)
13	**Total exposure measure**	**83.309**

Template 8b: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures as of 31.12.2025

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	77.459
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(1.295)
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	1.640
9	Adjustment for securities financing transactions (SFTs)	22
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	4.056
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	(2.616)
13	**Total exposure measure**	**79.265**

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 30.06.2026

(Amounts in millions of Euro)

		CRR leverage ratio exposures	
		a	b
		30.06.2026	**31.12.2025**
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	78.254	73.904
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	11	8
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(160)	(182)
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)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(2.281)	(2.255)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**75.823**	**71.475**

		CRR leverage ratio exposures	
		a	b
		30.06.2026	31.12.2025
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	1.401	1.792
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	293	293
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**	**1.694**	**2.085**
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	1.628	1.628
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)		
16	Counterparty credit risk exposure for SFT assets	10	22
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**	**1.638**	**1.649**
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	12.252	11.877
20	(Adjustments for conversion to credit equivalent amounts)	(8.098)	(7.821)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22	**Off-balance sheet exposures**	**4.154**	**4.056**
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)	-	-
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)	-	-

		CRR leverage ratio exposures	
		a	b
		30.06.2026	**31.12.2025**
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**	5.697	5.686
24	**Total exposure measure**	**83.309**	**79.265**
	Leverage ratio		
25	Leverage ratio	6,84%	7,17%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	6,84%	7,17%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	6,84%	7,17%
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 30.06.2026

(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:**	78.254
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	78.254
EU-4	Covered bonds	40
EU-5	Exposures treated as sovereigns	24.089
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	548
EU-7	Institutions	1.728
EU-8	Secured by mortgages of immovable properties	10.859
EU-9	Retail exposures	3.741
EU-10	Corporate	22.403
EU-11	Exposures in default	1.328
EU-12	Other exposures * (eg equity, securitisations, and other non-credit obligation assets)	13.519

Template 10b: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 31.12.2025

(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:**	73.904
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	73.904
EU-4	Covered bonds	40
EU-5	Exposures treated as sovereigns	22.211
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	471
EU-7	Institutions	1.824
EU-8	Secured by mortgages of immovable properties	10.227
EU-9	Retail exposures	3.617
EU-10	Corporate	19.839
EU-11	Exposures in default	1.070
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	14.606

(*) 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.

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

5.1 General information

Credit risk arises from the potential failure of debtors' or counterparties to meet all or part of their payment obligations to the Group. The primary objective of the Group's strategy for 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 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 policy 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 credit policies and procedures take into account the prevailing institutional framework set by legislation, regulations, ministerial decrees/decisions, etc. and along with the internally defined and established key risk principles and guidelines, they ensure that credit facilities are granted soundly and managed properly and that promote a unified approach on how business financing should be conducted.

Credit Risk Appetite expresses the level of credit risk that the Bank is willing to assume in order to achieve the business objectives and the expected risk-adjusted return, as defined by a set of minimum quantitative metrics and qualitative standards. Credit Risk Appetite is amongst the key contributors in the business planning process, promoting the appropriate alignment of corporate strategy, capital allocation and risk. Top-down risk appetite serves as the limit for risk-taking for the bottom-up planning from the business functions. Risk Limits and policies are calibrated to the credit risk appetite.

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. The Group uses internal rating/ scoring systems for its portfolios, in order to evaluate and classify both performing and non-performing relationships. Internal rating/scoring systems and the resulting parameters are validated by the Risk Models and Data Validation Business Area and the countries' respective local Unit on a regular basis, as part of the Group's internal assessment process. Furthermore, there are in place sets of reporting tools and frameworks which are used on regular intervals (daily, weekly, fortnight, monthly, quarterly and yearly), assisting the network and the management to identify early in some cases, or in due time in some other potential threats, risky portfolio sections and problematic relationships. These are employed on solo and group wide basis. The results of risk identification and assessment are reported by the countries' local Risk Management Units to the Group Risk Management Units which consolidate the results and submit them to the Credit Risk Committee. The results are incorporated in the overall credit risk policy, procedures and limit setting process. The overall process is further aided by the implementation of an appropriate organizational structure with clearly defined roles and responsibilities for its Personnel and Business Units, in order to manage all kinds of credit risk-bearing activities.

Alpha Bank has prepared its operational and system infrastructure in line with the requirements of the Internal Ratings Based approach for credit risk and the International Financial Reporting Standard (IFRS) 9. Alpha Bank's current credit risk management framework consists of a set of governance rules, policies and procedures, as well as rating/scoring systems, covering the whole range of the Bank's portfolio, and is under continuous review and enhancement so as to:

- Include any updates issued by the regulatory authorities
- Take into consideration the macroeconomic and political environment

- Facilitate the portfolio management and the decision making processes
- Contribute to preventing any potential negative effects in the Bank's and Group's financial results.

Under this perspective and in order to strengthen and improve the credit risk management framework, the following actions have been implemented during 2025:

- Update of the Credit Policy Manuals for Retail Banking (Housing and Consumer Lending, Small Business Banking) and Wholesale Banking, taking into account the regulatory guidelines on credit risk management issues and the Group's business strategy.
- Update of the Group Credit Risk Control Framework in order to ensure compliance with Credit Risk Policies at Bank and Group level.
- Enhancement of credit risk models, where needed, to keep them up-to-date and expand applicability, including but not limited to Climate Risk.
- Update of the Credit Rating System User's Manual in order to capture the new ESG implementations in Credit Rating System.
- Ongoing validation of the Risk Models in order to ensure their accuracy, reliability, stability and predictive power
- Benchmarking key risk indicators with the use of EBA risk dashboard.
- Update of a Risk Data Aggregation and Risk Reporting Validation Framework that provides guidance for the assessment - as a second line of defence - of the accuracy, completeness and consistency of the procedures and controls across the whole range of the directives of Basel Committee on Banking Supervision's (BCBS239) and of ECB for all types of risk.
- Update of the Concentration Risk and Credit Threshold Policy regarding the maximum acceptable credit limits for large business groups as well as the applicable provisions regarding the override of the credit limits thresholds per credit risk rating zone.
- Update of the Credit Risk Early Warning Policy regarding the introduction of new and updating of existing credit risk early warning triggers as well as the update of the frequency of specific credit risk early warning triggers.
- Update of the Loan Collateral Policy regarding the update of the type of inspection required during the approval process for a new loan secured by a new or existing property, the enrichment of the cases of ad hoc real estate revaluations, the introduction of the Quality Assurance process to conduct second level controls and the introduction of criteria for the acceptance of appraisal companies operating outside Greece and Cyprus.
- Update of the Group Loan Impairment Policy regarding the update of the quantitative and qualitative indicators used in assessing an exposure for whether it shows Significant Increase in Credit Risk, the update of the expected cash flow calculation methodology (DCF) used in the individual impairment assessment and the enhancement of the Post Model Adjustments application process.
- Update of the Retail Banking Arrears and Forbearance Policy regarding the update of the framework for managing arrears and assessing the settlement of debts of the Bank's staff and the update of affordability assessment.
- Update of the Wholesale Banking Arrears and Forbearance Policy regarding the introduction of a framework for Leveraged Transactions to Non-Performing Borrowers.

- Update of the Group Loan Default Classification Policy regarding the introduction of new and update of existing UTP triggers, enhancement of the definition of forborne exposures and enrichment of the indications of financial difficulty for Retail Banking exposures.
- Update of the Recovery and Resilience Facility (RRF) program Bank's Policy regarding the time of finalization of the pre-screening controls and the possibility to finance on an exceptional basis Small Businesses start-ups classified in the credit risk zone "Moderate Risk – Watch List" when the request concerns viable investment plans and simultaneously the stipulated criteria are met.
- Update of the Climate Related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending in order to allow finance of the defense sector up to a certain cap for conventional weapons related activities in accordance with the "Defense Sector Financing Policy", to remove the disclosure obligations to EBRD after its disinvestment from Alpha Bank's share capital and to amend the definition of the critical industry sectors connected with potential climate and ESG risks following the relevant amendment of the Wholesale Banking Credit Manual.
- Participation of the Credit Control Business Area in the Retail Banking Arrears Committees without voting right but with veto right on forbearance requests with multiple forbearance measures falling under the perimeter defined in the Management Arrears Act.
- Provision of a risk opinion at the Wholesale Banking II Credit Committee, in addition to the opinion provided at the Wholesale Banking I Credit Committee, on concentration issues and adherence to Credit Risk Policies.
- Establishment of quality control assessment as regards the real estate made available as loan collaterals as well as the owned by the Bank and Group Companies, and provision of a risk opinion to the competent Committees. Control and assessment of real estate impairments owned by the Bank and the Group Companies.
- Periodic conduct of stress test exercises as a tool for assessing the impact of various macroeconomic scenarios on the business strategy formulation, the business decision-taking and the Group's capital position. The stress tests are conducted in accordance with the requirements of the regulatory framework and constitute a key component of the Group's credit risk management strategy.

Template 11a: EU CR1-A: Maturity of exposures 30.06.2026

(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	263	7.438	20.679	17.471	-	45.851
2	Debt securities	-	2.478	5.396	10.967	-	18.841
3	**Total**	**263**	**9.916**	**26.075**	**28.438**	**-**	**64.693**

Template 11b: EU CR1-A: Maturity of exposures 31.12.2025

(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	174	6.560	20.121	16.628	-	43.483
2	Debt securities	-	2.389	6.388	8.531	-	17.308
3	**Total**	**174**	**8.949**	**26.510**	**25.159**	**-**	**60.792**

Template 12a: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 30.06.2026

(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	195	7	(4)	-
020	Mining and quarrying	17	4	(2)	-
030	Manufacturing	4.407	103	(47)	-
040	Electricity, gas, steam and air conditioning supply	3.978	2	(1)	-
050	Water supply	54	0	(0)	-
060	Construction	1.137	38	(22)	-
070	Wholesale and retail trade	3.536	138	(57)	-
080	Transport and storage	5.966	22	(6)	-
090	Accommodation and food service activities	3.226	38	(26)	-
100	Information and communication	394	5	(4)	-
110	Financial and insurance activities	520	-	(0)	-
120	Real estate activities	2.510	38	(22)	-
130	Professional, scientific and technical activities	572	4	(2)	-
140	Administrative and support service activities	424	4	(3)	-
150	Public administration and defense, compulsory social security	1	0	(0)	-
160	Education	84	7	(1)	-
170	Human health services and social work activities	261	3	(2)	-
180	Arts, entertainment and recreation	339	3	(2)	-
190	Other services	399	9	(28)	-
200	**Total**	**28.021**	**425**	**(231)**	**-**

Template 12b: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 31.12.2025

(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	236	12	(4)	-
020	Mining and quarrying	25	4	(2)	-
030	Manufacturing	4.163	118	(52)	-
040	Electricity, gas, steam and air conditioning supply	3.637	1	(1)	-
050	Water supply	48	0	(0)	-
060	Construction	1.202	37	(23)	-
070	Wholesale and retail trade	3.476	131	(53)	-
080	Transport and storage	5.359	21	(5)	-
090	Accommodation and food service activities	2.978	27	(11)	-
100	Information and communication	366	5	(4)	-
110	Financial and insurance activities	382	-	(0)	-
120	Real estate activities	2.216	23	(22)	-
130	Professional, scientific and technical activities	486	2	(2)	-
140	Administrative and support service activities	471	7	(4)	-
150	Public administration and defense, compulsory social security	1	0	(0)	-
160	Education	87	7	(1)	-
170	Human health services and social work activities	237	3	(2)	-
180	Arts, entertainment and recreation	247	2	(1)	-
190	Other services	316	8	(31)	-
200	**Total**	**25.933**	**409**	**(219)**	**-**

The tables below present the credit quality of the Group's exposures broken down by significant geographical area as of 30.06.2026 and 31.12.2025.

Template 13a: EU CQ4: Quality of non-performing exposures by geography as of 30.06.2026

(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***	***67.837***	***2.070***	***(810)***		***(5)***
020	*Greece*	39.793	1.887	(697)		(5)
030	*United Kingdom*	1.998	49	(24)		-
040	*Romania*	865	0	(5)		-
050	*Cyprus*	3.136	90	(57)		-
070	*Other countries*	22.045	43	(28)		-
080	***Off-balance-sheet exposures***	***12.254***	***164***		***17***	
090	*Greece*	10.889	158		14	
100	*United Kingdom*	76	0		0	
110	*Romania*	0	-		0	
120	*Cyprus*	652	7		3	
140	*Other countries*	637	0		0	
150	**Total**	**80.091**	**2.234**	**(810)**	**17**	**(5)**

Template 13b: EU CQ4: Quality of non-performing exposures by geography as of 31.12.2025

(Amounts in millions of Euro)

		a	c	e	f	g
		Gross carrying/nominal		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***	***64.091***	***1.731***	***(784)***		***(5)***
020	*Greece*	38.416	1.561	(677)		(5)
030	*United Kingdom*	2.200	38	(26)		-
040	*Romania*	795	0	(7)		-
050	*Cyprus*	3.006	91	(55)		-
070	*Other countries*	19.675	41	(20)		-
080	***Off-balance-sheet exposures***	***11.878***	***194***		***26***	
090	*Greece*	10.697	188		22	
100	*United Kingdom*	29	0		0	
110	*Romania*	0	-		0	
120	*Cyprus*	564	6		4	
140	*Other countries*	587	0		0	
150	**Total**	**75.969**	**1.925**	**(784)**	**26**	**(5)**

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

Template 14a: EU CQ1: Credit quality of forborne exposures as of 30.06.2026

(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	480	1.130	1.130	1.130	(22)	(194)	1.272	873
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	0	-	-	-	(0)	-	0	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	10	0	0	0	(0)	(0)	10	0
060	*Non-financial corporations*	99	178	178	178	(3)	(55)	196	116
070	*Households*	371	952	952	952	(19)	(140)	1.066	758
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	1	0	0	0	0	-	0	0
100	**Total**	**481**	**1.130**	**1.130**	**1.130**	**(22)**	**(194)**	**1.272**	**873**

Template 14b: EU CQ1: Credit quality of forborne exposures as of 31.12.2025

(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			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	805	821	821	821	(47)	(180)	1.252	589
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*	158	174	174	174	(7)	(53)	241	113
070	*Households*	647	647	647	647	(39)	(128)	1.010	476
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	1	-	-	-	0	-	0	-
100	**Total**	**806**	**821**	**821**	**821**	**(47)**	**(180)**	**1.252**	**589**

Template 15a: EU CR1: Performing and non-performing exposures and related provisions as of 30.06.2026

(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 value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and			Non-performing exposures – accumulated impairment				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	3.736	3.736	-	-	-	-	-	-	-	-	-	-		-	-
010	Loans and advances	46.963	42.710	2.998	2.064	-	1.711	(226)	(70)	(131)	(567)	-	(464)	(1.736)	30.182	1.388
020	*Central banks*	0	0	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-
030	*General governments*	103	100	3	0	-	0	(0)	(0)	(0)	(0)	-	(0)	(1)	73	0
040	*Credit institutions*	2.353	2.353	0	70	-	70	(0)	(0)	(0)	(70)	-	(70)	-	-	-
050	*Other financial corporations*	8.648	7.979	83	0	-	0	(13)	(3)	(10)	(0)	-	(0)	(25)	5.684	0
060	*Non-financial corporations*	27.596	25.900	1.510	425	-	364	(83)	(39)	(42)	(148)	-	(108)	(884)	18.153	255
070	*Of which SMEs*	9.192	8.192	933	371	-	327	(41)	(7)	(32)	(120)	-	(93)	(523)	6.300	231
080	*Households*	8.263	6.378	1.402	1.568	-	1.276	(130)	(29)	(78)	(348)	-	(285)	(826)	6.272	1.133
090	Debt securities	18.805	18.794	-	6	-	6	(14)	(14)	-	(4)	-	(4)	-	-	-
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	15.399	15.399	-	-	-	-	(11)	(11)	-	-	-	-	-	-	-
120	*Credit institutions*	2.194	2.194	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
130	*Other financial corporations*	16	6	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-
140	*Non-financial corporations*	1.196	1.196	-	6	-	6	(2)	(2)	-	(4)	-	(4)	-	-	-
150	Off-balance-sheet exposures	12.090	11.812	274	164	-	162	(2)	(2)	(0)	(15)	-	(14)		1.076	13
160	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	*General governments*	212	208	4	-	-	-	(0)	(0)	(0)	-	-	-		0	-
180	*Credit institutions*	918	911	7	-	-	-	(1)	(1)	(0)	-	-	-		-	-
190	*Other financial corporations*	752	751	2	0	-	0	(0)	(0)	(0)	(0)	-	(0)		18	0
200	*Non-financial corporations*	8.535	8.342	190	160	-	158	(1)	(1)	(0)	(15)	-	(14)		978	12
210	*Households*	1.673	1.601	71	4	-	4	(0)	(0)	(0)	(0)	-	(0)		80	1
220	**Total**	**81.594**	**77.052**	**3.272**	**2.234**	**-**	**1.879**	**(243)**	**(86)**	**(131)**	**(586)**	**-**	**(482)**	**(1.736)**	**31.258**	**1.401**

Template 15b: EU CR1: Performing and non-performing exposures and related provisions as of 31.12.2025

(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	3.235	3.235	-	-	-	-	(0)	(0)	-	-	-	-		-	-
010	Loans and advances	45.077	40.536	3.202	1.726	-	1.432	(227)	(60)	(135)	(540)	-	(444)	(1.714)	29.353	1.095
020	*Central banks*	0	0	-	-	-	-	(0)	(0)	-	(0)	-	-	-	-	-
030	*General governments*	106	105	0	0	-	0	(0)	(0)	(0)	(0)	-	(0)	(1)	76	0
040	*Credit institutions*	2.522	2.522	0	70	-	70	(0)	(0)	(0)	(70)	-	(70)	-	-	-
050	*Other financial corporations*	8.326	7.677	22	0	-	0	(3)	(3)	(0)	(0)	-	(0)	(27)	5.681	0
060	*Non-financial corporations*	25.525	23.913	1.463	409	-	347	(74)	(38)	(33)	(145)	-	(107)	(869)	17.033	242
070	*Of which SMEs*	8.820	7.954	834	332	-	288	(30)	(6)	(22)	(115)	-	(89)	(509)	6.207	201
080	*Households*	8.599	6.319	1.717	1.246	-	1.015	(151)	(18)	(102)	(324)	-	(266)	(817)	6.563	853
090	Debt securities	17.283	17.273	-	5	-	5	(14)	(14)	-	(4)	-	(4)	-	-	-
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	14.041	14.041	-	-	-	-	(11)	(11)	-	-	-	-	-	-	-
120	*Credit institutions*	2.107	2.107	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
130	*Other financial corporations*	16	6	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-
140	*Non-financial corporations*	1.120	1.119	-	5	-	5	(2)	(2)	-	(4)	-	(4)	-	-	-
150	Off-balance-sheet exposures	11.684	11.497	184	194	-	192	(3)	(3)	(0)	(23)	-	(23)		1.023	32
160	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	*General governments*	211	210	1	-	-	-	(0)	(0)	(0)	-	-	-		0	-
180	*Credit institutions*	930	923	7	-	-	-	(1)	(1)	(0)	-	-	-		-	-
190	*Other financial corporations*	725	725	0	0	-	0	(0)	(0)	(0)	(0)	-	(0)		7	-
200	*Non-financial corporations*	8.164	8.051	111	190	-	188	(2)	(2)	(0)	(22)	-	(22)		940	31
210	*Households*	1.654	1.589	64	4	-	4	(0)	(0)	(0)	(0)	-	(0)		76	1
220	**Total**	**77.279**	**72.541**	**3.386**	**1.925**	**-**	**1.629**	**(244)**	**(76)**	**(135)**	**(567)**	**-**	**(471)**	**(1.714)**	**30.375**	**1.127**

Template 16a: EU CR2: Changes in the stock of non-performing loans and advances as of 30.06.2026

(Amounts in millions of Euro)

		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	1.726
020	Inflows to non-performing portfolios	647
030	Outflows from non-performing portfolios	(309)
040	Outflows due to write-offs	(32)
050	Outflow due to other situations	(277)
060	**Final stock of non-performing loans and advances**	2.064

Template 16b: EU CR2: Changes in the stock of non-performing loans and advances as of 31.12.2025

(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	948
030	Outflows from non-performing portfolios	(783)
040	Outflows due to write-offs	(122)
050	Outflow due to other situations	(661)
060	**Final stock of non-performing loans and advances**	1.726

Template 17a EU CR5 – standardised approach as of 30.06.2026

(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	23.743	-	-	4	9	-	-	-	-	0	-	-	-	-	-	2.175	-	-	-	-	711	-	-	-	3	26.646	22.691
2	Non-central governments public central entities	579	-	-	-	72	-	-	-	-	-	-	-	-	-	-	38	-	-	-	-	-	-	-	-	-	689	
EU 2a	Regional governments or local authorities	-	-	-	-	72	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	72	72
EU 2b	Public sector entities	579	-	-	-	0	-	-	-	-	-	-	-	-	-	-	38	-	-	-	-	-	-	-	-	-	617	579
3	Multilateral development banks	1.252	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.252	1.252
EU 3a	International organisations	597	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	597	
4	Institutions	340	-	-	-	288	708	-	-	-	736	-	-	-	-	-	95	-	-	-	0	-	-	-	-	-	2.167	1.403
5	Covered bonds	-	-	-	36	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	
6	Corporates	-	-	-	-	5.605	-	-	-	-	5.147	-	-	2.460	1.272	-	6.542	-	-	673	525	-	-	-	-	-	22.224	16.104
6,1	Of which: Specialised Lending	-	-	-	-	861	-	-	-	-	864	-	-	424	1.272	-	1.440	-	-	673	-	-	-	-	-	-	5.535	4.778
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	381	-	-	438	91	17	-	-	-	-	927	
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	91	-	-	-	-	-	91	
EU 7b	Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	381	-	-	438	-	17	-	-	-	-	835	
8	Retail exposures	-	-	-	-	-	-	-	-	729	-	-	-	2.560	-	-	-	-	-	-	-	-	-	-	-	-	3.289	
9	Secured by mortgages on immovable property and ADC exposures	3	-	-	-	4.621	169	145	-	21	-	2.653	-	720	-	156	314	0	16	-	1.133	-	-	-	-	736	10.687	
9,1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	4.621	-	-	-	-	-	-	-	509	-	-	94	-	-	-	4	-	-	-	-	-	5.228	
9.1.1	**No loan splitting applied**	-	-	-	-	-	-	-	-	-	-	-	-	509	-	-	94	-	-	-	4	-	-	-	-	-	607	
9.1.2	loan splitting applied (secured)	-	-	-	-	4.621	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.621	
9.1.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9,2	Secured by mortgages on residential immovable property - IPRE	-	0	-	-	-	169	145	-	21	-	2	-	1	-	-	-	0	-	-	90	-	-	-	-	-	428	
9,3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-	-	2.651	-	210	-	-	220	-	-	-	41	-	-	-	-	-	3.122	
9.3.1	No loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	210	-	-	220	-	-	-	41	-	-	-	-	-	471	
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	2.651	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.651	
9.3.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-	0	-	-	-	0	-	-	-	-	-	0	
9,4	Secured by mortgages on commercial immovable property - IPRE	3	0	-	-	-	-	-	-	-	-	-	-	-	-	156	-	-	16	-	491	-	-	-	-	736	1.402	
9,5	Acquisition, Development and Construction (ADC)	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	507	-	-	-	-	-	507	
10	Exposures in default	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-	1.091	-	-	-	211	-	-	-	-	-	1.301	
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	27	-	-	-	-	-	-	-	-	-	27	27
EU 10c	Other items	390	0	-	-	-	-	-	-	-	-	-	-	-	-	-	2.273	-	-	-	-	-	-	-	-	-	2.663	2.663
17	**TOTAL**	**26.903**	**0**	**-**	**40**	**10.598**	**877**	**145**	**-**	**750**	**5.882**	**2.653**	**-**	**5.740**	**1.272**	**156**	**12.936**	**0**	**16**	**1.112**	**1.960**	**728**	**-**	**-**	**-**	**739**	**72.509**	

Template 17b EU CR5 – standardised approach as of 31.12.2025

(Amounts in millions of Euro)

	Exposure classes	Risk weight																								Total	Of which
		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	22.195	-	-	3	8	-	-	-	-	-	-	-	-	-	-	2.257	-	-	-	-	695	-	-	-	-	25.158	21.163
2	Non-central governments public central entities	554	-	-	-	12	-	-	-	-	-	-	-	-	-	-	38	-	-	-	-	-	-	-	-	-	604	
EU 2a	Regional governments or local authorities	-	-	-	-	12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12	12
EU 2b	Public sector entities	554	-	-	-	0	-	-	-	-	-	-	-	-	-	-	38	-	-	-	-	-	-	-	-	-	592	554
3	Multilateral development banks	1.176	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.176	1.176
EU 3a	International organisations	393	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	393	
4	Institutions	344	-	-	-	505	609	-	7	-	655	-	-	-	-	-	113	-	-	-	0	-	-	-	-	-	2.233	1.477
5	Covered bonds	-	-	-	36	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	
6	Corporates	-	-	-	-	4.904	-	-	-	-	4.353	-	-	2.558	886	-	6.536	-	-	518	445	-	-	-	-	-	20.199	14.787
6,1	Of which: Specialised Lending	-	-	-	-	822	-	-	-	-	849	-	-	415	886	-	1.269	-	-	518	-	-	-	-	-	-	4.758	4.054
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	849	-	-	-	90	9	-	-	-	-	949	
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	90	-	-	-	-	-	90	
EU 7b	Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	849	-	-	-	-	9	-	-	-	-	859	
8	Retail exposures	-	-	-	-	-	-	-	-	719	-	-	-	2.484	-	-	-	-	-	-	-	-	-	-	-	-	3.203	
9	Secured by mortgages on immovable property and ADC exposures	1	-	-	-	4.739	146	132	-	19	-	2.478	-	796	-	76	312	0	41	18	685	-	-	-	-	619	10.062	
9,1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	4.739	-	-	-	-	-	-	-	594	-	-	86	-	-	-	4	-	-	-	-	-	5.423	
9.1.1	**No loan splitting applied**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**594**	**-**	**-**	**86**	**-**	**-**	**-**	**4**	**-**	**-**	**-**	**-**	**-**	**684**	
9.1.2	loan splitting applied (secured)	-	-	-	-	4.739	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.739	
9.1.3	loan splitting applied (unsecured)	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	
9,2	Secured by mortgages on residential immovable property - IPRE	**-**	**-**	**-**	**-**	**-**	**146**	**132**	**-**	**19**	**-**	**2**	**-**	**1**	**-**	**-**	**-**	**0**	**-**	**-**	**83**	**-**	**-**	**-**	**-**	**-**	**382**	
9,3	Secured by mortgages on commercial immovable property - non IPRE	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**2.476**	**-**	**201**	**-**	**4**	**226**	**-**	**-**	**18**	**54**	**-**	**-**	**-**	**-**	**-**	**2.980**	
9.3.1	No loan splitting applied	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	201	**-**	**-**	226	**-**	**-**	18	54	**-**	**-**	**-**	**-**	**-**	499	
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	2.476	-	-	-	4	-	-	-	-	-	-	-	-	-	-	2.481	
9.3.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-	0	-	-	0	0	-	-	-	-	-	0	
9,4	Secured by mortgages on commercial immovable property - IPRE	**1**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**71**	**-**	**-**	**41**	**-**	**131**	**-**	**-**	**-**	**-**	**619**	**864**	
9,5	Acquisition, Development and Construction (ADC)	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**413**	**-**	**-**	**-**	**-**	**-**	**413**	
10	Exposures in default	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**861**	**-**	**-**	**-**	**187**	**-**	**-**	**-**	**-**	**-**	**1.048**	
EU 10a	Claims on institutions and corporates with a short-term credit assessment	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	
EU 10b	Collective investment undertakings (CIU)	**0**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**18**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**18**	**18**
EU 10c	Other items	**468**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**2.114**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**2.582**	**2.582**
17	**TOTAL**	**25.132**	**-**	**-**	**39**	**10.170**	**755**	**132**	**7**	**738**	**5.008**	**2.478**	**-**	**5.838**	**886**	**76**	**13.097**	**0**	**41**	**536**	**1.407**	**704**	**-**	**-**	**-**	**619**	**67.663**	

5.2 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.

5.2.1 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 repayment sources in case of claim liquidation.

The Bank calculates the value of the collaterals received 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, which 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 assessment of the value of collateral is carried out by appraisers, with the necessary expertise and specialization. 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.

According to the Bank's Credit Policy, the existence and the valuation of collaterals are closely monitored. 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 property valuations are performed on an annual basis for all real estate types, except for those cases where something different is foreseen contractually, in cases of known changes on the property or in the business course, or in case there are urban planning changes or any other considerable factors, whereas the frequency of the pledge 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 as well as back-testing for the verification of property valuations. Audits relate to valuations based either on indices or on individual valuations in order to ensure the proper collateral valuation is captured in the Bank's systems in accordance with the values indicated in the relevant approvals of the competent Committees.

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.

5.2.2 Description of the main collateral types

There are two broad categories of collaterals: 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). The guarantor can be an individual or a legal entity and the solvency and ability of the guarantors to meet the liabilities assumed are assessed. 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.

Tangible collaterals are distinguished between mortgages and prenotation on mortgages which are registered on real estate properties and pledges over movable assets (e.g., commodities, checks, bills of exchange) or on claims and rights. For better assurance of the credit facilities granted, mortgaged and, where applicable, pledged collaterals assets are covered by an insurance contract, with assignment of the relevant insurance contract to the Bank. 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 18a: EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 30.06.2026

(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	20.400	31.570	23.351	8.219	-
2	Debt securities	18.811	-	-	-	
3	**Total**	**39.211**	**31.570**	**23.351**	**8.219**	**-**
4	*Of which non-performing exposures*	681	1.388	1.220	168	-
EU-5	*Of which defaulted*	681	1.388			

Template 18b: EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 31.12.2025

(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	18.822	30.448	22.111	8.337	-
2	Debt securities	17.289	-	-	-	
3	**Total**	**36.111**	**30.448**	**22.111**	**8.337**	**-**
4	*Of which non-performing exposures*	636	1.095	920	175	-
EU-5	*Of which defaulted*	636	1.095			

Template 19a: EU CR4 – standardised approach – Credit risk exposure and CRM effects as of 30.06.2026

(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	21.441	232	26.414	232	3.956	14,85%
2	Non-central government public sector entities	548	5	688	1	52	7,60%
EU 2a	Regional government or local authorities	71	4	71	0	14	20,00%
EU 2b	Public sector entities	476	1	617	0	38	6,16%
3	Multilateral development banks	172	5	1.249	3	-	0,00%
EU 3a	International organisations	597	-	597	-	-	0,00%
4	Institutions	1.728	792	1.775	393	733	33,82%
5	Covered bonds	40	-	40	-	4	10,80%
6	Corporates	22.403	7.723	19.703	2.521	13.078	58,85%
6,1	Of which: Specialised Lending	8.199	51	5.515	20	3.222	58,21%
7	Subordinated debt exposures and equity	927	-	927	-	1.129	121,79%
EU 7a	Subordinated debt exposures	91	-	91	-	137	150,00%
EU 7b	Equity	835	-	835	-	992	118,71%
8	Retail	3.741	3.171	2.901	389	2.038	61,97%
9	Secured by mortgages on immovable property and ADC exposures	10.859	159	10.633	54	5.254	49,16%
9,1	Secured by mortgages on residential immovable property - non IPRE	5.236	19	5.219	9	1.365	26,11%
9,2	Secured by mortgages on residential immovable property - IPRE	432	1	428	0	194	45,35%
9,3	Secured by mortgages on commercial immovable property - non IPRE	3.137	59	3.097	25	1.750	56,04%
9,4	Secured by mortgages on commercial immovable property - IPRE	1.539	17	1.396	6	1.185	84,50%
9,5	Acquisition, Development and Construction (ADC)	514	63	494	13	761	150,00%
10	Exposures in default	1.328	146	1.260	41	1.407	108,10%
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	0,00%
EU 10b	Collective investment undertakings	27	-	27	-	27	98,59%
EU 10c	Other items *	2.663	-	2.663	-	2.273	85,37%
12	**TOTAL**	**66.472**	**12.234**	**68.877**	**3.632**	**29.952**	**41,31%**

Template 19b: EU CR4 – standardised approach – Credit risk exposure and CRM effects as of 31.12.2025

(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	19.814	231	24.927	231	3.996	15,88%
2	Non-central government public sector	471	2	603	1	40	6,64%
EU 2a	Regional government or local authorities	11	1	11	0	2	20,00%
EU 2b	Public sector entities	460	1	592	0	38	6,38%
3	Multilateral development banks	173	-	1.176	0	-	0,00%
EU 3a	International organisations	393	-	393	-	-	0,00%
4	Institutions	1.824	826	1.825	408	727	32,54%
5	Covered bonds	40	-	40	-	4	10,80%
6	Corporates	19.839	7.425	17.749	2.450	12.071	59,76%
6,1	Of which: Specialised Lending	6.413	58	4.735	23	2.608	54,82%
7	Subordinated debt exposures and equity	949	-	949	-	1.008	106,22%
EU 7a	Subordinated debt exposures	90	-	90	-	135	150,00%
EU 7b	Equity	859	-	859	-	873	101,62%
8	Retail	3.617	3.105	2.822	381	1.992	62,20%
9	Secured by mortgages on immovable property and ADC exposures	10.227	94	10.020	42	4.545	45,17%
9,1	Secured by mortgages on residential immovable property - non IPRE	5.429	20	5.414	9	1.444	26,62%
9,2	Secured by mortgages on residential immovable property - IPRE	386	0	382	0	176	46,15%
9,3	Secured by mortgages on commercial immovable property - non IPRE	2.987	55	2.954	26	1.694	56,86%
9,4	Secured by mortgages on commercial immovable property - IPRE	978	10	861	4	611	70,71%
9,5	Acquisition, Development and Construction (ADC)	448	9	409	3	619	150,00%
10	Exposures in default	1.070	170	1.000	48	1.142	108,91%
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	0,00%
EU 10b	Collective investment undertakings	18	-	18	-	18	98,21%
EU 10c	Other items *	2.582	-	2.582	-	2.114	81,87%
12	**TOTAL**	**61.017**	**11.852**	**64.103**	**3.560**	**27.655**	**40,87%**

(*) 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.

The following table provides the equity exposures under Articles 133 (3) to (6) and Article 495a(3) CRR as of 30.06.2026.

Template 20 EU CR10.5 - Equity exposures under Articles 133 (3) to (6) and Article 495a(3) CRR 30.06.2026

Equity exposures under Articles 133 (3) to (6) and Article 495a(3) CRR			
Equity exposures	**On-balancesheet exposure**	**Off-balancesheet exposure**	**Risk weighted exposure amount**
	a	**b**	**c**
Total	835		992

Template 21a: EU CQ7: Collateral obtained by taking possession and execution processes as of 30.06.2026

(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)	36	(9)
020	Other than PP&E	695	(88)
030	*Residential immovable property*	252	(14)
040	*Commercial Immovable property*	435	(73)
050	*Movable property (auto, shipping, etc.)*	0	-
060	*Equity and debt instruments*	7	(0)
070	*Other collateral*	-	-
080	**Total**	**731**	**(98)**

Template 21b: EU CQ7: Collateral obtained by taking possession and execution processes as of 31.12.2025

(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	719	(99)
030	*Residential immovable property*	253	(15)
040	*Commercial Immovable property*	459	(84)
050	*Movable property (auto, shipping, etc.)*	0	-
060	*Equity and debt instruments*	7	(0)
070	*Other collateral*	-	-
080	**Total**	**754**	**(109)**

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.

As of June 30th, 2026, the Group had no active credit derivative exposures. Therefore, the disclosure of template EU CCR6 (Credit derivatives exposures) does not apply.

Template 22a: EU CCR1 – Analysis of CCR by approach as of 30.06.2026

(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)	120	209		1.4	967	461	461	166
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)					4.906	10	10	7
5	VaR for SFTs					-	-	-	-
6	**Total**					**5.873**	**472**	**472**	**172**

Template 22b: EU CCR1 – Analysis of CCR by approach as of 31.12.2025

(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)	101	210		1.4	959	434	434	147
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)					5.421	22	22	8
5	VaR for SFTs					-	-	-	-
6	**Total**					**6.380**	**456**	**456**	**155**

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 following tables present the CVA calculation of the Group:

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 30.06.2026

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	**Exposures to QCCPs (total)**		**9**
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	428	9
3	(i) OTC derivatives	428	9
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	124	-
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 present the Group's exposures to central counterparties (CCPs) and related capital requirements.

Template 23b: EU CCR8 – Exposures to CCPs as of 31.12.2025

(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	389	8
3	(i) OTC derivatives	389	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	62	-
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 30.06.2026 and 31.12.2025.

Template 24a: EU CCR3 – Standardized approach – CCR exposures by regulatory portfolio and risk as of 30.06.2026

(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	22	-	-	-	-	-	-	-	-	-	-	22
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	145	428	-	-	22	7	-	-	-	-	51	653
7	Corporates	9	-	-	-	91	140	-	33	63	7	5	348
8	Retail	-	-	-	-	-	-	-	1	-	-	-	1
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**176**	**428**	**-**	**-**	**114**	**146**	**-**	**34**	**63**	**7**	**56**	**1.024**

Template 24b: EU CCR3 – Standardized approach – CCR exposures by regulatory portfolio and risk as of 31.12.2025

(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	25	-	-	-	-	-	-	-	-	-	-	25
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	87	389	-	-	30	5	-	-	-	-	45	557
7	Corporates	11	-	-	-	90	130	-	36	54	4	2	326
8	Retail	-	-	-	-	-	-	-	-	-	-	-	-
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	0	-	-	0
11	**Total exposure value**	**123**	**389**	**-**	**-**	**120**	**135**	**-**	**36**	**54**	**4**	**47**	**907**

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 31.12.2025.

Template 25a: EU CCR5 – Composition of collateral for CCR exposures 30.06.2026

(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	511	311	324	169	-	-	-	-
2	Cash – other currencies	0	5	0	2	-	-	-	-
3	Domestic sovereign debt	-	-	-	263	-	114	-	5
4	Other sovereign debt	-	-	-	-	-	203	-	53
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	78
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	983	-	1.345
9	**Total**	**511**	**315**	**324**	**434**	**-**	**1.300**	**-**	**1.481**

Template 25b: EU CCR5 – Composition of collateral for CCR exposures 31.12.2025

(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	683	294	257	188	-	3.958	-	3.804
2	Cash – other currencies	0	-	0	1	-	-	-	-
3	Domestic sovereign debt	-	-	-	261	-	134	-	91
4	Other sovereign debt	-	-	-	-	-	237	-	69
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	100
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	771	-	1.115
9	**Total**	**683**	**294**	**257**	**450**	**-**	**5.100**	**-**	**5.179**

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, Cosmos and Gaia 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.

Investment in securitisation positions

On June 30th, 2026, the Bank held investments in collateralized loan obligations ("CLOs") with a total carrying amount of € 788 mn. Also, the Bank has taken positions in senior notes of securitisations with a total value of € 170 million, which are backed by auto lease receivables.

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 three synthetic securitisations as of 30.06.2026, which are comprised of performing corporate/SME exposures (Blue, Eleven and Arch). Bank retains at least 5% of each of the securitized exposures in compliance with the retention rule laid down by the supervisory regulations.

Blue, Eleven and Arch 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 and Arch's structure, the Bank has issued directly a Credit Linked Note subscribed by an investor acting as funded credit protection for the hedged tranche.

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.Any losses initially realized in the portfolio of securitised loans, will be covered by the Junior Tranches.The Junior tranches 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 30.06.2026

(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**			**3.155**	**2**	**2.716**	**2.716**	**5.872**						**968**		**968**
2	Retail (total)			3.155	2			3.155						11		11
3	residential mortgage			2.687	1			2.687						11		11
4	credit card			467				467								
5	other retail exposures			1	1			1								
6	re-securitisation															
7	Wholesale (total)			-	-	2.716	2.716	2.717						958		958
8	loans to corporates			-	-	2.716	2.716	2.717						788		788
9	commercial mortgage															
10	lease and receivables													170		170
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation															

Template 26b: EU-SEC1 - Securitisation exposures in the non-trading book as of 31.12.2025

(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		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**	**-**	**-**	**3.288**	**2**	**3.986**	**3.986**	**7.274**	**-**	**-**	**-**	**-**	**-**	**786**	**-**	**786**
2	Retail (total)	-	-	3.287	2	-	-	3.287	-	-	-	-	-	-	-	-
3	residential mortgage	-	-	2.657	1	-	-	2.657	-	-	-	-	-	-	-	-
4	credit card	-	-	630	-	-	-	630	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	1	1	-	-	1	-	-	-	-	-	-	-	-
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	-	-	3.986	3.986	3.987	-	-	-	-	-	786	-	786
8	loans to corporates	-	-	-	-	3.986	3.986	3.987	-	-	-	-	-	716	-	716
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	70	-	70
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 30.06.2026

(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 approach)				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-IRB	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRB	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
1	**Total exposures**	**2.672**			**3**	**43**			**2.719**				**288**				**23**	
2	Traditional transactions				2				2				17				1	
3	Securitisation				2				2				17				1	
4	Retail underlying				2				2				15				1	
5	Of which STS																	
6	Wholesale				-				-				2				-	
7	Of which STS																	
8	Re-securitisation																	
9	Synthetic transactions	2.672			-	43			2.716				271				22	
10	Securitisation	2.672			-	43			2.716				271				22	
11	Retail underlying																	
12	Wholesale	2.672			-	43			2.716				271				22	
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 31.12.2025

(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**	**3.923**	**-**	**-**	**4**	**61**	**-**	**-**	**3.988**	**-**	**-**	**-**	**421**	**-**	**-**	**-**	**34**	**-**
2	Traditional transactions	-	-	-	2	-	-	-	2	-	-	-	20	-	-	-	2	-
3	Securitisation	-	-	-	2	-	-	-	2	-	-	-	20	-	-	-	2	-
4	Retail underlying	-	-	-	2	-	-	-	2	-	-	-	17	-	-	-	1	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	3.923	-	-	1	61	-	-	3.986	-	-	-	402	-	-	-	32	-
10	Securitisation	3.923	-	-	1	61	-	-	3.986	-	-	-	402	-	-	-	32	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	3.923	-	-	1	61	-	-	3.986	-	-	-	402	-	-	-	32	-
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 30.06.2026

(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**	**958**	**0,3**		**10**			**798**	**170**			**274**	**21**			**22**	2	
2	Traditional securitisation	958	0,3		10			798	170			274	21			22	2	
3	Securitisation	958	0,3		10			798	170			274	21			22	2	
4	Retail underlying		0,3		10			11				117				9		
5	Of which STS																	
6	Wholesale	958						788	170			158	21			13	2	
7	Of which STS																	
8	Re-securitisation																	
9	Synthetic securitisation																	
10	Securitisation																	
11	Retail underlying																	
12	Wholesale																	
13	Re-securitisation																	

Template 28b: EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor as of 31.12.2025

(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**	**775**	**-**	**-**	**10**	**-**	**-**	**716**	**70**	**-**	**-**	**255**	**11**	**-**	**-**	**20**	1	**-**
2	Traditional securitisation	775	-	-	10	-	-	716	70	-	-	255	11	-	-	20	1	-
3	Securitisation	775	-	-	10	-	-	716	70	-	-	255	11	-	-	20	1	-
4	Retail underlying	-	-	-	10	-	-	10	-	-	-	114	-	-	-	9	-	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	775	-	-	-	-	-	705	70	-	-	141	11	-	-	11	1	-
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 30.06.2026

(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**	**18.095**	**11.684**	**(160)**
2	Retail (total)	12.542	9.197	(110)
3	residential mortgage	11.515	8.738	(117)
4	credit card	467	4	3
5	other retail exposures	560	455	4
6	re-securitisation	-	-	-
7	Wholesale (total)	5.553	2.487	(50)
8	loans to corporates	5.553	2.487	(50)
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 31.12.2025

(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**	**20.060**	**11.668**	**(365)**
2	Retail (total)	13.038	9.095	(296)
3	residential mortgage	11.848	8.650	(294)
4	credit card	630	6	2
5	other retail exposures	561	439	(4)
6	re-securitisation	-	-	-
7	Wholesale (total)	7.021	2.573	(69)
8	loans to corporates	7.021	2.573	(69)
9	commercial mortgage	-	-	-
10	lease and receivables	-	-	-
11	other wholesale	-	-	-
12	re-securitisation	-	-	-

8 Market Risk

8.1 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.

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 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

8.2 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 is 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 -30.06.2026 are displayed in the following table:

Template 30a: EU MR2-A - Market risk under the internal Model Approach (IMA) as of 30.06.2026

(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)		4
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		8
2	**SVaR** (higher of values a and b)	193	15
(a)	Latest available SVaR (SVaRt-1))		10
(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**	297	24

Template 30b: EU MR2-A - Market risk under the internal Model Approach (IMA) as of 31.12.2025

(Amounts in millions of Euro)

		a	b
		RWAs	Own funds requirements
1	**VaR** (higher of values a and b)	100	8
(a)	Previous day's VaR (VaRt-1)		1
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		8
2	**SVaR** (higher of values a and b)	118	9
(a)	Latest available SVaR (SVaRt-1))		2
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		9
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**	**217**	**17**

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 30.06.2026

(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**	92	142	-	-	-	234	19
1a	*Regulatory adjustment* [1]	*77*	*110*	-	-	-	*187*	*15*
1b	*RWAs at the previous quarter-end (end of the day)*	*14*	*32*	-	-	-	*47*	*4*
2	Movement in risk levels	44	95	-	-	-	139	11
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)*	57	127	-	-	-	184	15
8b	*Regulatory adjustment* [1]	47	66	-	-	-	113	9
8	**RWAs at the end of the disclosure period**	104	193	-	-	-	297	24

Template 31b: 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**	100	118	-	-	-	217	17
1a	*Regulatory adjustment* [1]	*85*	*93*	-	-	-	*177*	*14*
1b	*RWAs at the previous quarter-end (end of the day)*	*15*	*25*	-	-	-	*40*	*3*
2	Movement in risk levels	(1)	7	-	-	-	7	1
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)*	14	32	-	-	-	47	4
8b	*Regulatory adjustment* [1]	77	110	-	-	-	187	15
8	**RWAs at the end of the disclosure period**	92	142	-	-	-	234	19

[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 parallel movement

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 -2025 for the Bank trading portfolio, are given in the following table:

Template 32a: EU MR3 - IMA values for trading portfolios as of 30.06.2026

(Amounts in millions of Euro)

		a
		30.06.2026
VaR (10 day 99%)		
1	Maximum value	5
2	Average value	2
3	Minimum value	1
4	Period end	5
SVaR (10 day 99%)		
5	Maximum value	11
6	Average value	4
7	Minimum value	1
8	Period end	10
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 31.12.2025

(Amounts in millions of Euro)

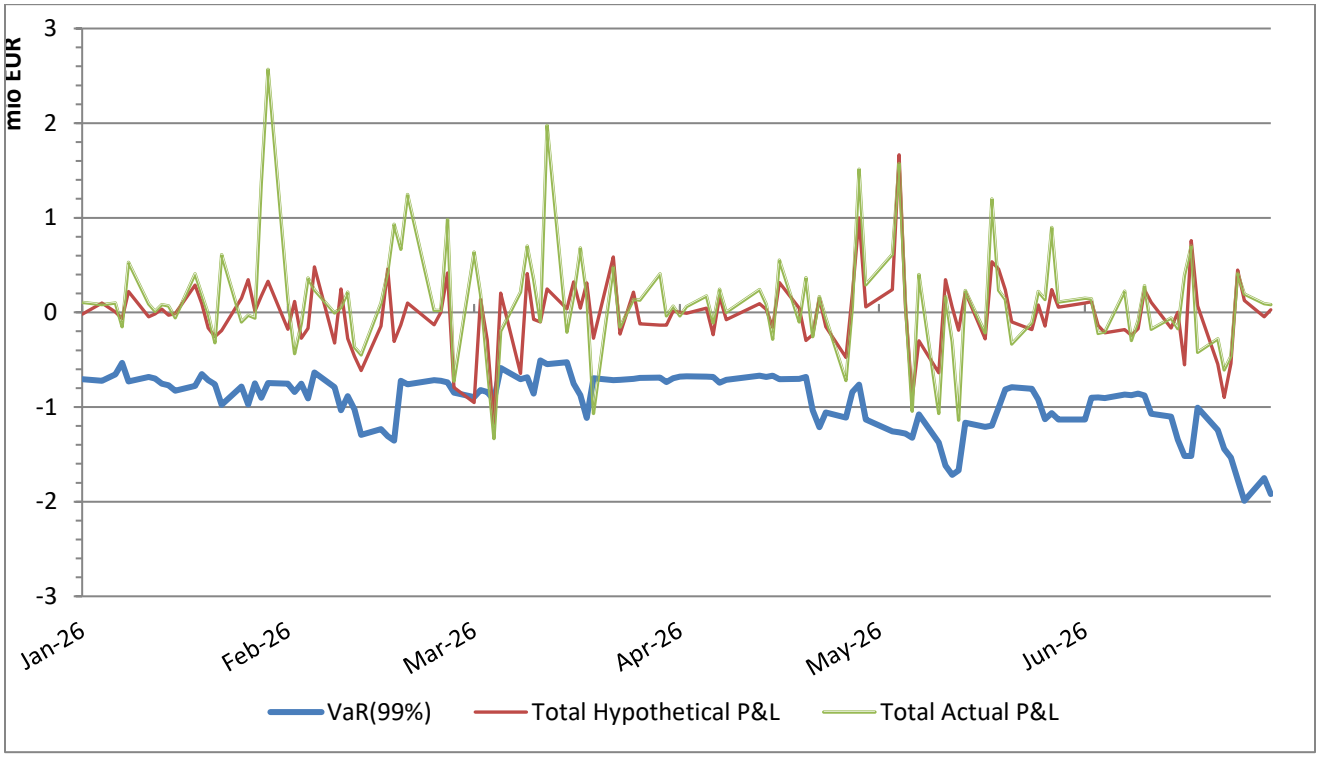
		a
		31.12.2025
VaR (10 day 99%)		
1	Maximum value	6
2	Average value	2
3	Minimum value	1
4	Period end	1
SVaR (10 day 99%)		
5	Maximum value	9
6	Average value	3
7	Minimum value	1
8	Period end	2
IRC (99.9%)		
9	Maximum value	-
10	Average value	-
11	Minimum value	-
12	Period end	-
Comprehensive risk measure (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 2026 two overshootings were observed on Backtesting-and competent authorities were notified accordingly.

8.3 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 30.06.2026

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	1
2	Equity risk (general and specific)	137
3	Foreign exchange risk	181
4	Commodity risk	1
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	**Total**	**318**

Template 34b: EU MR1 - Market risk under the standardised approach as of 31.12.2025

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	5
2	Equity risk (general and specific)	75
3	Foreign exchange risk	177
4	Commodity risk	1
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	**Total**	**258**

9 Interest Rate and Credit Spread Risk in the Banking Book

9.1 Definition

IRRBB refers to the current or potential risk to the Bank's capital and earnings arising from adverse movements in interest rates that affect the Bank's book positions. Changes in interest rates impact the present value and timing of future cash flows, consequently affecting 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 differences in the repricing timing of assets, liabilities and off-balance sheet positions. 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, repricing mismatches may adversely affect the Bank's interest margins and economic value under changing interest rate environments. 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 explicit or implicit optionality 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 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 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
- Market Liquidity Spread Changes:

9.2 Interest Rate Risk Framework

Alpha Group maintains a comprehensive framework for the identification, measurement, monitoring, control and reporting of IRRBB and CSRBB exposures in line with regulatory requirements, the approved risk appetite and business strategy. 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.

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 Bank assesses IRRBB using both earnings-based and economic value-based measures. Specifically:

- **ΔNII (Net Interest Income sensitivity)**:

measures the impact of interest rate shocks on projected earnings over a one-year horizon compared with the baseline scenario.

- **ΔEVE (Economic Value of Equity sensitivity):**

measures the impact of interest rate shocks on the economic value of banking book positions compared with the baseline scenario.

- **DV01 by time tenor sensitivity**

The DV01 quantifies the sensitivity by time bucket of the banking book portfolio resulting from a 1 basis point (0.01%)movement in interest rates.

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. 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 reviews and approves the appropriateness of stress testing scenarios on an annual basis. Market Risk Control assesses the impact of the stress scenarios on 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 maintains appropriate systems and processes 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 the approved limits while 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 monitors exposures and reports the relevant results 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 balance sheet structure, market conditions, 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.

ALCo is responsible for reviewing and approving IRRBB management and hedging strategies.,

Regular ALCo presentation incorporates an in-depth analysis of the following:

- EVE and NII sensitivities
- stress scenarios in relation to specific limits,
- Interest Rate Gaps,
- hedging activities and
- overall IRRBB profile.

The Committee meets on a regular basis 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-Maturing 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 The Bank estimates the stable and non-stable part of NMDs, the amortization tenor, the core and non-core components and the repricing characteristics

Optionality risk stems primarily from the 0% floor embedded in deposits. Basis risk and behavioral risk stemming from loan prepayments and early withdrawals of fixed term deposits is considered limited.

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

Changes in interest rates and credit spreads may materially affect the Banks earnings and present value. The changes in PV lead to changes in the underlying value of the Bank's assets, liabilities and off-balance sheet items and hence its economic value. The Bank monitors IRRBB and CSRBB exposures through sensitivity analysis, stress testing and limit monitoring procedures to ensure that exposures remain within the approved Risk Appetite Framework.

During the reporting period, IRRBB remained within approved limits, including subsidiary level thresholds.

Template 35a: EU-IRRBB1 - Interest rate risks of non-trading book activities as of 30.06.2026

(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	(519)	(355)	32	8
2	Parallel down	196	132	(192)	(149)
3	Steepener	(194)	(85)		
4	Flattener	(1)	26		
5	Short rates up	(187)	(80)		
6	Short rates down	(39)	(6)		

Template 35b: EU-IRRBB1 - Interest rate risks of non-trading book activities as of 31.12.2025

(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	(355)	(534)	8	(122)
2	Parallel down	132	457	(149)	(150)
3	Steepener	(85)	(71)		
4	Flattener	26	(14)		
5	Short rates up	(80)	(179)		
6	Short rates down	(6)	124		

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 Bankis 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 incorporates also 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 2026, the HQLA buffer stood at EUR 18.9 billion and the Group LCR stood at 197%.

The following table provides a breakdown of the LCR as of 31 December 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 30.06.2026

(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)	30.06.2026	31.03.2026	31.12.2025	30.09.2025	30.06.2026	31.03.2026	31.12.2025	30.09.2025
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)**					**17.068**	**16.559**	**16.334**	**16.086**
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	39.466	38.715	38.034	37.535	2.440	2.393	2.363	2.319
3	*Stable deposits*	20.197	19.863	19.676	19.559	1.010	993	984	978
4	*Less stable deposits*	11.765	11.493	11.292	11.000	1.429	1.399	1.378	1.341
5	Unsecured wholesale funding	12.004	11.552	11.138	11.065	5.540	5.339	5.177	5.186
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	300	302	306	313	75	75	76	78
7	*Non-operational deposits (all counterparties)*	11.668	11.233	10.816	10.735	5.429	5.247	5.085	5.090
8	*Unsecured debt*	36	17	16	18	36	17	16	18
9	*Secured wholesale funding*					80	128	117	138
10	Additional requirements	1.557	1.409	1.323	1.284	642	617	598	589
11	*Outflows related to derivative exposures and other collateral requirements*	426	460	501	509	426	460	501	509
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	1.130	949	822	775	216	157	97	80
14	Other contractual funding obligations	334	324	294	293	334	324	294	293
15	Other contingent funding obligations	10.974	10.760	10.471	10.199	776	762	729	690
16	**TOTAL CASH OUTFLOWS**					**9.811**	**9.564**	**9.279**	**9.215**
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	140	132	101	87	-	-	-	-
18	Inflows from fully performing exposures	1.186	1.308	1.510	1.550	636	677	795	844
19	Other cash inflows	208	172	140	140	63	50	43	45
20	**TOTAL CASH INFLOWS**	**1.534**	**1.613**	**1.750**	**1.777**	**699**	**726**	**838**	**888**
EU-20c	*Inflows subject to 75% cap*	1.500	1.565	1.704	1.724	699	726	838	888
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					17.068	16.559	16.334	16.086
22	**TOTAL NET CASH OUTFLOWS**					**9.112**	**8.838**	**8.441**	**8.327**
23	LIQUIDITY COVERAGE RATIO					188%	188%	194%	193%

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.

Alpha bank

Template 37a: EU LIQ2: Net Stable Funding Ratio as of 30.06.2026

(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	**8.993**	**44**	**-**	**993**	**9.985**
2	*Own funds*	8.993	44	-	993	9.985
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		37.678	3.055	**3**	**37.857**
5	*Stable deposits*		22.514	1.377	1	22.698
6	*Less stable deposits*		15.163	1.678	2	15.159
7	Wholesale funding:		**22.458**	**744**	**3.928**	**12.044**
8	*Operational deposits*		300	-	-	150
9	*Other wholesale funding*		22.158	744	3.928	11.894
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**120**	**1.758**	**-**	**62**	**62**
12	*NSFR derivative liabilities*	120				
13	*All other liabilities and capital instruments not included in the above categories*		1.758	-	62	62
14	**Total available stable funding (ASF)**					**59.948**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**434**
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:		**4.548**	**3.457**	**39.229**	**35.911**
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*		306	2	169	201
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3.870	3.238	26.651	28.874
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		170	430	2.502	4.867
22	*Performing residential mortgages, of which:*		104	132	4.614	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		104	107	4.362	-
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*		268	84	7.796	6.835
25	Interdependent assets		**-**	**-**	**-**	**-**
26	Other assets:		**1.291**	**41**	**10.182**	**10.329**
27	*Physical traded commodities*				-	-

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	330	281
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		607			30
31	*All other assets not included in the above categories*		684	41	9.852	10.018
32	Off-balance sheet items		**713**	**1.495**	**5.254**	**777**
33	**Total RSF**					**47.451**
34	**Net Stable Funding Ratio (%)**					**126%**

Template 37b: EU LIQ2: Net Stable Funding Ratio as of 31.03.2026

(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	**8.831**	**31**	**-**	**993**	**9.824**
2	*Own funds*	8.831	31	-	993	9.824
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		**37.200**	**2.896**	**3**	**37.276**
5	*Stable deposits*		22.387	1.334	1	22.536
6	*Less stable deposits*		14.813	1.562	3	14.740
7	Wholesale funding:		**21.142**	**1.468**	**3.150**	**10.190**
8	*Operational deposits*		290	-	-	145
9	*Other wholesale funding*		20.852	1.468	3.150	10.045
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**148**	**1.198**	**-**	**64**	**64**
12	*NSFR derivative liabilities*	148				
13	*All other liabilities and capital instruments not included in the above categories*		1.198	-	64	64
14	**Total available stable funding (ASF)**					**57.353**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**396**
16	Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
17	Performing loans and securities:		**4.151**	**3.703**	**37.323**	**34.347**
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*		227	1	265	289
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3.589	3.402	25.074	27.653

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		233	427	2.165	4.570
22	*Performing residential mortgages, of which:*		101	134	4.706	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		101	105	4.199	-
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*		234	166	7.278	6.404
25	Interdependent assets		-	-	-	-
26	Other assets:		**1.595**	**51**	**9.894**	**10.165**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	288	245
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		714			36
31	*All other assets not included in the above categories*		881	51	9.606	9.885
32	Off-balance sheet items		**557**	**1.607**	**5.441**	**818**
33	**Total RSF**					**45.726**
34	**Net Stable Funding Ratio (%)**					**125%**

Appendix II of this document contains the historical NSFR data for the three prior quarters (Q4 2025, Q3 2025 and Q2 2025)

11 Environmental, Social and Governance (ESG) Risks

11.1 ESG Strategy and Governance

11.1.1 Environmental Risk

Business Strategy and Processes

Alpha Bank has adopted a Strategy for Sustainable Development which aims to mitigate material negative impacts and risks arising from its financing activities and operations, while enhancing its positive impacts on the environment, society and the economy, and ensuring best practice in Corporate Governance.

The Strategy is designed to guide the transition towards a low-carbon, climate-resilient and sustainable economy, while supporting the Group's long-term business resilience to evolving environmental, social and governance challenges. It reflects the Group's commitment to the Principles for Responsible Banking and alignment with international objectives set by the Paris Agreement on Climate Change and the United Nations 2030 Agenda for Sustainable Development. At the same time, it provides a framework for addressing sustainability-related risks and opportunities, and for responding to evolving stakeholder expectations.

Through the integration of sustainability considerations into its business model, governance and risk management frameworks, the Group aims to support sustainable economic growth, financial stability and the transition of its Clients and counterparties towards more sustainable business practices.

The Strategy supports alignment with regulatory and supervisory expectations and reinforces the Group's commitment to responsible business conduct and long-term value creation for its stakeholders, including Clients, Employees, investors and society at large.

To prioritize the environmental and climate issues which are related to its activities and might impact the Group’s operations and/or its Stakeholders, the Bank conducts the Double Materiality Assessment on an annual basis. As a result, the Bank identifies 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 are assessed based on the magnitude of the current financial effects and the likelihood of occurrence and the potential magnitude of their financial effects in the short-term, medium-term and long-term horizons.

For 2025, **financial materiality** assessment covers Alpha Bank SA and Alpha Bank Cyprus which are considered material considering the classification as Relevant Legal Entities (RLEs).

For the identification of sectors sensitive to transition risk the Bank uses methodologies from the Climate Policy Relevant Sectors (CPRS), the UNEP FI - Net Zero Banking Alliance (NZBA) guidelines and Long-Term Strategy for Greece for 2050 (LTS), emission intensities at sector level and forward-looking Probability of Defaults (PDs) based on the ECB short-term disorderly transition scenario and the contribution of the calculated (or estimated) Scope 1 and 2 emissions of each sector in the Bank’s total Scope 1 and 2 emissions. To further examine the impact under different time horizons, the Group conducts a qualitative materiality assessment for transition risk sub-types (market, technology, reputation, policy and legal), as proposed by the TCFD. Regarding physical risk, the Group performs a materiality assessment based on IPCC AR5 RCP 8.5 for 2026, 2030 and 2050 horizons.

The ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) Tool is utilized to examine the materiality of the anticipated financial effect for nature-related risks.

Alpha Bank is currently in the process of updating its annual Financial Materiality assessment under the Corporate Sustainability Reporting Directive (CSRD) which will be included in the FY26 Sustainability Statement.

The prioritization and final list of material impacts, risks and opportunities are validated within the dedicated Working Group which acts as the first control frontier with the participation of Directors of the key business areas, including Sustainability, Climate, ESG and Enterprise Risk, Non-Financial Risks Control, Internal Audit, Legal, Accounting, Group Data Protection, Human Resources. The Group Sustainability Committee functions as the second level approval, followed by the Corporate Governance Sustainability, and Nominations Committee and the Audit Committee.

The Group's risk assessment approach is based on the Basel Committee on Banking Supervision's standard 239 (BCBS 239) and the Principles of Risk Data Aggregation and Risk Reporting (RDARR). RDARR processes are independently validated within the Group, by the second line of defense.

Lastly, the consideration of ESG impacts, risks and opportunities are embedded in the Group's operating model, which defines how roles and responsibilities concerning sustainability are allocated across the Alpha Bank.

Alpha 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 Bank has set climate decarbonization targets across its lending and investment portfolios in alignment with the Net Zero by 2050 greenhouse gas emissions goal.

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 2025, which is publicly available on Alpha Bank's website.

Environmental Commitments

The **Group'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:

Targets	Target Date	KPIs
Allocate Euro 3.8 billion to new Sustainable Financings (base year 2025)	2027	New financing volumes (in Euro million)
Achieve ca. Euro 900 million of Retail Sustainable Loans, including loans to Small Businesses (base year 2025)	2027	New financing Volumes (Euro million)
Within the total Sustainable Financings, achieve at least Euro 2.6 billion to Renewable Energy Systems by 2026 (base year 2024)	2026	New financing volumes (in Euro million)
Zero financing to new investments in thermal coal mining, upstream oil exploration or coal-fired electricity generation	Ongoing	New financing volumes (in Euro million)
Power generation sector: commitment to reduce financed emissions within the lending and investment portfolio by 41% per MWh (base year 2022)	2030	kgCO2e / MWh (physical intensity metric)
Oil and gas sector: commitment to reduce financed emissions within the lending and investment portfolio by 26% per MWh (base year 2022)	2030	Indexed tCO2e of 2022 = 100 (absolute emissions metric)
Cement sector: commitment to reduce financed emissions within the lending and investment portfolio by 15% per ton of cementitious product (base year 2022)	2030	kgCO2e / t cementitious product (physical intensity metric)
Iron and steel: commitment for the financed emissions within lending and investment portfolio to remain below the IEA NZE reference pathway (base year 2022)	2030	kgCO2e / t Steel - intensity of portfolio (physical intensity metric)
Zero financing to targeted activities harming species diversity, habitats and waterbodies	Ongoing	New financing volumes (in Euro million)

Transition Plan for Climate Change Mitigation

Alpha Bank has developed a Transition Plan that explains how the Bank aligns its business model, strategy, and risk management with climate and environmental objectives, including the identification and management of ESG-related financial risks. The Transition Plan is a forward-looking strategic roadmap that addresses ESG financial risks and climate change mitigation actions aligned with the Paris Agreement, while maintaining prudence in risk management and supporting clients in the transition to a more sustainable economy.

The Bank's Transition Plan is structured around four key themes:

(1) Strategic Foundations & Objectives

(2) Implementation Strategy

(3) Monitoring, Metrics & Reporting

(4) Governance

The strategic objectives aim to align the Bank's asset portfolio with Financed Emission reduction (Net Zero) goals and the broader economy's transition to more sustainable models, while scaling-up sustainable finance to capitalize on evolving opportunities. The Transition Plan outlines the actions, tools and decision-making framework that will enable the Bank to achieve this ambition.

Sectoral target development

The key instrument to address the strategic objectives related to the Bank's lending and investment portfolio is the introduction of net zero targets (2050 and 2030 interim) and risk appetite metrics to control the exposure in sensitive to transition sectors.

In 2024, Alpha Bank announced a first-round of sector targets across its lending and investment portfolios 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 Bank employs the widely used, science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE2050) scenario as its benchmark pathway to set 2030 interim targets and ultimately converge towards net zero by 2050.

The Bank prioritized setting targets for the Power Generation, Oil & Gas, Cement and Iron & 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 peer practice.

Table: 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

Going forward, the Bank will expand the target perimeter and strengthen existing sector targets monitoring processes, while reviewing target setting methodologies and decarbonization pathways to ensure its target architecture remains robust, science-based and aligned with European and national policy frameworks. The Bank also intends to expand its sustainable finance solutions and support its customers' transition through targeted engagement.

Portfolio steering

The Bank uses a diversified suite of steering mechanisms, applied proportionately across sectors as it continues to embed transition-risk considerations into the Risk Appetite Framework (RAF), including refinement of Early Warning and Risk Tolerance thresholds for sectors with climate targets.

Client Engagement

Alpha Bank developed a Client Engagement Framework to ensure a consistent, and forward-looking engagement process across sectors and client segments in alignment with EU disclosure regulations (CSRD, ESRS E1 Climate Change) and prudential requirements (EBA Guidelines on the management of ESG Risks)

The Client Engagement Framework aims to strengthen the Bank's portfolio resilience by identifying and mitigating ESG risks, as well as transition risks of clients towards an environmentally sustainable economy. In addition, it creates opportunities by delivering tailored solutions that actively support green transition while strengthening client trust when navigating an evolving market and regulatory landscape.

Alpha Bank's engagement model centers around the systematic evaluation of its clients and prioritization based on internal assessment of ESG risk, Net Zero target-setting and sector relevance to transition risk.

- For clients assessed as High ESG risk, engagement focuses on deciding an Action Plan with the client to remediate identified gaps. Measures are time-bound, realistic while progress is expected on an annual basis. Credit pricing could be linked to risk remediation, where appropriate.

- For clients in scope of the Bank's Net Zero sector perimeter, engagement focuses on supporting clients in their transition and ultimately steering high-carbon sectors towards global climate goals.
- For clients in other climate sensitive sectors, the Bank prioritizes the top 20 clients with increased transition risk to initiate a dialogue. The main objective is to highlight the need to adopt practices that improve clients' resilience to future regulatory developments and climate change as well as identify new green finance opportunities.

Client engagement is performed on an annual basis with emphasis on opportunity-creation and risk-mitigation, including the enhancement of data collection needed for regulatory reporting and for managing climate and environmental risks. Where client engagement outcomes reveal material issues such as lagging performance in alignment objectives, deterioration in ESG risk assessment, or concerns related to specific transactions, an escalation to relevant Committees is followed.

Sustainable Finance Opportunities

A cornerstone of Alpha Bank's Sustainable Finance Strategy is the development of targeted financial products that support customers in their transition to low-carbon business models.

For large corporate clients the Bank draws on its expertise in deploying co-funding initiatives, to support clients' transition pathways including the EU Resilience and Recovery Facility (RRF) Green transition pillar to accelerate sustainable investments. 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.

For small businesses, the Alpha Photovoltaic product facilitates investment in photovoltaic stations up to 1 MW to boost renewable energy generation. Additionally, in collaboration with the Hellenic Development Bank, the Green Co-Financing Loans program offers loans with attractive terms—including interest-free portions and subsidies—to encourage sustainable projects.

For individual clients, the Bank offers a variety of green loans with preferential interest rates for green mortgages, home energy upgrades, eco-friendly transportation (including electric and hybrid vehicles), and energy-efficient home equipment such as photovoltaic panels and heat pumps. Also, the Bank actively participates in state-supported energy-saving programs.

Risk integration

The Bank is committed to integrating ESG and Climate risks into its overall risk management framework. In this context, the Bank regularly monitors its exposure concentration in climate sensitive sectors for its loan and investment portfolio, while updating its policies and processes, improving data quality, coverage and calculation approaches. Alpha Bank recognizes climate, environmental and social (C&E/ESG) risks as transversal risk drivers that influence traditional financial and non-financial risk categories and therefore incorporates ESG and climate characteristics into the risk identification and materiality assessment processes and in the overall risk management framework.

The Bank's Double Materiality Assessment leverages CPRS classifications, and sector-level vulnerability mapping. This identifies material impacts, risks and opportunities across climate, environmental, social and governance dimensions. Both climate transition and physical risks assessment is conducted for credit risk, market/liquidity risk, operational risk, reputational risk, and strategic risk across relevant time horizons (short: 1 year ahead, medium: 2-5 years ahead, long-term: >5 years).

Also, the Bank ensures it will not finance transactions that impose environmental or social threat, through an Exclusion List included in the "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending" under the Group's existing Credit Risk Management Framework and the Group's Credit Policy.

In addition, in 2025, the Climate Related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending was updated in order to allow finance of the defense sector up to a certain cap for conventional weapons related activities in accordance with the "Defense Sector Financing Policy".

The Transition Plan is integrated into the Group ESG Governance model for effective oversight, management, and implementation of sustainability-related matters across all levels of governance (Board of Directors, Executive, Operational).

The Transition Plan is presented in detail in the Sustainability Statement Section of the Annual Report 2025, which is available on the Alpha Bank Group website.

Sustainable Finance Framework

Alpha Bank's Sustainable Finance Framework (SFF or framework) constitutes the basis for the Bank's sustainable lending strategy as well as supporting 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 is available on the Alpha Bank ESG Reporting Hub, on the website link.

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**

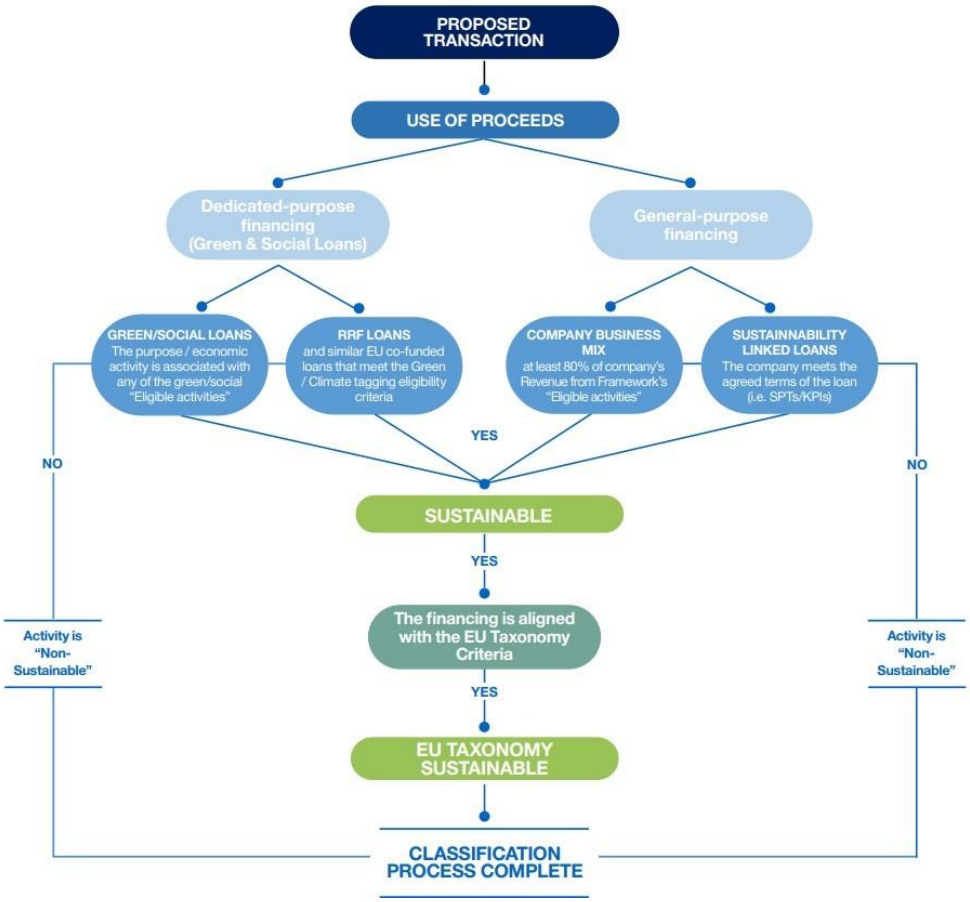
- *Green/Social Loans*: The funds are 100% directed towards a project/investment listed under the eligible green/social criteria.
- *Recovery and Resilience Facility (RRF financing) and similar EU co-funded loans.*

B. **General Purpose Financing**

- *Company Business Mix:* When a company derives a certain percentage (at least 80%) of its revenues from eligible activities.

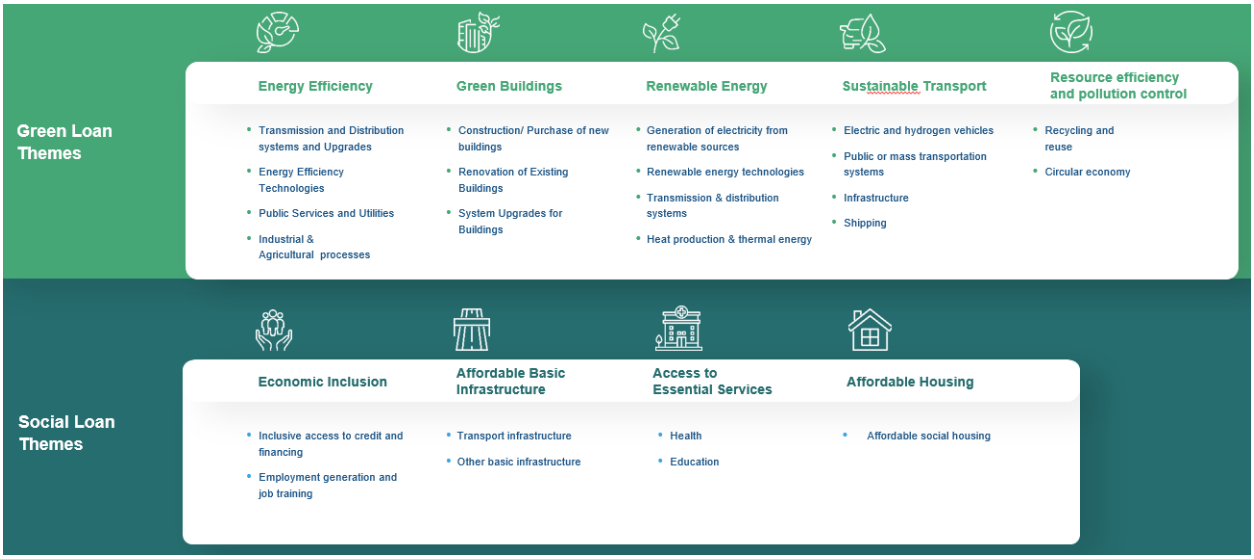
Sustainability-Linked Loans/Facilities: General Purpose financing that is linked with measurable ESG targets at obligor level based on pre-determined sustainability performance targets agreed with the client.

Diagram: Sustainable Finance Framework decision process:



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.

Table: 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.

Green Bond Framework

Building on the Sustainable Finance Framework, Alpha Bank launched its Green Bond Framework (GBF) in January 2025 which provides a clear and transparent roadmap for how the Bank intends to channel capital into projects that advance environmental goals. The Green Bond Framework aligns with 2021 ICMA Green Bond Principles (with June 2022 Appendix I) and follows its four core components:

1. Use of Proceeds
2. Evaluation and Selection Process
3. Management of Proceeds
4. Reporting

As a result,

- in October 2025 Alpha Bank successfully completed the pricing of a senior preferred green bond of Euro 500 million. The transaction was more than six times oversubscribed.

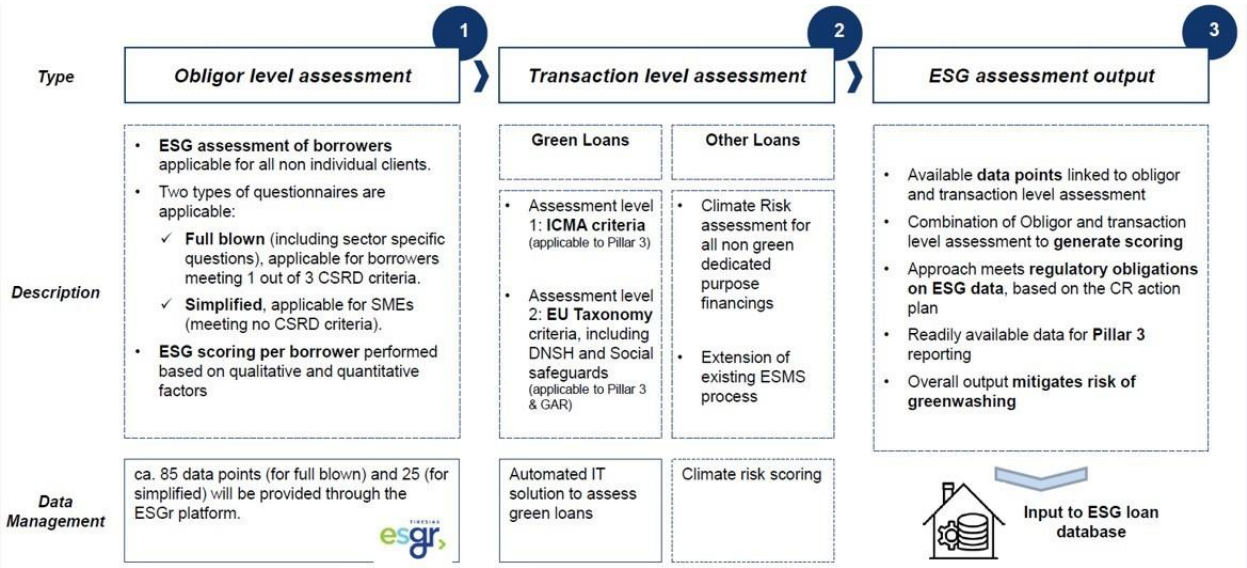
- In April 2026, the issuance of a second senior preferred green bond of €600 million was completed. The transaction was more than three times oversubscribed.

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

Alpha Bank has implemented assessment processes for ESG 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.

Corporate financing initiatives

For corporate clients, the Bank provides, financing in relation to "Greece 2.0 National Recovery and Resilience Plan". Through the Recovery and Resilience Facility, the Bank provides financing for the green pillar, with a focus on renewable energy sources. Eligible categories 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 programs, such as the Financing Program 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 throughout the long duration of financing.

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**.

Private Banking solutions

The Bank provides the standardized ESG disclosures and integrates sustainability considerations into product selection, advisory processes, and Customer engagement. Activities include prioritizing SFDR and EU Taxonomy-aligned products, training advisors on ESG integration, and providing necessary educational activities to enhance Customer understanding of sustainability impacts.

Started in 2021 and continuing through 2026, Alpha Bank has also set an additional action to collaborate with Reforest Action and subsequent promotion of impact investing to private banking Customers. Since 2021 as part of the collaboration with Reforest'Action, a global actor in reforestation and agroforestry, more than 69,921 trees have been financed for planting, of which nearly 9,135 were financed in 2025. The reforestation projects have been implemented in critical areas across Greece, including the Arona forest in Katerini, Thessaloniki Forest, Pierian Mountains forest, and Kastanolongos forest in Southern Evia. This effort has resulted in the storage of 1,370 tons of CO2 and the creation of 27,405 natural shelters for wild animals according to the certificates the Group has received for the completion of each initiative. activities to enhance Customer understanding of sustainability impacts. The above initiative also raises Customers' awareness on environmental issues and at the same time has direct and measurable positive I impact.

Participation in global initiatives for sustainability

Alpha Bank partners with key Greek, European, and global organizations to promote ESG-based responsible practices and advance sustainable banking. These partnerships include:

1. UNEP FI Principles for Responsible Banking – Member since 2004, aligning financing decisions with the UN SDGs and Paris Agreement.

2. United Nations Global Compact – Signed the Letter of Commitment in 2024 to embed its Ten Principles and promote sustainability across the corporate culture.

3. UN Principles for Responsible Investment – Alpha Asset Management has been a signatory since 2018, integrating ESG criteria into investment management.

4. CSR Hellas – Member since 2007, supporting corporate social responsibility adoption and business training.

5. Hellenic Bank Association – Active participant in committees focused on sustainability, green banking, and corporate governance within the Greek banking sector.

6. Climate Governance Initiative, Greece – Member of the Chapter Zero Alliance which is actively advancing climate governance.

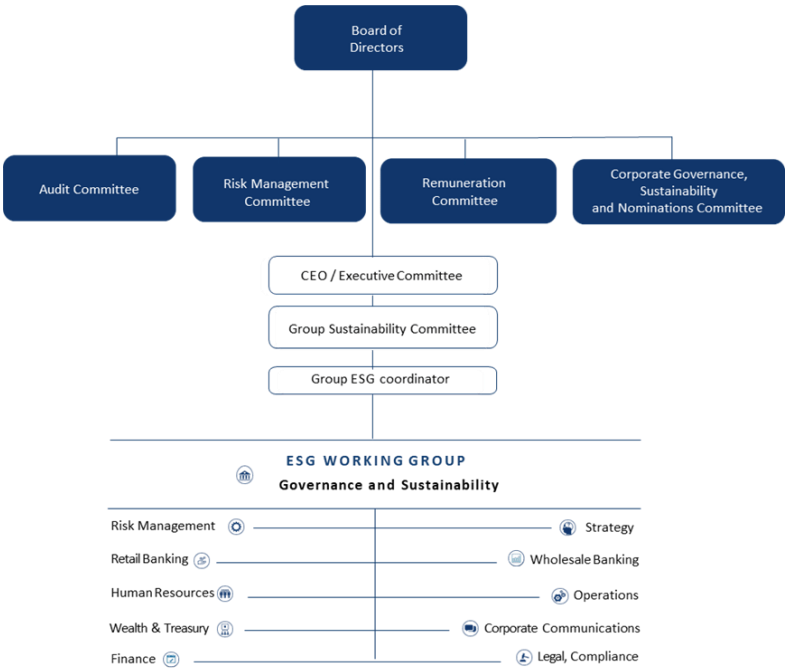
These collaborations strengthen Alpha Bank's commitment to fostering a sustainable and responsible financial system. The partnerships and initiatives in which Alpha Bank participates in are available on its website.

Alpha Asset Management M.F.M.C.

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 July 2026, the company submitted its 2025 PRI Assessment report which covered the responsible investment activities occurred through 2025.

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 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 S.A. 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 Audit Committee**, among others, safeguards the integrity of financial and sustainability reporting processes, reviews the scope, frequency, and results of audit assurance on sustainability reporting, including statutory requirements. The full scope of the duties and responsibilities of the Audit Committee are set out in its Charter, which is posted on the Alpha Bank S.A. website.
- **The Risk Management Committee**, among others, monitors that Alpha Bank adequately embeds ESG risks in its risk appetite, strategy and risk management framework. It collaborates with the CGSNC and the Audit Committee as necessary on the effective oversight of the mitigation of certain key areas of risk, including climate-related or other ESG risks, and capital management and their repercussions on the Internal Control System. The full scope of the duties and responsibilities of the Risk Management Committee are set out in its Charter, which is posted on the Alpha Bank S.A. website.
- **The Remuneration Committee**, among others, assesses the alignment of the Remuneration Policy with the Bank's ESG objectives, risk appetite, values, and long-term strategy. The full scope of the duties and responsibilities of the Remuneration Committee are set out in its Charter, which is posted on the Alpha Bank S.A. website.
- **The Corporate Governance, Sustainability and Nominations Committee** (CGSNC), among its other responsibilities supports the BoD in ensuring the implementation of ESG standards in accordance with regulatory requirements, the relevant best practices, and to ensure that ESG issues are communicated effectively to the other BoD Committees. The full scope of duties and responsibilities of the CGSNC are set out in its Charter, which is posted on the Alpha Bank S.A. website.

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, 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. 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, Science Based Target setting, as well as key disclosures and regulatory submissions.

Operational level implementation

At the Operational level, the Sustainability business area, which is led by the Group ESG Coordinator, drives the ESG Strategy and ensures the adoption of best market practices across the Group, with an emphasis on ESG Strategy and integration, Sustainable Finance operationalization, stakeholder engagement, and disclosures in line with relevant regulatory requirements. The Group ESG Coordinator also leads sustainability-related initiatives and oversees ESG objectives through the cross-functional ESG Working Group, which supports coordination across relevant business and control functions. In addition, the business area of Climate, ESG and Enterprise Risk Management is a horizontal risk division which collaborates and coordinates with the rest of the functions and business areas under the supervision of the Chief Risk Control Officer, while undertaking the management of a limited number of risks under its controlling capabilities, related to Bank- wide and even Group matters.

Among others, the Climate, ESG and Enterprise Risk Management Business Area collaborates with the Sustainability Business Area 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 described in the 2025 Remuneration Policy of the members of the Board of Directors, the Combined Bonus Plan (CBP), which as of 2025 is the only active variable remuneration scheme, incorporates wider ESG-related goals for Material Risk Takers, including members of the SLT and Directors. This variable remuneration scheme is designed to enhance the alignment of executive remuneration with the Bank's long-term strategic objectives and sustainable value creation and incorporates short and long-term targets, which may vary annually and are always subject to the approval of the BoD. In terms of short-term targets and among other criteria for the award and payment of variable remuneration, specific criteria linked to corporate social responsibility and wider ESG-related goals, related to actions and initiatives that Alpha Bank may be developing, must be fulfilled. Long-term performance targets of the CBP include profitability and sustainability metrics, such as non-financial targets (weighted at 20%) relating to sustainable finance disbursement targets, and female participation at middle management level and above aiming to incorporate ESG criteria in long-term incentive remuneration. These metrics are linked to the material impacts, risks and opportunities identified through the Group's due diligence processes. In terms of governance on the incentive scheme approval and update, the Remuneration Policy is submitted for approval to the Board of Directors and subsequently to the General Meeting of Shareholders following its endorsement by the Remuneration Committee.

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.

As described in the Environmental Risk section, the Group maintains an Exclusion list under the Climate related, Environmental, Social and Governance Risk Management Policy on Group’s Business Lending. Under this Policy the funding of the production or trade in alcoholic beverages (excluding beer and wine), Tobacco, Gambling, Casinos and equivalent enterprises activities is permissible on a combined basis up to 5% of the total loan portfolio.

Risk arising from the Bank’s own activities and financings

The Double Materiality Assessment is performed annually by Alpha Bank. With regard to financial materiality in particular, the assessment of magnitude of the current financial effect of material risks is implemented by evaluating if any operational risk losses have been recognized during the current financial year. To assess the anticipated financial effect of social risks the Group leverages the Operational Risk Taxonomy and Risk and Control Self-Assessments (RCSA) inherent ratings. The Bank is currently in the process of updating its annual Impact and Financial Materiality assessment under the Corporate Sustainability Reporting Directive to identify material impacts, risks and opportunities for the short-term, mid-term and long-term time horizons.

The prioritization and final list of material impacts, risks and opportunities are validated within the dedicated Working Group which acts as the first control frontier with the participation of Directors of the key business areas, including Sustainability, Climate, ESG and Enterprise Risk, Non-Financial Risks Control, Internal Audit, Legal, Accounting, Group Data Protection, Human Resources. The Group Sustainability Committee functions as the second level approval, followed by the Corporate Governance Sustainability, and Nominations Committee and the Audit Committee.

For the detailed Double Materiality Results and their effects across time horizons see the Sustainability Statement within the 2025 Annual Report, available on Alpha Bank’s website.

Social Commitments

- The **Group’s Strategic Plan** incorporates the following commitments to foster healthy economies and societal progress in alignment with the Principles of Responsible Banking:
- 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

Targets	Target Date	KPIs
Increase employment of young people by 20% (base year 2020)	2027	Percentage of Employees in the age group of 18-30
		Percentage of hirings in the age group of 18-30
Maintain >40% women representation in Managerial positions	2027	Percentage of women in managerial positions
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
Provide a safe and inclusive work environment	Ongoing	Number of injuries in the workplace
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%)

Sustainable Finance

The Sustainable Finance Framework (SFF) lays out the criteria to characterize specific loans as sustainable, including themes that contribute to the access to Finance and Healthy Economies, Housing (i.e. access to credit and financing and affordable social housing). The process for monitoring the implementation of the SFF includes a robust governance model as well as its integration into the Bank's existing credit approval process. The SFF relates to banking and lending activities provided to individual, corporate and SME Customers. It encompasses a variety of ESG lending solutions in the Bank's Wholesale and Retail banking portfolios. Additional credit products may be considered following an assessment of certain eligibility criteria.

The **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. Access to credit and financing and contribution to Healthy Economies targets females, rural populations focusing on agricultural production and agricultural value chains, excluded and/ or marginalized populations, and economically disadvantaged groups through SME lending in emerging markets and Microfinance lending. Affordable social housing focuses on the financing of construction, renovation and maintenance of houses destroyed or damaged by natural disasters, as well as the provision of adequate, safe, and affordable housing for women, low-income, and underserved populations. The framework also covers aging population, vulnerable youth, persons with different abilities or in need of medical attention.

Financing Opportunities

Alpha Bank is dedicated to ensuring equal access and seamless physical and digital access to its products and services, thereby enhancing the inclusion and financial wellbeing of its Customers. The Group's activities provide comprehensive and inclusive access to financial services through a range of high-quality financial products and services for Individuals (private Customers), Corporate and SME Customers with financing solutions such as "Alpha Education Consumer Loan". In addition, through co-financing programs "EIF Innovation & Digitalization Portfolio Guarantee Product" and the "Hellenic Development Bank Just Transition Co-Financing Loans Fund" Alpha Bank supports investments in innovation and digital transformation, enhancing access to finance for SMEs, Small Mid-Caps, and R&D-intensive beneficiaries.

Private Banking Customers are also supported through access to investment products that promote environmental or social characteristics or have sustainable investment objectives.

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. In addition, the Whistleblowing Policy aims to promote transparency and integrity within the organization by encouraging not only Employees, but also Customers, and suppliers to report any incidents of fraud, corruption, coercion, or other violations of the Bank's policies and procedures. In alignment with internationally recognized standards such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, the Group integrates human rights considerations into its strategic and operational decision-making, aiming to prevent violations and foster a responsible and respectful working environment in its own workforce and its business partnerships.

The Bank recognizes the right to union membership and collective bargaining 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 across 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.

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.

In addition, Alpha Bank Group launched, throughout 2025, several impactful initiatives under its DEI and sustainability pillars. These initiatives and programs were designed to empower individuals, strengthen leadership, promote balance between personal and professional life as well as embed sustainable habits into daily work practices. Below is an overview of key programs that reflect this commitment:

- "Parents' month": In June/July 2025, to celebrate Global Parents' Day (June 1st), Alpha Bank Group introduced "Parents' Month", a series of 10 webinars led by expert speakers. These sessions covered topics such as parenting challenges and practical tips, emotional connection and safety, balancing roles as a professional, individual, and parent and Mental health topics (e.g., menopause, coping with internal pressure). The program attracted 2,553 total attendances with sessions providing valuable insights to support both professional and personal growth, as well as reinforcing Employee wellbeing.

- "Do Good People" App: In 2025, Alpha Bank successfully rolled out the "Do Good People" mobile application to all Employees. This initiative stems from Alpha Bank's collaboration with Do Good People, S.L., a Spanish company and one of the winners of FinQuest 2022 (3rd prize). Their innovative platform enables organizations to actively engage their workforce in sustainability through simple, impactful daily actions.

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 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**" was established in 2021. These communities encourage learning from diverse experiences, sharing best practices, building cross-functional alliances, and enhancing the Employee value proposition. They provide safe, supportive spaces for Employees to connect, grow professionally, and foster cultural awareness.

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
○ Introduction to ESG ○ Health & Safety: Flood in the Building ○ Health & Safety: Earthquake ○ Introductory Training on Health & Safety in the Workplace ○ Health & Safety at Work: We Act Responsibly, We Live Better ○ ESG Risks and Opportunities ○ Energy Saving Awareness ○ Health & Safety: Fire Incident in the Building ○ Nutrition as a Key Factor for Quality Sleep and Mental Balance ○ Act on Climate | Climate Action (20 minutes) ○ Building Well-Being and Balance at Work	Sustainable Finance Framework Operationalization

During 2025, 60% of workforce of Alpha Bank Greece participated in training organized by the ESG Academy, while over 74% of retail banking business Employees followed dedicated ESG lessons. Employees across the Bank benefited from introductory eLearning courses on ESG fundamentals and the ESG Risks and Opportunities.

A dedicated session titled “Introduction to Climate Risks” was delivered to Employees in Wholesale Banking and Wholesale Credit, with the participation of 260 individuals, further strengthening awareness and understanding of climate-related risks within core business and credit functions. In addition, the Bank delivered targeted training to Wholesale Relationship Managers and Risk Professionals on integrating ESG criteria into client assessments and the evaluation of sustainable finance transactions. The program enhanced staff capability to apply the ESG process, use the relevant internal tools, and ensure consistent identification and classification of sustainable financing activities.

Certified Management Systems (ISO)

Regarding in-house impacts across the Bank’s operations and its supply chain certain business areas and subsidiaries of the Group apply, among other measures, the following International Standards published by ISO, International Organization for Standardization and other management standards.

Table: Management Systems as disclosed in the Sustainability Statement FY25 in Alpha Bank's Annual Report

Standard	Subsidiary certified
ISO 14064 Management System	Alpha Bank S.A.
ISO 50001 Energy Management System	Alpha Bank S.A.
ISO 45001 Occupational Health and Safety Management System	Alpha Bank S.A., Alpha Supporting Services S.A., Alpha Bank Cyprus Ltd
ISO 22301 Business Continuity Management System	Alpha Bank S.A., Alpha Supporting Services S.A., Alpha Leasing S.A., Alpha Finance A.E.P.E.Y.
ISO 27001 Information Security Management System incorporating ISO 27017 Information Security Controls for Cloud Services and ISO 27018 Protection of Personally Identifiable Information on Public Clouds	Alpha Bank S.A. and for Alpha Supporting Services S.A applies only the 27001
ISO 27701 Privacy Information Management	Alpha Bank S.A.
ISO 14001 Environmental Management System	Alpha Bank S.A., Alpha Supporting Services S.A., Alpha Bank Cyprus Ltd, Alpha Real Estate Services S.A.
ISO 9001 Quality Management System	Alpha Bank S.A, Alpha Real Estate Services S.A., Alpha Supporting Services S.A., Alpha Leasing S.A.
ISO 20000-1 Information technology –Service Management System	Alpha Bank S.A, Alpha Supporting Services S.A.
EMAS Eco-Management and Audit Scheme	Alpha Bank S.A, Alpha Supporting Services S.A.
ISO 22316 Security and Resilience	Alpha Bank S.A.
ISO 20400 Sustainable Procurement	Alpha Bank S.A.

Additionally, through its Environmental Management System, the Bank aims to reduce its environmental and carbon footprint by promoting the rational use of energy for lighting, heating and cooling of office buildings and Branches, while it has relevant minimum energy efficiency specifications for major electromechanical equipment and buildings' elements.

Also, the Bank supports initiatives for the efficient use of 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 GHG emissions the bank implements procedures certified with the ISO14064 standard, verified by external accredited auditor.

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 annually 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.

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.

Business Continuity Management Framework

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 Group recognizes Health and Safety as an area of material impact on its workforce. Thus, a Strategy on Health, Safety and Wellbeing has been approved, structured around the following three pillars, with launches and implementation of initiatives and actions around them:

- mental health,
- modern workplace, and
- resilience and readiness

The Group fully complies with ILO requirements incorporated with European guidance and local regulations. To ensure compliance, as well as meet and drive best practices in its sector, Alpha Bank Group implements, monitors and improves a certified, by an accredited body, Health and Safety management system according to ISO 45001 Alpha Bank S.A., Alpha Supporting Services S.A., Alpha Bank Cyprus Ltd

Alpha Bank Group also invests in mental health related initiatives to raise awareness and help initiate discussions around selfcare and empowerment. Indicative actions include:

- A 24/7 psychological support hotline, aiming to improve response to mental health issues
- Increased free one-to-one sessions with psychotherapists
- An annual mental health campaign

- Regular internal audits and inspections of buildings and infrastructure

Alpha Bank has also been certified with an Occupational Health and Safety Management System in accordance with ISO 45001:2018 (for Alpha Bank S.A., Alpha Supporting Services S.A., Alpha Bank Cyprus Ltd.) 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) is 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

Alpha Bank has given priority to managing and mitigating any underlying social risks arising as an integral part of developing and offering products and services, while complying with the applicable regulatory framework. Furthermore, it develops and improves mechanisms to identify, measure and communicate impact, across the entire range of its activities. The Board of Directors and the relevant Board Committees are responsible for the approval of the Group policies and strategies and the supervision of their application, including strategy and policies on social matters and corporate sustainability policies.

For more details on governance structure, please refer to the Governance section of the Qualitative Information on Environmental Risks.

11.1.3 Governance Risk

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.

The Double Materiality Assessment is performed annually by Alpha Bank. With regard to financial materiality in particular, the assessment of the current financial effect is implemented by evaluating if any business conduct-related operational risk losses have been recognized during the current financial year.. To assess the anticipated financial effect of business-conduct risks the Group leverages the Compliance Risk Assessment, which is considered integral part of the Bank's Risk Management Framework. The Bank is currently in the process of updating its annual Impact and Financial Materiality assessment under the Corporate Sustainability Reporting Directive to identify material impacts, risks and opportunities for the short-term, mid-term and long-term time horizons.

The prioritization and final list of material impacts, risks and opportunities are validated within the dedicated Working Group which acts as the first control frontier with the participation of Directors of the key business areas, including Sustainability, Climate, ESG and Enterprise Risk, Non Financial Risks Control, Internal Audit, Legal, Accounting, Group Data Protection, Human Resources. The Group Sustainability Committee functions as the second level approval, followed by the Corporate Governance Sustainability, and Nominations Committee and the Audit Committee.

For the detailed Double Materiality Results and their effects across time horizons please refer to the Sustainability Statement within the 2025 Annual Report, available on Alpha Bank's website.

Regarding the governance processes of Alpha Bank, including Committees responsibilities, please refer to the governance structure as described in the environmental section.

Governance Commitments

Alpha Bank integrates responsible banking principles into its governance structure to ensure accountability, oversight, and alignment across all organizational levels. With strategic objective to ensure robust and transparent governance, the Bank has set commitments to align with the Principles for Responsible Banking. The commitments include:

- Ensure the Diversity and Independence of the BoD,
- Embed sustainability in Governance practices and Strategy,
- Enhance transparency and safeguard business ethics

The implementation is achieved through clear roles, performance measurement, and ongoing monitoring of sustainability-related impacts, risks, opportunities, commitments and targets.

The following Governance-related targets are monitored by the Board of Directors:

- A majority of Independent Members in the Board of Directors and its Committees
- A minimum of 40% female representation in Non- Executive Board Members
- Proactive engagement with Investors and Stakeholders to align priorities
- Increase of material information disclosure to all Stakeholders
- Incorporate ESG criteria in our Remuneration and Risk Management frameworks
- Safeguard internal risk controls that protect the Customers' data

Policies

All policies, procedures, and controls safeguard the prudent management of non-compliance risk with the applicable regulatory framework, as well as the alignment of corporate culture with a robust business conduct framework. This framework includes the Code of Conduct and Ethics, the Whistleblowing Policy, the Anti-bribery and Corruption Policy, the Anti-Money Laundering and Counter-Terrorism Financing Policy, and the Policy on the Prevention of Conflicts of Interests. Additionally, fundamental Codes and Policies related to Corporate Culture and Governance, in line with regulations applied by the Alpha Bank Group are provided in Alpha Bank's website.

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.

With respect to counterparties, the Group has incorporated the Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business 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, social and governance risks 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).

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[2] 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.

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.

[2] 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)

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.

KYC / Customer Due Diligence

In 2025, a set of comprehensive Know-Your-Customer (KYC) / Customer Due Diligence improvements took place, designed to streamline certification and verification processes, reduce risks, and ensure compliance across all client categories. With improvements continuing through 2026, this approach contributes to more efficient Customer onboarding, better data quality, and enhanced risk mitigation, while aligning with regulatory requirements.

These include:

- Policies and Procedures adaptation to Meet Regulatory Requirements,
- launch of Specialized Campaigns for Customers with KYC Deficiencies,
- establish Control Checkpoints for Monitoring KYC Activities in the 1st Line of Defense (1LoD),
- continuously Update and Enhance AML Training Materials,
- strengthen Systemic Controls for Existing Customers Acquiring New Products.

Other actions and enhancements that took place in 2025 include:

Transaction Monitoring & Suspicious Transactions Reporting Management

- Prioritization of alerts based on risk profiles, and
- enhancing the accuracy and timeliness of suspicious activity detection, are expected to detect faster potential suspicious activities and more efficient STR filing.

IT Systems & Data Analytics Enhancements

- Integrated new high-risk factors and calibrated existing ones to improve the CRR methodology,
- optimization of Sanctions Screening Tool (Siron Embargo) by introducing dual-control functionality for transactions with specific risk-based criteria,
- aligned AML platforms and core banking systems with the new SEPA Instant Payments Regulation.

Enhanced risk mitigation and full compliance with the new regulation, while ensuring smooth processing of instant payments is taking place on ongoing basis.

Governance, Control, and Assurance:

Expansion of second-line monitoring through more frequent and detailed reviews of KRI metrics, alongside the introduction of monthly performance reviews with accountable Business Areas.

Increased oversight and a clearer understanding of risk levels across the organization, leading to faster identification and mitigation of potential issues are taking place on ongoing basis.

Updated AML BWRA Methodology

A refined methodology for evaluating the business-wide risk assessment (BWRA) is implemented, including deeper integration of internal controls and risk mitigation strategies. Enhanced risk-based decision-making and a clearer focus on areas that require the most attention for risk mitigation are taking place on ongoing basis.

GAP Analysis for New EU AML Regulatory Package:

Comprehensive GAP analysis of the new EU AML regulations to evaluate current practices and identify required updates. This comes in full alignment with the new regulatory framework, ensuring that all business units meet the latest compliance standards.

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.

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 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 in 2026:

- The Bank has centralized data related to the Transition risk sensitive sectors and Physical Risk assessment on obligor and real estate level, ensuring both credit assessment and reporting needs are efficiently met.

- In the context of the RDARR/BCBS239 remediation programme, the Bank implemented a comprehensive set of data governance and reporting enhancements, including the establishment of ESG Critical Data Elements (CDEs), the enhancement of the Business Glossary, the introduction of ESG Data KQIs, the formalization of Service Level Agreements (SLAs) for critical ESG risk data processes, and the strengthening of reporting governance through process manual for all Grade A ESG reports.

- The Bank has started preparing for its participation in the upcoming 2027 EU-wide stress test which this year will include a separate climate module. The Bank has actively participated in relevant workshops with EBA and has prepared action points after publication of draft methodology.

- The Bank is in the process of updating its annual Climate and ESG Materiality assessment. It is noted that all Alpha Bank subsidiaries are conducting their own ESG Risk Materiality Assessment for the second consecutive year.

Climate & Environmental Risks and 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.

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.

In 2026, the Bank further enhanced 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 included the integration of financed emissions into the assessment framework, expansion of the assessment perimeter (e.g., off-balance sheet exposures and real estate investment properties), closer alignment with the Bank's transition plans and decarbonization targets, as well as the incorporation of emerging regulatory expectations and market best practices etc.

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 - Term 2026	Medium - Term 2030	Long – Term 2050	Short – Term 2026	Medium - Term 2030	Long – Term 2050
Credit risk		✓	✓		✓	✓
Market risk						
Liquidity risk						
Operational risk (incl. Legal)		✓	✓		✓	✓
Business & Strategic risk		✓	✓		✓	✓
Reputational risk		✓	✓		✓	✓

Nature related Risks Materiality Assessment

As it is previously mentioned, the Bank further enhanced 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. Thus, improvements are introduced in the approach to nature-related risks, with a particular focus on impact analysis.

The following table summarizes the materiality per risk type for all time horizons:

Risk Type	Nature – Related Risks		
	Short (2026)	Medium (2030)	Long (2050)
Credit risk			✓
Market risk			
Liquidity risk			
Operational Risk			
Business & Strategic ri			✓
Reputational risk			✓

Mitigation Actions

Credit Risk

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 2026, 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.
- Risk Appetite Framework (RAF) indicators: The Group has integrated a set of qualitative statements and quantitative indicators related to climate risks. With respect to quantitative indicators, the Group has established several C&E indicators aimed at enhancing portfolio sustainability and mitigating potential transition and physical risks. Corresponding limits have also been defined. ing 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

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 flag which will be used to capture and monitor environmental factors.
- Operational Risk Events Management: Operational risk events are mapped to respective risks and flags of the Risk Taxonomy. This allows the Bank to swiftly define the perimeter of environmental events within the loss dataset.
- Risk and Control Self-Assessment (RCSA): RCSA risks and controls related to environmental, social and governance risks are mapped to the appropriate Risk Taxonomy ESG flag as applicable, permitting use of the results to measure the Bank's exposure to these risks.
- Scenario analysis: The Bank has designed and included in its Scenario Analysis exercise, ESG related scenarios in order to identify and measure the impact of extreme events (i.e., with a substantial negative impact on the Bank's profitability and/or reputation) under this perimeter.
- 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.
- 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.
- ESG-related Lawsuits: In particular for legal risk, the Bank has enhanced its processes in order to identify, manage, mitigate and monitor legal risk driven from ESG-related factors more effectively. Emphasis is placed to ESG-related legal risk due 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).
- RAF Indicators: The Bank has also integrated an indicator related to ESG and non-financial risk in its RAF. More specifically, this RAF indicator refers to the "Percentage of gross actual ESG Risk losses to Pillar II allocated operational risk capital charge".

Reputational Risk

The Group has developed the Reputational Risk Policy to effectively manage its reputational risk exposures, including reputational risk exposures stemming from ESG factors. In this context, 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.

- *RAF Indicators:* The Bank has also integrated an indicator related to ESG and reputational risk in its RAF.

In 2026, in the context of CSRD and more specifically, the financial materiality, the Bank proceeded with the consolidation of the results in Group level covering Alpha Bank S.A. and Alpha Bank Cyprus. These two entities are deemed material for ESG Risk Materiality Assessment purposes due to their classification as Relevant Legal Entities (RLEs) within the context of the Group's Recovery Plan.

Business & Strategic Risk

In respect to the Business & Strategic risk, the Bank has also integrated several indicators related to ESG and Business & Strategic risk in its RAF.

Environmental Data related to Collection Structure, Quality and Accuracy

The Bank is committed to incorporate 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 critical data elements are assessed, considering both the front lines' needs and the monitoring or reporting requirements. The ESG related critical data follows the principles of Bank's Data Governance Framework, as well as its policies and procedures. The objective is to ensure quality, 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 & Transition Risk categorization 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 seeks 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. An ESG Data Dictionary was delivered in H1 2025. Implementation efforts by the Bank's IT Division to this point have provided integration of Climate and Environmental Risk related data into the Bank's core lending product and workflowsystems and ensured the collection of available ESG Data in the Enterprise Data Warehouse (EDW). These ongoing efforts have 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.

Furthermore, in 2026 Bank implemented a mechanism to accurately capture the Wholesale Banking Client Questionnaire on Reputational Risk, internally assess and score the responses, and send the resulting dataset to the Data Warehouse. The aim of this questionnaire is the identification of potential Reputational Risks or greenwashing, arising from customer relationships or activities involving environmental, social, or governance (ESG) factors.

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 has established a comprehensive set Climate and Environmental (C&E) indicators in its RAF, to address all material C&E risks, improve portfolio sustainability, and mitigate potential exposures. The Bank maintains a set of C&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.

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, contribution of individual business units in the risk and risk profile across different time horizons.
- 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, time horizon and the contribution of individual business units.
- ESG Obligor ratings of loan exposures, completion rate and contribution of of individual business units.
- Nature risk in loan exposures, broken down by type (Dependency and impact) and individual categories

Climate Risks 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 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 counterparty specific characteristics (collateral and/or company level) versus regional averages depending on the counterparty's materiality to the respective portfolio. More specifically, regarding collaterals representing a large share of collateralized exposures in terms of value AAL is calculated using collateral specific characteristics such as specific location, intended usage (residential vs commercial) and year of construction. Regarding the most material companies in value terms in the Bank's NFC portfolio individual characteristics of the company's operations are used such as location of headquarters and local units, balance sheet data, and the company's economic sector of operation. Regarding collaterals and companies representing an immaterial share of exposures estimates of the AAL at NUTS3 level are used where applicable.

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 (2026) 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.

Nature-related Risks Scenario Analysis

Regarding nature risks and in alignment with its materiality assessment the Bank has run multiple long-term nature scenarios for credit risk. The methodology uses the GLOBIO model to assess the dependency component of the Bank's counterparties (outside-in) and estimates counterparties' land usage reduction costs for the impact component (inside-out).

The dependency component is estimated under two Shared Socioeconomic Pathways (SSPs) with corresponding Representative Concentration Pathways (RCPs) based on the Mean Species Abundance (MSA) index. This results in two global scenarios: Sustainability (SSP1 × RCP2.6) and Fossil-fueled Development (SSP5 × RCP8.5). Changes in the MSA index are subsequently translated into Probability of Default (PD) impacts.

The impact component is estimated by leveraging Land usage intensity based on the SBTN 2030/2050 target under two scenarios i.e. 'Baseline' and a 'Stressed' scenarios'. The 'Baseline scenario' reflects the most likely macroeconomic trajectory under current policies and prevailing market conditions, assuming no major shocks or structural breaks, based on the 'NGFS NDC scenario'. While the 'Stressed scenario' represents the future pathway associated with the highest environmental transition risk costs based on the 'NGFS Delayed transition scenario.

The total impact of climate and nature 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.

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

To enhance the assessment of climate related financial risks within the Expected Credit Loss (ECL) framework, the Bank has established a comprehensive process for collecting and integrating detailed Environmental, Social and Governance (ESG) information pertaining to both obligors and collateral values. This includes, among others, industry specific environmental characteristics, the geographical location of collateral assets, and Energy Performance Certificate (EPC) attributes. The collected information has been systematically incorporated into the Bank's relevant infrastructures, while corresponding methodological upgrades have been implemented across the stress testing and risk modelling landscape.

In this context, the Bank has developed and maintains a series of analytical mechanisms designed to quantify the potential impact of climate and environmental risks on credit risk metrics. More specifically, the following mechanisms are currently in place:

- **Environmental Risk Scenarios Framework:** A set of forward-looking environmental risk methodologies that translate climate and nature related scenarios into quantifiable impacts on macroeconomic, sectoral, obligor or collateral level, as described in the previous section. These methodologies assess potential changes in industry growth trajectories, revenue generation and asset valuations, under a range of adverse environmental scenarios, which are used as inputs in credit risk models.

- **Real Estate Value Indexation Mechanism:** A property value adjustment framework that incorporates EPC ratings and geographical risk factors into collateral valuation processes. The mechanism enables the Bank to model the sensitivity of real estate collateral values to physical and transition climate risks.

- **Counterparty Level Risk Adjustment Model:** A bottom-up credit risk assessment model designed to evaluate the impact of climate (or nature) risk scenarios on individual obligors' creditworthiness. Through this mechanism, obligor specific financial profiles can be adjusted to reflect vulnerabilities to climate driven events or sectoral transitions.

In addition to the above, the Bank continues to strengthen its ESG data collection framework for corporate obligors through the interbank ESG data exchange platform. The information gathered is systematically incorporated into the Bank's internal ESG scorecards, supporting the assignment of ESG scores that feed into risk assessment, monitoring and credit decision processes.

All processes and methodologies related to climate and environmental risk are subject to ongoing review, enhancement and alignment with evolving regulatory expectations and supervisory guidelines. As part of the Bank's commitment to robust model governance, the suite of environmental risk assessment models undergoes formal validation in 2026, in accordance with the updated Group Credit Risk Models Validation Framework. This ensures that all modelling components remain methodologically sound, compliant with regulatory requirements, and fit for purpose within the Bank's broader credit risk management framework.

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 dimensions are 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 :
  - The Exclusion List, i.e., a list of activities, that the Group does not finance, and the transition risk sensitive sector's classification which is a classification of economic activities for the assessment of the 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 "Environmental and Social Requirements" of the European Bank for Reconstruction and Development (EBRD).

- Monitor of the ESG Obligor's/Project's performance.
- Managing Obligor's/Project's Non-Compliance with the Policy Rules and Standards.
- Internal and External Reporting.

An enhanced credit assessment process takes 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 enhancements 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 inter-banking client ESG questionnaires on a sectoral, cross sectoral or on a simplified basis, 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, Increased ESG Impact or Sustainable.
    - 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 transition risk sensitive sector's classification in the context of the ESG transaction 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 climate and nature scenario analysis to align with EBA's Guidelines on environmental scenario analysis and 2026 ECB good practices for climate and nature-related risk stress testing.
- Track developments in the regulatory frameworks and ensure alignment with the requirements.

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 critical industry sectors that are connected with potential climate and ESG risks. In particular, definition of the Exclusion List, i.e., a list of activities that the Group does not finance, and the transition risk sensitive sector’s classification which is a classification of economic activities for the assessment of the transition to a low-carbon economy.
- 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 “Environmental and Social Requirements” of the European Bank for Reconstruction and Development (EBRD).
- Monitor of the ESG Obligor’s/Project’s performance.
- Managing Obligor’s/Project’s Non-Compliance with the Policy Rules and Standards;
- Internal and External Reporting.

An enhanced credit assessment process takes 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 enhancements 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 inter-banking client ESG questionnaires on a sectoral, cross sectoral or on a simplified basis, 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, Increased ESG Impact or Sustainable.

- 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 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”.

- As of 19 December 2025, the Group has amended its Exclusion List to allow finance of the defense sector up to a certain cap for conventional weapons related activities in accordance with the “Defense Sector Financing Policy”.

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.

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.

Greenwashing Risk

In 2026, the Bank has also identified greenwashing as a driver, embedded within existing Compliance Risk categories, namely Customer Conduct Risk, Market Conduct Risk and Corporate Governance. These risks primarily affect consumers and end-users.

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:

- Youth Housing Program – “My Home II”: 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 (ALPHA BANK S.A.)

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.

In H2 2025 the project of "the establishment of Greenwashing 2LoD activity" was performed. Regulatory Compliance has assumed responsibility for identifying, assessing, monitoring & mitigating greenwashing risk across the Bank.

A Greenwashing Procedural Framework has been developed to set out methodology for integrating greenwashing into the Bank's Risk Taxonomy, defining key risk indicators and controls to support effective monitoring and oversight.

Thus, in this year's exercise, greenwashing risk is assessed under the Governance-related risks, considering the nature of greenwashing risk and its treatment within the Bank (e.g., considered as a driver in Compliance risk categories, evaluated within the RCSA process etc.).

Greenwashing refers to the act of making inaccurate, misleading, or unsubstantiated claims regarding the sustainability attributes of products, services, or an organization's strategic intentions and actions. Such claims may appear in marketing materials, public statements, disclosures, mis-selling or poor design of ESG-labeled products or other forms of communication and can create a false perception of environmental or social responsibility. Greenwashing is treated as a driver embedded in existing Compliance Risk categories - specifically Market Conduct Risk, Customer Conduct Risk, and Corporate Governance to ensure its effective identification, assessment, monitoring and mitigation.

Furthermore, greenwashing risk is evaluated within the RCSA process, while a dedicated greenwashing-related scenario ("Fine imposed to the Bank due to Greenwashing") has been developed and incorporated into the Bank's Scenario Analysis exercise, that enables the identification and measurement of the potential impact of extreme events, namely those that could substantially affect its profitability and/or reputation, within the next 12 months.

Greenwashing Risk, is deemed immaterial in the short term and materially affected by C&E risks in medium and long-term, taking into the following considerations: i) no Greenwashing-related risk losses recorded up to date, ii) the EBA guideline on Green Mortgages and EBA's report "Greenwashing monitoring and supervision" and the relevant EBA report on Green Loans & Mortgages, iii) the limited current number of exposures and anticipated increased exposures in the future related to sustainable financings and the iv) the greenwashing risk related scenario results ("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).

Greenwashing Risk

the Bank has incorporated ESG into several components of its Operational Risk Management Framework to monitor and manage ESG Factors from a Non-Financial Risk perspective. In this context greenwashing risk is integrated into the following components: the Risk Taxonomy, the RCSA process, the Scenario analysis and the ESG-related lawsuits classification, as well as the Regulatory Compliance Monitoring Plan.

In addition to the above, the Bank has formulated a Sustainable Finance Framework serving as a guide that sets out a series of approaches and procedures required for classifying financings as sustainable and a relevant process for the assessment of sustainable financing. Taking into account the EBA Report on Green Loans & Mortgages and EBA's report "Greenwashing monitoring and supervision," the Bank has been based on the following regulations/ principles to classify its financing as sustainable, with the aim to eliminate greenwashing risk:

- EU Taxonomy regulation
- Loan Market Association (LMA) Green Loan Principles
- International Capital Markets Association (ICMA) Green/ Social Bond Principles.
- Current market practices

Moving forward, as new guidelines and principles come into force, the Bank will adjust its Sustainable Finance Framework and processes to align with the evolving environment. Some of the forthcoming guidelines and principles include:

- EU Green Bond Standard
- On-going Call for Advice to EBA on green loans and mortgages
- Requirements on transition plans (CSRD, CRD, CSDDD)

Moreover, within its Compliance Risk Monitoring & Control framework, the Bank has identified a set of greenwashing-related KRIs and controls, which have been gradually embedded into the relevant processes to ensure consistent oversight. These KRIs and controls are intended to address risks arising, amongst others, from unclear or misleading sustainability-related statements or declarations, mis-selling or poor design of ESG-labelled products, and inadequate handling of ESG-related complaints across key activities.

In terms of controls, the Bank implements both operational and second line of defense (2LoD) controls, which are expected to strengthen existing first line of defense (1LoD) measures and provide additional safeguards. These controls include:

- Ongoing monitoring (2LoD) controls, that include periodic or ad hoc reviews designed to ensure ongoing compliance and detect potential greenwashing incidents. These controls include oversight activities such as periodic monitoring of ESG-related disclosures to ensure alignment with applicable regulatory requirements, reviewing relevant external assurance reports where relevant and performing sample-based checks to detect potential misrepresentation in ESG-related materials shared with clients and in ESG classifications of new financings.

- Preventive controls, carried out during the relevant processes, aim to prevent greenwashing before it occurs. They ensure that sustainability-related claims and ESG-labelled products are accurate, substantiated, and aligned with the Bank's internal frameworks prior to being communicated or offered.

Reputational Risk Assessment

The Group Reputational Risk Management Framework outlines the governance structure and approach for identifying, assessing, mitigating, avoiding, and managing potential 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 conflict of interest Questionnaire of counterparties evaluates whether the Vendor has a documented Conflict of Interest policy, and any family relationships between the Vendor's employees (or their close family members) and the Alpha Bank's BoD and ExCo.

Know-Your-Customer Policies & Processes

The Bank maintains a robust Know Your Customer (KYC) framework that complies with applicable laws, regulatory requirements, and international best practices. Within this framework, Customer Due Diligence (CDD) measures are applied using a risk-based approach. Customers are classified according to their risk profile, and appropriate management measures are implemented accordingly, including the application of standard, enhanced, or simplified due diligence, as required.

CDD measures are conducted both at the initiation of the business relationship and on an ongoing basis. These measures include the identification and verification of the Customer's and Beneficial Owner's identity using documents, data, or information obtained from reliable and independent sources.

Additionally, CDD involves the development of a financial and transactional profile for each customer. This profile includes information such as the purpose of opening the account or establishing the business relationship; the expected nature and level of account activity; the types of transactions likely to be carried out; the anticipated sources of funds credited to the account; the expected destinations of outgoing payments or remittances; as well as the customer's assets, sources of income, and a description of their professional or business activities. All Customers are required to complete a KYC Questionnaire, which constitutes an integral component of the Bank's KYC process.

An important element of the Customer Due Diligence (CDD) framework is the scrutiny of any transaction or activity that, by its nature, the manner in which it is conducted, or the information relating to the person involved, may be associated with money laundering or terrorist financing (ML/TF). Particular attention is given to transactions that are complex, unusually large in value, or lack an apparent economic or lawful purpose.

The continuous monitoring of the business relationship throughout its duration is also essential. This monitoring ensures that the transactions and activities carried out by the Customer remain consistent with the customer's established financial and transactional profile.

In addition, the Bank applies additional appropriate measures where necessary. These may include refusing to execute transactions or provide services where Customer identification and verification requirements have not been satisfied, where due diligence measures are incomplete, or where there are reporting obligations to the competent Financial Intelligence Unit (FIU) regarding the Customer.

Furthermore, the Bank does not process transactions, provide services, or carry out activities where a Customer's name appears on sanctions lists issued by the EU, UN, OFAC and OFSI. In such cases, the Bank promptly notifies the relevant competent authorities.

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 Financial Crime Director as AML/CFT Compliance Officer (Designated Senior Executive) according to the latest legislation, the role of the Group Chief of Compliance at Group level acting as the Group AML/CFT Compliance Officer and the role and responsibilities of the Board of Directors and the Audit Committee in the AML/CFT framework.

As part of implementing its due diligence measures, the Bank periodically reviews customers' ML/TF risk, taking into account the scope and the nature of the business relationship, as well as their transactional activity and financial profile.

The Bank has established and maintains policies and procedures regarding remote Customer onboarding process and continuously monitors this process. Additionally, the Bank in providing payment services, complies with Regulation (EU) 1113/2023 on the information accompanying transfers of funds.

Moreover, compliance with restrictive measures against countries, persons, or entities according to the regulations issued by the EU, UN, OFAC, and OFSI 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.

Finally, where suspicious or unusual transactions are identified and cannot be justified based on the available information, they are reported to the competent FIU.

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 (ALPHA BANK S.A.).

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. In 2025, Flexfin, AXIA Ventures have been incorporated to the Alpha Bank portfolio and Astrobank to the Alpha Bank Cyprus portfolio.

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 exposure towards Renewable Energy Sources has 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 as well as 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 (31.12.2024) 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 30.06.2026

(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 (MIn EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (MIn 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	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						
Exposures towards sectors that highly contribute to climate change*	**26,046**	**2,107**	**0**	**1,306**	**396**	**-182**	**-26**	**-141**	**15,799,260**	**9,418,386**	**17%**	**17,113**	**4,415**	**4,136**	**382**	**6**
A - Agriculture, forestry and fishing	195	0	0	16	7	-4	0	-4	213,047	50,008	0%	170	21	2	2	3
B - Mining and quarrying	26	0	0	4	4	-2	0	-1	22,328	17,372	41%	24	0	1	1	4
B.05 - Mining of coal and lignite	0	0	0	0	0	0	0	0	232	60	0%	0	0	0	0	1
B.06 - Extraction of crude petroleum and natural gas	0	0	0	0	0	0	0	0	11	5	0%	0	0	0	0	1
B.07 - Mining of metal ores	10	0	0	0	1	0	0	0	17,592	16,139	98%	10	0	0	0	2
B.08 - Other mining and quarrying	14	0	0	3	3	-1	0	-1	4,344	1,129	0%	12	0	1	1	5
B.09 - Mining support service activities	1	0	0	0	0	0	0	0	150	39	0%	1	0	0	0	4
C - Manufacturing	4,888	463	0	226	109	-52	-4	-44	5,649,155	4,378,814	29%	3,912	804	129	44	4
C.10 - Manufacture of food products	1,280	0	0	74	24	-9	-1	-7	589,197	511,356	6%	920	342	11	7	4
C.11 - Manufacture of beverages	209	0	0	8	2	-1	0	-1	41,105	35,932	30%	168	37	2	2	3
C.12 - Manufacture of tobacco products	14	0	0	0	0	0	0	0	6,478	5,663	0%	14	0	0	0	2
C.13 - Manufacture of textiles	76	0	0	7	6	-3	0	-3	9,461	7,036	0%	45	15	15	2	6

C.14 - Manufacture of wearing apparel	48	0	0	8	10	-5	0	-4	9,539	8,134	25%	40	3	3	3	5
C.15 - Manufacture of leather and related products	8	0	0	3	1	-1	0	-1	1,539	1,144	0%	6	0	1	1	7
C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	15	0	0	4	5	-3	0	-3	2,083	1,661	0%	11	1	1	4	8
C.17 - Manufacture of pulp, paper and paperboard	146	0	0	7	8	-5	0	-4	32,077	18,340	0%	123	15	7	2	3
C.18 - Printing and service activities related to printing	26	0	0	1	4	-1	0	-1	3,362	2,472	0%	22	2	1	1	4
C.19 - Manufacture of coke oven products	463	463	0	0	0	0	0	0	2,851,291	2,552,444	86%	463	0	0	0	2
C.20 - Production of chemicals	228	0	0	6	7	-3	0	-2	85,122	48,080	4%	165	26	37	0	5
C.21 - Manufacture of pharmaceutical preparations	330	0	0	0	1	-1	0	-1	17,806	14,338	6%	151	178	0	0	5
C.22 - Manufacture of rubber products	190	0	0	13	3	-1	0	-1	46,869	42,193	3%	121	63	4	1	4
C.23 - Manufacture of other non-metallic mineral products	261	0	0	8	7	-3	0	-2	684,980	133,947	75%	242	12	2	6	4
C.24 - Manufacture of basic metals	538	0	0	26	4	-2	0	-2	776,923	524,963	46%	501	36	1	1	3
C.25 - Manufacture of fabricated metal products, except machinery and equipment	162	0	0	30	6	-3	-1	-2	31,284	27,431	0%	128	24	3	6	4
C.26 - Manufacture of computer, electronic and optical products	100	0	0	1	0	0	0	0	7,543	7,038	10%	83	17	0	0	4
C.27 - Manufacture of electrical equipment	575	0	0	2	2	-1	0	-1	376,188	363,744	48%	523	17	35	0	4

C.28 - Manufacture of machinery and equipment n.e.c.	104	0	0	21	7	-5	0	-5	57,668	55,687	56%	94	7	2	1	3
C.29 - Manufacture of motor vehicles, trailers and semi-trailers	19	0	0	1	1	0	0	0	6,814	6,636	27%	17	2	0	1	4
C.30 - Manufacture of other transport equipment	22	0	0	0	1	0	0	0	2,241	2,041	0%	20	1	0	1	3
C.31 - Manufacture of furniture	31	0	0	3	4	-2	0	-1	3,666	3,241	0%	24	2	3	4	6
C.32 - Other manufacturing	25	0	0	3	3	-2	0	-1	3,366	2,977	8%	21	2	1	2	5
C.33 - Repair and installation of machinery and equipment	18	0	0	1	3	-2	0	-2	2,554	2,314	0%	13	3	2	1	5
D - Electricity, gas, steam and air conditioning supply	4,216	1,227	0	20	2	-2	0	-1	1,991,168	1,365,592	38%	2,963	292	907	54	6
D35.1 - Electric power generation, transmission and distribution	4,210	1,224	0	20	2	-2	0	0	1,987,034	1,364,662	38%	2,959	291	907	54	6
D35.11 - Production of electricity	2,909	1,224	0	19	2	-1	0	0	1,706,074	1,194,376	34%	1,979	236	640	54	6
D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	4	3	0	0	0	0	0	0	1,277	287	0%	4	0	0	0	2
D35.3 - Steam and air conditioning supply	2	0	0	0	0	0	0	0	2,858	642	0%	1	2	0	0	7
E - Water supply; sewerage, waste management and remediation activities	88	0	0	1	0	0	0	0	53,969	23,006	40%	68	6	13	0	4
F - Construction	1,163	0	0	142	38	-22	-1	-20	613,435	533,409	33%	679	125	330	31	7
F.41 - Construction of buildings	451	0	0	91	25	-15	0	-15	35,723	29,332	0%	356	32	61	3	4
F.42 - Civil engineering	514	0	0	43	6	-3	0	-2	462,957	398,906	58%	170	58	262	24	11
F.43 - Specialised construction activities	198	0	0	8	8	-3	0	-3	114,755	105,170	40%	153	35	6	4	4
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,536	320	0	224	138	-57	-8	-46	1,671,925	1,506,222	8%	2,815	466	180	76	4
H - Transportation and storage	6,020	96	0	92	22	-6	-1	-4	5,254,814	1,371,304	8%	3,326	1,043	1,620	30	8

H.49 - Land transport and transport via pipelines	169	96	0	16	2	-1	0	-1	41,035	16,169	60%	49	76	42	3	8
H.50 - Water transport	3,718	0	0	10	18	-3	0	-3	4,423,735	641,562	0%	2,976	731	11	0	4
H.51 - Air transport	268	0	0	0	0	0	0	0	427,855	409,302	87%	1	1	255	10	13
H.52 - Warehousing and support activities for transportation	1,843	0	0	63	2	-2	-1	0	353,803	296,109	7%	283	236	1,307	17	15
H.53 - Postal and courier activities	23	0	0	2	0	0	0	0	8,386	8,161	68%	17	0	5	0	6
I - Accommodation and food service activities	3,248	0	0	291	38	-15	-5	-7	211,984	147,509	1%	1,359	1,051	796	42	7
L - Real estate activities	2,666	0	0	289	38	-22	-6	-14	117,435	25,152	7%	1,798	607	158	102	5
Exposures towards sectors other than those that highly contribute to climate change*	**6,015**	**0**	**0**	**286**	**35**	**-55**	**-14**	**-12**				**4,099**	**1,178**	**501**	**236**	**5**
K - Financial and insurance activities	3,231	0	0	83	0	-12	-10	0				2.033	641	354	204	6
Exposures to other sectors (NACE codes J, M - U)	2,783	0	0	203	35	-43	-4	-12				2.066	538	147	32	4
TOTAL	**32,061**	**2,107**	**0**	**1,592**	**431**	**-237**	**-40**	**-153**	**15,799,260**	**9,418,386**	**17%**	**21,212**	**5,594**	**4,637**	**618**	**6**

Template 38b: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 31.12.2025

(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 (MIn EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (MIn 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	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						
Exposures towards sectors that highly contribute to climate change*	**24,329**	**2,368**	**0**	**1,203**	**380**	**-179**	**-29**	**-138**	**16,730,646**	**10,351,032**	**21%**	**15,471**	**4,506**	**3,324**	**1,027**	**6**
A - Agriculture, forestry and fishing	236	0	0	14	12	-4	0	-3	255,243	60,151	0%	214	17	2	3	3
B - Mining and quarrying	35	0	0	5	4	-2	0	-2	14,813	3,856	0%	31	2	1	1	4
B.05 - Mining of coal and lignite	0	0	0	0	0	0	0	0	231	60	0%	0	0	0	0	1
B.06 - Extraction of crude petroleum and natural gas	0	0	0	0	0	0	0	0	11	5	0%	0	0	0	0	1
B.07 - Mining of metal ores	10	0	0	0	1	0	0	0	8,330	2,165	0%	10	0	0	0	3
B.08 - Other mining and quarrying	22	0	0	4	3	-2	0	-1	5,943	1,549	0%	19	1	1	1	4
B.09 - Mining support service activities	2	0	0	0	0	0	0	0	298	77	0%	1	1	0	0	4
C - Manufacturing	4,625	597	0	204	124	-56	-5	-49	4,491,410	3,237,828	26%	3,607	879	91	48	4
C.10 - Manufacture of food products	1,231	0	0	75	32	-13	-1	-11	541,805	468,144	6%	849	366	8	7	4
C.11 - Manufacture of beverages	195	0	0	8	2	-1	0	-1	41,091	35,968	34%	139	51	2	2	3
C.12 - Manufacture of tobacco products	19	0	0	0	0	0	0	0	8,901	7,781	0%	19	0	0	0	2
C.13 - Manufacture of textiles	65	0	0	9	5	-3	0	-3	8,609	6,404	0%	31	20	12	2	7
C.14 - Manufacture of wearing apparel	46	0	0	5	12	-7	-1	-6	7,863	6,481	20%	38	2	2	4	5

C.15 - Manufacture of leather and related products	9	0	0	3	1	-1	0	-1	1,669	1,241	0%	6	1	0	1	7
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	2,495	1,990	0%	10	1	1	4	9
C.17 - Manufacture of pulp, paper and paperboard	144	0	0	5	7	-5	0	-4	31,416	17,962	0%	117	17	8	2	3
C.18 - Printing and service activities related to printing	22	0	0	3	4	-1	0	-1	2,850	2,093	0%	18	2	1	0	4
C.19 - Manufacture of coke oven products	597	597	0	0	0	0	0	0	1,827,265	1,467,146	79%	597	0	0	0	2
C.20 - Production of chemicals	220	0	0	7	7	-2	0	-2	91,056	51,187	5%	170	13	36	1	5
C.21 - Manufacture of pharmaceutical preparations	237	0	0	0	1	-1	0	-1	19,150	15,397	8%	175	62	0	0	3
C.22 - Manufacture of rubber products	181	0	0	2	15	-1	0	-1	30,474	25,521	4%	119	59	1	1	4
C.23 - Manufacture of other non-metallic mineral products	226	0	0	7	5	-3	-1	-2	604,404	116,002	74%	211	7	2	7	3
C.24 - Manufacture of basic metals	529	0	0	15	5	-2	0	-2	781,500	542,798	11%	460	67	1	1	4
C.25 - Manufacture of fabricated metal products, except machinery and equipment	172	0	0	31	4	-2	-1	-1	32,717	28,689	0%	130	31	4	6	4
C.26 - Manufacture of computer, electronic and optical products	57	0	0	1	0	0	0	0	4,951	4,652	35%	55	1	1	0	4
C.27 - Manufacture of electrical equipment	441	0	0	3	1	-1	0	-1	296,527	285,848	52%	272	166	2	0	3
C.28 - Manufacture of machinery and equipment n.e.c.	99	0	0	17	7	-5	0	-5	16,002	14,811	53%	92	4	2	1	3

C.29 - Manufacture of motor vehicles, trailers and semi-trailers	28	0	0	2	0	0	0	0	129,586	127,824	46%	27	1	0	1	3
C.30 - Manufacture of other transport equipment	24	0	0	0	1	0	0	0	2,434	2,217	0%	22	1	0	1	4
C.31 - Manufacture of furniture	32	0	0	2	4	-2	0	-1	3,580	3,165	0%	21	3	5	4	8
C.32 - Other manufacturing	23	0	0	3	2	-2	0	-1	3,090	2,720	0%	19	2	1	2	5
C.33 - Repair and installation of machinery and equipment	13	0	0	1	3	-2	0	-2	1,975	1,787	0%	11	0	2	1	5
D - Electricity, gas, steam and air conditioning supply	3,855	1,218	0	25	1	-2	0	0	1,963,632	1,344,383	31%	2,591	556	636	71	6
D35.1 - Electric power generation, transmission and distribution	3,836	1,201	0	25	1	-2	0	0	1,959,045	1,343,353	31%	2,574	555	636	71	6
D35.11 - Production of electricity	2,645	1,201	0	24	1	-1	0	0	1,676,306	1,163,175	28%	1,682	309	608	46	7
D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	17	17	0	0	0	0	0	0	1,612	362	0%	17	0	0	0	1
D35.3 - Steam and air conditioning supply	2	0	0	0	0	0	0	0	2,975	668	0%	1	1	0	0	7
E - Water supply; sewerage, waste management and remediation activities	76	0	0	1	0	0	0	0	49,980	25,065	38%	57	5	13	0	4
F - Construction	1,228	0	0	220	37	-23	-2	-21	439,974	389,761	29%	677	182	341	28	8
F.41 - Construction of buildings	527	0	0	163	26	-17	-1	-16	27,086	22,705	0%	375	91	58	3	5
F.42 - Civil engineering	491	0	0	47	4	-3	0	-2	271,336	235,641	62%	134	59	277	21	12
F.43 - Specialised construction activities	210	0	0	9	6	-3	0	-3	141,552	131,415	22%	168	32	6	4	4
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,486	457	0	199	131	-53	-8	-41	2,042,924	1,862,407	6%	2,779	364	261	83	4
H - Transportation and storage	5,396	96	0	39	21	-5	0	-4	7,205,487	3,283,033	8%	2,841	868	1,066	620	9
H.49 - Land transport and transport via pipelines	166	96	0	17	2	-1	0	-1	38,662	15,260	61%	45	76	42	3	8

H.50 - Water transport	3,271	0	0	2	19	-3	0	-3	4,450,199	646,520	0%	2,560	710	1	0	4
H.51 - Air transport	223	0	0	0	0	0	0	0	2,342,730	2,328,624	88%	2	2	220	0	13
H.52 - Warehousing and support activities for transportation	1,712	0	0	17	1	-1	0	0	363,088	282,109	7%	217	81	797	617	16
H.53 - Postal and courier activities	23	0	0	2	0	0	0	0	10,808	10,520	67%	17	0	6	0	7
I - Accommodation and food service activities	2,992	0	0	250	27	-12	-5	-5	163,649	127,004	2%	1,129	1.090	735	38	7
L - Real estate activities	2,402	0	0	247	23	-22	-8	-13	103,534	17,544	10%	1,546	542	177	136	6
Exposures towards sectors other than those that highly contribute to climate change*	**5,141**	**0**	**0**	**282**	**35**	**-47**	**-4**	**-11**				**3,860**	**666**	**399**	**216**	**5**
K - Financial and insurance activities	2,639	0	0	23	0	-2	0	0				1.961	225	270	182	5
Exposures to other sectors (NACE codes J, M - U)	2,502	0	0	259	35	-45	-4	-11				1.898	441	128	34	4
TOTAL	**29,469**	**2,368**	**0**	**1,485**	**414**	**-226**	**-33**	**-150**	**16,730,646**	**10,351,032**	**15%**	**19.331**	**5,173**	**3,722**	**1.243**	**6**

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. In 2025, Astrobank has been incorporated to the Alpha Bank Cyprus portfolio.

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

Energy consumption data includes actual EPC and estimates. 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 of estimates 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 data. 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 and non-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.

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 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.

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Template 39a: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 30.06.2026

(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**	14,089	1,001	4,349	2,277	1,901	371	1,438	484	154	223	202	112	74	189	12,651	78%
2	Of which Loans collateralised by commercial immovable property	6,968	212	864	554	1,526	287	1,128	195	73	136	51	26	3	11	6,473	63%
3	Of which Loans collateralised by residential immovable property	6,712	769	3,396	1,654	313	63	291	289	81	81	119	76	64	166	5,836	96%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	409	20	90	69	62	22	18	0	0	5	31	10	7	13	342	63%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	9,900	671	3,812	2,064	1,725	305	1,323								9,900	100%
6	**Total non-EU area**	738	381	154	7	0	0	48	2	127	225	135	46	2	5	198	25%
7	Of which Loans collateralised by commercial immovable property	435	202	54	7	0	0	47	2	77	99	57	21	0	4	174	28%
8	Of which Loans collateralised by residential immovable property	303	179	100	0	0	0	1	0	50	126	78	24	1	0	23	0%
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	50	0	0	0	0	0	47								50	95%

Alpha bank

Template 39b: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 31.12.2025

(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**	13,521	806	4,170	2,298	1,765	362	1,328	370	100	186	149	70	47	96	12,503	78%
2	Of which Loans collateralised by commercial immovable property	6,464	161	685	539	1,418	293	1,023	150	52	127	52	13	2	8	6,061	61%
3	Of which Loans collateralised by residential immovable property	6,701	643	3,399	1,690	298	53	292	220	48	54	71	48	38	75	6,147	95%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	356	2	87	70	49	16	13	0	0	5	26	10	7	13	295	60%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	9,712	587	3,769	2,117	1,641	313	1,285								9,712	100%
6	**Total non-EU area**	686	297	155	9	0	0	0	1	105	191	123	30	2	9	226	0%
7	Of which Loans collateralised by commercial immovable property	378	149	61	8	0	0	0	1	64	84	51	10	0	8	160	0%
8	Of which Loans collateralised by residential immovable property	308	148	94	0	0	0	0	0	41	107	73	20	1	0	66	0%
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

In 2024, Alpha Bank announced a first-round of sector targets across its lending and investment portfolios to align with the UNEP FI overarching principles of setting and disclosing long-term and intermediate targets to support meeting a net zero by 2050 greenhouse gas emissions goal.

The Bank's Transition Plan outlines the strategic objective of aligning its asset portfolio with Financed Emission reduction (Net Zero) goals and the broader economy's transition to more sustainable models, while scaling-up sustainable finance to capitalize **on evolving opportunities.** Specifically, the Transition Plan includes the actions, tools and decision-making framework that will enable the Bank to achieve its objectives.

2. Approach, applicable standards and key assumptions

The first round of sector targets across lending and investment portfolios, published in November 2024 and disclosed initially in the submission of 30.06.2025, represent a key milestone towards the Bank's net zero objective. For the purposes of establishing an emissions baseline, the Bank enhanced the measurement of financed emissions from 2022 onwards, covering lending and investment exposures across all sectors financed. Financed emissions are measured based on the greenhouse gas (GHG) emissions of borrowers and investee companies. The enhanced measurement resulted in a material increase in the coverage of the Bank's 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 performance improved following a temporary deviation from the IEA trajectory in 2025. This is also explained by the alignment with respective RAF limits covering drawn exposure.
- 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.

In this context, Alpha Bank has developed a Client Engagement Framework that promotes a consistent, and forward-looking engagement process across sectors and client segments. For clients within the Bank's Net Zero sector perimeter engagement is designed to support their transition and ultimately to enable the alignment of carbon-intensive sectors with global climate objectives. Client engagement is conducted on an annual basis focusing on the identification of transition opportunities, the mitigation of climate-related risks, the enhancement of data quality and availability to support regulatory reporting and the effective management of climate and environmental risks.

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, as well as 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 largely 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 targets in accordance with the UNEP FI target setting guidelines. The second wave of sectoral net-zero targets is expected to be finalized in 2026, subject to regulatory and methodological developments. Going forward, the Bank also intends to strengthen its existing sector-target monitoring processes and to expand its sustainable finance solutions to support its clients' transition through targeted engagement.

The Bank will also continue reviewing target setting methodologies and decarbonization pathways to ensure its target architecture remains robust, science-based and aligned with European and national policy frameworks.

Template 40a: Banking book - Climate change transition risk: Alignment metrics 30.06.2026

(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*	1.907,91	*123 kgCO2e/MWh*	*2026*	*0%*	*143,63*
2	Fossil fuel combustion	*1920*	403,73	*87 Indedexed tCO2e of 2022 = 100*	*2026*	*13%*	*77,35*
3	Automotive						
4	Aviation						
5	Maritime transport						
6	Cement, clinker and lime production	*2351*	192,67	*627 kgCO2e / t Cementitious product*	*2026*	*35%*	*596,91*
7	Iron and steel, coke, and metal ore production	*2410*	275,78	*404 kgCO2e / t Steel*	*2026*	*0%*	*1319,98*
8	Chemicals						
9	… potential additions relavant to the business model of the institution						

Template 40b: Banking book - Climate change transition risk: Alignment metrics 31.12.2025

(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*	1.745,62	*142 kgCO2e/MWh*	*2025*	*0%*	*155,00*
2	Fossil fuel combustion	*1920*	527,58	*104 Indedexed tCO2e of 2022 = 100*	*2025*	*36%*	*81,00*
3	Automotive						
4	Aviation						
5	Maritime transport						
6	Cement, clinker and lime production	*2351*	164,43	*623 kgCO2e / t Cementitious product*	*2025*	*34%*	*610,00*
7	Iron and steel, coke, and metal ore production	*2410*	261,33	*390 kgCO2e / t Steel*	*2025*	*0%*	*1379,76*
8	Chemicals						
9	… potential additions relavant to the business model of the institution						

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

Information includes exposures towards 1 (one) counterparty which is a subsidiary of a company 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: Transition-to pollut comp>: Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms 30.06.2026

(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	3,05	0,01%	0	0,6	1

Template 41b: Transition-topollutcomp>: Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms 31.12.2025

(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	16,97	0,06%	0	0,4	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. In 2025, Flexfin and Astrobank has been incorporated to the Alpha Bank and Alpha Bank Cyprus portfolio accordingly.

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 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.

While in 2025's analysis builds upon the previous methodology, new risks have been also assessed (i.e., ocean acidification, avalanches and solifluction). Additionally, the disaggregation of some risks that were previously assessed under one category was conducted and are now assessed into distinct categories (e.g., Changing temperature vs. Temperature variability, Soil erosion vs. Coastal erosion). This facilitated also the result aggregation of the examined physical risks into the four climate-related hazards classes (Temperature-, Wind-, Water-, Soil- related) of the EU Commission Delegated Regulation (EU) 2023/2486.

More specifically, the vulnerability assessment identifies 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 27 climate risks and for selected risks (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 (2026), medium (2030) and long-term (2050) time horizons. 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 (2026), 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 physical risks with the highest exposure on a country level (Heat stress, Water stress, Heatwaves, Droughts & Floods). Under the enhanced assessment the methodology remains the same, however the Bank proceeded with the development of Sensitivity analysis for the 27 climate hazards (Changing temperature, Temperature variability, Heat stress, Permafrost thawing, Changing wind patterns, Changing precipitation patterns and types, Precipitation or hydrological variability, Sea level rise, Water stress, Saline intrusion, Soil erosion, Coastal erosion, Soil degradation, Solifluction, Ocean acidification, Heatwaves, Coldwaves/ frost, Wildfire, Cyclone, hurricane, typhoon, Storm (blizzards, dust, sandstorms), Droughts, Tornado, Heavy precipitation (rain, hail, snow/ ice), Floods, Avalanches, Landslide, Subsidence), at the more granular level of top subsectors (NACE 2 level) in terms of Bank's outstanding gross carrying amount.
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 71,1% of the total Group NFC exposures.

Alpha bank

Template 42a: Banking book - Climate change physical risk: Exposures subject to physical risk 30.06.2026

(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	195	169	17	2	2	3	0	0	190	15	2	-1	0	-1
2	B - Mining and quarrying	26	2	0	0	0	3	0	0	2	0	1	0	0	0
3	C - Manufacturing	4,888	940	358	17	7	4	0	1,322	0	79	24	-9	-1	-7
4	D - Electricity, gas, steam and air conditioning supply	4,216	0	0	0	0	0	0	0	0	0	0	0	0	0
5	E - Water supply; sewerage, waste management and remediation activities	88	66	6	13	0	4	0	0	85	1	0	0	0	0
6	F - Construction	1,163	37	4	1	0	2	0	41	0	7	11	-10	0	-10
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,536	0	0	0	0	0	0	0	0	0	0	0	0	0
8	H - Transportation and storage	6,020	0	0	0	0	0	0	0	0	0	0	0	0	0
9	L - Real estate activities	2,666	81	3	0	0	3	84	0	0	5	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
10	Loans collateralised by residential immovable property	7,015	69	56	129	186	18	219	220	1	71	85	-10	-2	-6
11	Loans collateralised by commercial immovable property	7,403	373	256	212	67	9	270	631	7	157	35	-10	-2	-6
12	Repossessed colalterals	409	0	0	0	29	21	16	13	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 31.12.2025

(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	236	213	12	2	3	2	0	0	230	14	7	-1	0	-1
2	B - Mining and quarrying	35	2	1	0	0	3	0	0	3	0	1	0	0	0
3	C - Manufacturing	4,625	874	378	17	7	4	0	1,277	0	81	32	-13	-1	-12
4	D - Electricity, gas, steam and air conditioning supply	3,855	0	0	0	0	0	0	0	0	0	0	0	0	0
5	E - Water supply; sewerage, waste management and remediation activities	76	57	5	13	0	4	0	0	75	1	0	0	0	0
6	F - Construction	1,228	121	18	0	0	3	0	139	0	77	12	-11	0	-11
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,486	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
8	H - Transportation and storage	5,396	0	0	0	0	0	0	0	0	0	0	0	0	0
9	L - Real estate activities	2,402	63	1	0	0	2	64	0	0	5	0	0	0	0
10	Loans collateralised by residential immovable property	7,009	68	52	136	193	18	223	225	1	87	68	-11	-3	-6
11	Loans collateralised by commercial immovable property	6,842	345	270	232	75	9	256	660	6	178	27	-10	-4	-5
12	Repossessed colalterals	356	0	0	0	29	21	16	13	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 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. Considering these developments, Alpha Bank has decided to refrain from publishing templates 6 to 10 of the ESG Pillar III disclosures until December 31, 2026.

12 Appendix

11.1 Appendix I – Own Funds structure

Template 43: EU CC1 - Composition of regulatory own funds as of 30.06.2026

(Amounts in millions of Euro)

		a	a	b
		30.06.2026	31.12.2025	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	5.250	6.581	(a)
2	Retained earnings	2.649	1.761	(b)
3	Accumulated other comprehensive income (and other reserves)	93	(1.142)	(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	229	540	(b)
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**8.220**	**7.741**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	(4)	(3)	
8	Intangible assets (net of related tax liability) (negative amount)	(480)	(441)	(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)	(181)	(210)	(e)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	108	153	(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)	(503)	(225)	(a)
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)	-	-	

		a	a	b
		30.06.2026	31.12.2025	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
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	(43)	(61)	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-	
EU-20c	of which: securitisation positions (negative amount)	(43)	(61)	
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)	(1.699)	(1.621)	(e)
22	Amount exceeding the 17,65% threshold (negative amount)	-	-	(e)
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	-	-	(e)
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	(421)	(347)	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**(3.223)**	**(2.755)**	
29	**Common Equity Tier 1 (CET1) capital**	**4.997**	**4.986**	
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	-	-	

		a	a	b
		30.06.2026	31.12.2025	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
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	-	-	(g)
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**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**5.697**	**5.686**	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	1.037	1.015	(h)
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	-	-	(g)
EU-47a	Amount of qualifying items referred to in Article 494a (2) CRR subject to phase out from T2	-	-	

		a	a	b
		30.06.2026	31.12.2025	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
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**	**1.037**	**1.015**	
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	1.037	1.015	
59	**Total capital (TC = T1 + T2)**	**6.734**	**6.702**	
60	**Total Risk exposure amount**	**34.833**	**32.482**	
Capital ratios and buffers				
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	14,35%	15,35%	
62	Tier 1 (as a percentage of total risk exposure amount)	16,36%	17,51%	
63	Total capital (as a percentage of total risk exposure amount)	19,33%	20,63%	

		a	a	b
		30.06.2026	31.12.2025	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
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)	10,08%	10,12%	
65	of which: capital conservation buffer requirement	2,50%	2,50%	
66	of which: countercyclical buffer requirement	0,44%	0,43%	
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	1,63%	1,69%	
68	**Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)**	8,18%	9,16%	
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)	104	97	
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)	17	9	
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)	711	695	
Applicable caps on the inclusion of provisions in Tier 2				
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	-	-	

		a	a	b
		30.06.2026	31.12.2025	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
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)	-	-	

12.2 Appendix II – Net Stable Funding Ratio

Template 44a: EU LIQ2: Net Stable Funding Ratio as of 31.12.2025

(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	**8.762**	**141**	**-**	**1.015**	**9.778**
2	*Own funds*	8.762	141	-	1.015	9.778
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		**38.438**	**1.916**	**6**	**37.535**
5	*Stable deposits*		23.341	876	2	23.008
6	*Less stable deposits*		15.097	1.040	4	14.527
7	Wholesale funding:		**19.325**	**1.316**	**3.082**	**9.921**
8	*Operational deposits*		286	-	-	143
9	*Other wholesale funding*		19.040	1.316	3.082	9.778
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**140**	**1.152**	**-**	**65**	**65**
12	*NSFR derivative liabilities*	140				
13	*All other liabilities and capital instruments not included in the above categories*		1.152	-	65	65
14	**Total available stable funding (ASF)**					**57.299**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**387**
16	Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
17	Performing loans and securities:		**3.985**	**3.812**	**37.703**	**34.638**
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*		243	1	499	524
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3.493	3.497	24.237	27.118
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		217	422	2.162	4.661
22	*Performing residential mortgages, of which:*		104	136	4.948	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		104	105	4.356	-

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
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*		145	177	8.019	6.996
25	Interdependent assets		-	-	-	-
26	Other assets:		**1.519**	**37**	**9.570**	**9.837**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	263	224
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		628			31
31	*All other assets not included in the above categories*		891	37	9.307	9.582
32	Off-balance sheet items		**640**	**1.227**	**5.379**	**803**
33	**Total RSF**					**45.665**
34	**Net Stable Funding Ratio (%)**					**125%**

Template 44b: EU LIQ2: Net Stable Funding Ratio as of 30.09.2025

(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	**8.666**	**139**	**6**	**999**	**9.664**
2	*Own funds*	8.666	139	6	999	9.664
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		**36.555**	**1.785**	**2**	**35.669**
5	*Stable deposits*		22.401	819	1	22.060
6	*Less stable deposits*		14.154	966	1	13.608
7	Wholesale funding:		**20.203**	**353**	**2.438**	**9.172**
8	*Operational deposits*		319	-	-	159
9	*Other wholesale funding*		19.885	353	2.438	9.013
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	**72**	**1.170**	**-**	**69**	**69**
12	*NSFR derivative liabilities*	72				
13	*All other liabilities and capital instruments not included in the above categories*		1.170	-	69	69
14	**Total available stable funding (ASF)**					**54.575**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**383**
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		**4.238**	**2.730**	**36.394**	**33.127**
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*		172	1	456	474
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3.840	2.437	23.064	25.826
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		201	205	2.131	4.569
22	*Performing residential mortgages, of which:*		105	136	5.027	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		105	107	4.422	-

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
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*		120	155	7.847	6.827
25	Interdependent assets		**-**	**-**	**-**	**-**
26	Other assets:		**1.413**	**30**	**9.094**	**9.350**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	265	225
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		613			31
31	*All other assets not included in the above categories*		801	30	8.830	9.095
32	Off-balance sheet items		**857**	**1.128**	**4.764**	**756**
33	**Total RSF**					**43.616**
34	**Net Stable Funding Ratio (%)**					**125%**

Template 44c: 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**
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	-

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
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%**