

Alpha Bank SA

2025 Responsible Banking Progress Statement





Summary template

In this Progress Statement for 2025 Alpha Bank Group has reported information and made references to the Sustainability Statement which was published within the Annual Management Report 2025. The information disclosed under the six (6) PRB Principles pertain to material impacts, risks and opportunities regarding the Group’s own operations and downstream value chain as per the requirements of the Corporate Sustainability Reporting Directive and the Greek Law 5164/2024.

Alpha Bank completed on 27.6.2025 the reverse merger by absorption (hereinafter the “Merger”) of “Alpha Services and Holdings S.A.” by Alpha Bank pursuant to the applicable legislation. Through the Merger Alpha Bank became the parent entity of the Group whilst Alpha Services and Holdings S.A. was merged into Alpha Bank.

Principle 1: Alignment

Content

Briefly describe your bank’s sustainability strategy, and which international, regional or national frameworks and UN Sustainable Development Goals it aims to align with. Note any changes in the reporting year

Alpha Bank’s purpose is to enable progress in life and business for a better tomorrow, underpinned by its core values of excellence, efficiency, collaboration, and empowerment. These values guide the Group in fostering strong, trusting relationships with Customers, supporting businesses in the transition towards a sustainable economy, and addressing social issues linked to equality and financial health.

The Group has adopted a Strategy for Sustainable Development which aims to mitigate material negative impacts arising from its financing activities and its operations, while enhancing its positive impacts on the environment, society, and the economy, and ensuring best practice in Corporate Governance. This Strategy is designed to guide the transition towards a low-carbon, resilient, and sustainable future. It reflects the Group’s commitment to align with international objectives set by the Paris Agreement on Climate Change and the United Nations 2030 Agenda for Sustainable Development and supports the broader economy through responsible financing practices. It also supports financial stability, alignment with regulatory expectations, and long-term value for stakeholders including investors, Employees, Clients, while ensuring responsible business conduct.

Key developments during 2025 included the following:

- Alpha Bank launched a comprehensive Transition Plan which provides a structured, forward-looking approach to addressing ESG-related financial risks and supporting climate change mitigation in alignment with the Paris Agreement, while maintaining prudence in risk management and supporting Clients in the transition to a more sustainable economy.
- In January 2025, the Bank launched its Green Bond Framework (GBF), providing a structured and transparent approach for financing environmentally beneficial activities. Under the Framework, in October 2025, the Bank completed the successful issuance of Euro 500 million Green Senior Preferred Bond. The transaction was more than six times oversubscribed, underscoring the depth of investor confidence in Alpha Bank’s renewed financial standing and strategic direction.
- In 2025 the implementation of the Sustainable Finance Framework (SFF) further advanced the Group’s commitment to sustainable lending, resulting in Euro 2.1 billion of new financing classified under the Framework’s criteria.

The Group’s sustainability strategy is structured around three overarching priorities:

Support an environmentally sustainable economy

- Support its Customers’ decarbonization and align its portfolio emissions with the objectives set in the Paris Agreement

- Mitigate key drivers of biodiversity loss
- Support the transition to a circular economy
- Achieve Net Zero emissions in its own operations

Foster healthy economies and societal progress

- Enhance people’s financial health through inclusive access to financing
- Provide an inclusive and safe work environment
- Support inclusivity and access to Healthcare, Education, Culture and Heritage

Ensure a robust and transparent governance

- Ensure the Diversity and Independence of the Board of Directors
- Embed sustainability in Governance practices and strategy
- Enhance transparency and safeguard business ethics

Finally, the Group’s Strategy considers the UN Sustainable Development Goals and aligns with the Paris Agreement. Its sustainability approach and disclosures align with the applicable European and national frameworks and requirements, including the EU Taxonomy, the Corporate Sustainability Reporting Directive (CSRD) and its transposition into the Greek law, the Greek National Energy and Climate Plan (NECP), the Sustainable Finance Disclosure Regulation (SFDR) and relevant ECB disclosure and supervisory requirements.

Links & references

- [2025 Sustainability Statement \(under CSRD\)](#):

[ESRS 2] ‘General disclosures ‘Strategy, business model and value chain’- p. 46

[E1-1] ‘Transition plan for climate change mitigation’- p.82

- [Alpha Bank Q4 2025 Results- Investor Presentation](#)

- [Alpha Bank Green Bond Framework](#)

Principle 2: Impact & Target Setting

Briefly describe the bank’s most significant impact areas and the steps taken to identify, measure and manage them—including impact analysis results, targets set (including sectors, portfolio coverage, and KPIs), actions taken, and progress against the targets. Where targets have been set, share details of the bank’s transition/action plan, and progress made. Explain how the bank addressed interlinkages between impact areas where possible.

In 2025, we further enhanced our Double Materiality Assessment (DMA) which encompassed both impact and financial materiality perspectives, in accordance with the requirements of the European Sustainability Reporting Standards (ESRS).

For the identification of impacts in the **upstream** value chain, the Group applied the UNEP FI Sector Impact Map to selected NACE sectors determined based on the Bank’s supplier spending.

For the **downstream** impact identification and assessment, we applied the relevant UNEP FI Portfolio Impact Analysis Tools, namely the Investment Portfolio Impact Analysis Tool, Consumer Banking and Institutional Banking Identification Modules, and Real Estate Impact Analysis tool, to the respective portfolios. The analysis also used sector-impact associations from the UNEP FI Sector-Impact Map, in accordance with the UNEP FI Impact Protocol.

The Group also used the ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) tool to assess nature-related financial risks within its portfolio. Findings from the impact-driven risk analysis using ENCORE have been considered as an overlay for identifying and assessing negative environmental impacts.

Finally, the impact materiality analysis for **own operations** was based on the material impacts reported in the 2024 Sustainability Statement and on impacts identified through an ESG standards review and a peer review. To ensure completeness, the Bank further assessed whether the identified impacts accurately reflected its actual impacts on people and the environment.

Material impacts results

Material impacts for the short-, medium-, and long-term time horizons are associated with the Group's own operations, the downstream value chain, Employees and Customers in countries where the Group operates.

More specifically, material impacts in the **downstream value chain** included:

- Climate Stability
- Biodiversity and Ecosystems
- Resource use and circular economy
- Access to Housing
- Access to Finance
- Contribution to Healthy Economies

Material impacts have also been identified in our **own operations** linked to:

- Climate Stability
- Contribution to Livelihood of own workforce
- Training and Skills development
- Contribution to Equality and Justice of own workforce
- Contribution to Health and Safety of own workforce

The impact "Contribution to Transparency and the Rule of Law" governs the way the Group operates **across its value chain**, regardless of the differing materiality levels of its individual value chain segments. No material impacts were identified specifically for the upstream value chain, given its comparatively low materiality in the context of the Group's activities and business model.

Progress on Targets

As a financial institution, Alpha Bank recognizes its role in helping to steer financial flows toward the transition to a low-carbon economy. Our Transition Plan outlines the operationalization of the Group's sustainability strategy by defining the actions, tools, and decision frameworks that will enable the portfolio to align with a 1.5°C pathway. It links the Bank's climate ambitions to portfolio steering, sustainable finance growth, Customer engagement, risk assessment and the development of internal capabilities.

Key instruments supporting the decarbonisation of the lending and investment portfolios include the introduction of net zero targets for 2050, interim 2030 sectoral targets, and risk appetite metrics to control the exposure in sensitive to transition sectors.

In 2024, Alpha Bank announced its 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 the net zero by 2050 greenhouse gas emissions goal. Alpha Bank employs the widely used, science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE 2050) scenario as its benchmark pathway to set 2030 interim targets and ultimately converge towards net zero by 2050.

Alpha 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.

A second wave of sectoral net-zero targets is expected to be finalized in 2026, subject to regulatory and methodological developments. The Bank also intends to strengthen its existing sector-target monitoring processes.

As part of the commitment to support the transition to a more sustainable economy, Alpha Bank has committed to:

- Allocate Euro 3.8 billion to new Sustainable Financings in 2025-2027, and within this amount,
- Achieve at least Euro 2.6 billion to Renewable Energy Systems by 2026.

In 2025, Euro 2.1 billion of new financing was classified under the Sustainable Finance Framework criteria, while Euro 0.77 billion was allocated to renewable energy systems.

2025 progress on other PRB relevant KPIs:

- Biodiversity and ecosystems: The Group maintained its target of zero financing to specified activities harming species diversity, habitats and waterbodies. Compliance is monitored through the Group's Exclusion List and established credit risk processes. The target was achieved in 2025, as no new financing was allocated to any excluded category.
- Gender diversity: The Group aims to maintain women's representation in managerial positions above 40%. Women represented 43% of managerial positions in 2025.
- Youth employment: The Group has set a target to increase employment youth employment by 20%. As an enabler to this target, 53% of new hires recorded in 2025 were Employees under the age of 30.
- Accessible branches: The Group targeted increasing access for people with mobility limitations to 85% of its branches. In 2025, 87% of the branches at Group level were reported as accessible.
- Financial inclusion: The Group supports financial inclusion through educational programs addressed to teachers, students, women, and people over 55. Four programs were implemented in 2025 reaching 24,600 beneficiaries.

Additional progress on targets related to the support of an environmentally sustainable economy is included under the "Principle 3: Clients and Customers".

Links & references

- [2025 Sustainability Statement \(under CSRD\):](#)

[IRO-1] 'Description of the process to identify and assess material impacts, risks and opportunities' -pg.60

[E1-1] 'Transition plan for climate change mitigation'-p.82

[E1-4] 'Targets related to climate change mitigation and adaptation'- p.102

[E4-4] 'Targets related to biodiversity and ecosystems'- p.112

[S1-5] 'Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities'- p.128

[S4-5] 'Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities'- p.145

Principle 3: Clients & Customers

Briefly describe how the bank works responsibly with Clients and customers in relation to significant impacts, including products and services offered, internal policies and processes and engagement to implement targets/action plans/transition plans to encourage sustainable practices/economic activities.

Note any changes in the reporting year.

We are committed to supporting our Customers' decarbonization journey by enhancing our business model and incorporating actions to promote sustainable practices. We are actively increasing transparency, and mitigating reputational, financial, and regulatory risks, while fostering long-term value creation for all Stakeholders.

To support this objective, we offer tailored financial products and services, that enable corporate and SME Customers to invest in renewable energy, waste reduction, and the transition towards sustainable operations, thereby contributing to systemic change across sectors. Through the Group's activities and the introduction of new sustainability-focused products we also support Retail Customers in making more sustainable financial decisions while improving access to finance and affordable housing. Furthermore, we provide inclusive banking services to underserved communities, fostering greater financial inclusion.

We further support our Customers' transition to a low carbon economy by monitoring relevant carbon-related data and offering advice and flexible financing solutions.

Access to funding is also facilitated through co-funding initiatives such as the EU Recovery and Resilience Facility Green Transition pillar and Green Co-Financing Loans offered in collaboration with the Hellenic Development Bank. For individual Customers, the Bank offers a variety of green loans with preferential interest rates for green mortgages, home energy upgrades, eco-friendly transportation, and energy-efficient home equipment such as photovoltaic panels and heat pumps. Finally, Private Banking Customers are also supported through access to investment products that promote environmental or social characteristics or have sustainable investment objectives under the SFDR, as well as through the integration of EU Taxonomy considerations into product selection and advisory processes.

Progress during 2025

In 2025 the Group's commitment to sustainable lending activities led to:

- Euro 2.1 billion of new financing being classified in alignment with the Sustainable Finance Framework's criteria, including:
 - Euro 769.35 million to Renewable Energy Systems;
 - Euro 328.4 million in new financing volumes to Retail Green and Social Loans;
 - Euro 6.6 million to new Recycling and Reuse financing.
- Financing provided to gambling, tobacco and alcoholic beverages represented 1.42% of the total loan portfolio, remaining below the Group's 5% cap for these activities.

ESG due diligence and Customer assessment

Alpha Bank has developed an ESG due diligence process, applicable to corporate Customers that are legal entities. It draws on an inter-bank initiative that has introduced ESG questionnaires, including sector specific and simplified for smaller businesses. The information collected is used to calculate an internal ESG Risk Score at obligor level and informs credit assessment, pricing, and the Customer-engagement approach. As a result, Customers are encouraged to clearly define and communicate their commitments and to develop and execute effective strategies to mitigate risks and improve their ESG performance.

Client Engagement Framework

The Client Engagement Framework has been developed to ensure a consistent and forward-looking engagement process across sectors and client segments and to support alignment with relevant regulatory and prudential expectations, including the EBA Guidelines on the management of ESG risks.

It aims at strengthening 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.

The engagement model centers around the systematic evaluation of 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 agreeing a time-bound and realistic **Action Plan** with the client to remediate identified gaps, with progress monitored at least annually. Depending on the severity of the risk and the Client's credit exposure, engagement may take place more frequently, including biannually or quarterly. Credit pricing may be linked to risk remediation, where appropriate.
- For Clients within the scope of the Bank's Net Zero sector perimeter, engagement focuses on supporting their transition and, ultimately, steering high-carbon sectors towards the Bank's sectoral decarbonization pathways. This includes identifying alignment gaps, facilitating access to sustainable finance solutions, advising on transition strategies and reporting structures, and escalating material misalignment where appropriate.
- 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 improve their resilience to future regulatory developments and climate change, while identifying opportunities related to energy efficiency, circularity, clean mobility and sustainability linked financing.

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

related to specific transactions, the matter is escalated to the relevant governance body. Transaction-specific issues may be escalated to the Credit Committee, while strategically significant matters may be escalated to the Group Sustainability Committee and, where appropriate, to the Executive Committee or Board of Directors.

Links & references

- [2025 Sustainability Statement \(under CSRD\)](#):

[SBM-1] 'Strategy, business model and value chain'- p.46

[E1-1] 'Transition plan for climate change mitigation'- p. 82

[E1-4] 'Targets related to climate change mitigation and adaptation'- p.102

[E5-3] 'Targets related to resource use and circular economy'- p.114

[S4-4] 'Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those action'- p.142

[S4-5] 'Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities'- p.145

'Contribution to Healthy Economies'- p.149

- [Sustainable Finance Framework \(SFF\)](#)

Principle 4: Stakeholders

Briefly describe how the bank consults, engages and collaborates/partners with relevant stakeholders for the purpose of implementing the Principles. This could include understanding impacts, setting ambitious targets, advocating for enabling regulatory/policy environments, and creating partnerships that contribute to addressing significant impacts. Note any changes in the reporting year.

At Alpha Bank, we recognize that meaningful stakeholder engagement is essential to our responsible banking approach and to shaping a relevant, forward-looking sustainability strategy that creates long-term value. Our engagement approach includes a diverse range of internal and external stakeholders whose priorities influence our strategic decisions and operations. Stakeholder engagement supports the implementation of the Principles of Responsible Banking by helping the Group identify and assess its most significant impacts, inform sustainability-related policies and targets, strengthen ESG risk management, and develop financing solutions that address environmental and social needs.

As identified through the Double Materiality Assessment (DMA) and the stakeholder analysis conducted in 2025, the Group maintains continuous and structured engagement with its key stakeholders. The 2025 stakeholder analysis applied ESRS-based criteria to identify and prioritize stakeholders according to their level of influence, interest and exposure to the Group's impacts and decisions. Based on this analysis, four priority stakeholder groups were identified, and their perspectives and expertise inform our decision-making processes. Our engagement approach is built on transparency, regular communication, and meaningful dialogue.

Engagement takes place through structured, regular processes, ad-hoc dialogue, and we employ multiple channels and mechanisms tailored to different stakeholder needs.

- **Investors and Shareholders:** We maintain engagement through General Meetings, investor briefings, one-to-one meetings, our annual sustainability and corporate governance roadshow, quarterly and annual results presentations, and dialogue with equity, fixed-income and ESG-focused investors. The Group also participates in sustainable finance conferences and industry forums, which facilitate dialogue with investors, peers, and other market participants on emerging sustainability priorities and practices.

Feedback received through these channels, together with relevant input arising from ESG ratings and assessments, informs the Group's sustainability strategy, disclosures, climate-risk management and governance.

- **Customers:** Engagement occurs through the branch network, Relationship Managers, Customer satisfaction surveys, online and mobile channels, Customer service channels and corporate service centers for wholesale Customers. The Group also engages directly with wholesale and retail Customers, including large corporate Customers, SMEs, and small businesses. Customer feedback supports the development of relevant financing solutions, advisory services and improvements in service delivery.
- **Employees and Society:** We conduct regular employee engagement surveys, townhall meetings, targeted internal communications and training, engagement with employee representative bodies and trade unions, community engagement activities, dialogue with civil society and NGO representatives, volunteering initiatives, sponsorships, and financial literacy and financial inclusion programs. Feedback from Employees and communities informs initiatives relating to Diversity, Equity and Inclusion, health and safety, employee wellbeing, financial inclusion, and financial literacy.
- **Regulatory and Supervisory Authorities:** We maintain engagement through regulatory filings, supervisory submissions, compliance reporting, direct consultations, bilateral supervisory dialogue and participation in thematic regulatory working groups, including those relating to climate risk and ESG-risk reporting under EU legislation. Such engagement helps the Group understand evolving regulatory and supervisory expectations and informs enhancements to ESG risk integration, sustainability reporting processes, governance and alignment with applicable European and national requirements.

The Group also engages with relevant value-chain stakeholders, including suppliers and business partners, through due diligence, onboarding and ESG-assessment processes. The Group follows a structured process to review stakeholder feedback, escalate material issues to Senior Management and relevant Board of Directors' Committees, and integrate stakeholder perspectives into the Double Materiality Assessment, strategic planning and related decision-making. Where relevant, this may inform management action plans and updates to policies, products, risk methodologies and sustainability initiatives and targets.

Updates from stakeholder engagement activities are communicated to Senior Management, the Board of Directors and its relevant Committees through regular reports and designated meetings. This supports the consideration of stakeholder views on sustainability-related impacts, risks and opportunities in strategic planning and decision-making.

Alpha Bank collaborates through international initiatives and partnerships that support the implementation of the Principles, and the management of significant environmental and social impacts. The Bank participates in UNEP FI initiatives and working groups and uses relevant tools and guidance to assess portfolio impacts and informs its sustainability objectives. Participation in the UN Global Compact supports alignment with broader sustainability principles, while partnerships with civil society and community organizations contribute to financial literacy and financial inclusion initiatives.

In 2025, the Group updated its stakeholder mapping and prioritization exercise as part of the Double Materiality Assessment. The assessment drew on stakeholder engagement outputs generated throughout the year, dedicated meetings with stakeholder representatives and the results of a wholesale Customer engagement survey. This provided additional input into the identification and prioritization of sustainability-related impacts, risks and opportunities and informed the Group's strategic-planning process.

Our stakeholder engagement practices are reviewed on an ongoing basis through the annual strategic planning and materiality assessment processes to ensure they remain inclusive, relevant, and responsive to evolving expectations. We maintain open and transparent communication channels, providing regular updates through sustainability disclosures and investor briefings.

Looking ahead, we plan to continue enhancing our stakeholder engagement to reach broader stakeholder audiences, where appropriate, and facilitate more interactive dialogue. We will continue to strengthen our partnerships with civil society organizations and explore new collaborative initiatives that leverage our expertise and resources to create positive social and environmental impact.

Links & references

- [2025 Sustainability Statement \(under CSRD\)](#):
[SBM-2] 'Interests and views of stakeholders'- p.49

Principle 5: Governance & Culture

Briefly describe the key governance structures in place (Board and Executive level) and related accountability mechanisms to implement the Principles. This could include how governance supports your bank's management of significant impacts and risks, including target implementation and monitoring of action/transition plans. In addition, briefly describe how a culture of responsible banking is driven internally (e.g. via employee learning & development). Note any changes or progress in the reporting period.

We integrate responsible banking principles into our governance structure to ensure accountability, oversight, and alignment across all organizational levels. Our governance framework supports PRB implementation through clear roles, performance measurement, and ongoing monitoring of sustainability-related impacts, risks, opportunities, commitments and targets.

Governance

The **Board of Directors (BoD)** holds ultimate responsibility for Alpha Bank, ensuring effective governance that promotes prudent and sustainable management. Key responsibilities include approving and overseeing the implementation of the Group's strategic objectives, risk management, and ESG strategy, as well as ensuring compliance with legal and regulatory frameworks. The BoD approves the Group's ESG-related targets and receives quarterly reporting on progress against the associated commitments and KPIs. Four (4) Committees operate at BoD level, each with an advisory role and with the possibility to assume delegated authorities, as determined by the BoD. Their respective Charters define their duties and support clear accountability.

Among the key responsibilities of the **Corporate Governance, Sustainability, and Nominations Committee (CGSNC)** is to support 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 **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 **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 **Remuneration Committee**, among others, assesses the alignment of the Remuneration Policy with the Bank's ESG objectives, risk appetite, values, and long-term strategy.

At Executive level, the Group Sustainability Committee oversees sustainability matters, steers the Group's ESG Strategy, and oversees its implementation. In addition, it ensures that the Executive Committee is informed on key matters discussed and decisions taken. The Group Sustainability Committee also supports the Board of Directors in its oversight of Climate & ESG Risks and Sustainability issues.

At 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.

Culture

We maintain a corporate culture that leverages the Group's Purpose and Values as a compass, supported by a robust set of policies covering key business conduct topics material to the Group and central to its operational effectiveness. At the core of our Corporate Culture sits the Code of Conduct and Ethics, providing clear guidance on conducting business in an ethical manner. The Code applies to the Group's personnel and

BoD Members, while relevant ethical expectations also extend, as applicable, to parties connected with the Group through formal agreements.

Training and Development play a central role in embedding the Group's policies, ESG strategy and responsible banking commitments.

The ESG Academy prioritizes three learning paths for its Employees: (i) ESG Awareness, (ii) Fundamentals towards ESG integration, (iii) Technical capabilities for ESG. The training is designed to build understanding of ESG and climate risks and their integration into the Bank's core operations, procedures, and Customer engagement.

In 2025, 60% of the 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. 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 BoD received ESG-related training covering the Climate Mitigation Journey (UNEP FI). BoD Members are also offered the opportunity to participate in training and education sessions provided by external institutions and, upon request, tailor-made programs to further enhance their knowledge and competences.

Our corporate ethics and compliance framework is supported by policies and related training on Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT), Anti-bribery and Corruption, Prevention of Conflicts of Interests, Whistleblowing, and other key conduct matters. In 2025, mandatory business conduct and compliance learning continued across the Group, including training on the Code of Conduct and Ethics, anti-bribery and corruption, anti-money laundering and whistleblowing. This complements the ESG Academy and supports a broader culture of ethical and responsible banking.

During 2025, the Group continued to strengthen the implementation of its ESG governance and capability-building framework, with increased emphasis on accountability, role-specific expertise and the integration of sustainability considerations into business, risk and decision-making processes.

Links & references

- [2025 Sustainability Statement \(under CSRD\)](#):
 - [GOV-1] 'The role of the administrative, management and supervisory bodies'-p.42
 - [GOV-2] 'Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies'- p.45
 - [GOV-3] 'Integration of sustainability-related performance in incentive schemes' -p.45
 - [G1-1] 'Business conduct policies and corporate culture'- p.150
- [2025 Corporate Governance Statement](#)- F12. 'Induction and Training'- p.194
- [2025 Remuneration Policy of the Members of the Board of Directors](#)

Principle 6: Transparency & Accountability

Content

Provide reference to additional relevant reports, if not listed as references with P1–P5.
Briefly note whether/where assurance of sustainability information has been undertaken (optional).

The information outlined in the Summary template reflects Alpha Bank Group's commitment to the six Principles. In particular, the sustainability information subject to Independent Limited Assurance in accordance with ISAE 3000 (Revised) has been drawn from the Group's FY25 Sustainability Statement under CSRD.

Links & references

[2025 Annual Management Report:](#)

'Independent Auditor's Report on Sustainability Statement' - pp.236

Additional Reports:

[2025 CDP Corporate Questionnaire](#)

[2025 ESG Databook](#)