



ALPHA BANK



 **CDP**

Discloser
2026

Alpha Bank



CDP Corporate Questionnaire 2026

Word version

Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

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C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☒ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☒ EUR

(1.3) Provide an overview and introduction to your organization.

(1.3.1) Type of financial institution

Select from:

☒ Bank

(1.3.2) Organization type

Select from:

☒ Publicly traded organization

(1.3.3) Description of organization

Alpha Bank S.A. is one of the largest financial institutions in Greece, founded in 1879, offering a comprehensive range of financial products and services, including retail banking, banking for small, medium and large enterprises, corporate and investment banking, wealth management, private banking, insurance products, brokerage services and real estate management. As of 31 December 2025, Alpha Bank Group employed 6,992 people by headcount, including 6,068 in Greece. In 2025, following the completion of the merger by absorption of Alpha Services and Holdings S.A. by Alpha Bank S.A. — the reverse merger — Alpha Bank S.A. became the listed parent company of the Group. The Bank operates through four core business segments: Retail Banking, Wholesale Banking, Wealth Management and the International Network, providing integrated financial solutions to individuals, businesses and institutional clients. Through its Gold Personal Banking and Private Banking services, as well as its Brokerage and Asset Management subsidiaries, the Bank offers specialized investment and wealth management solutions tailored to customer needs. Alpha Bank is committed to conducting its business responsibly and creating sustainable long-term value for its Shareholders, Customers,

Employees and society. Its strategic priorities focus on delivering sustainable profitability while maintaining a resilient balance sheet, strengthening capital generation and supporting sustainable economic growth. Sustainability is embedded across the Bank's governance, including risk management and remuneration frameworks, business model, operations and financed products and services. The Bank's approach is guided by three strategic commitments: supporting an environmentally sustainable economy, fostering healthy economies and societal progress, and ensuring robust and transparent governance. Accordingly, scaling up sustainable finance remains one of the Bank's key strategic priorities, enabling it to support clients' transition efforts while responding to increasing demand for sustainable financial solutions. A significant milestone during 2025 was the disclosure of Alpha Bank's Transition Plan within its FY2025 Sustainability Statement, which establishes the Bank's strategic roadmap for supporting the transition to a low-carbon economy and aligning its activities with the objectives of the Paris Agreement and the European Union's climate ambitions. The Transition Plan outlines the Bank's decarbonisation strategy, governance framework, sectoral priorities, sustainable finance ambitions and financed emissions targets, providing a transparent framework for monitoring progress over time. Building on its commitment under the Net-Zero Banking Alliance (NZBA), the Bank established its first portfolio-level financed emissions targets for selected carbon-intensive sectors in 2024. During 2025, Alpha Bank continued to make steady progress towards these targets through active client engagement, the expansion of sustainable financing activities and the integration of climate-related considerations into business processes. As methodologies, data availability and regulatory expectations continue to evolve, the Bank expects to further strengthen its climate strategy and establish additional targets over time. The Bank seeks to continuously enhance its positive contribution to society while minimizing adverse environmental and social impacts. To achieve this objective, it sets short-, medium- and long-term sustainability objectives, monitors progress through qualitative and quantitative performance indicators and regularly engages with stakeholders to identify emerging sustainability topics and strengthen its approach to responsible banking. The Bank's commitment to sustainability continues to be recognized by leading ESG rating agencies and market indices. In 2025, Alpha Bank retained ISS ESG PRIME Status with a Corporate Rating of "C" and maintained an MSCI ESG Rating of "AA". The Bank also remained a constituent of the FTSE4Good Index Series and the ATHEX ESG Index, reflecting the continued integration of ESG considerations into its strategy and operations. Since November 2014, the Group has been supervised under the Single Supervisory Mechanism (SSM) and, as a significant credit institution, is directly supervised by the European Central Bank. Furthermore, in 2025, the Group published its second Sustainability Statement in accordance with the Corporate Sustainability Reporting Directive (CSRD), as transposed into Greek legislation through Law 5164/2024, and the European Sustainability Reporting Standards (ESRS). The Statement provides comprehensive, standardized disclosures and is subject to independent limited assurance in accordance with ISAE 3000 (Revised) on environmental, social and governance matters, enhancing transparency while supporting the European Union's sustainable finance objectives.

[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/31/2025

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

☒ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

☒ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

☒ 1 year

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:

☒ 1 year

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:

☒ 1 year

[Fixed row]

(1.4.1) What is your organization’s annual revenue for the reporting period?

2205910104

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from:

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	☒ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

GRS830003000

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

(1.6.2) Provide your unique identifier

ALPHA GA

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

☒ Cyprus

☒ Greece

☒ Serbia

☒ Ireland

☒ Romania

☒ Bulgaria

☒ Luxembourg

☒ United Kingdom

(1.9) What was the size of your organization based on total assets value at the end of the reporting period?

77458803696

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

Banking (Bank)

(1.10.1) Activity undertaken

Select from:

☒ Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

☒ Yes, both the portfolio value and the % of revenue associated with it

(1.10.4) Portfolio value based on total assets

75223451361

(1.10.5) % of revenue

90

(1.10.6) Type of clients

Select all that apply

- ☒ Corporates (Large companies)
- ☒ Corporates (SMEs)
- ☒ Family offices / high-net-worth individuals
- ☒ Retail clients

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- | | |
|---|---|
| ☒ Retail | ☒ Fossil Fuels |
| ☒ Apparel | ☒ Manufacturing |
| ☒ Services | ☒ Infrastructure |
| ☒ Materials | ☒ Power generation |
| ☒ Hospitality | ☒ Transportation services |
| ☒ Food, beverage & agriculture | |
| ☒ Biotech, health care & pharma | |

Investing (Asset manager)

(1.10.1) Activity undertaken

Select from:

☒ No

Investing (Asset owner)

(1.10.1) Activity undertaken

Select from:

☒ No

Insurance underwriting (Insurance company)

(1.10.1) Activity undertaken

Select from:

☒ No

[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☒ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

☒ Upstream value chain

☒ Portfolio

(1.24.3) Highest supplier tier mapped

Select from:

☒ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

☒ Tier 2 suppliers

(1.24.5) Portfolios covered in mapping

Select all that apply

☒ Banking (Bank)

(1.24.7) Description of mapping process and coverage

Alpha Bank maps its value chain through separate but complementary processes for its financing portfolio and its upstream supplier base. For the portfolio, the Bank maps its non-financial corporate exposures by NACE sector. This mapping supports financed emissions measurement, climate-risk analysis, biodiversity and ecosystem-related analysis, and broader sustainability impact, risk and opportunity assessment. Exposures to sectors with the following NACE Codes are included: A. agriculture, forestry and fishing; B. mining and quarrying; C. manufacturing; D. electricity, gas, steam and air conditioning supply; E. water supply, sewerage, waste management and remediation activities; F. construction; G. wholesale and retail trade, repair of motor vehicles and motorcycles; H. transportation and storage; I. accommodation and food service activities, L. real estate activities. In addition, the Bank will apply the CPRS classification by Battiston et al. (2017) for disclosing those exposures that may be potentially affected by climate transition risks. At the supplier level, the Bank has established a Group Outsourcing Policy, which sets specific evaluation criteria for third party service providers aiming to minimize potential risks for the Bank and its Customers. According to the Policy, every third party and service provider is periodically evaluated. Suppliers are required to act in a manner consistent with the values, principles, commitments and obligations of the Code of Conduct & Ethics set out in the Bank's Corporate Responsibility Policy, respect international standards on human rights and apply appropriate working conditions, including the prohibition of child labor. Suppliers are required to sign and comply with the Bank's Suppliers Code of Conduct which covers Human Rights, Labour and Health & Safety, Environmental Responsibility, Integrity, Ethics, and Business Conduct. The Bank recently introduced a Digital Procurement Platform that selectively integrates an environmental, social and governance questionnaire in the supplier onboarding procedure. Assessment of Tier 2 and further supplier tiers is conducted selectively.

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

(2.1.4) How this time horizon is linked to strategic and/or financial planning

The short-term horizon corresponds to 2026 and is aligned with the Bank's annual strategic and financial planning cycle, double materiality assessment, and monitoring through the Risk Appetite Framework. It supports immediate adjustments to financial operations and portfolio steering, compliance with near-term regulatory requirements, management of emerging environmental risks, client engagement, risk limits, and delivery of the 2025–2027 sustainability strategy.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

5

(2.1.4) How this time horizon is linked to strategic and/or financial planning

The medium-term horizon runs from 2027 to 2030 and aligns with the Bank's 2030 sectoral decarbonization targets, forward-looking climate-risk assessment, and the period in which transition and physical climate risks become material. This is where more significant shifts occur in how the Bank structures its portfolios, as it aims to transition its lending and investment strategies to reduce exposure to high-carbon sectors, incorporate climate-related stress testing to evaluate the financial impacts of various climate scenarios, and develop green finance products to support clients in meeting the 2030 emissions reduction targets. These decisions inform client transition engagement, portfolio steering, risk appetite, capital planning and allocation, loan pricing models, and the development of sustainable financing solutions.

Long-term

(2.1.1) From (years)

5

(2.1.2) Is your long-term time horizon open ended?

Select from:

☒ No

(2.1.3) To (years)

25

(2.1.4) How this time horizon is linked to strategic and/or financial planning

The long-term horizon extends beyond 2030 to 2050 and aligns with the Group's net-zero ambition, the IEA Net Zero Emissions pathway used for selected carbon-intensive sectors, and the 2050 horizon used in climate- and nature-related risk assessments. It ensures that the Bank's strategic goals are aligned with global efforts to achieve net-zero emissions by 2050 and supports the assessment of portfolio resilience, long-term physical and transition risks, and opportunities such as adaptation, biodiversity and circular economy financing. Alpha Bank forecasts its long-term financial health based on environmental factors, ensuring its investment and loan portfolios are aligned with sustainable growth models, while making strategic decisions to capitalize on long-term climate-related opportunities, such as renewable energy financing, and managing the risks associated with climate change. This long-term approach supports the Bank's resilience to evolving climate risks and opportunities, while supporting its financial sustainability and market competitiveness.

[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☒ Yes	Select from: ☒ Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☒ Yes	Select from: ☒ Both risks and opportunities	Select from: ☒ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☒ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

- ☒ Risks
- ☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain

(2.2.2.4) Coverage

Select from:

- ☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

- ☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ Annually

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

- ☒ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

- ☒ Enterprise Risk Management
- ☒ Other enterprise risk management, please specify :Vendor Risk Assessment Questionnaire

International methodologies and standards

- ☒ ISO 14001 Environmental Management Systems

Other

- ☒ Materiality assessment

(2.2.2.15) Risk types and criteria considered

Acute physical

- ☒ Flood (coastal, fluvial, pluvial, ground water)

Policy

- ☒ Changes to national legislation

Market

- ☒ Changing customer behavior

Technology

- ☒ Transition to lower emissions technology and products

Liability

- ☒ Regulation and supervision of environmental risk in the financial sector

(2.2.2.16) Partners and stakeholders considered

Select all that apply

- ☒ Customers
- ☒ Employees
- ☒ Investors
- ☒ Suppliers
- ☒ Regulators
- ☒ Local communities

(2.2.2.17) Has this process changed since the previous reporting year?

Select from:

- ☒ No

(2.2.2.18) Further details of process

Alpha Bank employs a systematic process to identify, assess, and manage environmental and climate-related risks, and opportunities across our direct operations and supply chain. This process begins with a double materiality assessment aligned with the CSRD framework, which scopes relevant issues through stakeholder engagement, regulatory analysis, and scenario planning. The materiality assessment conducted in 2025 aimed to encompass both the impact and financial materiality perspectives, along with the interconnections between them, in accordance with the Double Materiality Assessment process of the European Sustainability Reporting Standards (ESRS). The methodology followed aims to capture impacts across the entire Value Chain (VC) by examining each segment separately. For our direct operations, we conduct annual environmental reviews and energy audits of our major buildings, branch network, and data centers to identify impacts (e.g. carbon

emissions) and dependencies (e.g., energy), translating these into risks (e.g. rising energy costs) and opportunities (e.g. renewable energy procurement). For our supply chain, we have integrated ESG criteria, including climate performance, into our supplier pre-qualification (Suppliers' Code of Conduct requires suppliers to sign and comply with ESG requirements), due diligence, and contracting processes, mandating disclosures via the Bank's Vendor Risk Assessment Questionnaire which has been enhanced to incorporate questions regarding environmental risk drivers that might affect vendors' operations and consequently the services offered to the Bank.

[Add row]

(2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities?

	Process in place covering this portfolio	Dependencies and/or impacts related to this portfolio evaluated in this process
Banking (Bank)	Select from: ☒ Yes	Select from: ☒ Both dependencies and impacts

[Fixed row]

(2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?

	Process in place covering this portfolio	Risks and/or opportunities related to this portfolio are evaluated in this process	Is this process informed by the dependencies and/or impacts process?
Banking (Bank)	Select from: ☒ Yes	Select from: ☒ Both risks and opportunities	Select from: ☒ Yes

[Fixed row]

(2.2.6) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities related to your portfolio activities.

Banking (Bank)

(2.2.6.1) Environmental issue

Select all that apply

- ☒ Climate change
- ☒ Water
- ☒ Biodiversity

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- ☒ Dependencies
- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

- ☒ Retail
- ☒ Fossil Fuels

- ☒ Apparel
- ☒ Services
- ☒ Materials
- ☒ Hospitality
- ☒ Food, beverage & agriculture
- ☒ Biotech, health care & pharma

- ☒ Manufacturing
- ☒ Infrastructure
- ☒ Power generation
- ☒ Transportation services

(2.2.6.6) Frequency of assessment

Select from:

- ☒ Annually

(2.2.6.7) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.6.8) Integration of risk management process

Select from:

- ☒ A specific environmental risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- ☒ Site-specific
- ☒ National

(2.2.6.10) Tools and methods used

Select all that apply

- ☒ ENCORE
- ☒ Internal tools/methods
- ☒ Risk models
- ☒ Scenario analysis
- ☒ Other, please specify :Materiality Assessment

(2.2.6.11) Risk type and criteria considered

Acute physical

- | | |
|---|--|
| ☒ Drought | ☒ Wildfires |
| ☒ Tornado | ☒ Subsidence |
| ☒ Avalanche | ☒ Cold wave/frost |
| ☒ Heat wave | ☒ Cyclone, hurricane, typhoon |
| ☒ Landslide | ☒ Heavy precipitation (rain, hail, snow/ice) |
| ☒ Flood (coastal, fluvial, pluvial, ground water) | |
| ☒ Storm (including blizzards, dust, and sandstorms) | |

Chronic physical

- | | |
|--|---|
| ☒ Heat stress | ☒ Coastal erosion |
| ☒ Soil erosion | ☒ Saline intrusion |
| ☒ Solifluction | ☒ Soil degradation |
| ☒ Water stress | ☒ Permafrost thawing |
| ☒ Sea level rise | ☒ Ocean acidification |
| ☒ Changing wind patterns | |
| ☒ Temperature variability | |
| ☒ Precipitation or hydrological variability | |
| ☒ Changing temperature (air, freshwater, marine water) | |
| ☒ Changing precipitation patterns and types (rain, hail, snow/ice) | |

Policy

- ☒ Carbon pricing mechanisms

☒ Other policy risk, please specify :increased reporting obligations exposure to litigation Increased mandates on and regulation of existing products and services

Market

☒ Changing customer behavior

☒ Uncertainty in market signals

☒ Other market risk, please specify :Increased cost of raw materials / energy needs Decreased revenues due to new competitors Decreased revenues due to reduced demand for products and services Access to finance

Reputation

☒ Stigmatization of sector

☒ Other reputation risk, please specify :Increased stakeholder concern or negative stakeholder feedback Shift in consumer preferences Impaired reputation Recruit & retain key talent

Technology

☒ Transition to lower emissions technology and products

☒ Unsuccessful investment in new technologies

☒ Other technology risk, please specify :Failing to keep up with the pace of technological change

(2.2.6.12) Partners and stakeholders considered

Select all that apply

☒ Customers

☒ Investors

☒ Regulators

(2.2.6.13) Further details of process

Alpha Bank conducts an annual Climate and ESG (C&ESG) Risk Materiality Assessment to identify the risk categories most vulnerable to climate and ESG-related risks across short-, medium-, and long-term time horizons. As part of this process, a climate transition risk assessment is carried out for transition risk sub-types per sector (market, technology, reputation, policy & legal) as proposed by the Task Force on Climate-Related Financial Disclosures (TCFD), in order to identify the climate-related transition risks that materially affect each sector. This enables the Bank to evaluate inherent climate transition risks across its portfolio and ensure its methodology remains aligned with international best practices. For the retail portfolio, and specifically regarding the energy efficiency of real estate collateral, the assessment is based on the distribution of Energy Performance Certificates (EPCs) and the minimum EPC requirements outlined in the European Parliament's

proposed directive on the recast of energy performance standards for non-residential buildings. In terms of physical risks, Alpha Bank evaluates exposure both at the country level, through a vulnerability analysis, and for real estate assets, at a site-specific level (NUTS 3). On nature-related risks, including biodiversity, the Bank performs materiality assessments of both impacts and dependencies across all time horizons. For the impact assessment, the Bank assessed nature-related impacts across its portfolio using the ENCORE Tool and the Biodiversity Footprint for Financial Institutions (BFFI) methodology, identifying sectors with High or Very High impacts and evaluating the likelihood and materiality of related risks across all horizons. For the dependency assessment, the Bank relies on the ENCORE tool, which helps evaluate nature-related risks by identifying economic activities' dependencies on ecosystem services. Furthermore, the Bank has developed internal models to assess the outcomes of ESG obligor questionnaires. Based on these models, responses are scored and each obligor is assigned a Low, Medium, or High ESG risk. The scoring process is industry-specific, with tailored scorecards depending on the sector in which the obligor operates. Finally, the Bank has developed a Climate Scenario Analysis methodology to support stress testing across all material risks, ensuring alignment with international best practices and ECB expectations.

[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☒ Yes

(2.2.7.2) Description of how interconnections are assessed

Alpha Bank assesses the interconnections between environmental dependencies, impacts, risks and opportunities through an integrated framework that combines ESG risk materiality assessments, climate and nature-related risk analyses, obligor-level ESG assessments, sustainable finance and responsible financing policies. This enables environmental considerations to be incorporated into strategic decision-making, risk management and lending processes. As part of its annual ESG Risk Materiality Assessment, the Bank evaluates sectors that are most exposed to climate- and nature-related risks across short-, medium- and long-term horizons. The assessment considers environmental dependencies and impacts from an inherent risk perspective, enabling the Bank to identify how environmental changes may affect sectoral risk profiles and financing activities. In parallel, the Bank identifies material sustainable finance opportunities under its Sustainable Finance Framework (SFF). Short-term opportunities are linked to the Business Plan, while medium- and long-term opportunities reflect the expected growth of sustainable finance driven by the evolution of environmental risks, including increasing demand for adaptation-related financing. The assessment is complemented by dedicated transition and physical risk analyses. Transition risks (policy and legal, market, technology and reputational) and physical hazards (including heat stress, water stress, heatwaves, droughts and floods) are assessed at sector and asset level. Geospatial analysis supports location-specific assessments, particularly for the real estate portfolio, strengthening the understanding of environmental impacts on asset values and credit risk. Environmental considerations are further integrated into lending decisions through industry-specific ESG Obligor Assessment Questionnaires. These evaluate borrowers' management of environmental topics, including biodiversity, pollution, water and waste management, based on internationally recognised sector-specific standards. The assessments support credit origination by identifying environmental risks while enabling engagement with clients to improve resilience and sustainability performance. In addition, Alpha Bank applies an Exclusion List that prohibits financing activities associated with significant environmental and social impacts, including activities affecting biodiversity and ecosystems. This supports responsible financing while mitigating environmental and reputational risks. Overall, this integrated approach enables Alpha Bank to assess the interconnections between

environmental dependencies, impacts, risks and opportunities, supporting a holistic view of climate- and nature-related risks and opportunities and their integration into the Bank's risk management framework and sustainable finance strategy.

[Fixed row]

(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?

	We consider environmental information
Banking (Bank)	Select from: ☒ Yes

[Fixed row]

(2.2.9) Indicate the environmental information your organization considers about clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process, and how this influences decision-making.

Banking (Bank)

(2.2.9.1) Environmental issues covered

Select all that apply

☒ Climate change

(2.2.9.2) Type of environmental information considered

Select all that apply

- ☒ Emissions data
- ☒ Other, please specify :Whether the client has (i) a formal processes for evaluating executive / management performance on ESG issues, (ii) incentives to board / management for the achievement of ESG targets, (iii) certifications e.g. ISO14001, ISO14064, ISO50001, EMAS
- ☒ Energy usage data
- ☒ CDP questionnaire response
- ☒ Emissions reduction targets
- ☒ Engagement with their value chain on environmental issues

(2.2.9.3) Process through which information is obtained

Select all that apply

- ☒ Directly from the client/investee
- ☒ Public data sources
- ☒ Other, please specify :Inter-banking platform that integrates ESG questionnaires for bank clients.

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

Select all that apply

- | | |
|---|---|
| ☒ Retail | ☒ Fossil Fuels |
| ☒ Apparel | ☒ Manufacturing |
| ☒ Services | ☒ Infrastructure |
| ☒ Materials | ☒ Power generation |
| ☒ Hospitality | ☒ Transportation services |
| ☒ Food, beverage & agriculture | |
| ☒ Biotech, health care & pharma | |

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

46

(2.2.9.6) Total portfolio value covered by the process

34877568155

[Add row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☒ Qualitative

☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☒ Capital allocation

(2.4.3) Change to indicator

Select from:

☒ Absolute increase

(2.4.5) Absolute increase/ decrease figure

65000000

(2.4.6) Metrics considered in definition

Select all that apply

☒ Frequency of effect occurring

☒ Time horizon over which the effect occurs

☒ Likelihood of effect occurring

(2.4.7) Application of definition

Based on the Bank's materiality assessment that runs annually, in order to define the material risks the bank has incorporated thresholds. These thresholds define whether transition or physical risks are material. Specifically, the thresholds for transition risks are set on the define transition sensitive perimeter over the total group assets. For physical risks, the threshold is set on the High Vulnerability perimeter over the total assets.

Opportunities

(2.4.1) Type of definition

Select all that apply

☒ Qualitative

☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☒ Capital allocation

(2.4.3) Change to indicator

Select from:

☒ Absolute increase

(2.4.5) Absolute increase/ decrease figure

2128000000

(2.4.6) Metrics considered in definition

Select all that apply

☒ Time horizon over which the effect occurs

☒ Likelihood of effect occurring

☒ Other, please specify :Possibility of capturing client needs and gaining higher market share and competitive advantage against peers.

(2.4.7) Application of definition

Alpha Bank recognizes the important role of financial institutions in mobilizing capital towards environmentally sustainable activities and in supporting their clients' transition to a low-carbon economy. The Sustainable Finance Framework serves as a key enabler to deliver the sustainable finance strategy of the Bank by financing climate mitigation projects. Loyal to its commitment towards the support of an environmentally sustainable economy and to mitigate climate change, the Group has an ambitious plan, with the main decarbonization levers being the increase in Sustainable Financings and the reduction of financings that may have a negative impact on climate and the environment. During the reporting year 2025, Sustainable Disbursements were EUR 2.1bn. Alpha Bank's strategy is to align all material elements of the loan and (on balance sheet) investment portfolio with a Science-Based 1.5C pathway, based on the International Energy Agency Net Zero Emissions (IEA NZE) Scenario, adapted to the Bank's portfolio composition and national characteristics as they apply. Moreover, to support the transition and mobilize capital to an environmentally sustainable economy and address climate change, the Bank has developed an ambitious strategy. Its primary focus is to increase sustainable financing while reducing financing that could negatively impact the environment. The Banks channels its investments into key areas, including: • Environmental initiatives (Renewable Energy Sources, Waste Management) • Other Energy Projects and Distribution Networks • Major Infrastructure Projects

[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both within our direct operations or upstream value chain, and within our portfolio

Forests

(3.1.1) Environmental risks identified

Select from:

☒ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Not an immediate strategic priority

(3.1.3) Please explain

Immediate priority is on climate change analysis.

Water

(3.1.1) Environmental risks identified

Select from:

☒ Yes, only in our portfolio

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

It has not been assessed as material risk

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Flooding (coastal, fluvial, pluvial, groundwater)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

☒ Credit risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Greece

(3.1.1.9) Organization-specific description of risk

Impact on the credit risk parameters as a result of acute physical risk events, affecting the creditworthiness of counterparties (e.g. impact on collateral values from acute physical risk related events, increased PD of companies sensitive to ESG factors).

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

☒ 1-10%

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Devaluation of collateral and potential for stranded, illiquid assets

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

☒ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ Likely

(3.1.1.14) Magnitude

Select from:

☒ Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The effect of the risk is not disaggregated between the financial position, financial performance and cash flows for the selected time horizons.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

24000000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

24000000

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

23000000

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

23000000

(3.1.1.25) Explanation of financial effect figure

Alpha Bank has developed economic impact analysis through climate change scenarios to examine and quantify the impact of potential flood events on its collateralized portfolio. The Bank calculated the size of the financial impact of collaterals in the context of the internal Climate Stress Test, which takes into account the insurance coverage for floods, the Bank has mandated for all real estate properties in new financings.

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☒ Establish organization-wide targets

(3.1.1.27) Cost of response to risk

288336

(3.1.1.28) Explanation of cost calculation

The cost is calculated through the average wage times the employees that are involved in the scenario analysis; (c*6 FTEs x 48,056 Average salary in 2025).

(3.1.1.29) Description of response

Alpha Bank has developed a detailed internal methodology for assessing the magnitude of impact, using map areas and local geographical characteristics, based on identified NUTS3 levels. Thus, the magnitude stated here is an average estimate, based on the abovementioned methodology.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Flooding (coastal, fluvial, pluvial, groundwater)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

☒ Operational risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Greece

(3.1.1.9) Organization-specific description of risk

The Bank's operations could be affected due to extreme weather events (e.g. floods) leading to damages to physical assets or critical infrastructure that is essential for providing services to customers (e.g. property, branches, energy supply, data centers etc.).

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased indirect [operating] costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ About as likely as not

(3.1.1.14) Magnitude

Select from:

☒ Medium

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The effect of the risk is not disaggregated between the financial position, financial performance and cash flows for the selected time horizons.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

3100000

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

6100000

(3.1.1.25) Explanation of financial effect figure

The Bank calculated the financial impact from the invoiced restoration expenses of the damages caused to the bank premises and other fixed assets.

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☒ Improve monitoring of direct operations

(3.1.1.27) Cost of response to risk

(3.1.1.28) Explanation of cost calculation

*The cost is calculated through the average wage times the employees that are involved in the scenario analysis; (c*4 FTEs x 48,056 Average salary in 2025).*

(3.1.1.29) Description of response

Alpha Bank has developed a system of procedures for managing climate and environmental aspects, threats and opportunities, is implemented ensuring compliance with International Standards ISO 14001 (Environmental Management System), ISO 14064 (Greenhouse Gas Emissions Management System), ISO 22301 (Business Continuity Management System) and best practices. An Environmental Management System (EMS) is in place for monitoring, managing and improving environmental performance ensuring compliance with the institutional and regulatory framework on environmental issues and the effective use of natural resources. EMS includes a Group Environmental Management Policy which incorporates principles of sustainable and responsible operation in its decisions and procedures. The Policy acknowledges the responsibility to contribute actively to environmental protection, tackling climate change and saving natural resources. Through this Policy, the Bank is committed to improving its environmental footprint by implementing appropriate processes and actions aiming at preventing pollution, the safe management of extraordinary environmental risks due to unforeseen incidents and addressing the direct and indirect consequences of its operation on the environment in general. Additionally, the Bank addresses physical risk incidents within its Business Continuity Management (BCM) System, certified with ISO22301, to ensure the uninterrupted provision of services to Customers and other Stakeholders. The Bank has already in place an insurance policy to handle the effects of extreme weather events on its infrastructure and buildings.

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☒ Assets

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

21100000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ 11-20%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

47500000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ 11-20%

(3.1.2.7) Explanation of financial figures

Internal Capital Adequacy Assessment Process (ICAAP)

Water

(3.1.2.1) Financial metric

Select from:

☒ Assets

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

200000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ Less than 1%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

200000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ Less than 1%

(3.1.2.7) Explanation of financial figures

Internal Capital Adequacy Assessment Process (ICAAP)
[Add row]

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

☒ Yes, we have identified opportunities, and some/all are being realized

Forests

(3.6.1) Environmental opportunities identified

Select from:

☒ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☒ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

Alpha Bank assessed forest-relevant opportunities as part of its broader ESRS E4 Biodiversity and Ecosystems assessment. The assessment concluded that material opportunities are expected to arise over the long term, primarily through the Group's sustainable financing activities related to biodiversity and ecosystems. However, the Bank has not identified a substantive Forests-specific opportunity as a standalone outcome. Forests are addressed within the broader biodiversity and ecosystems topic and through relevant credit safeguards, rather than as a separate business opportunity expected to have a substantive financial effect on the Bank.

Water

(3.6.1) Environmental opportunities identified

Select from:

☒ No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☒ Opportunities exist, but none anticipated to have a substantive effect on organization

(3.6.3) Please explain

Alpha Bank assessed Water and Marine Resources-related opportunities through its FY2025 ESRS E3 assessment. The assessment concluded that no material water and marine resources-related opportunities were identified in 2025 and that anticipated opportunities related to Water and Marine Resources are not material across the short-, medium- and long-term horizons. Sustainable financings towards activities related to the sustainable use and protection of water and marine resources fall within the Sustainable Finance Framework, but they were not assessed as giving rise to a substantive Water security opportunity for the Group.

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☒ Increased sales of existing products and services

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Greece

(3.6.1.8) Organization specific description

Alpha Bank has identified climate change as a material business opportunity through its comprehensive materiality assessment, recognizing the transition to a low-carbon economy as a key driver of long-term value creation. The Group's key climate-related opportunities stem from expanding sustainable financing activities and issuing green bonds, supporting clients' transition while strengthening the Bank's sustainable finance profile. Sustainable financing is implemented through Alpha Bank's Sustainable Finance Framework (SFF), which is aligned with internationally recognized market principles, and which defines the methodology for classifying eligible green and social financing activities. The Group has established a sustainable finance disbursement target of €3.8 billion by 2027, demonstrating its commitment to financing the transition to a sustainable economy. Additionally, Alpha Bank's Sustainable Green Senior Preferred Bond Framework, which was introduced in 2025, governs the issuance of green bonds and the allocation of proceeds to eligible green assets. Under this framework, in 2025 the Bank successfully issued its inaugural Green Bond of nominal value at €500 million, mobilizing capital to finance environmentally sustainable projects.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Realization of the opportunity through the integration of net zero targets and transition planning. As more clients decarbonize their operations, the demand for sustainable products increases. Alpha Bank, through the integration of net zero targets into its strategy, is well positioned to serve its clients' needs and thereby increase market share and revenues.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ Yes

(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

3800000000

(3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

(3.6.1.23) Explanation of financial effect figures

The figure represents the Bank's target for new sustainable financings for 2025–2027 and is used as a proxy for the scale of the opportunity in the banking portfolio. It does not represent incremental net revenue, profit or cash flow. The target covers new sustainable financing volumes, with a main focus on power, buildings and transportation, including renewable energy, grid upgrading, energy efficiency, building upgrades and electric vehicles / alternative fuels. The Group has established a set of KPIs for each of the environmental priority impact areas of its Strategy (Climate), to enable the measurement of the overall performance and make the necessary corrective actions to achieve the strategic commitments and management of its impacts, risks and opportunities related to climate change. One of the top commitments for the Group is to support Customers' decarbonization and align their portfolio emissions with the Paris Agreement. As part of this commitment the Group has set the target to lend €3.8 billion in sustainable disbursements during 2025-2027. The main focus is in the Power sector (solar, wind, grid upgrading, etc.), buildings (energy efficiency, upgrades, heat insulation, certification) and transportation (electric vehicles, alternative fuels).

(3.6.1.24) Cost to realize opportunity

480560

(3.6.1.25) Explanation of cost calculation

*The costs associated with realising the opportunity are primarily embedded in the Bank's cost of employees of the Sustainability Division that supports innovative sustainable ideas, environmentally and socially conscious initiatives, and financial inclusion projects (c*10 FTEs x 48,056 Average salary in 2025). Additional costs arising in other relevant Bank Business Areas are not separately tracked or allocated solely to this opportunity.*

(3.6.1.26) Strategy to realize opportunity

Alpha Bank realises this opportunity through the implementation of its Sustainable Finance Framework, Transition Plan, Client Engagement Framework and Green Bond Framework. These frameworks enable the Bank to identify eligible green and social financing opportunities, support Customers' transition plans, classify sustainable financings consistently and allocate proceeds from green bond issuances to eligible green assets. The opportunity is supported by transition-related investment needs, market demand for credible sustainable finance instruments and regulatory-driven developments. In 2025, Customers continued to face investment needs relating to renewable energy, grid upgrading, energy efficiency in buildings, cleaner transportation and broader decarbonisation. At the same time, EU and supervisory developments, including the EU Taxonomy, CSRD/ESRS reporting requirements, EBA expectations on ESG risk management and transition-finance policy developments, increased the need for companies and financial institutions to improve ESG data, transition planning and access to credible sustainable financing. In 2025, €2.1 billion of new financing was classified under the Sustainable Finance Framework criteria, contributing to the Group's target of €3.8 billion of new sustainable financings for 2025–2027. The Bank's focus areas include power generation, including solar, wind and grid upgrading; buildings, including energy efficiency upgrades, heat insulation and certification; and transportation, including electric vehicles and alternative fuels. Alpha Bank also supports realisation of the opportunity through client engagement. The Client Engagement Framework enables the Bank to assess Customers' ESG maturity, identify transition opportunities and support the development of credible decarbonisation pathways, while linking engagement outcomes with appropriate sustainable finance solutions. In parallel,

the Green Bond Framework, launched in 2025, supports the allocation of proceeds from green bond issuances to eligible green assets. In October 2025, the Bank issued its inaugural €500 million Green Senior Preferred Bond, supporting its ability to mobilise funding for eligible green assets.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

☒ Other, please specify :Actual Net credit expansion

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

2128000000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 11-20%

(3.6.2.4) Explanation of financial figures

In 2025, €2,128 million of new financing was classified under the Sustainable Finance Framework criteria. This amount represents 16.3% of total new disbursements in the relevant portfolio during 2025. The percentage has been calculated as sustainable finance disbursements divided by total new disbursements for the same reporting boundary and period.

Climate change

(3.6.2.1) Financial metric

Select from:

☒ Assets

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

1134000000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 1-10%

(3.6.2.4) Explanation of financial figures

Based on the methodology set out in Annex VI of Commission Delegated Regulation (EU) 2021/2178, the Group's total assets amounted to 76,163 million in 2025. Taxonomy-aligned assets contributing to the climate change mitigation objective totalled 1,134 million. Accordingly, the percentage of total assets aligned with climate change mitigation opportunities was calculated by dividing taxonomy-aligned assets by total assets.

[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☒ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☒ More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☒ Executive directors or equivalent

☒ Non-executive directors or equivalent

☒ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☒ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Our Company's Diversity Policy is outlined in the Suitability and Nomination Policy for the Members of the Board of Directors and the Corporate Governance Statement. In accordance with the Diversity Policy, the Company: i. respects and defends diversity irrespective of gender, age, nationality, marital status, sexual orientation, genetic features, disability, race, color, religious or political affiliation, ethnic or social origin, citizenship or any other aspect unrelated to employment, ii. recognizes the need for diversity pertaining to skills, background, knowledge and experience in order to facilitate constructive discussion and independent thinking, iii. respects the principle of equal opportunities for any gender and takes measures to improve a more gender-balanced composition. According to the Diversity Policy,

the Board’s actual target is that the percentage of the less represented gender in the Board should reach at least 30%, while always considering industry trends and best practices. All the candidates for the Board shall be assessed on the basis of the same criteria. In this context, all genders shall have equal opportunities to be nominated under the condition that they fulfil all the other prerequisites in accordance with the Suitability and Nomination Policy for the Members of the Board of Directors.

(4.1.6) Attach the policy (optional)

Suitability and Nomination Policy May 2025 EN.pdf
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	Select from: ☒ Yes
Forests	Select from: ☒ Yes
Water	Select from: ☒ Yes
Biodiversity	Select from: ☒ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board’s oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- ☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Board Terms of Reference
- ☒ Other policy applicable to the board, please specify :Charter of Risk Management Committee Charter of Remuneration Committee Charter of Corporate Governance, Sustainability and Nominations Committee Charter of the Audit Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Reviewing and guiding annual budgets
- ☒ Overseeing and guiding scenario analysis
- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets
- ☒ Approving corporate policies and/or commitments
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Overseeing and guiding the development of a climate transition plan
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☒ Approving and/or overseeing employee incentives
- ☒ Monitoring the implementation of the business strategy
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Monitoring the implementation of a climate transition plan
- ☒ Overseeing and guiding the development of a business strategy

(4.1.2.6) Scope of board-level oversight

Select all that apply

- ☒ Risks and opportunities to our own operations
- ☒ Risks and opportunities to our banking activities

(4.1.2.7) Please explain

The Board of Directors has the overall responsibility for the Company and approves and oversees the implementation of the Company's strategic objectives, risk strategy and Environmental, Social and Governance (ESG) strategy as well as its internal governance. Climate change is overseen through the Board and its Committees, including the Corporate Governance, Sustainability and Nominations Committee, the Risk Management Committee, the Remuneration Committee and the Audit Committee. According to its Charter, the Corporate Governance, Sustainability and Nominations Committee ensures the implementation of Environmental, Social and Governance (ESG) standards according to the regulatory framework and the relevant best practices, thereby strengthening the Company's long-term commitment to creating value in its sustainable development. For this purpose, the Committee ensures that there is an adequate level of communication on ESG issues between the Members of the Committee and the Members of the Risk Management Committee, the Remuneration Committee and the Audit Committee. According to its Charter, the Risk Management Committee ensures that the Company adequately embeds ESG risks in the overall risk appetite statement and framework, business strategy and risk management framework. According to its Charter, the Remuneration Committee ensures that the Group Remuneration Policy as well as the "Remuneration Policy of the Members of the Board of Directors as per the provisions of Law 4548/2018" are consistent with the values, culture, business strategy, risk appetite and strategic objectives of the Company and its Subsidiaries (the "Group"), taking into account ESG risks that affect the business environment in the short, medium or long term. According to its Charter, the Audit Committee, collaborates with the [RMC] 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. Board-level oversight covers both own operations and banking activities, including climate-related risks and opportunities, climate strategy, sustainable finance, financed emissions, transition planning, climate-related targets, scenario analysis, reporting and assurance.

Forests

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- ☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Board Terms of Reference
- ☒ Other policy applicable to the board, please specify :Charter of Risk Management Committee Charter of Remuneration Committee Charter of Corporate Governance, Sustainability and Nominations Committee Charter of the Audit Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Approving corporate policies and/or commitments
- ☒ Monitoring the implementation of the business strategy
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Overseeing and guiding the development of a business strategy
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.6) Scope of board-level oversight

Select all that apply

- ☒ Risks and opportunities to our own operations
- ☒ Risks and opportunities to our banking activities

(4.1.2.7) Please explain

Forests are overseen as part of the Board's broader oversight of ESG strategy, ESG risks, biodiversity and ecosystems, sustainability reporting and environmental and social risk management in the lending portfolio. The Board and relevant Board Committees do not manage Forests as a standalone strategic topic, as no substantive Forests-specific dependency, impact, risk or opportunity has been identified. However, forest-relevant matters are covered within the Bank's biodiversity and ecosystems assessment, sustainable finance framework and credit policy safeguards. The Corporate Governance, Sustainability and Nominations Committee

oversees ESG matters and supports coordination between relevant Board Committees. The Risk Management Committee oversees the integration of ESG risks into the risk appetite statement, business strategy and risk management framework. The Audit Committee oversees sustainability reporting and related controls, while the Remuneration Committee considers ESG risks where relevant to remuneration governance. Board-level oversight is therefore exercised at biodiversity, ecosystems and portfolio-risk level, including forest-relevant safeguards and exclusions such as restrictions on financing activities linked to conversion of natural forests into plantations, commercial logging in primary tropical moist forests, and production or trade in wood or forestry products unless sourced from sustainably managed forests.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- ☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Board Terms of Reference
- ☒ Other policy applicable to the board, please specify :Charter of Risk Management Committee Charter of Remuneration Committee Charter of Corporate Governance, Sustainability and Nominations Committee Charter of the Audit Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Approving corporate policies and/or commitments

- ☒ Monitoring the implementation of the business strategy
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Overseeing and guiding the development of a business strategy
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.6) Scope of board-level oversight

Select all that apply

- ☒ Risks and opportunities to our own operations
- ☒ Risks and opportunities to our banking activities

(4.1.2.7) Please explain

Water security is overseen as part of the Board's broader oversight of ESG strategy, ESG risks, sustainability reporting, environmental management and environmental risk assessment. Water and Marine Resources were assessed under the FY2025 ESRS E3 process and were not identified as material; therefore, Water is not managed as a standalone Board agenda topic, but remains within the Board's broader sustainability, risk and reporting oversight. The Corporate Governance, Sustainability and Nominations Committee oversees ESG matters and supports communication between relevant Board Committees. The Risk Management Committee oversees the embedding of ESG risks in the risk appetite statement, business strategy and risk management framework. The Audit Committee oversees sustainability reporting and related controls, while the Remuneration Committee considers ESG risks where relevant to remuneration governance. Board-level oversight covers own operations, including environmental management and resource use, as well as banking activities where water-related impacts, risks and opportunities are assessed through the double materiality process, sustainable finance classification and broader environmental and social risk management.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- ☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Board Terms of Reference
- ☒ Other policy applicable to the board, please specify :Charter of Risk Management Committee Charter of Remuneration Committee Charter of Corporate Governance, Sustainability and Nominations Committee Charter of the Audit Committee

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- | | |
|--|---|
| ☒ Reviewing and guiding annual budgets | ☒ Approving and/or overseeing employee incentives |
| ☒ Overseeing and guiding scenario analysis | ☒ Monitoring the implementation of the business strategy |
| ☒ Overseeing the setting of corporate targets | ☒ Overseeing reporting, audit, and verification processes |
| ☒ Monitoring progress towards corporate targets | ☒ Monitoring the implementation of a climate transition plan |
| ☒ Approving corporate policies and/or commitments | ☒ Overseeing and guiding the development of a business strategy |
| ☒ Monitoring compliance with corporate policies and/or commitments | |
| ☒ Overseeing and guiding the development of a climate transition plan | |
| ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities | |

(4.1.2.6) Scope of board-level oversight

Select all that apply

- ☒ Risks and opportunities to our own operations
- ☒ Risks and opportunities to our banking activities

(4.1.2.7) Please explain

The Board of Directors has the overall responsibility for the Company and approves and oversees the implementation of the Company's strategic objectives, risk strategy and Environmental, Social and Governance (ESG) strategy as well as its internal governance. The FY2025 assessment identified biodiversity and ecosystems-related impacts, risks and opportunities, particularly in relation to the downstream financing portfolio. According to its Charter, the Corporate Governance, Sustainability and Nominations Committee ensures the implementation of Environmental, Social and Governance (ESG) standards according to the regulatory framework and the relevant best practices, thereby strengthening the Company's long-term commitment to creating value in its sustainable development. For this purpose, the Committee ensures that there is an adequate level of communication on ESG issues between the Members of the Committee and the Members of the Risk Management Committee, the Remuneration Committee and the Audit Committee. According to its Charter, the Risk Management Committee ensures that the Company adequately embeds ESG risks in the overall risk appetite statement and framework, business strategy and risk management framework. According to its Charter, the Remuneration Committee ensures that the Group Remuneration Policy as well as the "Remuneration Policy of the Members of the Board of Directors as per the provisions of Law 4548/2018" are consistent with the values, culture, business strategy, risk appetite and strategic objectives of the Company and its Subsidiaries (the "Group"), taking into account ESG risks that affect the business environment in the short, medium or long term. According to its Charter, the Audit Committee, collaborates with the [RMC] 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. Board-level oversight covers biodiversity and ecosystem-related impacts, risks and opportunities in own operations and banking activities, including the assessment of dependencies, impacts, risks and opportunities, the monitoring of relevant policies and commitments, and oversight of sustainability disclosures.

[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues
- ☒ Staff-level experience in a role focused on environmental issues

Forests

(4.2.1) Board-level competency on this environmental issue

Select from:

- ☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Management-level experience in a role focused on environmental issues
- ☒ Staff-level experience in a role focused on environmental issues

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues
- ☒ Management-level experience in a role focused on environmental issues
- ☒ Staff-level experience in a role focused on environmental issues

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	Select from: ☒ Yes
Forests	Select from:

	Management-level responsibility for this environmental issue
	☒ Yes
Water	Select from: ☒ Yes
Biodiversity	Select from: ☒ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ General Counsel

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☒ Assessing environmental dependencies, impacts, risks, and opportunities

☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing supplier compliance with environmental requirements
- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan
- ☒ Conducting environmental scenario analysis
- ☒ Managing annual budgets related to environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Developing a business strategy which considers environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

Other

- ☒ Providing employee incentives related to environmental performance

(4.3.1.3) Coverage of responsibilities

Select all that apply

- ☒ Dependencies, impacts, risks, and opportunities related to our banking activities
- ☒ Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

☒ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☒ More frequently than quarterly

(4.3.1.6) Please explain

Executive-level responsibility for climate change sits within Alpha Bank's ESG and sustainability governance framework. The Group Sustainability Division is headed by the Chief of Corporate Center and General Counsel, who is a member of the Executive Committee. The Group Sustainability Committee (GSC) is chaired by the Chief of Wholesale Banking and includes senior executive representation from key business and control functions, including the Deputy CEO, CRO, Chief of Retail Banking, Chief of Corporate Center and General Counsel, Chief of International Network. The GSC considers ESG related matters and supports an internal governance framework that allows the Bank to manage ESG risks and consider all sustainability topics, steer the Group's Sustainability strategy, incorporate ESG considerations into the risk management framework, strategy and business model. It proposes the Group's ESG Policy and targets; monitors trends in, and stakeholders' expectations regarding, ESG-related topics; proposes criteria for sustainable credit approvals, debt issuances and investments, to be incorporated in the relevant policies; oversees ESG-related disclosures and communications; stays informed of matters raised by Internal Audit and external audits and assesses the action plans proposed to mitigate them; stays informed about the results of supervisory evaluations and decides on appropriate actions in response to such topics, in alignment with the Bank's Compliance function; discusses proposals for relevant operational or capital expenses, driven by the Group's ESG initiatives. For climate change, management responsibility covers both own operations and banking activities, including climate-related impacts, risks and opportunities, financed emissions, decarbonisation targets, transition planning, sustainable finance, client engagement and climate-related disclosures.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ General Counsel

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☒ Assessing environmental dependencies, impacts, risks, and opportunities

☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan
- ☒ Conducting environmental scenario analysis
- ☒ Managing annual budgets related to environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Developing a business strategy which considers environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing major capital and/or operational expenditures relating to environmental issues

(4.3.1.3) Coverage of responsibilities

Select all that apply

- ☒ Dependencies, impacts, risks, and opportunities related to our banking activities
- ☒ Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

Executive-level responsibility for forest-relevant matters sits within Alpha Bank's broader ESG and sustainability governance framework, primarily through the Group Sustainability Division and the Group Sustainability Committee. Forests are not managed as a standalone strategic topic, as no substantive Forests-specific dependency, impact, risk or opportunity has been identified. However, forest-relevant matters are considered within the Bank's biodiversity and ecosystems assessment, sustainable finance framework and environmental and social risk management / credit policy safeguards. The GSC considers ESG related matters and supports an internal governance framework that allows the Bank to manage ESG risks and consider all sustainability topics, steer the Group's Sustainability strategy, incorporate ESG considerations into the risk management framework, strategy and business model. It proposes the Group's ESG Policy and targets; monitors trends in, and stakeholders' expectations regarding, ESG-related topics; proposes criteria for sustainable credit approvals, debt issuances and investments; oversees ESG-related disclosures and communications; stays informed of matters raised by Internal Audit and external audits and assesses the action plans proposed to mitigate them; stays informed about the results of supervisory evaluations and decides on appropriate actions in response to such topics; discusses proposals for relevant operational or capital expenses, driven by the Group's ESG initiatives. This governance structure enables management oversight of forest-relevant safeguards in the lending portfolio, including restrictions relating to conversion of natural forests into plantations, commercial logging in primary tropical moist forests, and production or trade in wood or forestry products unless sourced from sustainably managed forests.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ General Counsel

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments

- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan
- ☒ Conducting environmental scenario analysis
- ☒ Managing annual budgets related to environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Developing a business strategy which considers environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.3) Coverage of responsibilities

Select all that apply

- ☒ Dependencies, impacts, risks, and opportunities related to our banking activities
- ☒ Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

Executive-level responsibility for Water security sits within Alpha Bank's broader ESG and sustainability governance framework, primarily through the Group Sustainability Division and the Group Sustainability Committee. Water is not treated as a standalone strategic priority because Water and Marine Resources were

assessed under the FY2025 ESRS E3 process and no material Water and Marine Resources impacts, risks or opportunities were identified. However, water-related matters remain within management's broader responsibility for environmental assessment, ESG risk management, sustainable finance and sustainability reporting. The Group Sustainability Division is headed by the Chief of Corporate Center and General Counsel, who is a member of the Executive Committee. The GSC considers ESG related matters and supports an internal governance framework that allows the Bank to manage ESG risks and consider all sustainability topics, steer the Group's Sustainability strategy, incorporate ESG considerations into the risk management framework, strategy and business model. It proposes the Group's ESG Policy and targets; monitors trends in, and stakeholders' expectations regarding, ESG-related topics; proposes criteria for sustainable credit approvals, debt issuances and investments; oversees ESG-related disclosures and communications; stays informed of matters raised by Internal Audit and external audits and assesses the action plans proposed to mitigate them; stays informed about the results of supervisory evaluations and decides on appropriate actions in response to such topics; discusses proposals for relevant operational or capital expenses, driven by the Group's ESG initiatives. This structure provides management-level responsibility for assessing and monitoring water-related matters in own operations and banking activities, even though no substantive Water security-specific DIRO was identified for FY2025.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ General Counsel

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan
- ☒ environmental issues
- ☒ Conducting environmental scenario analysis
- ☒ Implementing the business strategy related to environmental issues
- ☒ Developing a business strategy which considers environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing major capital and/or operational expenditures relating to

(4.3.1.3) Coverage of responsibilities

Select all that apply

- ☒ Dependencies, impacts, risks, and opportunities related to our banking activities
- ☒ Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

Executive-level responsibility for biodiversity sits within Alpha Bank's ESG and sustainability governance framework, primarily through the Group Sustainability Division and the Group Sustainability Committee. Biodiversity and ecosystems are considered within the Bank's double materiality assessment, environmental and social risk management, sustainable finance approach and sustainability reporting. The Group Sustainability Division is headed by the Chief of Corporate Center and General Counsel, who is a member of the Executive Committee. The GSC is chaired by the Chief of Wholesale Banking and includes senior executive representation from key business and control functions. The GSC considers ESG related matters and supports an internal governance framework that allows the Bank to manage ESG risks and consider all sustainability topics, steer the Group's Sustainability strategy, incorporate ESG considerations into the risk management framework, strategy and business model. It proposes the Group's ESG Policy and targets; monitors trends in, and stakeholders' expectations regarding, ESG-related topics; proposes criteria for sustainable credit approvals, debt issuances and investments; oversees ESG-related disclosures and communications; stays informed of matters

raised by Internal Audit and external audits and assesses the action plans proposed to mitigate them; stays informed about the results of supervisory evaluations and decides on appropriate actions in response to such topics; discusses proposals for relevant operational or capital expenses, driven by the Group's ESG initiatives. For biodiversity, management responsibility covers the assessment and monitoring of biodiversity and ecosystem-related dependencies, impacts, risks and opportunities, particularly in relation to the downstream financing portfolio, as well as relevant policies, credit safeguards, sustainable finance classification and sustainability disclosures.

[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

20

(4.5.3) Please explain

Alpha Bank provides monetary incentives linked to climate-related performance through its variable remuneration framework for Executive Board Members / senior executives. The Combined Bonus Plan includes both short-term and long-term incentive components. The Long-Term Incentive scorecard includes Sustainability Metrics with a 20% weighting, integrating ESG considerations into executive remuneration. This sustainability component includes a climate-related target focused on Sustainable Finance Disbursements measured over the business plan period. Promotion of sustainability agenda was also included in the CEO's scorecard. Non-Executive Board Members do not receive variable remuneration.

Forests

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

Alpha Bank does not currently provide monetary incentives specifically linked to Forests. Forest-relevant matters are addressed through the Bank's broader biodiversity and ecosystems assessment, environmental and social risk management, sustainable finance framework and credit policy safeguards. Therefore, no Forests-specific monetary incentives are currently planned.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

Alpha Bank does not currently provide monetary incentives specifically linked to Water security. Water and Marine Resources were assessed under the FY2025 ESRS E3 process and were not identified as material. Therefore, no Water-specific monetary incentives are currently planned.
[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

- ☒ Shares

(4.5.1.3) Performance metrics

Targets

- ☒ Progress towards environmental targets
- ☒ Achievement of environmental targets
- ☒ Other targets-related metrics, please specify :Promotion of Sustainability Agenda

Strategy and financial planning

- ☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursement

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

- ☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

As per the 2025 Remuneration Policy of the Members of the Board of Directors, Alpha Bank provides monetary incentives linked to environmental performance through its variable remuneration framework for Executive Members of the Board and senior executives. Variable compensation is provided through the Combined Bonus Plan, which includes short-term and long-term incentive components linked to performance against strategic KPIs, subject to approval by the Board of Directors. Performance is assessed annually through a balanced scorecard covering Group and individual targets. The Long-Term Incentive scorecard includes both financial and non-financial KPIs and incorporates ESG criteria in executive remuneration. For 2025, Sustainability Metrics have a 20% weighting within the Long-Term Incentive scorecard. These include a climate-related target focused on Sustainable Finance Disbursements, defined as the total volume of loans classified as environmentally and socially sustainable in accordance with the Bank's Sustainable Finance Framework, measured over the business plan period. The incentive is linked primarily to climate change, as Sustainable Finance Disbursements support the Bank's net-zero commitment, interim 2030 sector targets, Transition Plan and client transition financing. It encourages portfolio steering towards eligible sustainable activities, supports client decarbonisation and transition needs, and reinforces the integration of environmental considerations into business planning, client engagement and credit decision-making. The incentive is delivered through variable remuneration, including cash and share-linked or other equivalent non-cash instruments, subject to the applicable regulatory limits, shareholder approvals, deferral, malus and clawback provisions. Non-Executive Board Members are not included, as they do not receive performance-based variable remuneration.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The position's incentives contribute to Alpha Bank's environmental commitments and Climate Transition Plan by linking executive variable remuneration to the mobilisation of sustainable finance, which is a key lever for portfolio decarbonisation and client transition support. Under the Bank's variable remuneration framework, performance is assessed through a balanced mix of financial, non-financial and risk-adjusted criteria, ensuring that ESG priorities are embedded in how success is measured. The Long-Term Incentive scorecard includes Sustainability Metrics with a 20% weighting. These metrics include Sustainable Finance Disbursements, defined as the total volume of loans classified as environmentally and socially sustainable in accordance with Alpha Bank's Sustainable Finance Framework. By linking part of executive remuneration to this metric, the Bank incentivises management to originate, structure and grow financing that supports eligible sustainable activities, including climate mitigation, energy efficiency, renewable energy, sustainable transport, green buildings, resource efficiency and other environmentally sustainable purposes. The incentive therefore supports the Bank's net-zero commitment across its lending and investment portfolio by 2050, its interim 2030 sector targets and the implementation of its Climate Transition Plan. This remuneration approach reinforces long-term, responsible performance by encouraging portfolio steering towards activities and clients that contribute to the transition to a low-carbon economy. It also supports client decarbonisation and transition financing, and promotes the integration of climate and environmental considerations into business planning, client engagement, credit decision-making and sustainable finance origination.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Chief Financial Officer (CFO)

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

☒ Achievement of environmental targets

Strategy and financial planning

☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursements

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

As per the 2025 Remuneration Policy of the Members of the Board of Directors, Alpha Bank provides monetary incentives linked to environmental performance through its variable remuneration framework for Executive Members of the Board and senior executives. Variable compensation is provided through the Combined Bonus Plan, which includes short-term and long-term incentive components linked to performance against strategic KPIs, subject to approval by the Board of Directors. Performance is assessed annually through a balanced scorecard covering Group and individual targets. The Long-Term Incentive scorecard includes both financial and non-financial KPIs and incorporates ESG criteria in executive remuneration. For 2025, Sustainability Metrics have a 20% weighting within the Long-Term Incentive scorecard. These include a climate-related target focused on Sustainable Finance Disbursements, defined as the total volume of loans classified as environmentally and socially sustainable in accordance with the Bank's Sustainable Finance Framework, measured over the business plan period. The incentive is linked primarily to climate change, as Sustainable Finance Disbursements support the Bank's net-zero commitment, interim 2030 sector targets, Transition Plan and client transition financing. It encourages portfolio steering towards eligible sustainable activities, supports client decarbonisation and transition needs, and reinforces the integration of environmental considerations into business planning, client engagement and credit decision-making. The incentive is delivered through variable remuneration, including cash and share-linked or other equivalent non-cash instruments, subject to the applicable regulatory limits, shareholder approvals, deferral, malus and clawback provisions. Non-Executive Board Members are not included, as they do not receive performance-based variable remuneration.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The position's incentives contribute to Alpha Bank's environmental commitments and Climate Transition Plan by linking executive variable remuneration to the mobilisation of sustainable finance, which is a key lever for portfolio decarbonisation and client transition support. Under the Bank's variable remuneration framework, performance is assessed through a balanced mix of financial, non-financial and risk-adjusted criteria, ensuring that ESG priorities are embedded in how success is measured. The Long-Term Incentive scorecard includes Sustainability Metrics with a 20% weighting. These metrics include Sustainable Finance Disbursements, defined as the total volume of loans classified as environmentally and socially sustainable in accordance with Alpha Bank's Sustainable Finance Framework. By linking part of executive remuneration to this metric, the Bank incentivises management to originate, structure and grow financing that supports eligible sustainable activities, including climate mitigation, energy efficiency, renewable energy, sustainable transport, green buildings, resource efficiency and other environmentally sustainable purposes. The incentive therefore supports the Bank's net-zero commitment across its lending and investment portfolio by 2050, its interim 2030 sector targets and the implementation of its Climate Transition Plan. This remuneration approach reinforces long-term, responsible performance by encouraging portfolio steering towards activities and clients that contribute to the transition to a low-carbon economy. It also supports client decarbonisation and transition financing, and promotes the integration of climate and environmental considerations into business planning, client engagement, credit decision-making and sustainable finance origination.

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Chief Wholesale Banking

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

☒ Achievement of environmental targets

Strategy and financial planning

☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursement

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

As per the 2025 Remuneration Policy of the Members of the Board of Directors, Alpha Bank provides monetary incentives linked to environmental performance through its variable remuneration framework for Executive Members of the Board and senior executives. Variable compensation is provided through the Combined Bonus Plan, which includes short-term and long-term incentive components linked to performance against strategic KPIs, subject to approval by the Board of Directors. Performance is assessed annually through a balanced scorecard covering Group and individual targets. The Long-Term Incentive scorecard includes both financial and non-financial KPIs and incorporates ESG criteria in executive remuneration. For 2025, Sustainability Metrics have a 20% weighting within the Long-Term Incentive scorecard. These include a climate-related target focused on Sustainable Finance Disbursements, defined as the total volume of loans classified as

environmentally and socially sustainable in accordance with the Bank's Sustainable Finance Framework, measured over the business plan period. The incentive is linked primarily to climate change, as Sustainable Finance Disbursements support the Bank's net-zero commitment, interim 2030 sector targets, Transition Plan and client transition financing. It encourages portfolio steering towards eligible sustainable activities, supports client decarbonisation and transition needs, and reinforces the integration of environmental considerations into business planning, client engagement and credit decision-making. The incentive is delivered through variable remuneration, including cash and share-linked or other equivalent non-cash instruments, subject to the applicable regulatory limits, shareholder approvals, deferral, malus and clawback provisions. Non-Executive Board Members are not included, as they do not receive performance-based variable remuneration.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Chief Retail Client Strategies Officer

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

- ☒ Progress towards environmental targets
- ☒ Achievement of environmental targets

Strategy and financial planning

- ☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursements

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

- ☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

As per the 2025 Remuneration Policy of the Members of the Board of Directors, Alpha Bank provides monetary incentives linked to environmental performance through its variable remuneration framework for Executive Members of the Board and senior executives. Variable compensation is provided through the Combined Bonus Plan, which includes short-term and long-term incentive components linked to performance against strategic KPIs, subject to approval by the Board of Directors. Performance is assessed annually through a balanced scorecard covering Group and individual targets. The Long-Term Incentive scorecard includes both financial and non-financial KPIs and incorporates ESG criteria in executive remuneration. For 2025, Sustainability Metrics have a 20% weighting within the Long-Term Incentive scorecard. These include a climate-related target focused on Sustainable Finance Disbursements, defined as the total volume of loans classified as environmentally and socially sustainable in accordance with the Bank's Sustainable Finance Framework, measured over the business plan period. The incentive is linked primarily to climate change, as Sustainable Finance Disbursements support the Bank's net-zero commitment, interim 2030 sector targets, Transition Plan and client transition financing. It encourages portfolio steering towards eligible sustainable activities, supports client decarbonisation and transition needs, and reinforces the integration of environmental considerations into business planning, client engagement and credit decision-making. The incentive is delivered through variable remuneration, including cash and share-linked or other equivalent non-cash instruments, subject to the applicable regulatory limits, shareholder approvals, deferral, malus and clawback provisions. Non-Executive Board Members are not included, as they do not receive performance-based variable remuneration.

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Chief of Corporate Center and General Counsel

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

☒ Achievement of environmental targets

☒ Other targets-related metrics, please specify :Assessment of the Company's Exposure to Industry-Specific ESG Risks

Strategy and financial planning

☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursements

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Deputy Chief Executive Officer

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

☒ Achievement of environmental targets

Strategy and financial planning

☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursements

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Chief Digital and Technology Officer

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

- ☒ Progress towards environmental targets
- ☒ Achievement of environmental targets

Strategy and financial planning

- ☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursements

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

- ☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Chief Human Resources Officer

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

☒ Achievement of environmental targets

Strategy and financial planning

☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursements

Resource use and efficiency

☒ Reduction in total energy consumption

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Chief Wealth Management Officer

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

☒ Achievement of environmental targets

Strategy and financial planning

☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursements

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

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Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Other C-Suite Officer, please specify :Chief Integration and Group Initiatives Officer

(4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

☒ Shares

(4.5.1.3) Performance metrics

Targets

- ☒ Progress towards environmental targets
- ☒ Achievement of environmental targets

Strategy and financial planning

- ☒ Other strategy and financial planning-related metrics, please specify :Sustainable Finance Disbursements

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☒ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

- Select all that apply
- ☒ Climate change
 - ☒ Water
 - ☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

- ☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations

(4.6.1.4) Explain the coverage

The Bank's Environmental Policy is incorporated in its publicly committed Environmental Strategy which includes commitments for climate change, biodiversity and circularity, with specific targets that are monitored quarterly and reported annually. The Bank's Environmental Policy commitments are disclosed through its annual Sustainability Statement and Climate-related report. In particular, for its own operations, the Bank has established an Environmental Management Policy since April 2019 that sets the framework for the Group's Environmental Management, aiming at improving its environmental performance, compliance with the institutional and regulatory framework on environmental issues and ensuring the effective use of natural resources. According to the Policy, an Environmental Management System (EMS), certified under ISO 14001, has been developed according to international standards, setting the framework for the monitoring, management and improvement of the environmental impact of its activities. The EMS monitors the Bank's environmental performance related to its operations, including energy use, greenhouse gas emissions, resource use, water use, waste management and pollution prevention.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to take environmental action beyond regulatory compliance
- ☒ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

- ☒ Commitment to 100% renewable energy

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☒ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

☒ Publicly available

(4.6.1.8) Attach the policy

Environmental Policy.pdf

Row 4

(4.6.1.1) Environmental issues covered

Select all that apply

☒ Climate change

☒ Water

☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☒ Downstream value chain

☒ Portfolio

(4.6.1.4) Explain the coverage

The Bank has adopted a Sustainable Development Strategy to manage material ESG impacts and enhance its contribution to society, the economy and the environment. The Strategy supports the transition to a low-carbon economy and aligns with the Paris Agreement, UN 2030 Agenda and EU Climate Law. As a financial institution, Alpha Bank directs financial flows towards sustainable activities by supporting clients' transition through financing, advisory services and partnerships. This approach is operationalized through the Sustainable Finance Framework, which sets criteria for classifying financing as sustainable, and the Transition Plan, which sets the roadmap for aligning the Bank's business model, portfolio management and risk management with a low-carbon economy. The Green Bond Framework supports allocation of proceeds to eligible green assets. The Strategy is underpinned by the Bank's net-zero GHG emissions commitment across its lending and investment portfolio by 2050, supported by interim 2030 targets under NZBA. These commitments drive portfolio steering, client engagement and climate risk management, while supporting biodiversity protection, circular economy principles and financing towards eligible activities, including renewable energy, energy efficiency, sustainable transport, green buildings, resource efficiency, water and biodiversity-related objectives.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to a circular economy strategy
- ☒ Commitment to avoidance of negative impacts on threatened and protected species
- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to take environmental action beyond regulatory compliance
- ☒ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

- ☒ Commitment to net-zero emissions
- ☒ Commitment to not invest in fossil-fuel expansion

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- ☒ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

(4.6.1.8) Attach the policy

(4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?

	Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies
Banking (Bank)	<i>Select from:</i> ☒ Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies

[Fixed row]

(4.7.1) Provide details of the policies which include environmental requirements that clients/investees need to meet.

Banking (Bank)

(4.7.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.7.1.2) Type of policy

Select all that apply

- ☒ Credit/lending policy

- ☒ Engagement policy
- ☒ Pricing policy

(4.7.1.3) Public availability

Select from:

- ☒ Publicly available

(4.7.1.4) Attach the policy

AB Transition Plan.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

- ☒ Direct operations and upstream/downstream value chain

(4.7.1.6) Industry sectors covered by the policy

Select all that apply

- | | |
|---|---|
| ☒ Retail | ☒ Fossil Fuels |
| ☒ Apparel | ☒ Manufacturing |
| ☒ Services | ☒ Infrastructure |
| ☒ Materials | ☒ Power generation |
| ☒ Hospitality | ☒ Transportation services |
| ☒ Food, beverage & agriculture | |
| ☒ Biotech, health care & pharma | |

(4.7.1.7) Commodities covered by the policy

Select all that apply

- ☒ Timber products

(4.7.1.8) Commodity value chain stage covered by the policy

Select all that apply

- ☒ Production
- ☒ Processing
- ☒ Trading
- ☒ Manufacturing
- ☒ Retailing

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

*The client engagement framework operates under a multi-layered governance structure that ensures clear ownership, effective oversight, and appropriate escalation pathways. This structure aligns with EBA expectations on governance and risk management integration, decision-making and in the development of various internal processes. The engagement process aims to support the resilience of the Bank's portfolio and the encouragement of the sustainable development of its clients. Corporate clients subject to the ESGr questionnaire (*explained below) are engaged according to their ESG risk profile, sector relevance, credit exposure and the outcome of the Bank's ESG assessment process. Additional engagements occur if risk increases, if the client is in a target-setting sector, or if an Action Plan is triggered. For High ESG Risk clients, engagement frequency may increase, depending on the severity of the identified issues, the client's exposure and the applicable credit governance process. *The Hellenic Bank Association (HBA) interbank ESGr questionnaire is used to collect client ESG information and to apply an internally developed methodology to calculate the Alpha Bank ESG Risk Score. The outputs are used to: • Determine High/Medium/Low ESG Risk categories • Inform credit assessment, and where applicable, credit structuring and pricing considerations • Trigger the proposal or monitoring of client Action Plans, where required • Inform the client engagement strategy • Serve as a baseline for monitoring ESG performance This tool is foundational to the Bank's ESG data collection process, client engagement prioritization and credit review.*

(4.7.1.12) Requirements for clients/investees

Environmental commitments

- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

- ☒ Commitment to net-zero emissions
- ☒ Commitment to not invest in fossil-fuel expansion
- ☒ Commitment to 100% renewable energy
- ☒ Commitment to disclose Scope 1 emissions

- ☒ Commitment to disclose Scope 2 emissions
- ☒ Commitment to disclose Scope 3 emissions

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

- ☒ Yes

(4.7.1.14) % of clients/investees compliant with the policy

100

(4.7.1.15) % of portfolio value that is compliant with the policy

100

(4.7.1.16) Target year for 100% compliance

Select from:

- ☒ Already met

Banking (Bank)

(4.7.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Biodiversity

(4.7.1.2) Type of policy

Select all that apply

- ☒ Credit/lending policy

- ☒ Risk policy

(4.7.1.3) Public availability

Select from:

- ☒ Publicly available

(4.7.1.4) Attach the policy

Exclusion List.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

- ☒ Direct operations and upstream/downstream value chain

(4.7.1.6) Industry sectors covered by the policy

Select all that apply

- | | |
|---|---|
| ☒ Services | ☒ Infrastructure |
| ☒ Materials | ☒ Power generation |
| ☒ Hospitality | ☒ Transportation services |
| ☒ Fossil Fuels | ☒ Food, beverage & agriculture |
| ☒ Manufacturing | ☒ Biotech, health care & pharma |

(4.7.1.7) Commodities covered by the policy

Select all that apply

- | | |
|--|--|
| ☒ Soy | ☒ Timber products |
| ☒ Cocoa | ☒ Cattle products |
| ☒ Rubber | ☒ All agricultural commodities |
| ☒ Coffee | |
| ☒ Palm oil | |

(4.7.1.8) Commodity value chain stage covered by the policy

Select all that apply

- ☒ Production
- ☒ Processing
- ☒ Trading
- ☒ Manufacturing
- ☒ Retailing

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

As part of the aforementioned policies, the Group applies, maintains and updates an Exclusion List that determines specific activities that are excluded from financing or subject to restrictions, in line with the Bank's risk appetite, environmental and social risk-management approach and responsible financing principles. This is applicable to all business lending obligors across all geographies and industry sectors within the scope of the Bank's credit approval process. The criteria for exclusion span various environmental and social matters, including activities with significant adverse environmental impacts, certain fossil-fuel-related activities, and activities affecting biodiversity and forests. Criteria coverage is determined by the nature of the client's activity, sector, geography, transaction purpose, use of proceeds and the environmental and social risks associated with the proposed financing. The Exclusion List applies at client and transaction level and is used to identify activities that are not aligned with the Bank's policy framework, risk appetite or sustainability commitments. Forest-related criteria are included where the client's activity involves forest-relevant products or activities, including restrictions on conversion of natural forests into plantations, commercial logging in primary tropical moist forests, and production or trade in wood or forestry products unless sustainably managed. Exceptions, where explicitly permitted by the applicable policy framework, are determined through the relevant credit, risk and governance processes. Any exception would require appropriate assessment, justification, documentation and approval in line with the Bank's internal policies, risk appetite and applicable regulatory requirements. Activities explicitly excluded under the Exclusion List are not eligible for financing.

(4.7.1.12) Requirements for clients/investees

Environmental commitments

- ☒ Commitment to avoidance of negative impacts on threatened and protected species
- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to respect legally designated protected areas

Climate-specific commitments

☒ Commitment to not invest in fossil-fuel expansion

Forests-specific commitments

☒ Commitment to no land clearance by burning or clearcutting

Social commitments

☒ Adoption of the UN International Labour Organization principles

☒ Commitment to respect internationally recognized human rights

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

☒ Yes

(4.7.1.14) % of clients/investees compliant with the policy

100

(4.7.1.15) % of portfolio value that is compliant with the policy

100

(4.7.1.16) Target year for 100% compliance

Select from:

☒ Already met

[Add row]

(4.7.2) Provide details of your exclusion policies related to industries, activities and/or locations exposed or contributing to environmental risks.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

☒ Thermal coal

(4.7.2.2) Fossil fuel value chain

Select all that apply

☒ Upstream

(4.7.2.3) Year of exclusion implementation

2016

(4.7.2.4) Phaseout pathway

Select all that apply

☒ New business/investment for new projects

☒ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2016

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

☒ Worldwide

(4.7.2.7) Description

The Bank applies, maintains and updates an exclusion list that determines specific activities, which are not allowed to be financed. The criteria for exclusion span across various environmental and social matters. Specifically, the Group does not finance, among others, the following activity: -New investments in thermal coal mining or coal-fired electricity generation capacity. Please note that Alpha Bank does not have any exposure on thermal coal in its loan portfolio.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

☒ Coal mining

(4.7.2.2) Fossil fuel value chain

Select all that apply

☒ Upstream

(4.7.2.3) Year of exclusion implementation

2016

(4.7.2.4) Phaseout pathway

Select all that apply

☒ New business/investment for new projects

☒ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2016

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

☒ Worldwide

(4.7.2.7) Description

The Bank applies, maintains and updates an exclusion list that determines specific activities, which are not allowed to be financed. The criteria for exclusion span across various environmental and social matters. Specifically, the Group does not finance, among others, the following activity: -New investments in thermal coal mining or coal-fired electricity generation capacity. Please note that Alpha Bank does not have any exposure on coal mining in its loan portfolio

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

☒ Power from coal

(4.7.2.2) Fossil fuel value chain

Select all that apply

☒ Upstream

(4.7.2.3) Year of exclusion implementation

2016

(4.7.2.4) Phaseout pathway

Select all that apply

☒ New business/investment for new projects

☒ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2016

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

☒ Worldwide

(4.7.2.7) Description

The Bank applies, maintains and updates an exclusion list that determines specific activities, which are not allowed to be financed. The criteria for exclusion span across various environmental and social matters. Specifically, the Group does not finance, among others, the following activity: -New investments in thermal coal mining or coal-fired electricity generation capacity. Please note that Alpha Bank does not have any exposure on coal in its loan portfolio

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

☒ All oil & gas

(4.7.2.2) Fossil fuel value chain

Select all that apply

☒ Upstream

(4.7.2.3) Year of exclusion implementation

2016

(4.7.2.4) Phaseout pathway

Select all that apply

☒ New business/investment for new projects

☒ New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2016

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

☒ Worldwide

(4.7.2.7) Description

The Bank applies, maintains and updates an exclusion list that determines specific activities, which are not allowed to be financed. The criteria for exclusion span across various environmental and social matters. Specifically, the Group does not provide new financing to, among others, the following activities: - Upstream oil exploration - extraction and production. - Upstream oil development projects, except in rare and exceptional circumstances where the proceeds of the project exclusively target the reduction of GHG emissions or flaring at existing producing fields. The exclusion applies to new business relating to both new and existing upstream oil projects across the geographies in which the policy operates. Please note that Alpha Bank does not have any exposure on oil in its loan portfolio from existing producing fields.
[Add row]

(4.8) Does your organization include covenants in financing agreements to reflect and enforce your environmental policies?

	Covenants included in financing agreements to reflect and enforce policies
	Select from: ☒ Yes

[Fixed row]

(4.8.1) Provide details of the covenants included in your organization’s financing agreements to reflect and enforce your environmental policies.

Row 1

(4.8.1.1) Environmental issue

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Biodiversity

(4.8.1.2) Types of covenants used

Select all that apply

- ☒ A purpose or use of proceeds clause that refers to a taxonomy aligned activity
- ☒ Covenants related to compliance with your environmental policies
- ☒ Margin or pricing depends on sustainability criteria
- ☒ Legal mandate to obtain third party verification of sustainability criteria
- ☒ Other, please specify :A purpose or use of proceeds clause that refers to a Bank's Sustainable Finance Framework activity

(4.8.1.3) Asset class/product types covered by covenants

Select all that apply

- ☒ Corporate loans
- ☒ Retail loans
- ☒ Corporate real estate
- ☒ Retail mortgages
- ☒ Project finance

(4.8.1.4) Criteria for how covenants are applied

Select from:

- ☒ New business/investment for all projects

(4.8.1.5) % of clients covered by covenants

100

(4.8.1.6) % of portfolio covered in relation to total portfolio value

(4.8.1.7) Provide details on which environmental policies your covenants enforce and how

The Alpha Bank Sustainable Finance Framework (SFF) sets out the approaches and procedures for classifying financing as sustainable. It defines the decision and classification process implemented by the Bank to categorize financial products or services as sustainable, including green or social financing. The SFF covers ESG lending solutions in the Bank's Wholesale and Retail banking portfolios. Based on market practices and standards, eligible financings are classified into four categories: (i) Dedicated-purpose – Green/Social Loans, (ii) Dedicated-purpose – Recovery and Resilience Facility-based Approach, (iii) General-purpose – Company Business Mix, (iv) General-purpose – Sustainability-linked Loans/Facilities. Covenants included in relevant financing agreements enforce the SFF by translating its sustainable finance eligibility criteria into contractual requirements. These may include use-of-proceeds restrictions, reporting and information undertakings, supporting documentation requirements and, where applicable, Sustainability Performance Targets ("SPTs"). These covenants support alignment with the Bank's environmental policies, Transition Plan, Client Engagement Framework and environmental and social risk-management approach. Sustainability-linked loans provide incentives to achieve defined, measurable ESG targets based on pre-determined SPTs agreed with the client. Typically, achievement of selected SPTs, such as emissions reduction, energy efficiency, renewable energy, adaptation or resilience, water-related performance or other sector-relevant environmental objectives, may lead to a discount to the loan margin, while non-achievement may result in pricing consequences or other contractual actions, depending on the agreement. SPTs are set in good faith between the Bank and its clients and are expected to be ambitious, encourage positive change and track material improvements against a baseline performance level. They should be aligned with the client's sustainability strategy, where applicable, and reflect issues relevant to the client's sector and business. SPTs are determined before or concurrently with loan origination and are expected to be achieved within the loan term. Supporting documentation is collected and retained through the credit approval process, while compliance is monitored through client reporting, KPI review, credit monitoring and escalation through the Bank's credit and risk governance processes where required.

Row 2

(4.8.1.1) Environmental issue

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.8.1.2) Types of covenants used

Select all that apply

- ☒ A purpose or use of proceeds clause that refers to a taxonomy aligned activity
- ☒ Covenants related to compliance with your environmental policies

☒ Other, please specify :A purpose or use of proceeds clause that refers to the Bank's Sustainable Finance Framework activity

(4.8.1.3) Asset class/product types covered by covenants

Select all that apply

- ☒ Corporate loans
- ☒ Retail loans
- ☒ Corporate real estate
- ☒ Retail mortgages
- ☒ Project finance

(4.8.1.4) Criteria for how covenants are applied

Select from:

- ☒ New business/investment for all projects

(4.8.1.5) % of clients covered by covenants

100

(4.8.1.6) % of portfolio covered in relation to total portfolio value

100

(4.8.1.7) Provide details on which environmental policies your covenants enforce and how

For green and use-of-proceeds financing, Alpha Bank includes environmental covenants in relevant financing agreements to support implementation of its Sustainable Finance Framework, Sustainable Development Strategy, Transition Plan and environmental and social risk-management approach. These covenants help ensure that proceeds are used for eligible environmental activities and that the financed activity remains consistent with the Bank's sustainable finance eligibility criteria. Where applicable, covenants may require the client to use proceeds only for eligible green activities under the Sustainable Finance Framework and, where relevant, EU Taxonomy-related criteria. Eligible activities may include renewable energy, energy efficiency, sustainable transport, green buildings, resource efficiency and pollution control, sustainable use and protection of water and marine resources, and biodiversity-related objectives. Agreements may also include information undertakings, reporting obligations, documentation requirements, environmental permits, compliance with applicable environmental laws, and adherence to project-specific environmental and social requirements. These covenants enforce the Bank's environmental policies by linking the contractual use of financing to the environmental purpose for which the facility was approved and classified. Compliance is monitored through credit review, client reporting, review of supporting

documentation, use-of-proceeds checks and, where relevant, project monitoring. If requirements are not met, consequences depend on the financing agreement and may include remediation, reclassification, restriction of proceeds, waiver or amendment processes, or contractual default where applicable.
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☒ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

- | | |
|---|---|
| ☒ UNEP FI | ☒ UNEP FI Principles for Responsible Banking |
| ☒ UN Global Compact | ☒ Partnership for Carbon Accounting Financials (PCAF) |
| ☒ CDP Investor Signatory | ☒ Global Reporting Initiative (GRI) Community Member |
| ☒ Net Zero Banking Alliance | |
| ☒ Principles for Responsible Investment (PRI) | |

(4.10.3) Describe your organization's role within each framework or initiative

Alpha Bank participates in selected international sustainability and environmental initiatives to support the implementation of its ESG strategy, strengthen transparency, align with recognised market standards and contribute to the transition to a more sustainable economy.

- *United Nations Environment Programme Finance Initiative (UNEP FI): Alpha Bank has been a member of UNEP FI since 2004, participating in the global initiative that brings together financial institutions to advance sustainable finance and accelerate the transition towards a more sustainable economy. Through UNEP FI, the Bank monitors international developments, expectations and guidance relevant to sustainable banking, climate alignment, impact management and responsible finance.*
- *UNEP FI Principles for Responsible Banking (PRB): Alpha Bank became a founding signatory of the Principles for Responsible Banking in 2019. Through the PRB framework, the Bank aligns its strategy, financing activities and governance with the UN Sustainable Development Goals and the Paris Agreement, while publishing annual progress reports on the implementation of the Principles. The framework supports the Bank's work on impact analysis, target setting, client engagement, sustainable finance and governance.*
- *United Nations Global Compact (UN Global Compact): Alpha Bank is a participant in the UN Global Compact and has signed the Letter of Commitment, reaffirming its commitment to the Ten Principles relating to human rights, labour standards, environmental protection and anti-corruption. The Bank also promotes the achievement of the Sustainable Development Goals through its corporate strategy, responsible business practices and stakeholder engagement.*
- *Net-Zero Banking Alliance (NZBA): In 2023, Alpha Bank became the first Greek bank to join the UN-convened Net-Zero Banking Alliance, committing to align its lending and investment portfolios with net-zero greenhouse gas emissions by 2050. Participation in NZBA supports the Bank's Climate Transition Plan, portfolio steering and client transition*

engagement. The Bank has established interim 2030 decarbonisation targets for selected carbon-intensive sectors, using recognised climate scenarios and UNEP FI guidance. • Partnership for Carbon Accounting Financials (PCAF): Alpha Bank is a member of PCAF, applying internationally recognised methodologies to measure and disclose financed emissions. Participation in PCAF supports the Bank's climate target-setting, portfolio alignment and transparent reporting of financed greenhouse gas emissions, while improving comparability and consistency in the measurement of climate impacts across financial portfolios. • CDP: Alpha Bank participates in the CDP disclosure framework by reporting its environmental performance through CDP questionnaires. This supports enhanced transparency on climate-related governance, strategy, risk management, metrics and targets, and enables stakeholders to assess the Bank's progress against environmental commitments. • Principles for Responsible Investment (PRI): Alpha Asset Management MFMC is a signatory to the UN-supported Principles for Responsible Investment. Through PRI, Alpha Asset Management integrates ESG considerations into investment analysis, decision-making, ownership practices and engagement activities, supporting responsible investment practices and the development of more sustainable financial markets within the Group's asset-management activities. • Global Reporting Initiative (GRI): Alpha Bank applies the GRI Standards as one of its sustainability reporting references, supporting comprehensive, consistent and transparent disclosure of its environmental, social and governance performance. Through these initiatives and frameworks, Alpha Bank supports the development and application of common standards for sustainable finance, climate alignment, financed-emissions measurement, responsible banking and transparent environmental disclosure. For more information please visit our website: <https://www.alpha.gr/en/Group/esg-and-sustainability/institutional-partnerships-and-initiatives> [Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Yes

☒ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☒ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☒ Paris Agreement

☒ Another global environmental treaty or policy goal, please specify :UN 2030 Agenda for Sustainable Development / UN Sustainable Development Goals

(4.11.4) Attach commitment or position statement

Sustainability-Statement-FY2025-Alpha-Bank-ENG.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☒ Yes, my organization is registered

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

☒ Mandatory government register

☒ Voluntary government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

*Greek General Commercial Registry (G.E.MI.) – Registration No. 159029160000. Alpha Bank S.A. is registered with the Greek General Commercial Registry (G.E.MI.) in accordance with Greek company law and has been listed on the Athens Stock Exchange since 1925.
<https://publicity.businessportal.gr/company/159029160000>*

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Alpha Bank manages external engagement on environmental matters through its governance, risk-management, compliance and sustainability framework, so that positions expressed externally are consistent with the Bank's ESG strategy, environmental commitments, Sustainable Finance Framework and Climate Transition Plan. External engagement may take place directly, where relevant, or indirectly through industry associations, institutional initiatives and sustainability frameworks. Depending on the subject matter, positions and contributions are coordinated by the relevant business, risk, legal, compliance, investor relations and sustainability functions. The process is also informed by the Bank's stakeholder mapping and double materiality assessment, through which key stakeholder groups — investors and shareholders, customers, employees and communities, and regulators and supervisors — are considered in sustainability-related engagement. This supports alignment of engagement on sustainable finance, climate-related risk management, ESG disclosures, financed emissions, transition finance and environmental

regulation with the Bank's public commitments, including the Paris Agreement, the UN Sustainable Development Goals and its net-zero portfolio commitment by 2050. Consistency is supported by management and Board-level oversight. The Group Sustainability Committee monitors ESG trends, regulatory developments and stakeholder expectations, proposes sustainability-related policies and targets, oversees ESG disclosures and communications, and supports the integration of ESG considerations into the Bank's business strategy, risk-management framework and operating model. Where appropriate, environmental matters are escalated to senior management and Board Committees, including the Corporate Governance, Sustainability and Nominations Committee and the Risk Management Committee. Participation in UNEP FI, the PRB, the NZBA, PCAF and the UNGC also supports consistency by providing recognised principles and methodologies that inform the Bank's external positions on sustainable finance, climate alignment, financed-emissions measurement and environmental disclosure. Through this process, Alpha Bank seeks to ensure that external engagement supports its environmental commitments and Climate Transition Plan, and is consistent with its responsible financing approach, risk appetite and commitment to a low-carbon and resilient economy.

[Fixed row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☒ Other trade association in Europe, please specify :Hellenic Bank Association (HBA)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Alpha Bank is a proactive member of the Hellenic Bank Association (HBA), which represents the vast majority of Greek and foreign credit institutions operating in Greece. The HBA expresses the views of its member banks, provides advisory input to the regulatory process, participates in international, European and national law-preparing and technical committees, and cooperates with financial-sector organizations and associations in the context of bilateral or multilateral initiatives. In 2025, the HBA considered sustainability-related topics relevant to banks, including the development of EU sector-specific sustainability standards, the Voluntary ESRS for SMEs, Pillar III climate-risk disclosures, the EBF response to the EBA Guidelines on ESG Risk Management, transition finance, climate scenario analysis, Green Asset Ratio calculation and the transposition of the CSRD into national legislation. Alpha Bank actively contributes to HBA deliberations, and its comments and views may be reflected in HBA position papers and consultation responses. The Bank's contributions are informed by its internal sustainability, risk-management, legal, compliance and business expertise, as appropriate, and are expected to be consistent with its ESG strategy, Sustainable Finance Framework, Climate Transition Plan, environmental commitments, regulatory obligations and public disclosures. Alpha Bank's position is broadly consistent with the HBA's work on supporting the Greek banking sector's implementation of EU and national sustainability-related requirements and on developing practical approaches to sustainable finance, ESG reporting and climate and environmental risk management. No material inconsistency has been identified between Alpha Bank's environmental commitments and the HBA's relevant positions during the reporting year. If a potential divergence were identified, the Bank would assess the matter internally and, where appropriate, communicate its views through the relevant HBA committee, working group or consultation process.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☒ Paris Agreement

☒ Another global environmental treaty or policy goal, please specify :UN 2030 Agenda for Sustainable Development / UN Sustainable Development Goals (SDGs)

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☒ Other trade association in Europe, please specify :European Banking Federation (EBF)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Alpha Bank's position is broadly consistent with the European Banking Federation's (EBF) work on sustainable finance and environmental regulation. The EBF represents the European banking sector in policy and regulatory dialogue and contributes to the development and implementation of EU banking regulation, including areas relevant to climate risk management, ESG disclosures, sustainable finance, transition finance, prudential supervision and the EU sustainable finance framework. Alpha Bank's environmental commitments, including its alignment with the Paris Agreement, Sustainable Finance Framework, Climate Transition Plan, net-zero portfolio commitment by 2050 and interim climate targets, are consistent with the EBF's general support for a coherent and practicable EU sustainable finance framework that enables banks to finance the transition while managing climate and environmental risks. The Bank's engagement with EBF-related positions is indirect, primarily through banking-sector representation and relevant industry dialogue. Where Alpha Bank contributes to discussions, consultations or working groups relevant to environmental policy or regulation, its input is informed by internal sustainability, risk, legal, compliance and business functions, as appropriate. This helps ensure that contributions are aligned with the Bank's environmental commitments, risk appetite, regulatory obligations and public disclosures. No material inconsistency has been identified between Alpha Bank's environmental commitments and the EBF's relevant positions during the reporting year. If a potential divergence were identified, the Bank would assess the issue internally and, where appropriate, communicate its views through the relevant industry forum or association channel.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☒ Paris Agreement

☒ Another global environmental treaty or policy goal, please specify :UN 2030 Agenda for Sustainable Development / UN Sustainable Development Goals (SDGs)
[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☒ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

☒ In mainstream reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☒ ESRS

☒ Other, please specify :Article 8 of the EU Taxonomy Regulation

(4.12.1.4) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.12.1.5) Status of the publication

Select from:

- ☒ Complete

(4.12.1.6) Content elements

Select all that apply

- | | |
|--|--|
| ☒ Strategy | ☒ Biodiversity indicators |
| ☒ Governance | ☒ Climate-related targets |
| ☒ Risks & Opportunities | ☒ Greenhouse gas emissions figures |
| ☒ Value chain engagement | ☒ Content of environmental policies |
| ☒ Dependencies & Impacts | ☒ Other, please specify :EU Taxonomy / GAR |

(4.12.1.7) Page/section reference

Sustainability Statement pg. 41-158 Article 8 of the EU Taxonomy Regulation pg. 458-497

(4.12.1.8) Attach the relevant publication

Alpha Group 31122025ENG.pdf

(4.12.1.9) Comment

The Sustainability Statement FY2025 is Alpha Bank Group's main environmental disclosure for the reporting year and is included in its annual reporting. It has been prepared on a consolidated basis, consistent with the basis of preparation of the financial statements, and covers Alpha Bank Group, including material impacts, risks and opportunities related to its own operations and value chain, where relevant. The Statement has been prepared in accordance with CSRD / ESRS requirements and includes disclosures on environmental governance, strategy, policies, actions, targets, metrics, risk management, double materiality assessment outcomes, EU Taxonomy reporting, sustainable finance, GHG emissions and the Bank's Climate Transition Plan. It covers environmental topics including climate change, pollution,

water and marine resources, biodiversity and ecosystems, and resource use / circular economy. Given the nature of the Bank's activities, the Statement also includes information connected with the Group's downstream value chain through the provision of financial products and services to customers, particularly in relation to climate change. Time horizons referred to in the Statement are aligned with ESRS definitions. The Sustainability Statement has received independent limited assurance in accordance with ISAE 3000 (Revised).

Row 2

(4.12.1.1) Publication

Select from:

☒ In mainstream reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☒ Other, please specify :ESMA/EBA Guidelines

(4.12.1.4) Environmental issues covered in publication

Select all that apply

☒ Climate change

☒ Forests

☒ Water

☒ Biodiversity

(4.12.1.5) Status of the publication

Select from:

☒ Complete

(4.12.1.6) Content elements

Select all that apply

- ☒ Strategy
- ☒ Governance
- ☒ Risks & Opportunities
- ☒ Value chain engagement
- ☒ Greenhouse gas emissions figures
- ☒ Other, please specify :EU Taxonomy / GAR

(4.12.1.7) Page/section reference

pg. 168-228

(4.12.1.8) Attach the relevant publication

consolidated-pillar-III-disclosures-31-december-2025.pdf

(4.12.1.9) Comment

The Group Pillar III Report is prepared in accordance with the disclosure requirements set out in Part Eight of Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms, as amended, and the related Capital Requirements Directive framework. It provides regulatory prudential disclosures on the Group's capital, risk profile, governance and risk-management framework. The Report is relevant to environmental disclosure because it includes a dedicated section on ESG risks, with emphasis on the identification, monitoring and management of climate-related and environmental risks within the Bank's prudential risk-management framework. It covers the regulatory ESG disclosure templates, including information on exposures subject to climate-related transition and physical risks, energy-efficiency of collateral where applicable, EU Taxonomy / Green Asset Ratio-related disclosures and other ESG risk metrics required under the Pillar III framework. The Pillar III Report complements the Sustainability Statement by presenting climate and environmental risk information from a prudential and regulatory perspective. It should therefore be used primarily as evidence of how environmental and climate-related risks are integrated into risk management, governance, capital and regulatory disclosures, rather than as the main source for broader environmental strategy, policies, biodiversity, forest or water-related targets.

Row 3

(4.12.1.1) Publication

Select from:

- ☒ In voluntary communications

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

- ☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

- ☒ Other, please specify :UNEP FI Principles of Responsible Banking

(4.12.1.4) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
☒ Biodiversity

(4.12.1.5) Status of the publication

Select from:

- ☒ Complete

(4.12.1.6) Content elements

Select all that apply

- ☒ Strategy
☒ Governance
☒ Risks & Opportunities
☒ Value chain engagement
☒ Dependencies & Impacts
- ☒ Greenhouse gas emissions figures

(4.12.1.7) Page/section reference

The entire document is relevant.

(4.12.1.8) Attach the relevant publication

2025-PRB-Responsible-Banking-Progress-Statement-AlphaBank.pdf

(4.12.1.9) Comment

For 2025, Alpha Bank prepared its PRB Progress Statement in line with the updated Principles for Responsible Banking framework introduced by UNEP FI in November 2024. The Progress Statement explains how the Group implements the six PRB Principles and links responsible banking commitments with its strategy, governance, impact analysis, target setting, stakeholder engagement and sustainable finance activities. The Progress Statement also cross-refers to the Sustainability Statement included in the Annual Report 2025, which was prepared under the Corporate Sustainability Reporting Directive, the ESRS and Greek Law 5164/2024. The information disclosed under the PRB Principles therefore reflects the Group's material sustainability impacts, risks and opportunities, including those related to its own operations and downstream value chain through the provision of financial products and services to customers. The publication is relevant to environmental disclosure because it describes the Bank's alignment with the SDGs and the Paris Agreement, its sustainable finance approach, its climate-related commitments, and the integration of ESG considerations into governance, strategy, risk management and client engagement. It complements the Sustainability Statement by presenting the Bank's progress through the specific lens of the UNEP FI PRB framework.

Row 4

(4.12.1.1) Publication

Select from:

☒ In voluntary sustainability reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☒ Other, please specify :International Capital Markets Association ("ICMA") Green Bond Principles

(4.12.1.4) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.12.1.5) Status of the publication

Select from:

- ☒ Complete

(4.12.1.6) Content elements

Select all that apply

- | | |
|--|--|
| ☒ Strategy | ☒ Content of environmental policies |
| ☒ Governance | ☒ Other, please specify : Reporting commitments |
| ☒ Value chain engagement | |
| ☒ Public policy engagement | |
| ☒ Greenhouse gas emissions figures | |

(4.12.1.7) Page/section reference

The entire document is relevant.

(4.12.1.8) Attach the relevant publication

Alpha Bank Green Bond Framework ESG Strategy IP.pdf

(4.12.1.9) Comment

Alpha Bank's Green Bond Framework is a relevant supporting publication for environmental disclosure, as it sets out the basis for issuing green bonds or other green financial instruments by Alpha Bank or Alpha Services and Holdings S.A. The Framework supports the Bank's broader sustainability strategy by enabling the allocation of capital to eligible green assets and activities that contribute to environmental objectives. The Framework is aligned with the 2021 ICMA Green Bond Principles and incorporates their four core components: Use of Proceeds, Process for Project Evaluation and Selection, Management of Proceeds, and Reporting. Eligible green categories include activities such as renewable energy, energy efficiency, clean transportation, green buildings, sustainable water and wastewater

management, pollution prevention and control, circular economy, and biodiversity-related objectives, where applicable. The Framework also refers to alignment, on a best-efforts basis, with evolving market practice and the EU Taxonomy Regulation. It complements the Sustainability Statement by showing how the Bank mobilises funding for eligible environmentally sustainable activities.

Row 5

(4.12.1.1) Publication

Select from:

- ☒ In voluntary sustainability reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

- ☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

- ☒ ESRS
☒ GRI
☒ Other, please specify :Internal ESG KPI reporting structure

(4.12.1.4) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
☒ Forests
☒ Water
☒ Biodiversity

(4.12.1.5) Status of the publication

Select from:

☒ Complete

(4.12.1.6) Content elements

Select all that apply

- ☒ Governance
- ☒ Biodiversity indicators
- ☒ Greenhouse gas emissions figures
- ☒ Water accounting figures
- ☒ Other, please specify :energy data, water data, waste/resource-use data, environmental KPIs, workforce/social/governance KPIs

(4.12.1.7) Page/section reference

The entire document is relevant.

(4.12.1.8) Attach the relevant publication

2025-ESG-DATABOOK-ALPHA-BANK-180626.pdf

(4.12.1.9) Comment

The ESG Databook provides a consolidated set of quantitative ESG indicators covering environmental, social and governance matters. It complements the Sustainability Statement by presenting detailed KPI data in a structured format, including indicators related to the Group's own operations and, where disclosed, financed emissions and sustainable finance. The Databook is relevant to environmental disclosure because it includes reported metrics such as energy consumption, greenhouse gas emissions, water use, waste, resource use and other environmental performance indicators. It also supports transparency and comparability by presenting data that can be used to track performance over time and substantiate disclosures included in the Sustainability Statement. The ESG Databook is prepared with reference to the Bank's sustainability reporting framework, including ESRS and GRI Standards where applicable, as a quantitative data source supporting the Sustainability Statement.

Row 6

(4.12.1.1) Publication

Select from:

- ☒ In voluntary sustainability reports

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☒ ESRS

☒ GRI

☒ IFRS

☒ Other, please specify :EFRAG

(4.12.1.4) Environmental issues covered in publication

Select all that apply

☒ Climate change

☒ Forests

☒ Water

☒ Biodiversity

(4.12.1.5) Status of the publication

Select from:

☒ Complete

(4.12.1.6) Content elements

Select all that apply

☒ Strategy

☒ Governance

☒ Risks & Opportunities

☒ Value chain engagement

☒ Public policy engagement

☒ Climate-related targets

☒ Content of environmental policies

(4.12.1.7) Page/section reference

The entire document is relevant.

(4.12.1.8) Attach the relevant publication

UNGC COP Viewer-2026.pdf

(4.12.1.9) Comment

The Communication on Progress (CoP) is the primary mechanism for UN Global Compact participants to demonstrate progress made against the Ten Principles of the UN Global Compact and the UN Sustainable Development Goals (SDGs). The CoP questionnaire discloses progress made in the areas of governance, human rights, labour, environment and anti-corruption. This standardized questionnaire allows participants to: ■ Measure and demonstrate progress on the Ten Principles in a consistent and harmonized way; ■ Build credibility and brand value by showing their commitment to corporate sustainability, the Ten Principles and the SDGs; ■ Receive insights, learn and continuously improve sustainability performance by helping to identify gaps and inform goal-setting year over year; and ■ Compare progress against peers through access to one of the world's largest sources of free, public and comparable corporate sustainability data.

[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ Annually

Forests

(5.1.1) Use of scenario analysis

Select from:

☒ No, and we do not plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☒ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

Alpha Bank has not developed a separate scenario focused specifically on forest-risk commodities. Portfolio-level nature risks are assessed through broader biodiversity and ecosystem resilience analysis, including consideration of land-use and timber-related pressures. Given the Bank's business model and its limited direct operational exposure to forest-risk commodities, which arises mainly through paper procurement, a dedicated forests scenario is not currently a strategic

priority. Forest-related considerations are instead addressed through nature-risk assessment, environmental and social due diligence, biodiversity-related exclusions and certified-paper procurement requirements. The need for a dedicated forests scenario will be reassessed as exposures, data availability and relevant methodologies evolve.

Water

(5.1.1) Use of scenario analysis

Select from:

☒ No, and we do not plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☒ Not an immediate strategic priority

(5.1.4) Explain why your organization has not used scenario analysis

Alpha Bank does not perform a standalone water-security scenario analysis. The FY2025 double-materiality assessment did not identify material water and marine resources impacts, risks or opportunities in the short (2026), medium (2030) or long term (2050), and no water-related operational losses were recognized in 2025. The climate physical-risk analysis does assess flood risk to borrowers and collateral, but this is a climate scenario rather than a dedicated water-security scenario. No public plan to introduce a standalone water scenario within the next two years has been disclosed.

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 7.0

(5.1.1.2) SSPs used in conjunction with scenario

Select from:

☒ SSP3

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 2.0°C - 2.4°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2040

☒ 2050

☒ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Climate change (one of five drivers of nature change)

Direct interaction with climate

☒ On asset values, on the corporate

Macro and microeconomy

☒ Domestic growth

☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Emissions and increasing reliance on carbon-intensive energy sources, with renewable penetration remaining broadly stable and insufficient to decarbonise the electricity mix. As a result, global warming reaches approximately 2.2°C by 2050, leading to progressively severe and non-linear physical risk impacts, including more frequent and intense extreme weather events. Macroeconomically, the scenario is characterised by persistent supply-side disruptions, rising energy and food prices, inflationary pressures and monetary tightening. Severe physical damages weigh heavily on output, employment and asset values, resulting in materially lower GDP relative to baseline and heightened physical risk exposure across sectors and geographies.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for the Bank.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Net-Zero

(5.1.1.3) Approach to scenario

Select from:

- ☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- ☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Policy
- ☒ Market
- ☒ Reputation
- ☒ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2030
- ☒ 2040
- ☒ 2050
- ☒ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Stakeholder and customer demands

☒ Consumer sentiment

Regulators, legal and policy regimes

☒ Global regulation

☒ Level of action (from local to global)

☒ Global targets

☒ Other regulators, legal and policy regimes driving forces, please specify :EU ETS carbon price

Macro and microeconomy

☒ Domestic growth

☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Net Zero scenario represents an accelerated transition pathway consistent with limiting global warming to approximately 1.6°C and achieving net zero CO₂ emissions by 2050. The scenario assumes the implementation of stringent climate policies, including aggressive carbon pricing, large-scale public and private investment in low-carbon technologies, rapid electrification and a substantial expansion of renewable energy. Fossil fuel demand declines sharply, electricity generation becomes almost fully decarbonised by 2050, and energy efficiency improvements materially reduce overall energy demand. While the transition generates short-term inflationary and output pressures due to higher carbon prices, these effects are gradually offset by increased investment, productivity gains and avoided physical climate damages. Over the long term, the scenario reflects structural economic reallocation away from carbon-intensive sectors and improved macroeconomic performance relative to the baseline, driven by reduced transition and physical risk exposure.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for Alpha Bank Group.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ Bespoke physical climate scenario

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ Unknown

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Climate change (one of five drivers of nature change)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

In this scenario, it is assumed that severe floods and wildfires take place in Greece. These events bring in one year the losses that, on average, the country will experience in a 50 years' time horizon, which is a rather conservative assumption. While the probability of such an event is low, it allows the creation of relevant acute physical risk scenario. Regarding the estimations of acute physical risks, the Bank has procured a solution to assess the expected economic impacts of acute physical risks on collaterals and economic activity. The assessment consists of three main physical risk components: • Hazard: the geographical hazard can be seen as the probability of the residential real estate or the company to be hit by physical risk events, given their localization. • Vulnerability: the vulnerability represents the non-dimensional impact (e.g. percentage damage on the asset value) in case of a natural event: for a building, it depends on structural characteristics which affect its resilience to natural events. • Exposure: the exposure represents the value of the asset exposed to physical risks and is the main ingredient needed to translate an a-dimensional impact to monetary impacts. The combined assessment of the three aforementioned components (exposure, hazard, and vulnerability) – which is coherent with the approach used for the development of the ECB climate-related statistical indicators - allows estimating the expected economic impacts arising from different acute physical risks. The Bank follows a proportional approach regarding estimating acute physical risks using collateral specific characteristics versus regional averages depending on the collateral's materiality to the Real estate portfolio. More specifically, regarding collaterals representing a large share of collateralized exposures in terms of value losses are calculated using collateral specific characteristics such as specific location, intended usage (residential vs commercial) and year of construction. However, regarding collaterals representing an immaterial share of exposures estimates of losses at NUTS3 level are used.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for the Bank.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ Bespoke climate transition scenario

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Policy

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :2026, 2027

(5.1.1.9) Driving forces in scenario

Regulators, legal and policy regimes

☒ Other regulators, legal and policy regimes driving forces, please specify :Increasing EU ETS carbon price

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The short-term disorderly transition risk scenario assesses short-term vulnerabilities triggered by a sharp, abrupt increase in the price of carbon emissions. The scenario aims to capture tail risks in a situation suitable for stress testing and should thus be considered as a severe but plausible representation of a disorderly transition. In terms of magnitude, this is not as adverse as a typical macro stress test scenario, and it is important to note that a disorderly transition is different from a

severe economic crisis. It is the result of a push to reallocate resources in the economy resulting in temporary shocks, which can be relatively large in sectors strongly linked to fossil fuels.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for the Bank.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Delayed Transition

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Policy

☒ Market

☒ Reputation

☒ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2040

☒ 2050

☒ Other, please specify :2026

(5.1.1.9) Driving forces in scenario

Stakeholder and customer demands

☒ Consumer sentiment

Regulators, legal and policy regimes

☒ Global regulation

☒ Level of action (from local to global)

☒ Global targets

☒ Other regulators, legal and policy regimes driving forces, please specify :EU ETS carbon price

Macro and microeconomy

☒ Domestic growth

☒ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The Delayed Transition scenario represents a disorderly transition pathway in which climate policy action is postponed until 2030 and subsequently implemented abruptly and aggressively. The design of the scenario, including its underlying climate pathway, macroeconomic variables and methodological framework reflects a late but forceful policy response. The scenario assumes a sharp and rapid increase in carbon pricing after 2030, concentrated green investment in the latter part of the horizon, accelerated renewable deployment and significant energy efficiency gains. Due to the delayed start, the adjustment is more abrupt, leading to elevated transition risks, stranded assets and stronger short- to medium-term inflationary pressures compared to the Net Zero pathway. The energy mix remains more carbon-intensive relative to the orderly transition scenario, and global warming reaches approximately 1.7°C by 2050. Macroeconomically, the abrupt policy tightening results in more pronounced short- and medium-term GDP losses relative to Net Zero, reflecting higher capital depreciation and disorderly sectoral reallocation. Although economic conditions gradually recover toward the end of the horizon, the net benefits of avoided physical risk materialise later and remain more limited compared to a timely and orderly transition.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for the Bank.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Physical Damage Function

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 3.0°C - 3.4°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2040

☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Speed of change (to state of nature and/or ecosystem services)

☒ Climate change (one of five drivers of nature change)

Macro and microeconomy

☒ Domestic growth

☒ Other macro and microeconomy driving forces, please specify :unemployment rate, inflation, Real Estate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The NGFS Current Policies scenario is constructed on the foundational assumption that governments worldwide maintain their existing climate policies without introducing additional measures or enhancements. This scenario presumes a continuation of the current regulatory frameworks, carbon pricing mechanisms, and energy transition policies as they stand today, without significant acceleration or deviation. The main drivers underpinning this scenario include ongoing fossil fuel consumption patterns, incremental improvements in energy efficiency, and the gradual deployment of renewable energy technologies, all influenced by prevailing economic, technological, and social factors. The scenario reflects a trajectory where climate action remains limited, resulting in continued greenhouse gas emissions at levels consistent with current policy commitments. Methodologically, the NGFS Current Policies scenario employs integrated assessment models and climate-

economic frameworks to simulate the interplay between economic growth, energy demand, and emissions trajectories under the status quo policy environment. These models incorporate sectoral data, technological adoption rates, and policy impacts to project future greenhouse gas emissions and their consequent climate outcomes. The scenario analysis integrates feedback loops between the economy and climate system, enabling a comprehensive assessment of physical and transition risks. This approach ensures that the scenario provides a robust baseline for understanding the implications of maintaining current policies, serving as a critical reference point for risk assessment and strategic planning in climate-related financial disclosures.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for Alpha Bank Cyprus.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Short-Term Baseline

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Policy

☒ Market

☒ Reputation

☒ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ Unknown

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :2026, 2027, 2028

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Speed of change (to state of nature and/or ecosystem services)

☒ Climate change (one of five drivers of nature change)

Macro and microeconomy

☒ Domestic growth

☒ Other macro and microeconomy driving forces, please specify :Unemployment, Inflation, Real estate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Baseline The baseline scenario for the Network for Greening the Financial System (NGFS) short-term scenarios is designed to provide a reference pathway that reflects current policies and announced commitments related to climate change mitigation. This scenario assumes that no additional climate policies beyond those already implemented or firmly planned are introduced. Key variables in this scenario include greenhouse gas emissions trajectories, energy demand and supply dynamics, technological advancements, and economic growth patterns. The baseline scenario incorporates assumptions about the gradual transition away from fossil fuels, improvements in energy efficiency, and the uptake of renewable energy sources, but these changes occur at a pace consistent with existing policy frameworks rather than accelerated climate action. In this context, the baseline scenario serves as a critical benchmark for assessing the potential impacts of climate change and the effectiveness of various policy interventions. It assumes moderate temperature increases aligned with current global commitments, with limited progress towards achieving the Paris Agreement targets. Economic variables such as GDP growth, inflation, and sectoral productivity are modeled under the assumption of a stable but evolving economic environment influenced by climate-related risks and opportunities. The scenario also factors in physical risks from climate change, including

extreme weather events and gradual environmental shifts, which are expected to increasingly affect economic and financial systems over the short term. This comprehensive set of assumptions and variables provides a robust foundation for stress testing and risk assessment exercises within the NGFS framework.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for Alpha Bank Cyprus.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Short-Term Diverging Realities

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Policy

☒ Market

☒ Reputation

☒ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ Unknown

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :2026,2027,2028

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Speed of change (to state of nature and/or ecosystem services)

☒ Climate change (one of five drivers of nature change)

Macro and microeconomy

☒ Domestic growth

☒ Other macro and microeconomy driving forces, please specify :Unemployment, Inflation, Real Estate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The "Diverging Realities" scenario within the NGFS short-term scenarios framework envisions a fragmented global response to climate change, characterized by heterogeneous policy approaches, technological adoption rates, and economic outcomes across regions. This scenario assumes that while some countries and regions implement ambitious climate policies and accelerate their transition to low-carbon economies, others lag due to political, economic, or social constraints. Key variables include disparate greenhouse gas emission trajectories, uneven deployment of renewable energy technologies, and varying degrees of energy efficiency improvements. The scenario also incorporates differences in regulatory frameworks, carbon pricing mechanisms, and investment flows, resulting in a patchwork of climate action that leads to divergent economic and environmental outcomes globally. Economic assumptions under the "Diverging Realities" scenario reflect the complexity of managing a world with uneven climate progress. Regions advancing rapidly in climate mitigation may experience transitional economic shifts, including sectoral realignments and capital reallocation, while lagging regions face heightened physical climate risks and potential economic stagnation. The scenario anticipates increased volatility in global markets due to these disparities, with implications for trade, investment, and financial stability. Additionally, the uneven pace of transition exacerbates risks related to stranded assets and credit exposure in carbon-intensive sectors concentrated in slower-moving regions. This scenario

underscores the challenges of global coordination in climate policy and the importance of adaptive strategies for financial institutions operating in a world of diverging climate realities.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for Alpha Bank Cyprus.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Long-Term Current Policies

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Policy

☒ Market

☒ Reputation

☒ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 3.0°C - 3.4°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2040

☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Speed of change (to state of nature and/or ecosystem services)

☒ Climate change (one of five drivers of nature change)

Macro and microeconomy

☒ Domestic growth

☒ Other macro and microeconomy driving forces, please specify :Unemployment Rate, Inflation, Real Estate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The NGFS Current Policies scenario is constructed on the foundational assumption that governments worldwide maintain their existing climate policies without introducing additional measures or enhancements. This scenario presumes a continuation of the current regulatory frameworks, carbon pricing mechanisms, and energy transition policies as they stand today, without significant acceleration or deviation. The main drivers underpinning this scenario include ongoing fossil fuel consumption patterns, incremental improvements in energy efficiency, and the gradual deployment of renewable energy technologies, all influenced by prevailing economic, technological, and social factors. The scenario reflects a trajectory where climate action remains limited, resulting in continued greenhouse gas emissions at levels consistent with current policy commitments. Methodologically, the NGFS Current Policies scenario employs integrated assessment models and climate-economic frameworks to simulate the interplay between economic growth, energy demand, and emissions trajectories under the status quo policy environment. These models incorporate sectoral data, technological adoption rates, and policy impacts to project future greenhouse gas emissions and their consequent climate

outcomes. The scenario analysis integrates feedback loops between the economy and climate system, enabling a comprehensive assessment of physical and transition risks. This approach ensures that the scenario provides a robust baseline for understanding the implications of maintaining current policies, serving as a critical reference point for risk assessment and strategic planning in climate-related financial disclosures.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for Alpha Bank Cyprus.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☒ NGFS scenarios framework, please specify :Long-Term Fragmented World

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Policy

☒ Market

☒ Reputation

☒ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 3.0°C - 3.4°C

(5.1.1.7) Reference year

2025

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2030

☒ 2040

☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Speed of change (to state of nature and/or ecosystem services)

☒ Climate change (one of five drivers of nature change)

Macro and microeconomy

☒ Domestic growth

☒ Other macro and microeconomy driving forces, please specify :Unemployment Rate, Inflation, Real Estate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The NGFS Fragmented World scenario assumes a global landscape characterized by divergent and uncoordinated climate policies across regions, resulting in a patchwork of national and subnational approaches to climate action. In this scenario, countries pursue their own climate agendas with varying levels of ambition, leading to inconsistent regulatory frameworks, carbon pricing mechanisms, and technology adoption rates. The main drivers include geopolitical tensions, differing economic priorities, and uneven technological capabilities, which collectively hinder global cooperation and delay the establishment of a unified transition pathway. This fragmentation results in uneven progress toward emissions reduction, with some regions advancing rapidly while others lag, thereby increasing transition risks and market volatility. From a methodological perspective, the NGFS Fragmented World scenario employs integrated assessment models that incorporate regional heterogeneity in policy implementation, economic development, and energy system transformations. The scenario models the interactions between fragmented policy landscapes and their implications for global emissions trajectories, economic growth, and climate outcomes. By capturing the complexities of a multipolar world with

disparate climate strategies, the scenario provides a nuanced understanding of the physical and transition risks arising from policy divergence. This approach enables stakeholders to assess the potential financial and operational impacts of a disjointed global response to climate change, highlighting the challenges of managing risks in an unevenly regulated environment.

(5.1.1.11) Rationale for choice of scenario

Severe but plausible scenarios which cover material Climate risks for Alpha Bank Cyprus.

[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management
- ☒ Strategy and financial planning
- ☒ Resilience of business model and strategy
- ☒ Capacity building

(5.1.2.2) Coverage of analysis

Select from:

- ☒ Portfolio

(5.1.2.3) Summarize the influence of the scenario analysis on the selected business processes

Assess potential impact on balance sheet from climate scenarios on different time horizons. Scenario-analysis outputs quantify potential effects on credit risk, probabilities of default, collateral values, expected losses, the balance sheet, income and capital ratios under short-, medium- and long-term pathways. The results inform ICAAP, stress testing, climate-risk materiality assessment, portfolio steering, strategic and financial planning, operational resilience and the continuing development of climate-risk methodologies and data capabilities.

[Fixed row]

(5.2) Does your organization's strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

☒ Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:

☒ Yes

(5.2.7) Transition plan includes a managed phaseout plan which finances or enables an accelerated phaseout of high emitting physical assets

Select from:

☒ No, but we plan to add a phaseout plan within the next two years

(5.2.9) Explain why your organization does not include a managed phaseout plan which finances or enables an accelerated phaseout of high emitting physical assets

Alpha Bank enables the managed decline of high-impact activities through exclusions, exposure steering, risk appetite, pricing/covenants and client engagement. The Bank's exclusion framework provides zero new financing for thermal coal mining, coal-fired power generation, upstream oil exploration and extraction, and activities with significant biodiversity impacts. Climate-related criteria have also been integrated into credit underwriting, portfolio steering, risk management and client assessments. For carbon-intensive sectors (Power Generation, Oil & Gas, Cement and Iron & Steel), the Bank has set 2030 portfolio Net Zero targets, aligned with the Net Zero Banking Alliance (NZBA) framework and the IEA Net Zero Emissions by 2050 scenario, and monitors exposure and transition readiness. The Bank plans to expand sector-specific Net Zero targets to additional sectors, subject to regulatory and methodological developments. At the same time, it increases financing to low-carbon sectors. Between 2025 and 2027, Alpha Bank will allocate EUR 3.8 billion to sustainable financing, including at least EUR 2.6 billion for renewable energy projects by 2026, supporting clients' transition to a low-carbon economy. Progress is monitored through portfolio emissions metrics, Risk Appetite Framework indicators and governance oversight. The implementation assumes continued availability of reliable climate data, supportive policy developments, and client progress in delivering credible transition plans. The Bank will periodically review its approach to reflect evolving regulations, methodologies and market conditions while maintaining its commitment to achieve Net Zero financed emissions by 2050. This approach supports an orderly decline of incompatible exposure while financing clients' credible transition investments.

(5.2.10) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☒ We have a different feedback mechanism in place

(5.2.11) Description of feedback mechanism

Alpha Bank collects shareholder feedback on its climate and sustainability strategy, including its transition planning, through structured engagement conducted more frequently than annually. The principal channels include General Meetings, investor briefings, one-to-one meetings, the annual Sustainability and Corporate Governance Roadshow, quarterly and annual results presentations, and dialogue with equity and ESG-focused investors. The Bank's sustainability and climate-related reports provide the information base for this dialogue. A dedicated team reviews and categorizes the feedback received and identifies material or recurring themes. Key findings are escalated to Senior Management and the relevant Board Committees and are considered in the Double Materiality Assessment, strategic planning and related decision-making. Where relevant, feedback is translated into management actions and may inform updates to strategic priorities, policies, risk methodologies, sustainability initiatives, targets and disclosures. The Bank monitors resulting actions and communicates progress through its regular reporting and engagement channels. During 2025, investors emphasized the importance of transparent and credible transition planning, science-aligned decarbonization pathways, consistent financed-emissions measurement and disclosure, robust climate scenario analysis, effective Board oversight, alignment of remuneration with sustainability outcomes and transparent progress reporting. In response to investor feedback, the Group further developed its transition-planning framework, expanded its financed-emissions measurement, enhanced its sustainability disclosures and strengthened Board-level oversight of climate-related risks.

(5.2.12) Frequency of feedback collection

Select from:

☒ More frequently than annually

(5.2.13) Description of key assumptions and dependencies on which the transition plan relies

The Transition Plan assumes the continued applicability of the NZBA-derived guidelines on sector pathways and uses the science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE2050) scenario as its benchmark pathway for setting the Bank's 2030 sector targets and steering portfolio alignment towards net zero by 2050. Alpha Bank measures financed emissions under the PCAF standard. Calculations include clients' Scope 1-3 emissions, where data allows, and the Bank uses physical emissions intensity metrics and/or absolute emissions to set and monitor progress towards long-term and intermediate sector targets. The effectiveness of the plan depends on the evolution of EU and national decarbonization policies and legal frameworks; the scale and pace of technological developments; economic, geopolitical and operating conditions; key clients meeting their decarbonization commitments; and the availability and quality of client-level emissions and transition plan data. Climate data, scenarios, methodologies and sectoral pathways continue to evolve and may require changes to the Bank's methodologies, targets and implementation priorities. Evolving EU and national regulatory expectations are expected to continue driving ESG-risks integration, resilience analysis and climate-risk assessment. Internally, implementation is underpinned by established governance and the integration of climate considerations into business planning, portfolio steering, the Risk Appetite Framework, credit underwriting, ICAAP and stress testing. Supporting data and IT systems, together with

ongoing employee capability-building and reskilling, enable the effective execution, monitoring and continuous enhancement of the Transition Plan. The Bank reviews these factors and adapts its methodologies, targets and implementation priorities as required.

(5.2.14) Description of progress against transition plan disclosed in current or previous reporting period

Since the previous reporting year, Alpha Bank has advanced implementation of its Transition Plan by strengthening sustainable finance, portfolio decarbonization, client engagement and risk integration. Progress is monitored through portfolio, financing, operational and risk indicators. The Bank committed to allocate EUR 3.8 billion to sustainable financing over 2025–2027, including at least EUR 2.6 billion for renewable energy projects by 2026. In 2025, it delivered EUR 2.1 billion of new sustainable disbursements, including EUR 769 million for renewable energy. It also successfully issued its inaugural EUR 500 million Green Senior Preferred Bond to support eligible green investments. New financing to thermal-coal mining, upstream oil exploration and coal-fired electricity generation remained EUR 0. The Bank further embedded sustainability into its lending processes through the implementation of its Sustainable Finance Framework and Sustainable Finance Transaction Assessment tool, enabling the assessment of financing against the Framework and the EU Taxonomy. Building on the sector-specific Net Zero targets established in 2024 for the Power Generation, Oil & Gas, Cement and Iron & Steel sectors, financed-emissions intensity decreased from the 2022 baselines by 36.4%, 9.4% and 27.8% respectively, for Power Generation, Cement, and Iron & Steel. Oil & Gas absolute financed emissions increased by 4.3%, requiring continued client engagement and portfolio steering. For Alpha Bank's own operations in Greece, combined Scope 1 and 2 emissions decreased by 42% from the 2022 baseline, exceeding the 20% reduction target for 2025. Certificates of Origin from renewable sources covered 100% of its electricity consumption. The Bank has developed a Client Engagement Framework under which the ESG Risk Score informs credit pricing and engagement, while dedicated systems track client action plans. Corporate clients subject to the ESG questionnaire are required to be engaged at least annually, with additional engagement where risk increases, if the client falls within a Net Zero sector, or an Action Plan is triggered.

(5.2.15) Attach any relevant documents which detail your climate transition plan (optional)

AB Transition Plan.pdf

(5.2.16) Other environmental issues that your climate transition plan considers

Select all that apply

- ☒ Biodiversity
- ☒ Other, please specify :Circular economy

(5.2.17) Explain how the other environmental issues are considered in your climate transition plan

Alpha Bank Group has adopted a Strategy for Sustainable Development, which aims to mitigate material negative impacts arising from its operations, while enhancing its positive impacts on the environment, society and the economy, as well as ensuring best-practice corporate governance. Within the Transition Plan, one strategic objective is to promote biodiversity protection and circular economy principles across banking activities and financed projects. Alpha Bank applies an Exclusion List of economic activities that impose environmental or social threat, including zero financing of the targeted activities specified in the Group's Exclusion List. The Sustainable Finance Framework (SFF) further excludes bioenergy production that competes with food production or reduces forestation, biodiversity or soil

carbon pools. The Group applies ESG risk categorization and due diligence during credit approvals, including evaluation of potential risks and impacts on biodiversity conservation and the sustainable management of living natural resources. The SFF defines eligible green and social activities for financing. Under the SFF, sustainable financing supports projects in Energy Efficiency, Renewable Energy, Sustainable Transport, Resource Efficiency and Pollution Control, and Green Buildings. In particular, the Group finances circular-economy initiatives, including recycling and sustainable waste-management infrastructure; advanced recycling technologies; technologies that maximize use of waste, including material separation and energy efficient recycling; bio-waste treatment through anaerobic digestion and composting; the use of recycled materials instead of virgin resources; circular business models that extend product use through sharing, and repair and reuse activities that reduce material consumption; sharing models that increase product or asset utilization; and repair or other activities that reduce material use. The Bank monitors financing aligned with this theme and measures financing eligible and aligned to the EU Taxonomy objective for the transition to a circular economy. For EU Taxonomy alignment assessments, activities are evaluated against Do No Significant Harm criteria covering all environmental objectives, including circular economy and biodiversity and ecosystems.

(5.2.18) Adaptation-specific objectives included within your climate transition plan

Select from:

☒ No

[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☒ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☒ Products and services

☒ Upstream/downstream value chain

☒ Operations

(5.3.3) Primary reason why environmental risks and/or opportunities have not affected your strategy and/or financial planning across all business areas

Select from:

☒ Other, please specify :Investment in R&D is not a distinct business area within Alpha Bank's business model.

(5.3.4) Explain why environmental risks and/or opportunities have not affected your strategy and/or financial planning across all business areas

Alpha Bank is a commercial bank whose applicable business areas comprise products and services, the upstream and downstream value chain, and operations. Environmental risks and opportunities are integrated into the strategy and financial planning of each of these areas. The Bank does not conduct research and development as a separate business activity or maintain a standalone R&D strategy and budget comparable to those of research- or manufacturing-intensive companies. Technology, data and methodology development supporting environmental-risk management, sustainable finance and climate-related analysis is undertaken and funded through the Bank's existing business, risk-management and operational functions. Environmental considerations, therefore, influence these activities through the corresponding strategic and financial-planning processes, rather than through a separately managed R&D function.

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

- ☒ Physical risks
- ☒ Transition risks
- ☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate change has affected Alpha Bank's products and services strategy by integrating physical and transition risks, as well as climate-related opportunities, into financing, risk management, portfolio steering and business and product development. Transition risks associated with regulation, carbon pricing, technology and changing customer demand, together with physical risks affecting clients, economic activity and collateral values, may influence credit quality, portfolio performance

and the types of financing clients require. Conversely, clients' investments in decarbonization, renewable energy and energy efficiency create material sustainable-finance opportunities. These considerations influence strategy across the Bank's short-term (2026), medium-term (to 2030) and long-term (to 2050) horizons. Environmental risks affect which financing the Bank provides and how it may be structured. Alpha Bank has established 2030 financed-emissions targets for Power Generation, Oil & Gas, Cement and Iron & Steel and uses sector metrics, risk thresholds and engagement to monitor portfolio alignment. It also applies exclusions providing zero new financing to thermal-coal mining, upstream oil exploration and coal-fired electricity generation. The Sustainable Finance Framework governs the classification and assessment of eligible green and social financing across Wholesale and Retail Banking. Client- and transaction-level assessments determine eligibility under the Framework and, where applicable, evaluate EU Taxonomy alignment. Eligible activities include renewable energy, energy efficiency, green buildings, sustainable transport, resource efficiency and pollution control. As a result, the Bank has expanded its offerings to include green mortgages, consumer loans for energy-efficiency upgrades and sustainability-linked loans, alongside renewable-energy and infrastructure financing and sustainability-related client support. These strategic choices are reflected in Alpha Bank's commitment to originate EUR 3.8 billion of new sustainable financing during 2025–2027 and at least EUR 2.6 billion for renewable-energy systems by 2026. In 2025, the Bank originated EUR 2,128.4 million of sustainable financing, including EUR 769.35 million for renewable-energy systems. These changes demonstrate that environmental risks and opportunities have affected the range, eligibility, structuring and volume of Alpha Bank's financing products and services, supporting its Net Zero financed-emissions objective for 2050.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

- ☒ Physical risks
- ☒ Transition risks

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate-related risks and opportunities have affected Alpha Bank's upstream procurement and downstream client strategy. Upstream, the Suppliers' Code of Conduct is a core procurement control covering environmental responsibility, labour and human rights, health and safety, and business integrity. Acknowledgement and compliance are prerequisites for procuring goods or services and are documented through contractual annexes or acceptance of the procurement award. Suppliers must comply with environmental legislation, manage energy and water consumption, emissions, pollution and waste, and maintain relevant licences and certifications. Environmental management systems such as ISO 14001 are positively assessed. The Code also allows the Bank to request raw-material origin and product supply-chain information and requires suppliers to make every effort to ensure subcontractor compliance. Supplier performance is periodically assessed using criteria including management systems, reputation, ethics, policies and procedures. Alpha Bank S.A. has incorporated ISO 20400 Sustainable Procurement principles into its procurement framework. In 2025, 109 of 2,177 active or approved Alpha Bank suppliers—5%—held ISO 14001 or EMAS certification. These controls influence

supplier selection, contracting and monitoring and help manage environmental and reputational risk. Downstream, corporate legal-entity clients complete the standardized ESGr questionnaire developed by the Hellenic Banks Association on a common interbank platform. Alpha Bank independently assesses the responses and assigns an obligor-level ESG Risk Score of Low, Medium or High. The score is incorporated into Credit Policy and informs credit assessment, pricing, engagement frequency and identification of transition, physical and reputational risks. Transaction assessment also determines whether financing qualifies under the Sustainable Finance Framework and, where applicable, assesses EU Taxonomy alignment. The Client Engagement Framework covers corporate clients above the relevant eligibility threshold. All corporate clients subject to the ESGr questionnaire are engaged at least annually; additional engagement occurs if risk increases, the client is in a Net Zero target sector or an Action Plan is triggered. High ESG Risk clients may be engaged biannually or quarterly depending on severity and credit exposure. Engagement improves environmental data, assesses transition readiness, monitors Action Plan progress and identifies financing opportunities in renewable energy, energy efficiency, clean transport, green buildings and other eligible activities. Engagement activity and Action Plan progress are recorded in dedicated systems. Material issues may be escalated through Credit and Sustainability governance. This approach supports early risk identification, the Bank's 2030 sector targets and its long-term Net Zero financed-emissions objective.

Operations

(5.3.1.1) Effect type

Select all that apply

☒ Physical risks

☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Climate-related physical risks and operational decarbonization opportunities have affected Alpha Bank's own-operations strategy. The Group focuses on energy efficiency, renewable electricity, greenhouse-gas reduction, environmental management and resource efficiency across its buildings, branches, equipment and vehicle fleet. Physical climate risks are also considered through operational-risk assessment, business-continuity arrangements and climate scenario analysis. Climate-related operational losses recognized in 2025 were very limited and were assessed as not material. These considerations influence premises and equipment investment, energy procurement, fleet management and business-continuity planning. In 2025, the Group consumed 92,977 MWh of energy, of which 35,235 MWh, or 37.9%, came from renewable sources. Alpha Bank S.A., Alpha Bank London Ltd and Acarta Construct S.R.L. purchased electricity supported by Guarantees of Origin for their operating premises. Alpha Bank S.A. replaced 19 older HVAC systems with higher-efficiency equipment and upgraded lighting systems to LED luminaires in 45 branches. It also operated a small photovoltaic installation at one branch and progressed permits for 10 additional rooftop photovoltaic systems. These measures support the Group's objective of reducing its operational footprint and progressing towards Net Zero own operations. In 2025, the Group reported gross Scope 1 emissions of 6,913 tCO₂e, gross location-based Scope 2 emissions of 18,030 tCO₂e and gross market-based Scope 2 emissions of 10,527 tCO₂e.

Scope 3 emissions excluding category 15 financed emissions were 74,538 tCO₂e. Total gross Scope 3 emissions were 24,230,596 tCO₂e, of which 24,156,058 tCO₂e related to category 15 investments; this distinction is important because the total is predominantly financed rather than operational emissions. Resource-efficiency actions included recycling 297 tonnes of waste. ISO 14001 certification coverage reached 94.1% of the Group in 2025, supporting structured identification, monitoring and continuous improvement of operational environmental impacts. Together, these actions demonstrate that environmental risks and opportunities affect operational asset investment, energy sourcing, facilities and fleet management, resilience planning and progress toward Net Zero own operations.
[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

- ☒ Revenues
- ☒ Capital allocation

(5.3.2.2) Effect type

Select all that apply

- ☒ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☒ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Climate-related opportunities affect Alpha Bank's revenue planning, capital allocation and the composition and growth of its assets. Financial planning incorporates sustainable-finance origination targets, eligible-product development, client demand, funding for green assets and the implications of favorable sustainability-related pricing. The Sustainable Finance Framework governs the assessment and classification of eligible green and social financing across Wholesale and Retail Banking. It supports financing for renewable energy, energy efficiency, green buildings, sustainable transport, resource efficiency and pollution control. Products include green and energy-efficiency mortgages and consumer loans, renewable-energy and green-infrastructure financing, and sustainability-linked loans with pricing linked to

agreed ESG indicators. Transaction assessments determine eligibility and, where applicable, evaluate EU Taxonomy alignment. Planning is guided by the target to originate EUR 3.8 billion of new sustainable financing during 2025–2027 and at least EUR 2.6 billion for renewable-energy systems by 2026. In 2025, Alpha Bank originated EUR 2,128.4 million of sustainable financing, including EUR 769.35 million for renewable-energy systems. These targets and volumes influence annual origination planning and the expected composition and growth of the lending portfolio. In October 2025, Alpha Bank issued a EUR 500 million Green Senior Preferred Bond under its Green Bond Framework, with demand exceeding EUR 3 billion. The proceeds are intended to finance or refinance eligible green assets, supporting the Bank's funding and asset-allocation strategy. The FY2025 Sustainability Statement identifies climate-mitigation opportunities exceeding EUR 2.1 billion in 2025 and anticipates significant growth in sustainable financing during the next annual reporting period, potentially resulting in substantial adjustments to gross carrying amounts. The Bank's economic and normative analysis quantifies forgone interest income arising from reduced effective interest rates assumed to maintain sustainable-financing volumes, as well as reduced net fee and commission income.

Row 2

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

- ☒ Direct costs
- ☒ Indirect costs

(5.3.2.2) Effect type

Select all that apply

- ☒ Physical risks
- ☒ Transition risks

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☒ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Climate-related physical and transition risks affect Alpha Bank's direct and indirect cost planning primarily through expenditure on systems, methodologies, specialist personnel, assurance, training, regulatory compliance and operational resilience. Direct costs include the development and maintenance of data and technology infrastructure used to collect, validate and manage ESG, emissions, building-energy and physical-hazard data and to support ESG Risk Scores, financed-emissions measurement, climate scenario analysis, stress testing, sustainable-finance classification, portfolio monitoring and sustainability reporting. Methodology-related

expenditure supports the development and refinement of physical- and transition-risk assessments, credit-risk and ECL analysis, sector pathways, scenario analysis and regulatory stress testing. Personnel and indirect costs include the dedicated Climate and ESG Risk, Sustainability, Risk Management, Finance, IT, Compliance and business teams responsible for integrating environmental considerations into risk management, credit processes, financial planning, controls and disclosures. Reporting and compliance costs include data controls, preparation and independent limited assurance of the Sustainability Statement and compliance with CSRD/ESRS, EU Taxonomy, Pillar 3 and supervisory climate- and ESG-risk requirements. Training expenditure supports ESG and climate-risk capability building for Board Members, employees and relevant risk, credit and client-facing teams. Physical risks also affect expenditure planning for business continuity, operational resilience and the monitoring and protection of branches, data centres, energy supply and other critical infrastructure. Although the associated climate-related OpEx, CapEx and operational-risk losses were not material in FY2025, the assessed medium- and long-term significance of these risks supports continued investment in monitoring, controls, resilience and mitigation.

[Add row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing for this environmental externality	Primary reason for not pricing this environmental externality	Explain why your organization does not price this environmental externality
Carbon	Select from: ☒ No, and we do not plan to in the next two years	Select from: ☒ No standardized procedure	Lack of complete information on environmental externalities.
Water	Select from: ☒ No, and we do not plan to in the next two years	Select from: ☒ No standardized procedure	Lack of complete information on environmental externalities.
Other	Select from: ☒ No, and we do not plan to in the next two years		

[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

Clients

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☒ Yes

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☒ Yes

(5.11.2) Environmental issues covered

Select all that apply

☒ Climate change

☒ Forests

Smallholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☒ No, and we do not plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☒ Other, please specify :No material exposure to small-scale agricultural or forest products producers.

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Exposure (as defined in line with relevant supervisory guideline) to the agriculture sector represents only a small fraction of the Bank's current loan portfolio.

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☒ Yes

(5.11.2) Environmental issues covered

Select all that apply

☒ Climate change

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

☒ No, and we do not plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

☒ Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Important value chain stakeholders identified are already listed.

[Fixed row]

(5.11.3) Provide details of your environmental engagement strategy with your clients.

Row 1

(5.11.3.1) Type of clients

Select from:

- ☒ Clients of Banks

(5.11.3.2) Environmental issues covered by the engagement strategy

Select all that apply

- ☒ Climate change

(5.11.3.3) Type and details of engagement

Capacity building

- ☒ Support clients to develop public, time-bound action plans with clear milestones

Financial incentives

- ☒ Provide financial incentives for environmental performance
- ☒ Provide financial incentives for clients with a climate transition plan
- ☒ Provide financial incentives for progress against climate-related targets

Information collection

- ☒ Collect climate transition plan information at least annually from clients
- ☒ Collect GHG emissions data at least annually from clients
- ☒ Collect targets information at least annually from clients

Innovation and collaboration

- ☒ Other innovation and collaboration activity, please specify :1) Run a campaign to encourage client to fill the ESGr Questionnaire

Other, please specify

- ☒ Other, please specify :1) Develop ESG action plan, which is provided to clients to improve their ESG obligor score 2) Engage with clients to track progress and support their transition plans or other climate targets (i.e. GHG emission reduction)

(5.11.3.4) % of client-associated scope 3 emissions as reported in question 12.1.1

Select from:

☒ 76-99%

(5.11.3.5) % of portfolio covered in relation to total portfolio value

Select from:

☒ 51-75%

(5.11.3.6) Explain the rationale for the coverage of your engagement

Alpha Bank has developed a Client Engagement Framework to ensure a consistent, and forward-looking engagement process across sectors and client segments. Coverage is based on systematic ESG screening of corporate clients and a risk-based engagement perimeter. Structured engagement applies to clients above the applicable eligibility threshold and is prioritized according to the ESG Risk Score, inclusion in the Bank's Net Zero sector perimeter, sector exposure to transition risk and whether an Action Plan is required. For other climate-sensitive sectors, the Bank prioritizes the top 20 clients with increased transition risk. This directs engagement resources towards exposures most relevant to financed emissions, credit risk and sector-pathway alignment and where engagement can have the greatest effect. Client engagement is a core lever of Alpha Bank's Transition Plan as it enables the Bank to work responsibly with Customers in encouraging sustainable practices. The Client Engagement Framework's main objectives include the assessment of Customers' level of maturity in climate and ESG issues, identifying opportunities through sustainable finance solutions and improving its Customers' ESG and climate performance. Client engagement represents an essential element for the Bank in addressing ESG and climate risks, identifying ways to support its Customers transition to a low carbon economy, encouraging sustainable business models and achieving its sustainability targets including the reduction of its financed emissions in line with its net zero strategy. All clients within the structured engagement perimeter are engaged at least annually; High ESG Risk clients and clients within the Net Zero target perimeter may be engaged more frequently, depending on risk severity and credit exposure. This combination of broad ESG assessment and targeted, recurring engagement explains the selected coverage and supports consistent monitoring, client Action Plans and transition-readiness assessment.

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

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. The aim is to address the risks identified and support clients in improving their ESG performance, so that ESG risks do not turn into a credit risk for the Bank in the future. The strategy is communicated directly to clients by Relationship Managers through the ESGr questionnaire and scoring process, bilateral meetings, credit reviews and agreed Action Plans. a. ESG risk assessment is the initial step as it is based on the evaluation of reported data on climate and other environmental factors as well as social factors and corporate governance. The assessment serves to identify clients with High ESG risk score and 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. b. Integrating Net Zero into the engagement strategy has the objective of supporting clients in their transition and ultimately steering high carbon sectors towards global climate goals. Analysis focuses on tracking alignment with sectoral pathways within the Bank's Net Zero sector perimeter (e.g. power, cement, iron & steel, oil & gas), tracking progress of clients' own targets and reviewing clients' transition plan. c. 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. All corporate clients subject to the ESGr questionnaire must be engaged at least once

annually. The strategy is communicated publicly through the FY2025 Sustainability Statement within the Annual Report, the Sustainable Finance Framework and the Bank's ESG and Sustainability website.

(5.11.3.8) Attach your engagement strategy

Sustainability-Statement-FY2025-Alpha-Bank-ENG.pdf

(5.11.3.9) Staff in your organization carrying out the engagement

Select all that apply

- ☒ Specialized in-house engagement teams
- ☒ Senior-level roles
- ☒ Other, please specify :Sustainable Finance Team (under the scope of Sustainability Division)

(5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

- ☒ Other, please specify :Members of Finance and/or Sustainability divisions

(5.11.3.11) Effect of engagement, including measures of success

The ESG Client Engagement Process has entered the implementation phase, acting as the first step towards systematic ESG engagement and supervisory readiness. The implementation phase focuses on: -Missing ESG questionnaires: Clients enrolled in ESG and not completed the ESG questionnaire or last completed before 2025 -High ESG risk clients: Clients assessed with a High ESG score based on completed cross-sector ESG questionnaire -Net-Zero sectors clients: Clients operating in sectors for which the Bank has established Net-Zero targets -Clients in the top 20 clients with increased transition risk but not in Net-Zero sectors Engagement improves client ESG and emissions data, supports assessment of ESG maturity and transition readiness, enables time-bound Action Plans and identifies sustainable-finance opportunities. Engagement outcomes may inform credit pricing, structuring and monitoring. Success is assessed through completion of questionnaires and scheduled engagements, improved data quality, progress against Action Plans, changes in ESG Risk Score and transition readiness, and alignment with relevant sector pathways.

(5.11.3.12) Escalation process for engagement when dialogue is failing

Select from:

- ☒ Yes, we have an escalation process

(5.11.3.13) Describe your escalation process

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. Client engagement activity and Action Plan progress are monitored through dedicated systems. Material issues identified through engagement are escalated according to whether they concern a specific lending decision or broader strategic alignment. (i) Credit Committee For matters directly connected to a specific lending decision, including: • Approval of a loan to a High ESG Risk client • Proposed conditions, covenants, or pricing adjustments related to ESG risk • Concerns that the client's transition readiness is inconsistent with the Bank's credit standards (ii) Group Sustainability Committee For matters of strategic significance, including: • Clients in Net Zero sectors whose transition plans diverge from the Bank's sector pathways • Systemic issues identified across multiple sectors or client groups • Topics affecting the Bank's progress towards its Net Zero commitment • Matters requiring Bank-wide policy alignment or adjustment Where the relevant portfolio-alignment threshold is exceeded, possible actions include no financing for new clients unless a credible Transition Plan exists. For existing clients, the Bank may pursue additional decarbonization actions through engagement, exposure reduction or sector portfolio rebalancing. When appropriate, issues may be escalated to higher levels of authority, including the Executive Committee and the Board of Directors. This structure ensures that important issues relating to transition risk, reputational risk, and portfolio alignment receive appropriate senior oversight.
[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ Upstream value chain transparency and human rights

(5.11.7.3) Type and details of engagement

Information collection

☒ Other information collection activity, please specify :Before establishing a business relationship, suppliers must confirm compliance with Alpha Bank's Supplier Code of Conduct.

(5.11.7.4) Upstream value chain coverage

Select all that apply

☒ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☒ 76-99%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☒ Unknown

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

The Supplier Code of Conduct, covering Labour and Human Rights, Health and Safety, Environmental Responsibility, and Integrity, Ethics and Business Conduct, was issued in 2022. Acknowledgement of the Code is a prerequisite for any procurement of goods or services. Acceptance and compliance are documented through the signed agreement or, where no contract is used, through the supplier's certification that it is aware of and accepts the Code's terms and principles. Environmental-management systems based on international standards, such as ISO 14001, are encouraged and positively assessed in supplier evaluations. Suppliers are also expected to inform their personnel of the Code and make every effort to ensure that their subcontractors comply with its principles. They must maintain transparent, up-to-date records demonstrating compliance and be able to disclose the origin of raw materials and, when requested by the Bank, the supply chain of their products. This engagement embeds environmental-responsibility and human-rights requirements in supplier onboarding and evaluation, strengthens transparency beyond the Bank's direct suppliers and encourages effective environmental-management systems. Where non-compliance is identified, the Bank may pursue corrective measures and, if the supplier does not commit to or implement them within a reasonable period, terminate the relationship. Supplier Code of Conduct: <https://www.alpha.gr/-/media/AlphaHoldings/Files/etairiki-diakubernisi/suppliers-code-of-conduct.pdf>

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Yes

Forests

(5.11.7.1) Commodity

Select from:

☒ Timber products

(5.11.7.2) Action driven by supplier engagement

Select from:

- ☒ No deforestation and/or conversion of other natural ecosystems

(5.11.7.3) Type and details of engagement

Information collection

- ☒ Other information collection activity, please specify :Collection and assessment of environmental certification information for paper and paper-product suppliers

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

- ☒ Less than 1%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

As part of its ongoing commitment to environmental sustainability and responsible sourcing, Alpha Bank's electronic procurement system assesses suppliers against environmental criteria. The Bank purchases 75 g/m² energy-efficient printing paper from large manufacturers certified according to PEFC, ISO 9001 and ISO 14001. Its annual calendars and A6 notebooks are made with FSC-certified paper and, in 2025, Alpha Bank S.A. used FSC MIX paper where possible. FSC and PEFC are recognized certification schemes that support responsible forest management and sourcing. The Bank also reduces demand for paper by limiting printing and pre-printed forms and sending e-statements instead of paper statements. Through its supplier-assessment process and purchasing of certified paper products, the Bank incorporates environmental criteria into procurement and directs its forest-relevant procurement toward certified sources and reduces paper consumption, thereby reducing the risk of contributing to deforestation or conversion of natural ecosystems.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

- ☒ Yes

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ Emissions reduction

(5.11.7.3) Type and details of engagement

Information collection

☒ Other information collection activity, please specify :Require the documentation of suppliers' environmental-management systems and relevant certifications, including ISO 14001, as part of supplier on-boarding.

(5.11.7.4) Upstream value chain coverage

Select all that apply

☒ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☒ 100%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☒ Unknown

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Alpha Bank's Supplier Code of Conduct encourages suppliers to develop and maintain environmental-management systems based on international standards, including ISO 14001. Such systems are positively assessed in supplier evaluations. The Code also expects suppliers to optimize energy and water consumption and demonstrably improve their environmental performance, including through pollution prevention and the minimization of gas emissions. One of the key environmental criteria applied in most procurement processes is supplier compliance with internationally recognized standards: ISO 14001 and ISO 14064. This specific criterion is scored, with a weight of up to 5% in the overall evaluation, depending on the nature and scope of the procurement. For procurement categories with significant environmental impact, such as electricity supply and vehicle acquisition, compliance with these ISO standards is treated as a pass-fail requirement. Suppliers who do not meet these criteria are automatically excluded from the process. In FY2025, 109 of the Bank's 2,177 active or approved suppliers—5%—held active ISO 14001

certification. This engagement incorporates environmental performance into supplier evaluation and supports emissions reduction by encouraging formal environmental-management systems, efficient resource use and improvement in emissions performance.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Yes

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information on environmental initiatives, progress and achievements

Other

☒ Other, please specify :Seek and consider investor and shareholder feedback on the Group's climate strategy and transition-planning framework through roadshows and bilateral meetings.

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☒ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Alpha Bank proactively engages with investors and shareholders to align its priorities. Investors and shareholders are engaged because they provide equity or debt capital and have a high level of interest in and influence over the Group's long-term strategy, risk profile and value creation. Engagement enables the Bank to understand their climate-related expectations and address their information needs regarding the credibility, ambition, implementation and financial implications of its climate strategy and Transition Plan. The Bank's approach to stakeholder engagement is built on the principles of transparency, inclusivity, and accountability, ensuring that its sustainability efforts align with the expectations and values of its stakeholders. Investors and shareholders are provided with information on the Group's climate and sustainability strategy, Transition Plan and progress against its targets. The scope covers the Net Zero commitment; science-aligned decarbonization pathways and sector targets; financed-emissions measurement and disclosure; physical and transition risks; climate scenario analysis; integration of climate risk into governance, risk management and portfolio steering; Board oversight and remuneration alignment; sustainable-finance targets and products; taxonomy-aligned disclosures; and progress against climate targets and transition actions. Engagement is conducted through the annual Sustainability and Corporate Governance Roadshow, General Meetings, investor and earnings briefings, one-to-one meetings, Annual, Sustainability and Climate Reports, quarterly results, the Bank's website and press releases. These channels combine regular reporting with direct two-way dialogue, allowing investors and shareholders to raise questions, communicate priorities and provide feedback on the Bank's climate approach.

(5.11.9.6) Effect of engagement and measures of success

Engagement supports alignment of the Bank's climate and sustainability objectives with investor and shareholder expectations and maintains transparent, constructive dialogue on climate-related risks, opportunities and progress. During 2025, the Bank continued structured engagement through its Sustainability and Corporate Governance Roadshow and direct meetings with investors and shareholders. Feedback was reviewed, categorized and escalated to Senior Management and Board Committees. Investors emphasized credible transition planning, science-aligned decarbonization pathways, consistent financed-emissions disclosure, robust climate scenario analysis, effective Board oversight, remuneration alignment and transparent progress reporting. Investor feedback contributed to the further development of the Group's sustainability strategy and climate-risk mitigation and adaptation approach. In response, the Group strengthened its transition-planning framework, expanded financed-emissions measurement and reporting, enhanced its sustainability disclosures and reinforced Board-level oversight of climate-related risks. Success is measured by the identification and escalation of material themes, their translation into management action plans and incorporation into strategic priorities, policies, risk-management approaches, targets and disclosures, with progress monitored and reported back to stakeholders.

[Add row]

C6. Environmental performance - Consolidation approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Alpha Bank Group follows the operational control approach to consolidate its climate-related environmental performance data, as defined by the GHG Protocol. Specifically, the Group accounts for Scope 1 and Scope 2 GHG emissions from entities and facilities over which it operates and where it has full authority to introduce and implement operating policies. This aligns the reporting boundary with managerial responsibility for energy use, fuels, refrigerants and other operational emission sources. Joint ventures and associates over which the Group has no operational control are not included in Scope 1 or Scope 2; their attributable emissions are captured in Scope 3, category 15, in accordance with the PCAF methodology. Value-chain emissions are reported separately in Scope 3.

Forests

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Alpha Bank Group follows the operational control approach to consolidate forests-related data from its direct operations. This boundary covers the entities and facilities where the Group can control relevant operational drivers, principally paper procurement, use and recycling. Specifically, in 2024, the Bank has expanded its Exclusion list to encompass additional activities with environmental impact, such as the conversion of natural forests into plantation, commercial logging in primary tropical moist forests, and the production of or trade in wood or other forestry products unless sourced from sustainably managed forests. Alpha Bank's exclusion policy to allocate zero financing applies to all the Group's operations, in every country where it operates.

Water

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Alpha Bank Group applies the operational control approach to consolidate water-related performance data because responsibility for monitoring consumption and implementing water-efficiency measures rests with the entities and facilities the Group operates. Under the Environmental Management System, freshwater used for drinking, hygiene and gardening, where applicable, is monitored at relevant facilities. This approach links the data perimeter to sites where the Group can manage consumption and introduce corrective measures. Water-related impacts and dependencies arising from financed projects are assessed separately through environmental and social risk due diligence and are not treated as direct operational water use.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Alpha Bank Group applies the operational control approach to consolidate biodiversity-related data for its own operations, covering its own operational sites or sites under its operational control, as it does for its other environmental objectives. As per the FY2025 Sustainability Statement, the Group did not identify actual or potential biodiversity impacts at those sites; biodiversity was material only in the downstream value chain and investment portfolio.

[Fixed row]

C7. Environmental performance - Climate change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☒ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

(7.1.1.1) Has there been a structural change?

Select all that apply

☒ Yes, other structural change, please specify :Reverse merger

(7.1.1.2) Name of organization(s) acquired, divested from, or merged with

Alpha Services and Holdings S.A.

(7.1.1.3) Details of structural change(s), including completion dates

The Alpha Bank 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 and hotel services. On 27 June 2025 the Group completed the Reverse Merger between Alpha Bank S.A (absorbing entity) and Alpha Services and Holdings (ASH, the absorbed entity) by the method of absorption, thus Alpha Bank becoming the ultimate parent company of the Group. In particular, the Absorbed Entity merged with Alpha Bank, through a merger by absorption, by way of consolidation of the assets and liabilities of the Merging Entities. The merger used the provisions of Article 16 of the Greek Law 2515/1997 and the provisions of Articles 7 to 21 and 140 of Greek Law 4601/2019 as amended and in force. The completion of the Reverse Merger, was subject to obtaining all necessary regulatory authorisations and corporate approvals, including: (i) the prior approval by the ECB (acting through the SSM with the bank of Greece) under Article 16 of the Greek Law 2515/1997 in conjunction with Articles 4 and 6 of the SSM Regulation, which was obtained on 30 May 2025; (ii) the approval of the Ministry of Development, as well as (iii) all necessary corporate approvals including those by the Extraordinary General Meeting of the Absorbed Entity held on 23 June 2025 and the Extraordinary General Meeting of the Absorbing Entity held on 12 June 2025.

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

☒ Yes, a change in methodology

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

The calculation methodology was revised in FY2024 to align with the requirements of CSRD and ESRS E1 – Climate Change, particularly regarding the organisational boundary applied for GHG emissions reporting. Under the ESRS approach, the reporting boundary considers the consolidated accounting group (parent company and subsidiaries), while also taking into account the treatment of assets and entities based on financial and operational control, including specific provisions for leased assets. As a result, we expanded the perimeter of our GHG emissions calculation to: - include all subsidiaries of the Group within the reporting boundary; and - include holding leased assets, specifically properties that are leased to third parties, in accordance with the applicable ESRS treatment of leased assets and the underlying GHG Protocol principles. The expansion of the organisational and asset perimeter resulted in an increase in reported GHG emissions for FY2024, primarily reflecting the broader coverage rather than an equivalent increase in the Group's underlying operational activity. For the current reporting year, we have maintained the same methodological approach and reporting perimeter, ensuring consistency and comparability of emissions data across reporting periods.

[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

☒ Yes

(7.1.3.2) Scopes recalculated

Select all that apply

- ☒ Scope 1
- ☒ Scope 2, location-based
- ☒ Scope 2, market-based
- ☒ Scope 3

(7.1.3.3) Scope 3 categories recalculated

Select all that apply

- | | |
|--|---|
| ☒ Investments | ☒ Purchased goods and services |
| ☒ Capital goods | ☒ Waste generated in operations |
| ☒ Business travel | ☒ Upstream transportation and distribution |
| ☒ Employee commuting | ☒ Downstream transportation and distribution |
| ☒ Downstream leased assets | ☒ Fuel and energy-related activities (not included in Scope 1 or 2) |

(7.1.3.4) Base year emissions recalculation policy, including significance threshold

Following the revision of our GHG emissions calculation methodology under CSRD and ESRS E1, we reassessed the appropriate base year for emissions reporting. As the updated methodology resulted in a broader reporting perimeter, including all Group subsidiaries and relevant SPVs holding leased assets, historical emissions calculated under the previous methodology were no longer fully comparable with the revised figures. Therefore, FY2024 was established as the new base year for GHG emissions. This ensures that future performance is assessed against a baseline calculated using the same methodology and reporting perimeter, thereby improving consistency and comparability across reporting periods.

(7.1.3.5) Past years' recalculation

Select from:

- ☒ No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

- ☒ Global GHG Accounting and Reporting Standard for the Financial Industry (PCAF)
- ☒ 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories
- ☒ ISO 14064-1
- ☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

- ☒ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

- ☒ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

Alpha Bank Group discloses Scope 2 emissions based on both approaches: location-based and market-based. Gross location-based Scope 2 GHG emissions reflect the emissions associated with electricity consumption based on the average emission factors of the electricity grids where the Group operates. Gross market-based Scope 2 GHG emissions amounted to 10,527 tCO₂e for Alpha Bank Group, while for the parent company, Alpha Bank S.A., they were 0 tCO₂e. Alpha Bank S.A. has an annual contract for the purchase of electricity for its own operating premises, including branches, office buildings, warehouses and ATMs. Under this arrangement, the Bank purchases Guarantees of Origin covering the total electricity consumption of Alpha Bank S.A., as well as the consumption of certain subsidiaries operating within these premises and buildings. In addition, Alpha Bank London Ltd and Acarta Construct SRL obtained renewable energy Certificates of Origin covering their total electricity consumption in 2025. As a result, the remaining market-based Scope 2 emissions at Group level relate to entities whose electricity consumption was not fully covered by renewable energy certificates or Guarantees of Origin. The calculations are based the previous calendar year (Feb 2024 – Jan 2025).

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are excluded from your disclosure of climate-related data?

Select from:

☒ No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

3252

(7.5.3) Methodological details

Scope 1 comprises direct GHG emissions from sources owned by Alpha Bank Group or under the Group's operational control, in accordance with the GHG Protocol. Alpha Bank Group applies the operational-control consolidation approach defined by the GHG Protocol, under which emissions are accounted for from operations that the Group operates and for which it has the authority to introduce and implement operating policies. The principal Scope 1 sources in 2024 were: • stationary fuel combustion, mainly for heating purposes and generating-set operation • mobile combustion from fuel used by Bank-owned and leased corporate vehicles • fugitive emissions from refrigerant losses associated with refrigeration and air-conditioning equipment. Scope 1 emissions are reported in metric tonnes of CO₂ equivalent. The inventory is prepared in line with the GHG Protocol Corporate Accounting and Reporting Standard, and the Group's GHG emissions were subject to third-party verification in accordance with ISO 14064-1.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

27963

(7.5.3) Methodological details

Scope 2 location-based emissions result from electricity consumed by Alpha Bank Group within its operational-control boundary. Alpha Bank Group applies the operational-control approach defined by the GHG Protocol and reports its Scope 2 emissions using both the location-based and market-based methods. The location-based emissions are reported in metric tonnes of CO₂ equivalent and are derived from electricity-consumption data and the applicable grid emission factors.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO₂e)

19702

(7.5.3) Methodological details

Scope 2 comprises indirect GHG emissions associated with the generation of purchased electricity consumed by Alpha Bank Group in operations under its operational control, in accordance with the GHG Protocol Scope 2 Guidance. Under the market-based approach, Scope 2 emissions reflect the emissions associated with the electricity products and contractual instruments selected by the Group. The principal Scope 2 source in 2024 was: • purchased electricity consumed across the Group's branches, office buildings, other operating premises and ATMs. Scope 2 market-based emissions are reported in metric tonnes of CO₂ equivalent. The inventory is prepared in line with the GHG Protocol Corporate Accounting and Reporting Standard and Scope 2 Guidance, and the Group's GHG emissions were subject to third-party verification in accordance with ISO 14064-1.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO₂e)

9453

(7.5.3) Methodological details

Scope 3 Category 1 covers indirect GHG emissions arising from goods and services purchased by Alpha Bank Group. For the 2024 base year, the calculation included furniture, paper, toner, water, electronic equipment and other purchased goods and services.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Scope 3 Category 2 covers emissions associated with capital goods, namely goods with a long useful life that are used in providing the Group's products and services, such as equipment, machinery and infrastructure. For the 2024 base year, Alpha Bank Group did not calculate Category 2 emissions, as the category was assessed as not significant for the Group. Accordingly, the value reported as zero reflects that the category was not calculated and should not be interpreted as measured zero emissions.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

2097

(7.5.3) Methodological details

Scope 3 Category 3 covers indirect GHG emissions from fuel- and energy-related activities that are not included in Scope 1 or Scope 2. For the 2024 base year, the calculation included: (i) the extraction, production, and transportation of fuels consumed by the Group; (ii) the extraction, production, and transportation of fuels consumed in the generation of electricity consumed by the Group; (iii) the transmission and distribution losses corresponding to the electricity consumed by the Group.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

343

(7.5.3) Methodological details

Scope 3 Category 4 covers indirect GHG emissions from upstream transportation and distribution services provided by third parties. For the 2024 base year, this included the transportation of materials to Alpha Bank Group's warehouses and the collection and transportation of materials and equipment between the Group's facilities, including transfers arising from the merger or relocation of units and branches.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

39

(7.5.3) Methodological details

Scope 3 Category 5 covers indirect GHG emissions arising from the treatment and disposal of waste generated through Alpha Bank S.A.'s operations. For the 2022 base year, the calculation included treated wastewater, solid waste produced by employees and sent to landfill, and materials collected for recycling.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

(7.5.3) Methodological details

Scope 3 Category 6 covers indirect GHG emissions arising from employee business travel. For the 2024 base year, the calculation included air, sea and land transportation undertaken for business purposes, as well as hotel accommodation associated with these trips.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

3338

(7.5.3) Methodological details

Scope 3 Category 7 covers indirect GHG emissions arising from employees' travel between their homes and workplaces. For the 2024 base year, the calculation took into account employees' usual modes of transport, the type of fuel used, the number of working days during the year and the commuting distance per employee.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

This category does not apply to Alpha Bank Group because emissions from the operation of leased office buildings are included under Scopes 1 and 2. Accordingly, the value reported as zero reflects that the category was not calculated and should not be interpreted as measured zero emissions.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

5

(7.5.3) Methodological details

Scope 3 Category 9 covers indirect GHG emissions arising from downstream transportation and distribution activities that are not performed or directly controlled by the Group.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Scope 3 Category 10 covers indirect GHG emissions arising from the processing by third parties of intermediate products sold by the reporting entity. Alpha Bank Group provides financial services and does not sell intermediate products that require further processing. Accordingly, Category 10 was assessed as not relevant for the 2024 base year, and no emissions were reported; the value reported as zero reflects that the category was not calculated and should not be interpreted as measured zero emissions.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Scope 3 Category 11 covers indirect GHG emissions arising from the use of products sold by the Group. As a financial service provider, Alpha Bank Group does not sell products that generate GHG emissions during their use. Accordingly, Category 11 was assessed as not relevant for the 2024 base year, and no emissions were reported; the value reported as zero reflects that the category was not calculated and should not be interpreted as measured zero emissions.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Scope 3 Category 12 covers indirect GHG emissions arising from the treatment and disposal of products sold by the Group at the end of their useful life. As a financial service provider, Alpha Bank Group does not sell products that give rise to end-of-life treatment emissions. Accordingly, Category 12 was assessed as not relevant for the 2024 base year, and no emissions were reported; the value reported as zero reflects that the category was not calculated and should not be interpreted as measured zero emissions.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

(7.5.3) Methodological details

Scope 3 Category 13 covers indirect GHG emissions arising from the operation of assets owned by Alpha Bank Group, leased to third parties and not already included in the Group's Scope 1 or Scope 2 inventory.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Scope 3 Category 14 covers indirect GHG emissions arising from the operation of franchises that are not already included in the Group's Scope 1 or Scope 2 inventory. Alpha Bank Group does not have any franchises or franchisees. Accordingly, Category 14 was assessed as not relevant for the 2024 base year, and no emissions were reported; the value reported as zero reflects that the category was not calculated and should not be interpreted as measured zero emissions.

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Scope 3 “Other upstream” covers upstream GHG emissions that are not captured within Scope 3 Categories 1–8. No separate emissions figure was calculated under Scope 3 “Other upstream” for the 2024 base year; the value reported as zero reflects that the category was not calculated and should not be interpreted as measured zero emissions.

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2024

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Scope 3 “Other downstream” covers downstream GHG emissions that are not captured within Scope 3 Categories 9–15. No separate emissions figure was calculated under “Other downstream” for the 2024 base year; the value reported as zero reflects that the category was not calculated and should not be interpreted as measured zero emissions.
[Fixed row]

(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

6913

(7.6.3) Methodological details

The GHG emissions of 2025 have been estimated with the following assumptions: • Diesel consumption for generators and/or heating boilers for the period January 2025 – December 2025 was calculated using an activity-based approach based on primary fuel consumption data, applying national emission factors (YPEN) and IPCC Guidelines. • Natural gas consumption for the period January 2025 – December 2025 was calculated using an activity-based approach based on supplier invoices, applying national CO₂ emission factors (YPEN) and IPCC Guidelines for CH₄ and N₂O. • Fuel consumption for corporate vehicles for the period January 2025 – December 2025 was calculated using primary fuel data where available or, alternatively, estimated based on mileage and average fuel consumption factors

(DEFRA), applying emission factors from the National Inventory System and IPCC Guidelines. Refrigerants: emissions are attributed to the refrigerants' losses of 2024. Due to the reverse merger that took place in 2025, the emissions reported refer to Alpha Bank Group.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

3252

(7.6.2) End date

12/31/2024

(7.6.3) Methodological details

Scope 1 emissions occur from sources that owned and/or controlled from the Group. Scope 1 emissions for the Bank result from the following activities: • Emissions for heating purposes • Fugitive emissions during the use of refrigeration and air conditioning equipment. • Vehicle emissions from fuel combustion (diesel, natural gas). Alpha Bank Group's reported Scope 1 emissions in 2024 were significantly higher compared to 2023. This increase is primarily the result of a revised methodological approach adopted in line with the Corporate Sustainability Reporting Directive (CSRD). Under the updated 2024 methodology, Alpha Bank now includes emissions from leased assets within the Scope 1 boundary, an element that was not accounted for in previous years.
[Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

18030

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

10527

(7.7.4) Methodological details

Scope 2 emissions (location-based) for the Group resulted from the electricity consumption. Scope 2 market-based emissions for the Bank are zero due to green electricity. Electricity consumptions, period: 1 calendar year, as given from bills issued from Jan 2025 – Dec2025. Conversion coefficients (kWh to tCO2eq): Both for location and market-based calculation the appropriate values were used (DAPEEP 2024, TSOC 2024, EEA 2024).

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

27963

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

19702

(7.7.3) End date

12/31/2024

(7.7.4) Methodological details

Scope 2 emissions (location-based) for the Group resulted from the electricity consumption. Scope 2 market-based emissions for the Bank are zero due to green electricity. Alpha Group’s reported Scope 2 emissions in 2024 were significantly higher compared to 2023. This increase is primarily due to a methodological revision implemented in alignment with the Corporate Sustainability Reporting Directive (CSRD). As part of the updated 2024 approach, emissions from leased assets are now included within the Scope 2 boundary, whereas these were previously excluded.
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

16224

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category includes, analyzes, and estimates Scope 3 emissions arising from the use of products (e.g., paper, toner, furniture, electronic equipment), goods (e.g., water), and services (e.g., equipment maintenance, external mail, security, cleaning, legal, consulting, and other services). Given the nature of Alpha Bank Group's operations, this category is not considered particularly relevant; however, the associated emissions are nevertheless calculated and reported to ensure completeness of the Group's Scope 3 GHG inventory.

Capital goods

(7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1059

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

In this category are included the purchase of goods with a long useful life, which are used for the production of products or services. Given the nature of Alpha Bank Group's operations, this category is not considered particularly relevant; however, the associated emissions are nevertheless calculated and reported to ensure completeness of the Group's Scope 3 GHG inventory.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

5263

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Category 3 includes the analysis and assessment of emissions associated with the extraction, production, and transportation of energy products procured by the organization, as well as losses in electricity transmission and distribution networks. These emissions are not included in Scope 1 and 2 emissions, but they cover all types of conventional fuels used, such as natural gas, oil, gasoline, and electricity. Given the nature of Alpha Bank Group's operations, this category is not considered particularly relevant; however, the associated emissions are nevertheless calculated and reported to ensure completeness of the Group's Scope 3 GHG inventory.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

351

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category accounts for emissions arising from the transportation and handling of goods to the facilities of the entity concerned through vehicle fleets owned by external suppliers. Given the nature of Alpha Bank Group's operations, this category is not considered particularly relevant; however, the associated emissions are nevertheless calculated and reported to ensure completeness of the Group's Scope 3 GHG inventory.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Other, please specify :Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 emissions from waste generated in operations include solid wastes produced by employees and sent to landfill, as well as recycled materials. Given the nature of Alpha Bank Group's operations, this category is not considered particularly relevant; however, the associated emissions are nevertheless calculated and reported to ensure completeness of the Group's Scope 3 GHG inventory.

Business travel

(7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

220

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

Scope 3 emissions are derived from business travel comprises air, sea, and land transportation of employees for business-related activities, as well as accommodation in hotels during these trips. Given the nature of Alpha Bank Group's operations, this category is not considered particularly relevant; however, the associated emissions are nevertheless calculated and reported to ensure completeness of the Group's Scope 3 GHG inventory.

Employee commuting

(7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

3819

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

☒ Fuel-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category concerns emissions arising from employees' commuting to and from Group using various modes of transport. For Group, due to the large number of employees, emissions are estimated based on expert judgement and standard commuting profiles, taking into account the distribution of transport modes, average travel distances, and the extent of teleworking. For subsidiaries, emissions are calculated through employee questionnaires, which collect key information such as the mode of transport, travel distance, commuting frequency, and the number of days of on-site presence. Emissions from vehicles leased by the Group and provided to employees are excluded, as they are accounted for under Scope 1.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.6) Please explain

Emissions from leased offices are included in Scopes 1 and 2; therefore, this category is not applicable and has been assessed as not relevant.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

5

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category includes Scope 3 emissions associated with the downstream transportation and distribution of products after they leave the Group's operations, where such activities are carried out by third parties and are not owned or controlled by the Group. Given the nature of Alpha Bank Group's activities as a financial institution, this category is not considered relevant or material, as the Group does not distribute significant volumes of physical products. Nevertheless, any applicable emissions are assessed and calculated to ensure completeness of the Group's Scope 3 GHG inventory.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.6) Please explain

Alpha Bank Group provides financial services and does not sell intermediate products requiring further processing; therefore, this category has been assessed as not relevant.

Use of sold products

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.6) Please explain

This category includes Scope 3 emissions arising from the use of products sold by the Group during their expected lifetime. Given the nature of Alpha Bank Group's activities as a financial institution, this category is not considered relevant, as the Group does not sell products whose use generates significant GHG emissions and therefore, it was not evaluated for 2025.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.6) Please explain

This category includes Scope 3 emissions associated with the treatment and disposal of products sold by the Group at the end of their useful life. Given the nature of Alpha Bank Group's activities as a financial institution, this category is not considered relevant, as the Group does not sell significant volumes of physical products requiring end-of-life treatment. Accordingly, this category was not evaluated.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

47502

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Other, please specify :Average spend method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.6) Please explain

This category includes Scope 3 emissions associated with the operation of assets owned by Alpha Bank Group and leased to third parties, where the related emissions are not already included in the Group's Scope 1 and Scope 2 inventory. For Alpha Bank Group, this category, although it is not relevant, the associated emissions are calculated as part of the Group's Scope 3 GHG inventory.

Franchises

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.6) Please explain

This category includes Scope 3 emissions associated with the operation of franchises that are not included within the Group's Scope 1 and Scope 2 organizational boundary. Given the nature and operating model of Alpha Bank Group, this category is not considered relevant, as the Group does not operate through franchise arrangements. Accordingly, this category was not evaluated.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.6) Please explain

This category includes any other upstream Scope 3 emissions that are not captured within the specific upstream categories of the GHG Protocol. Given the nature of Alpha Bank Group's activities and the coverage of the other upstream Scope 3 categories, no additional material upstream emission sources have been identified.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.6) Please explain

This category includes any other downstream Scope 3 emissions that are not captured within the specific downstream categories of the GHG Protocol. Given the nature of Alpha Bank Group's activities and the coverage of the other downstream Scope 3 categories, no additional material upstream emission sources have been identified.

[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/31/2024

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

9453

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

0

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

2097

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

343

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

39

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

542

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

3338

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

5

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

0

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

49486

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

For 2024, Alpha Bank Group assessed Scope 3 emissions across Categories 1–14 in accordance with the GHG Protocol Corporate Value Chain Standard. Each category was considered based on its relevance to the Group's activities and operational profile. Where applicable, the associated emissions were calculated using

available activity data and appropriate emission factors. The following Scope 3 categories were not calculated for 2024, as they were considered not applicable to the nature of the Group’s activities: Capital Goods, Upstream Leased Assets, Processing of Sold Products, Use of Sold Products, End-of-Life Treatment of Sold Products, Franchises, Other (Upstream), and Other (Downstream). Values reported as zero in these categories reflect that they were not calculated and should not be interpreted as measured zero emissions.

[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from: ☒ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: ☒ Third-party verification or assurance process in place
Scope 3	Select from: ☒ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
☒ Annual process

(7.9.1.2) Status in the current reporting year

Select from:

☒ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.1.4) Attach the statement

Alpha Group 31122025ENG.pdf

(7.9.1.5) Page/section reference

Annual Financial Statements pg. 236-249

(7.9.1.6) Relevant standard

Select all that apply

☒ European Sustainability Reporting Standards (ESRS)

☒ ISAE3000

(7.9.1.7) Proportion of reported emissions verified (%)

100

[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

- ☒ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

- ☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

- ☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

- ☒ Limited assurance

(7.9.2.5) Attach the statement

Alpha Group 31122025ENG.pdf

(7.9.2.6) Page/ section reference

Annual Financial Statements pg. 236-249

(7.9.2.7) Relevant standard

Select all that apply

- ☒ European Sustainability Reporting Standards (ESRS)
☒ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

Row 2**(7.9.2.1) Scope 2 approach**

Select from:

☒ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☒ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.2.5) Attach the statement

Alpha Group 31122025ENG.pdf

(7.9.2.6) Page/ section reference

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(7.9.2.7) Relevant standard

Select all that apply

☒ European Sustainability Reporting Standards (ESRS)

☒ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

☒ Scope 3: Investments

☒ Scope 3: Capital goods

☒ Scope 3: Business travel

☒ Scope 3: Employee commuting

☒ Scope 3: Downstream leased assets

☒ Scope 3: Purchased goods and services

☒ Scope 3: Waste generated in operations

☒ Scope 3: Upstream transportation and distribution

☒ Scope 3: Downstream transportation and distribution

☒ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

☒ Complete

(7.9.3.4) Type of verification or assurance

Select from:

☒ Limited assurance

(7.9.3.5) Attach the statement

Alpha Group 31122025ENG.pdf

(7.9.3.6) Page/section reference

Annual Financial Statements pg. 236-249

(7.9.3.7) Relevant standard

Select all that apply

☒ European Sustainability Reporting Standards (ESRS)

☒ ISAE3000

(7.9.3.8) Proportion of selected emissions categories verified (%)

100

(7.9.3.9) Proportion of total reported scope 3 emissions verified (%)

100

[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

☒ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.4) Please explain calculation

The use of renewable energy consumption has decreased in absolute values because of the inclusion of leased assets in the emission calculation.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO₂e)

169

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

0.54

(7.10.1.4) Please explain calculation

In 2025, the Group implemented energy-saving projects in its branches (including office buildings and warehouses across the country), focusing on upgrading or replacing outdated lighting and air conditioning systems. These replacements are expected to continue in 2026, supported by employee awareness initiatives aimed at promoting best practices for the efficient use of energy and fostering a culture of responsible environmental behavior. Group monitors electricity consumption across different types of buildings and branches throughout the year to detect any significant deviations as early as possible. This enables the timely identification of any unjustified increases in energy use and allows for appropriate corrective measures to be taken. Specifically, in 2025, the Group installed LED lighting units in 45 branches 2 office buildings and 1 warehouse (external lighting). Additionally, new high-efficiency HVAC systems were installed in 19 branches. The estimated emissions reduction resulting from these initiatives is approximately 169 metric tons of CO₂ equivalent.

Divestment

(7.10.1.1) Change in emissions (metric tons CO2e)

6271

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

20.09

(7.10.1.4) Please explain calculation

Group's gross emissions (Scope 1 and 2 combined) reported in 2025 were significantly lower compared to 2024. This decrease is primarily attributed to the fact that certain subsidiaries were sold in 2025.

Acquisitions

(7.10.1.4) Please explain calculation

On 27 June 2025, the Group completed the Reverse Merger between Alpha Bank S.A. (the absorbing entity) and Alpha Services and Holdings S.A. (ASH, the absorbed entity), with Alpha Bank S.A. becoming the ultimate parent company of the Group. The merger was effected through the absorption of ASH by Alpha Bank S.A., including the consolidation of the assets and liabilities of the merging entities. While the reverse merger resulted in a change to the Group's corporate structure and reporting perimeter, its specific impact on the historical Scope 1 and Scope 2 emissions figures has not been separately quantified. Accordingly, no retrospective adjustment has been made to prior-year emissions solely to reflect the effect of the reverse merger.

Mergers

(7.10.1.4) Please explain calculation

On 27 June 2025, the Group completed the Reverse Merger between Alpha Bank S.A. (the absorbing entity) and Alpha Services and Holdings S.A. (ASH, the absorbed entity), with Alpha Bank S.A. becoming the ultimate parent company of the Group. The merger was effected through the absorption of ASH by Alpha Bank

S.A., including the consolidation of the assets and liabilities of the merging entities. While the reverse merger resulted in a change to the Group's corporate structure and reporting perimeter, its specific impact on the historical Scope 1 and Scope 2 emissions figures has not been separately quantified. Accordingly, no retrospective adjustment has been made to prior-year emissions solely to reflect the effect of the reverse merger.

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no change related to this activity.

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no change related to this activity.

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

6271

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

20.09

(7.10.1.4) Please explain calculation

Group's gross emissions (Scope 1 and 2 combined) reported in 2025 were significantly lower compared to 2024. This decrease is primarily attributed to the fact that certain subsidiaries were sold in 2025.

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no change related to this activity.

Unidentified

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

There is no change related to this activity.

[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

☒ Location-based

(7.12) Does your organization have significant land sector activities in its operations or value chain?

	Agriculture, forestry or other land sector activities
	Select from: ☒ Not evaluated

[Fixed row]

(7.13) Does your organization choose to account for and report technological CO2 removals or captured CO2 with geologic storage, or have you done so in previous years?

	Technological CO2 removals or captured CO2 with geologic storage in the reporting year	Technological CO2 removals or captured CO2 with geologic storage were accounted for and reported in previous years
	Select from: ☒ Not evaluated	Select from: ☒ No

[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

☒ No

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☒ More than 0% but less than or equal to 5%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Select from: ☒ Yes
Consumption of purchased or acquired electricity	Select from: ☒ Yes
Consumption of purchased or acquired heat	Select from: ☒ No
Consumption of purchased or acquired steam	Select from: ☒ No
Consumption of purchased or acquired cooling	Select from: ☒ No
Generation of electricity, heat, steam, or cooling	Select from: ☒ No

[Fixed row]

(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☒ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

590.33

(7.30.1.3) MWh from non-renewable sources

27219.47

(7.30.1.5) Total (renewable + non-renewable) MWh

27809.80

Consumption of purchased or acquired electricity

(7.30.1.2) MWh from renewable sources

34644.57

(7.30.1.3) MWh from non-renewable sources

30522.19

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

65166.76

Total energy consumption

(7.30.1.2) MWh from renewable sources

35234.9

(7.30.1.3) MWh from non-renewable sources

57741.65

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

92976.55

[Fixed row]

(7.30.14) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Bulgaria

(7.30.14.1) Consumption of purchased electricity (MWh)

0

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Cyprus

(7.30.14.1) Consumption of purchased electricity (MWh)

5782.67

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

5782.67

Greece

(7.30.14.1) Consumption of purchased electricity (MWh)

53683.25

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

53683.25

Ireland

(7.30.14.1) Consumption of purchased electricity (MWh)

0

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Luxembourg

(7.30.14.1) Consumption of purchased electricity (MWh)

0

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

Romania

(7.30.14.1) Consumption of purchased electricity (MWh)

5443.37

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

5443.37

Serbia

(7.30.14.1) Consumption of purchased electricity (MWh)

0

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

0.00

United Kingdom

(7.30.14.1) Consumption of purchased electricity (MWh)

257.46

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

257.46
[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.000011419

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

24944

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

(7.45.5) Scope 2 figure used

Select from:

☒ Location-based

(7.45.6) % change from previous year

16.88

(7.45.7) Direction of change

Select from:

☒ Decreased

(7.45.8) Reasons for change

Select all that apply

- ☒ Change in renewable energy consumption
- ☒ Other emissions reduction activities
- ☒ Change in boundary
- ☒ Change in physical operating conditions

(7.45.9) Please explain

The observed decrease in energy intensity relative to 2024 is mainly driven by differences in the scope of comparison, as the current assessment compares Group-level performance with Bank-level performance. At the Group level, energy intensity in 2024 was 0.00137390, decreased by 16.88% year-on-year compared to 2025.
[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:

☒ Waste

(7.52.2) Metric value

254

(7.52.3) Metric numerator

Weight of paper recycled (tn)

(7.52.5) % change from previous year

0

(7.52.6) Direction of change

Select from:

☒ No change

(7.52.7) Please explain

The weight of paper recycled covers Alpha Bank S.A. and Alpha Bank Cyprus.

Row 2

(7.52.1) Description

Select from:

☒ Waste

(7.52.2) Metric value

(7.52.3) Metric numerator

Weight of aluminum and plastic recycled (tn)

(7.52.5) % change from previous year

25

(7.52.6) Direction of change

Select from:

☒ Decreased

(7.52.7) Please explain

The weight of aluminum and plastic recycled covers Alpha Bank S.A.

Row 3**(7.52.1) Description**

Select from:

☒ Waste

(7.52.2) Metric value

297

(7.52.3) Metric numerator

Total weight of waste recycled (tn)

(7.52.5) % change from previous year

0.34

(7.52.6) Direction of change

Select from:

☒ Decreased

(7.52.7) Please explain

The weight of total waste recycled covers Alpha Bank S.A. and Alpha Bank Cyprus.

Row 4

(7.52.1) Description

Select from:

☒ Waste

(7.52.2) Metric value

40

(7.52.3) Metric numerator

Total weight of hazardous waste (tn)

(7.52.5) % change from previous year

0

(7.52.6) Direction of change

Select from:

☒ No change

(7.52.7) Please explain

This metric includes toners, batteries and electric devices.

[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☒ Absolute target

☒ Portfolio target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☒ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☒ No, and we do not anticipate setting one in the next two years

(7.53.1.5) Date target was set

12/31/2022

(7.53.1.6) Target coverage

Select from:

☒ Other, please specify

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

(7.53.1.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☒ Location-based

(7.53.1.11) End date of base year

12/31/2022

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

1473

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

18419

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

19892.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

87.5

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

87

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

87.1

(7.53.1.54) End date of target

12/31/2025

(7.53.1.55) Targeted reduction from base year (%)

20

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

15913.600

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

4400

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

7117

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

11517.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

210.51

(7.53.1.80) Target status in reporting year

Select from:

☒ Achieved

(7.53.1.82) Explain target coverage and identify any exclusions

The Scope 1 and Scope 2 reduction target's scope is Alpha Bank S.A, the parent company of Alpha Bank Group.

(7.53.1.83) Target objective

The objective of the target is to reduce absolute Scope 1 and Scope 2 GHG emissions from Alpha Bank S.A.'s own operations in Greece by 20% by 2025, compared to the 2022 baseline. The target supports the decarbonization of the Bank's operational footprint through measures such as improving energy efficiency, reducing fossil-fuel consumption and increasing the use of renewable electricity.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ No

(7.53.1.86) List the emissions reduction initiatives which contributed most to achieving this target

One of the key actions undertaken was the Workspace Optimization Project, which aimed to rationalize the Bank's building footprint and, as a result, reduce the associated environmental impacts and operating costs. The project was successfully completed in the first half of 2023. In parallel, during the 2023–2025 period, the Alpha Bank S.A implemented a series of energy-efficiency initiatives across branches and buildings throughout Greece, mainly focusing on the upgrade or replacement of outdated lighting and air-conditioning systems. In addition, as part of the transformation of the corporate fleet, vehicles reaching the end of their leasing contracts were progressively replaced with newer PHEV and hybrid vehicles, contributing to the reduction of operational emissions.

Row 2

(7.53.1.1) Target reference number

Select from:

☒ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.1.4) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.1.5) Date target was set

12/31/2024

(7.53.1.6) Target coverage

Select from:

☒ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

(7.53.1.8) Scopes

Select all that apply

☒ Scope 3

(7.53.1.10) Scope 3 categories

Select all that apply

☒ Scope 3, Category 15 – Investments

(7.53.1.11) End date of base year

12/31/2022

(7.53.1.28) Base year Scope 3, Category 15: Investments emissions covered by target (metric tons CO2e)

336891

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

336891.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

336891.000

(7.53.1.49) Base year Scope 3, Category 15: Investments emissions covered by target as % of total base year emissions in Scope 3, Category 15: Investments (metric tons CO2e)

0.725

(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

0.725

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

0.725

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

26

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

249299.340

(7.53.1.73) Scope 3, Category 15: Investments emissions in reporting year covered by target (metric tons CO2e)

351333

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

351333.000

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

351333.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

-16.49

(7.53.1.80) Target status in reporting year

Select from:

☒ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

The Net Zero target is covering the Group's exposures (loans and bonds) to the Oil & Gas sector. Alpha Bank's focus is on clients engaging in refining, as this covers most of our financed emissions in this sector. The target does not cover other parts of the value chain, such as exploration and production (E&P), or sales and marketing, as we have limited exposure to these parts of the value chain.

(7.53.1.83) Target objective

The target objective is 26% reduction in absolute financed emissions from 2022 to 2030. Our target exceeds the 23% reduction required by the IEA NZE, reflecting the ambitious decarbonization commitments of our key clients in the sector. For the design of the target, Alpha Bank used the IEA NZE scenario, which describes a pathway for decarbonization of the sector through an acceleration of measures to limit emissions from operations, while increasing the supply of low carbon liquids and gases. Also, decarbonization of refineries is expected through carbon capture, utilization and storage technologies.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

In 2024, Alpha Bank Group 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. These priority sectors represent a significant share of financed emissions and are already integrated into portfolio steering, engagement intensity, and RAF thresholds. Reported data coverage expected to leverage client information collected through the inter-banking ESGr questionnaire and used to enhance emissions baselines. Alpha Bank will expand its target perimeter and strengthen existing sector targets monitoring processes. Sectors under consideration for the next phase of Net Zero target-setting include Commercial Real Estate, Residential Real Estate, Shipping, and Aluminum, subject to clarity on sectoral transition pathways and regulatory developments. 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. Alpha Bank has established science-based GHG emission reduction targets for downstream activities due to their significance under the Group's business activities.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ Yes

[Add row]

(7.53.4) Provide details of the climate-related targets for your portfolio.

Row 1

(7.53.4.1) Target reference number

Select from:

☒ Por1

(7.53.4.2) Target type

Select from:

☒ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

Select from:

☒ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

12/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Sector level

(7.53.4.7) Sector

Select from:

☒ Manufacturing

(7.53.4.8) Portfolios covered by the target

Select all that apply

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

☒ Loans

☒ Project finance

☒ Bonds

(7.53.4.12) Target type: Absolute or intensity

Select from:

☒ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

0.08

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☒ Metric tons CO2e

(7.53.4.17) Target denominator

Select from:

☒ Ton iron and steel

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.35

(7.53.4.21) Frequency of target reviews

Select from:

☒ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

540

(7.53.4.24) We have an interim target

Select from:

☒ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

1260

(7.53.4.29) Figure in reporting year

390

(7.53.4.30) % of target achieved relative to base year

-20.833333333333336

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☒ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The Net Zero target covers manufacturing and casting of iron and steel. It does not cover other parts of the value chain, such as mining of iron ore or finished products manufacturing, as we have limited exposure to those parts. This choice is in line with market practice.

(7.53.4.38) Target objective

The target objective for our portfolio intensity is to remain below the IEA NZE pathway to 2030. Our starting position is well below the IEA NZE pathway with a portfolio intensity of 540kgCO₂e/t Steel in 2022, compared to the IEA level of 1,737 kgCO₂e/t Steel. For this reason there is not a specific value for target year and our target until to 2030 is the intensity of portfolio to remain below the reference pathway. This is because our exposure is primarily to secondary steel producers. To this end, we are not setting a quantitative target for our iron and steel portfolio.

Row 2

(7.53.4.1) Target reference number

Select from:

☒ Por2

(7.53.4.2) Target type

Select from:

☒ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

Select from:

☒ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

12/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Sector level

(7.53.4.7) Sector

Select from:

☒ Fossil Fuels

(7.53.4.8) Portfolios covered by the target

Select all that apply

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

☒ Loans

☒ Project finance

☒ Bonds

(7.53.4.12) Target type: Absolute or intensity

Select from:

☒ Absolute

(7.53.4.14) % of portfolio emissions covered by the target

1.45

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☒ Metric tons CO2e

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.7

(7.53.4.21) Frequency of target reviews

Select from:

☒ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

100

(7.53.4.24) We have an interim target

Select from:

☒ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

74

(7.53.4.29) Figure in reporting year

104.3

(7.53.4.30) % of target achieved relative to base year

-16.538461538461526

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☒ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The Net Zero target is covering the Group's exposures (loans and bonds) to the Oil & Gas sector. Alpha Bank's focus is on clients engaging in refining, as this covers most of our financed emissions in this sector. The target does not cover other parts of the value chain, such as exploration and production (E&P), or sales and marketing, as we have limited exposure to these parts of the value chain.

(7.53.4.38) Target objective

The target objective is 26% reduction in absolute financed emissions from 2022 to 2030. Our target exceeds the 23% reduction required by the IEA NZE, reflecting the ambitious decarbonization commitments of our key clients in the sector. For the design of the target, Alpha Bank used the IEA NZE scenario, which describes a pathway for decarbonization of the sector through an acceleration of measures to limit emissions from operations, while increasing the supply of low carbon liquids and gases. Also, decarbonization of refineries is expected through carbon capture, utilization and storage technologies.

Row 3

(7.53.4.1) Target reference number

Select from:

☒ Por3

(7.53.4.2) Target type

Select from:

☒ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

Select from:

☒ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

12/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Sector level

(7.53.4.7) Sector

Select from:

☒ Power generation

(7.53.4.8) Portfolios covered by the target

Select all that apply

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

☒ Loans

☒ Project finance

☒ Bonds

(7.53.4.12) Target type: Absolute or intensity

Select from:

☒ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

1.56

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☒ Metric tons CO2e

(7.53.4.17) Target denominator

Select from:

☒ Other, SDA denominator please specify :MWh

(7.53.4.18) % of portfolio covered in relation to total portfolio value

2.32

(7.53.4.21) Frequency of target reviews

Select from:

☒ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

223

(7.53.4.24) We have an interim target

Select from:

☒ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

132

(7.53.4.29) Figure in reporting year

142

(7.53.4.30) % of target achieved relative to base year

89.01098901098901

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☒ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The Net Zero target covers loans and bonds to power generation. It does not cover other parts of the value chain, such as original equipment manufacturers (OEMs), transmission and distribution (T&D), or retailing of electricity, as we have limited exposure to those parts. This choice is in line with market practice.

(7.53.4.38) Target objective

The target objective is 132 kgCO₂e/MWh or 41% reduction in physical intensity from 2022 to 2030. Our target is below the IEA NZE in 2030, reflecting the lower starting point relative to the industry average as a result of the high share of renewables in our portfolio and the ambitious decarbonization commitments our key clients have made.

Row 4

(7.53.4.1) Target reference number

Select from:

☒ Por4

(7.53.4.2) Target type

Select from:

☒ Sector Decarbonization Approach (SDA)

(7.53.4.4) Methodology used when setting the target

Select from:

☒ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

12/31/2024

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Sector level

(7.53.4.7) Sector

Select from:

☒ Manufacturing

(7.53.4.8) Portfolios covered by the target

Select all that apply

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

☒ Loans

☒ Project finance

☒ Bonds

(7.53.4.12) Target type: Absolute or intensity

Select from:

☒ Intensity

(7.53.4.14) % of portfolio emissions covered by the target

1.87

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☒ Metric tons CO2e

(7.53.4.17) Target denominator

Select from:

☒ Ton cement

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.22

(7.53.4.21) Frequency of target reviews

Select from:

☒ Semi-annually

(7.53.4.22) End date of base year

12/31/2022

(7.53.4.23) Figure in base year

687

(7.53.4.24) We have an interim target

Select from:

☒ No

(7.53.4.27) End date of target

12/31/2030

(7.53.4.28) Figure in target year

584

(7.53.4.29) Figure in reporting year

623

(7.53.4.30) % of target achieved relative to base year

62.13592233009708

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☒ Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

☒ 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The Bank's focus is on clients operating in clinker and cement manufacturing, which covers most of the emissions in the sector. The target does not include companies operating in the extraction of raw materials and construction, in line with market practice.

(7.53.4.38) Target objective

The target objective is 584 kgCO₂e/t cementitious product or 15% reduction in physical intensity from 2022 to 2030. The target is above the IEA NZE pathway as: Cement is a hard-to-abate sector, it has limited cost-effective opportunities to decarbonize by 2030 and much of the abatement is expected to occur after 2030. However, we will continue to engage with our key clients to support their decarbonization efforts.

Row 6

(7.53.4.1) Target reference number

Select from:

☒ Por5

(7.53.4.2) Target type

Select from:

☒ Green finance

(7.53.4.3) Taxonomy or framework used to define "green finance"

Select from:

☒ EU Taxonomy for Sustainable Activities

(7.53.4.4) Methodology used when setting the target

Select from:

☒ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

- ☒ Portfolio level

(7.53.4.9) Portfolio

Select from:

- ☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

- ☒ Loans
- ☒ Project finance
- ☒ Real estate

(7.53.4.11) Sectors covered by the target

Select all that apply

- | | |
|---|--|
| ☒ Retail | ☒ Fossil Fuels |
| ☒ Apparel | ☒ Manufacturing |
| ☒ Services | ☒ Infrastructure |
| ☒ Materials | ☒ Power generation |
| ☒ Hospitality | ☒ International bodies |
| ☒ Transportation services | |
| ☒ Food, beverage & agriculture | |
| ☒ Biotech, health care & pharma | |

(7.53.4.12) Target type: Absolute or intensity

Select from:

☒ Absolute

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

☒ Total green investments (unit currency as reported in 1.2)

(7.53.4.18) % of portfolio covered in relation to total portfolio value

100

(7.53.4.21) Frequency of target reviews

Select from:

☒ Quarterly

(7.53.4.22) End date of base year

12/31/2024

(7.53.4.23) Figure in base year

0

(7.53.4.24) We have an interim target

Select from:

☒ No

(7.53.4.27) End date of target

12/31/2027

(7.53.4.28) Figure in target year

3800000000

(7.53.4.29) Figure in reporting year

2128400000

(7.53.4.30) % of target achieved relative to base year

56.01052631578948

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☒ No, and we do not anticipate setting one in the next 2 years

(7.53.4.37) Please explain target coverage and identify any exclusions

Alpha Bank commits to accelerating portfolio alignment with the Objectives set in the Paris Agreement, through setting targets for sustainable lending. As part of this commitment the Group has set the target to lend Euro 3.8 billion in sustainable disbursements during 2025- 2027. The target covers the Group's lending portfolio.

(7.53.4.38) Target objective

As part of the commitment to support the transition to a more sustainable economy, the Group has committed to allocate Euro 3.8 billion to new Sustainable Financings in 2025-2027. Alpha Bank developed its Sustainable Finance Framework (the Framework or SFF) which defines in detail the criteria and processes to classify loans and specific financial products and services as sustainable. Green eligible categories are grouped into five distinct themes: Energy efficiency, green buildings, renewable energy, sustainable transport, resource efficiency and pollution control. Social eligible categories target activities that positively impact socioeconomically disadvantaged population through economic inclusion, affordable basic infrastructure, access to essential services and affordable housing. The Bank has developed an internal mechanism to assess the alignment of loans with both the Framework and the EU Taxonomy. Specific criteria are incorporated in the Sustainable Finance Transaction Assessment tool to help inform the credit decision making process. In addition, the Bank successfully issued its first green senior preferred bond in 2025, raising EUR 500 million with a maturity of six year and an option for early redemption after five years, to support green investments.

Row 7

(7.53.4.1) Target reference number

Select from:

☒ Por6

(7.53.4.2) Target type

Select from:

☒ Green finance

(7.53.4.3) Taxonomy or framework used to define “green finance”

Select from:

☒ EU Taxonomy for Sustainable Activities

(7.53.4.4) Methodology used when setting the target

Select from:

☒ NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

12/31/2023

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

☒ Portfolio level

(7.53.4.9) Portfolio

Select from:

☒ Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

- ☒ Loans
- ☒ Project finance
- ☒ Real estate

(7.53.4.11) Sectors covered by the target

Select all that apply

- | | |
|---|--|
| ☒ Retail | ☒ Fossil Fuels |
| ☒ Apparel | ☒ Manufacturing |
| ☒ Services | ☒ Infrastructure |
| ☒ Materials | ☒ Power generation |
| ☒ Hospitality | ☒ International bodies |
| ☒ Transportation services | |
| ☒ Food, beverage & agriculture | |
| ☒ Biotech, health care & pharma | |

(7.53.4.12) Target type: Absolute or intensity

Select from:

- ☒ Absolute

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

- ☒ Total green investments (unit currency as reported in 1.2)

(7.53.4.18) % of portfolio covered in relation to total portfolio value

100

(7.53.4.21) Frequency of target reviews

Select from:

☒ Quarterly

(7.53.4.22) End date of base year

12/31/2023

(7.53.4.23) Figure in base year

0

(7.53.4.24) We have an interim target

Select from:

☒ No

(7.53.4.27) End date of target

12/31/2026

(7.53.4.28) Figure in target year

2600000000

(7.53.4.29) Figure in reporting year

1125000000

(7.53.4.30) % of target achieved relative to base year

43.269230769230774

(7.53.4.31) Target status in reporting year

Select from:

☒ Underway

(7.53.4.34) Is this a science-based target?

Select from:

☒ No, and we do not anticipate setting one in the next 2 years

(7.53.4.37) Please explain target coverage and identify any exclusions

The coverage includes Group's lending activity to renewable energy projects.

(7.53.4.38) Target objective

The target is part of the Group's strategy under the Environmental pillar to support our customers' decarbonization and align our portfolio emissions with the objectives set in the Paris Agreement.

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☒ Other climate-related targets

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:

☒ Oth 1

(7.54.2.2) Date target was set

12/31/2023

(7.54.2.3) Target coverage

Select from:

☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:

☒ Absolute

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Low-carbon vehicles

☒ Percentage of low-carbon vehicles in company fleet

(7.54.2.7) End date of base year

12/31/2022

(7.54.2.8) Figure or percentage in base year

0.42

(7.54.2.9) End date of target

12/31/2025

(7.54.2.10) Figure or percentage at end of date of target

0.85

(7.54.2.11) Figure or percentage in reporting year

0.97

(7.54.2.12) % of target achieved relative to base year

(7.54.2.13) Target status in reporting year

Select from:

☒ Achieved**(7.54.2.15) Is this target part of an emissions target?***Yes, this target is part of the Bank's effort to reduce its Scope 1 emissions.***(7.54.2.16) Is this target part of an overarching initiative?**

Select all that apply

☒ No, it's not part of an overarching initiative**(7.54.2.18) Please explain target coverage and identify any exclusions***The coverage includes the replacement of 85% of the Bank's fleet with electric and/or plug-in vehicles and its geographical boundaries are concerning Alpha Bank S.A transportation in Greece.***(7.54.2.19) Target objective***The target is part of the Bank's strategy under the Environmental pillar to reduce its carbon footprint from its own operations. In 2024, Alpha Bank updated the target to 85%, instead of 70%.***(7.54.2.21) List the actions which contributed most to achieving this target***The main actions contributing to the achievement of the target include the gradual renewal of the Bank's corporate fleet, prioritising the replacement of conventional vehicles with electric and plug-in hybrid vehicles, particularly as existing vehicle contracts expire.**[Add row]***(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

	Emissions reduction initiatives that were active within the reporting year
	Select from: ☒ Yes

[Fixed row]

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	0	
To be implemented	0	0
Implementation commenced	0	0
Implemented	2	170
Not to be implemented	0	

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Lighting

(7.55.2.2) Estimated annual CO₂e savings (metric tonnes CO₂e)

106

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

78000

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

450000

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 6-10 years

(7.55.2.9) Comment

Alpha Bank is gradually replacing branch lighting with LED systems to reduce electricity consumption and related emissions. In 2025, upgrades were completed in 45 branches, with full implementation targeted by 2028.

Row 2

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☒ Heating, Ventilation and Air Conditioning (HVAC)

(7.55.2.2) Estimated annual CO₂e savings (metric tonnes CO₂e)

63

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

46000

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

1500000

(7.55.2.7) Payback period

Select from:

☒ >25 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 11-15 years

(7.55.2.9) Comment

Alpha Bank is upgrading HVAC systems across its premises to improve energy efficiency and reduce related emissions. In certain cases, the works also include replacement of false ceilings where technically required.

[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☒ Financial optimization calculations

(7.55.3.2) Comment

Capital availability and investment effectiveness (e.g. by means of pay-back period, NPV, etc.) are among the selection criteria.

Row 2

(7.55.3.1) Method

Select from:

☒ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

Regulatory requirements are monitored, and when necessary, appropriate actions to ensure compliance are planned and implemented.
[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☒ No

C12. Environmental performance - Financial services

(12.1) Does your organization measure the impact of your portfolio on the environment?

Banking (Bank)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

☒ Yes

(12.1.2) Disclosure metric

Select all that apply

☒ Financed emissions

(12.1.5) We measure the impact of our portfolio on forests

Select from:

☒ No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

Select from:

☒ Not an immediate strategic priority

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

In the context of CSRD, Alpha Bank has identified, through its FY2025 double materiality assessment, the negative portfolio impact on Biodiversity and Ecosystems (including habitats) as material over the short, medium and long-term horizons. However, the Bank has not yet established a separate measure of its portfolio impact on forests, as this has not been an immediate strategic priority.

(12.1.8) We measure the impact of our portfolio on water

Select from:

☒ No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

Select from:

☒ Judged to be unimportant or not relevant

(12.1.10) Explain why your organization does not measure its portfolio impact on water

The FY2025 double materiality assessment did not identify material impacts on Water and Marine Resources arising from the Group's products/services (downstream value chain), as the Group's portfolio did not indicate material association with sectors with significant water-related impacts. Furthermore, currently there is no projection of significant changes to the mix of portfolio indicating a material impact to Water and Marine Resources for the future time horizons.

(12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

☒ No, but we plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

Select from:

☒ No standardized procedure

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

The Bank assesses biodiversity-related and water and marine resources impacts and dependencies at sector level using ENCORE, supplemented by EXIOBASE and ReCiPe.

[Fixed row]

(12.1.1) Provide details of your organization's financed emissions in the reporting year and in the base year.

Banking (Bank)

(12.1.1.1) Asset classes covered in the calculation

Select all that apply

- ☒ Loans
- ☒ Project finance
- ☒ Bonds
- ☒ Equity investments
- ☒ Real estate

(12.1.1.2) Financed emissions (metric unit tons CO2e) in the reporting year

24156058

(12.1.1.3) % of portfolio covered in relation to total portfolio value

69.53

(12.1.1.4) Total value of assets included in the financed emissions calculation

52302865731.30

(12.1.1.5) % of financed emissions calculated using data obtained from clients/investees (optional)

12.8

(12.1.1.6) Emissions calculation methodology

Select from:

- ☒ The Global GHG Accounting and Reporting Standard for the Financial Industry (PCAF)

(12.1.1.7) Weighted data quality score (for PCAF-aligned data quality scores only)

3.38

(12.1.1.8) Financed emissions (metric unit tons CO2e) in the base year

(12.1.1.9) Base year end

12/31/2022

(12.1.1.10) % of undrawn loan commitments included in the financed emissions calculation

0

(12.1.1.11) Please explain the details of and assumptions used in your calculation

For FY2025, financed emissions are reported under Scope 3, Category 15 (investments), using the PCAF Standard. 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. Activity-based proxies were prioritised. Where suitable activity data were available, 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. Undrawn loan commitments are excluded from this calculation.

*[Fixed row]***(12.1.2) Disclose or restate your financed emissions for previous years.****Past year 1 for Banking (Bank)****(12.1.2.1) End Date**

12/31/2024

(12.1.2.2) Financed emissions (metric unit tons CO2e) in the reporting year

26464149

(12.1.2.3) % of portfolio covered in relation to total portfolio value

88

(12.1.2.4) % calculated using data obtained from clients/investees

33

(12.1.2.5) Emissions calculation methodology

Select from:

☒ The Global GHG Accounting and Reporting Standard for the Financial Industry (PCAF)

(12.1.2.6) Please explain the details of and assumptions used in your calculation

As of December 31st, 2024, the Bank conducted a full measurement of its financed emissions, covering investments and loans across its corporate portfolio and all the sectors it finances. For the calculation of the Bank's financed emissions, the PCAF Standard was followed. The first edition of the PCAF Standard was reviewed by the GHG Protocol and "conforms with the requirements set forth in the Corporate Value Chain (Scope 3) Accounting and Reporting Standard for Category 15 investment activities." For the accounting of the Bank's financed emissions, all asset classes were considered: Business Loans, Project Finance loans (Power, Shipping, Infrastructure), Listed and Unlisted Equities, Bonds, CRE loans, Mortgages, and Motor Vehicle loans. Financed emissions were measured using primary data (e.g., reported emissions) for 33% of the portfolio (in terms of outstanding amount). For the remaining 67%, financed emissions were estimated using proxy data, such as Environmentally Extended Input-Output (EEIO) analysis and other estimations provided by the PCAF methodology. Future disclosure of emissions by customers will improve data quality but may also lead to changes in financed emissions figures.

[Fixed row]

(12.2) Are you able to provide a breakdown of your organization's financed emissions and other portfolio carbon footprinting metrics?

	Portfolio breakdown	Please explain why you do not provide a breakdown of your portfolio impact on the climate
Banking (Bank)	Yes ☒ Yes, by asset class	Alpha Bank measures its financed emissions by Asset Class.

[Fixed row]

(12.2.1) Break down your organization’s financed emissions and other portfolio carbon footprinting metrics by asset class, by industry, and/or by scope.

Row 1

(12.2.1.1) Portfolio

Select from:
☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:
☒ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:
☒ Loans

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

24.95

(12.2.1.7) Value of assets covered in the calculation

18769236251

(12.2.1.8) Financed emissions or alternative metric

8100706

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Business loans include all on-balance sheet loans and lines of credit to businesses, nonprofits, and any other structure of organization that are not traded on a market and are for general corporate purposes, i.e., with unknown use of proceeds as defined by the GHG Protocol.

Row 2

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Absolute portfolio emissions (tCO₂e)

(12.2.1.4) Asset class

Select from:

☒ Project finance

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

9.52

(12.2.1.7) Value of assets covered in the calculation

7164580770

(12.2.1.8) Financed emissions or alternative metric

7291691

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

This asset class includes all loans or equities to projects for specific purposes (i.e., with known use of proceeds as defined by the GHG Protocol) that are on the balance sheet of Alpha Bank. The financing is designated for a defined activity or set of activities, such as the construction and operation of a gas-fired power plant, a wind or solar project, or energy efficiency projects. To calculate emissions, only the financed (ring-fenced) activities are included. Emissions and financials related to existing activities outside the financed project but within the financed organization are not considered. The asset class of project finance has been broken down into three segments: infrastructure, electricity generation and shipping, based on the loans' purpose. Cases identified as Project Finance by Alpha Bank, however, were with unknown use of proceeds as defined by the GHG Protocol and were out of PCAF Scope for this asset class, have been excluded from this asset class and have been treated as corporate loans. As such, all loans classified under this asset class are eligible to the respective criteria and no further filtering, and therefore, exclusions, are required.

Row 3

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:

☒ Bonds

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

5.63

(12.2.1.7) Value of assets covered in the calculation

4235072008

(12.2.1.8) Financed emissions or alternative metric

3095265

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

This asset class includes all corporate bonds for general corporate purposes (i.e., unknown use of proceeds as defined by the GHG Protocol) that are traded on a market and are on the balance sheet of the financial institution. Investment funds, green bonds, sovereign bonds, and derivative financial products (e.g., futures, options, swaps) are excluded from this calculation perimeter. Underwriting activities, such as IPO underwriting, are outside this financed emissions calculation. Exchange traded funds (ETFs) have not been included in this analysis due to data limitations.

Row 4

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:

☒ Equity investments

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

1.32

(12.2.1.7) Value of assets covered in the calculation

993207720

(12.2.1.8) Financed emissions or alternative metric

15908

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

Unlisted equity includes all equity investments for general corporate purposes (i.e., with unknown use of proceeds as defined by the GHG Protocol) to businesses, nonprofits, and any other structure of organization that are not traded on a market and are on the balance sheet of Alpha Bank (herein the “perimeter”). Private equity that refers to investment funds is not included in this asset class; hence from a NACE viewpoint, equities in private companies placed under NACE K64.3: Trusts, Funds and Similar Financial Entities have been reviewed and in case they referred to investment funds have been removed from the perimeter. As in listed equities, the initial perimeter is the totality of exposure in the balance sheet for all unlisted equities, whereas the PCAF perimeter is after excluding all types of equities for which PCAF has not developed yet measurement guidance. Listed equity includes all equity investments for general corporate purposes in companies whose shares are traded on a public market and are held on Alpha Bank’s balance sheet. The initial perimeter includes the total exposure to listed equities, while the PCAF perimeter excludes any exposures for which PCAF has not yet developed measurement guidance for the calculation of financed emissions.

Row 5

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:

☒ Real estate

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

1.62

(12.2.1.7) Value of assets covered in the calculation

1221440928

(12.2.1.8) Financed emissions or alternative metric

89173

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

According to the PCAF Standard, this asset class includes on-balance sheet loans for specific corporate purposes, namely the purchase and refinance of commercial real estate (CRE), and on-balance sheet investments in CRE. This definition implies that the property is used for commercial purposes, such as retail, hotels, office space, industrial, or large multifamily rentals. In all cases, the owner of the building uses the property to conduct income-generating activities. Loans secured by CRE for other purposes than CRE and loans to CRE companies that are unsecured, are classified as business loans if the loans are for general corporate purposes (i.e., with unknown use of proceeds as defined by the GHG Protocol) and have been covered in the respective section. This process was initiated as the first step to narrow down potential CRE cases. Subsequently, workshops were conducted with stakeholders from different monitoring units to further refine and define the initial perimeter, ensuring alignment with the PCAF definition. This collaborative effort enhanced precision in identifying CRE loans. This initial dataset was defined as the first level or initial perimeter for the asset class and the loans that did not fulfill the PCAF definition for CREs were calculated under the asset class of corporate loans. Then, moving towards the “PCAF perimeter”, a series of filters have been applied in order to remove irrelevant items.

Row 6

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:

☒ Other, please specify :Mortgages

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

7.15

(12.2.1.7) Value of assets covered in the calculation

5376904931

(12.2.1.8) Financed emissions or alternative metric

199750

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

This asset class includes on-balance sheet loans for specific consumer purposes—namely the purchase and refinance of residential property, including individual homes and multifamily housing with a small number of units. This definition implies that the property is used only for residential purposes and not to conduct income-generating activities. Mortgages used to construct or renovate a house are not required at this point given that the homeowner does not directly account for construction emissions. As a home is often constructed or renovated by a third party (i.e., a home builder) contracted by the homeowner, the emissions of the construction would normally be accounted by the third party during the building's construction phase.

Row 7

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:

☒ Other, please specify :Motor vehicle loans

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

0.15

(12.2.1.7) Value of assets covered in the calculation

116563446

(12.2.1.8) Financed emissions or alternative metric

11075

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

This asset class refers to on-balance sheet loans and lines of credit to businesses and consumers for specific (corporate or consumer) purposes - namely the finance of one or several motor vehicles.

Row 8

(12.2.1.1) Portfolio

Select from:

☒ Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

☒ Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:

☒ Other, please specify :Sovereign Debt

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

19.18

(12.2.1.7) Value of assets covered in the calculation

14425308260

(12.2.1.8) Financed emissions or alternative metric

5352491

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

☒ No

(12.2.1.12) Explain the details, assumptions and exclusions in your calculation

This asset class includes sovereign bonds and sovereign loans of all maturities issued in domestic or foreign currencies. Both sovereign loans and bonds lead to the transfer of funds to the country, which in turn creates a debt obligation to be repaid by the borrowing country. Sovereign debt is typically issued by the central government or treasury. Financial institutions' exposure to central banks typically consists of cash, foreign exchange, and derivative (repo) transactions. This central bank exposure is not within scope of this accounting standard. However, in some countries, central banks also issue debt on behalf of the sovereign. In those cases, central banks should be assigned the emissions of the respective sovereign. Supranational debt: Based on PCAF, in terms of covering supranationals – these supranationals are political unions first, and their balance sheets represent the aggregated balance sheets of their members. Technically, it is possible to aggregate the GHG emissions of supranationals as a sum of the emissions of its members. Practically, this would lead to double counting. Supranational debt has been excluded from the financed emissions calculations.

[Add row]

(12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.

Lending to all fossil fuel assets

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

609044493.16

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

185899525

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.8

(12.3.6) Details of calculation

Lending to all fossil fuel assets is calculated as the sum of the Bank's oil and gas exposure.

Lending to thermal coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0.21

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Lending activity to thermal coal was detected to clients with NACE B0510 and B0511. Exposure was calculated as the sum of their gross carrying amount of their balances.

Lending to met coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0.21

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Lending activity to met coal was detected to clients with NACE B0510 and B0520. Exposure was calculated as the sum of their gross carrying amount of their balances.

Lending to oil

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

529850449.26

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

177936761.78

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.7

(12.3.6) Details of calculation

Lending activity to oil was detected to clients with NACE 1920. Exposure was calculated as the sum of their gross carrying amount of their balances.

Lending to gas

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☒ Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

79194043.48

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

7962763.22

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.1

(12.3.6) Details of calculation

Lending activity to gas was detected to clients with NACE 3521. Exposure was calculated as the sum of their gross carrying amount of their balances.

[Fixed row]

(12.4) Does your organization provide finance and/or insurance to companies in the commodity value chain? If so, for each commodity and portfolio, state the values of your financing and/or insurance in the reporting year.

Lending to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

☒ Yes

(12.4.2) Commodity value chain stage coverage

Select all that apply

- ☒ Processing
- ☒ Trading
- ☒ Manufacturing

(12.4.3) Portfolio exposure (unit currency – as specified in 1.2)

169641900.98

(12.4.4) New loans advanced in reporting year (unit currency – as specified in 1.2)

44202501.86

(12.4.6) % value of the exposure in relation to your total portfolio value

0.2

Lending to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- ☒ Yes

(12.4.2) Commodity value chain stage coverage

Select all that apply

- ☒ Production
- ☒ Trading
- ☒ Manufacturing

(12.4.3) Portfolio exposure (unit currency – as specified in 1.2)

143257056.19

(12.4.4) New loans advanced in reporting year (unit currency – as specified in 1.2)

40994851.33

(12.4.6) % value of the exposure in relation to your total portfolio value

0.2

Lending to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

☒ Yes

(12.4.2) Commodity value chain stage coverage

Select all that apply

☒ Production

☒ Trading

☒ Manufacturing

(12.4.3) Portfolio exposure (unit currency – as specified in 1.2)

577259424.34

(12.4.4) New loans advanced in reporting year (unit currency – as specified in 1.2)

196218949.36

(12.4.6) % value of the exposure in relation to your total portfolio value

0.8

Lending to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

☒ Yes

(12.4.2) Commodity value chain stage coverage

Select all that apply

☒ Production

☒ Trading

☒ Manufacturing

(12.4.3) Portfolio exposure (unit currency – as specified in 1.2)

412347460.03

(12.4.4) New loans advanced in reporting year (unit currency – as specified in 1.2)

108234810.06

(12.4.6) % value of the exposure in relation to your total portfolio value

0.5

Lending to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

☒ Yes

(12.4.2) Commodity value chain stage coverage

Select all that apply

- ☒ Production
- ☒ Trading
- ☒ Manufacturing

(12.4.3) Portfolio exposure (unit currency – as specified in 1.2)

208143534.94

(12.4.4) New loans advanced in reporting year (unit currency – as specified in 1.2)

55817951.24

(12.4.6) % value of the exposure in relation to your total portfolio value

0.3

Lending to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- ☒ No

Lending to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- ☒ Yes

(12.4.2) Commodity value chain stage coverage

Select all that apply

- ☒ Production

- ☒ Trading
- ☒ Manufacturing

(12.4.3) Portfolio exposure (unit currency – as specified in 1.2)

298855694.66

(12.4.4) New loans advanced in reporting year (unit currency – as specified in 1.2)

83897798.62

(12.4.6) % value of the exposure in relation to your total portfolio value

0.4

[Fixed row]

(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?

Banking (Bank)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

- ☒ Yes

(12.5.2) Taxonomy under which portfolio alignment is being reported

Select from:

- ☒ EU Taxonomy for Sustainable Activities

(12.5.3) Total assets in your portfolio (unit currency as selected in 1.2)

75223451361.00

(12.5.4) Total assets covered in the calculation of the taxonomy KPIs in the reporting year

58473000000

(12.5.5) Total assets excluded from the calculation of your alignment KPIs in the reporting year

17690000000

(12.5.6) Aligned assets based on turnover of investees in the reporting year (unit currency as selected in 1.2)

1247000000

(12.5.7) Share of aligned assets based on turnover of investees out of total assets in the reporting year

2.1

(12.5.8) Eligible assets based on turnover of investees in the reporting year

10367000000

(12.5.9) Share of eligible assets based on turnover of investees in the reporting year out of total assets in the reporting year

17.7

(12.5.10) Aligned assets based on CAPEX of investees in the reporting year (unit currency as selected in 1.2)

1778000000

(12.5.11) Share of aligned assets based on CAPEX of investees out of total asset in the reporting year

3

(12.5.12) Eligible assets based on CAPEX of investees in the reporting year

10838000000

(12.5.13) Share of eligible assets based on CAPEX of investees out of total asset in the reporting year

18.5

(12.5.14) Share of aligned assets contributing to climate change mitigation based on turnover of investees in the reporting year

1.9

(12.5.15) Share of aligned assets contributing to climate change mitigation that is transitional based on turnover of investees in the reporting year

0

(12.5.16) Share of aligned assets contributing to climate change mitigation that is enabling based on turnover of investees in the reporting year

0.3

(12.5.17) Share of aligned assets contributing to climate change adaptation based on turnover of investees in the reporting year

0.2

(12.5.18) Share of aligned assets contributing to climate change adaptation that is adapted based on turnover of investees in the reporting year

0

(12.5.19) Share of aligned assets contributing to climate change adaptation that is enabling based on turnover of investees in the reporting year

0

(12.5.20) Share of aligned assets contributing to climate change mitigation based on CAPEX of investees in the reporting year

3

(12.5.21) Share of aligned assets contributing to climate change mitigation that is transitional based on CAPEX of investees in the reporting year

0

(12.5.22) Share of aligned assets contributing to climate change mitigation that is enabling based on CAPEX of investees in the reporting year

0.6

(12.5.23) Share of aligned assets contributing to climate change adaptation based on CAPEX of investees in the reporting year

0

(12.5.24) Share of aligned assets contributing to climate change adaptation that is adapted based on CAPEX of investees in the reporting year

0

(12.5.25) Share of aligned assets contributing to climate change adaptation that is enabling based on CAPEX of investees in the reporting year

0

(12.5.32) “Do No Significant Harm” requirements met

Select from:

☒ Yes

(12.5.33) Details of “Do No Significant Harm” analysis

For specific purpose funding, which is defined as exposures that have the purpose of financing specific identified activities, ('known use of proceeds'), the alignment assessment is based on information collected from the counterparty about the financed activity. The assessment considers the Delegated Regulation (EU) 2021/2178 which specifies that banking institutions must collect evidence of alignment for each of the technical criteria on contribution to the climate objectives, but also document the justification for the absence of impact causing harm to the other four environmental objectives.

(12.5.34) Details of calculation

The climate performance criteria are accompanied by multiple additional conditions, aimed at ensuring that the activity does not cause significant harm to one of the Taxonomy's other five environmental objectives. The assessment is performed based on Taxonomy Delegated Act, screening which activities are included in the EU Taxonomy (Taxonomy-eligible activities) to which objectives they substantially contribute and what criteria have to be met for activities to be considered Taxonomy aligned. For general-purpose financing, the Bank uses counterparties' disclosed turnover and CapEx Taxonomy KPIs. For dedicated-purpose financing, alignment is assessed at the level of the financed activity. An eligible activity is no treated as aligned unless the applicable alignment requirements are substantiated. The GAR uses the prudential consolidation perimeter and covered assets as its denominator. Central governance, central bank, supranational and trading-book exposures are excluded from both its numerator and denominator. Data limitations affect, in particular, mortgage EPC information and DNSH evidence for dedicated-purpose financing.

[Fixed row]

(12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?

	Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues
	Select from:

	Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues
	☒ Yes

[Fixed row]

(12.6.1) Provide details of your existing products and services that enable clients to mitigate and/or adapt to the effects of environmental issues, including any taxonomy or methodology used to classify the products and services.

Row 1

(12.6.1.1) Environmental issue

Select all that apply

☒ Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

☒ Mitigation

☒ Adaptation

(12.6.1.3) Portfolio

Select from:

☒ Banking (Bank)

(12.6.1.4) Asset class

Select from:

☒ Loans

(12.6.1.5) Type of product classification

Select all that apply

☒ Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

☒ The EU Taxonomy for environmentally sustainable economic activities

(12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

☒ Energy efficiency measures

☒ Green buildings and equipment

☒ Low-emission transport

☒ Renewable energy

☒ Other, please specify :Resource efficiency and pollution control

(12.6.1.8) Description of product/service

The European Recovery and Resilience Fund (EU RRF) plays a critical role in our sustainability strategy. RRF loans are aligned with Greece's Recovery and Resilience Plan, financing projects that improved energy transition. While compliance with RRF requirements is mandatory, we are voluntarily extending these principles to our broader lending portfolio, further supporting the green transition of SMEs and other key sectors.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

0.43

(12.6.1.10) Product considers principal adverse impacts on environmental factors

Select from:

☒ Yes

(12.6.1.11) Details on how the principal adverse impacts on environmental factors are considered in this product

In accordance with the EU Taxonomy Regulation, all loan applications must be submitted with a Do No Significant Harm (DNSH) report. This report must evaluate potential adverse impacts against the relevant Technical Screening Criteria (TSC) across the EU's six environmental objectives and demonstrate that tailored interventions mitigate these risks below regulatory thresholds.

Row 2

(12.6.1.1) Environmental issue

Select all that apply

☒ Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

☒ Mitigation

(12.6.1.3) Portfolio

Select from:

☒ Banking (Bank)

(12.6.1.4) Asset class

Select from:

☒ Loans

(12.6.1.5) Type of product classification

Select all that apply

☒ Products that promote environmental and/or social characteristics

☒ Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

☒ Internally classified

(12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

☒ Energy efficiency measures

☒ Green buildings and equipment

☒ Low-emission transport

☒ Renewable energy

(12.6.1.8) Description of product/service

Alpha Bank supports small and medium-sized businesses in improving their environmental footprint, reducing energy consumption and strengthening their resilience through dedicated financing schemes and partnerships with European and national institutions. Through its participation in InvestEU, the Bank facilitates access to financing for investments in renewable energy, energy efficiency, circular economy solutions and other sustainable infrastructure projects. In addition, Alpha Bank participates in programmes of the Hellenic Development Bank, including the Just Development Transition Loan Fund, which provides working capital and investment loans with 50% of the financing granted interest-free and an additional 3% interest-rate subsidy for the first three years. The Bank also offers financing through the Just Development Transition Investment Loan Guarantee Fund, which provides an 80% guarantee per financing and a 3% interest-rate subsidy for the first two years. These programmes primarily support SMEs operating in areas affected by the transition away from lignite-based economic activity. For retail customers, Alpha Bank offers a broad range of products designed to support energy efficiency and environmentally sustainable choices. Solutions include public programmes such as Exoikonomo 2023, Exoikonomo 2025 and Exoikonomo – Anakainizo gia Neous, which support energy-efficiency improvements and provide enhanced incentives for vulnerable and low-income households. The Bank also finances electric vehicles and home energy-efficiency improvements under preferential terms. In Cyprus, Alpha Bank additionally offers discounted financing for energy-efficient homes and environmentally friendly vehicles.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

0.65

(12.6.1.10) Product considers principal adverse impacts on environmental factors

Select from:

☒ No

Row 3

(12.6.1.1) Environmental issue

Select all that apply

☒ Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

☒ Mitigation

(12.6.1.3) Portfolio

Select from:

☒ Banking (Bank)

(12.6.1.4) Asset class

Select from:

☒ Loans

(12.6.1.5) Type of product classification

Select all that apply

☒ Other product classification, please specify :Sustainability-linked loans, based on Alpha Bank's Sustainable Finance Framework criteria

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

☒ LMA Sustainability Link Loans Principles

(12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

☒ Energy efficiency measures

☒ Green buildings and equipment

- ☒ Low-emission transport
- ☒ Renewable energy

(12.6.1.8) Description of product/service

Sustainability-Linked Loans (SLLs) constitute part of Alpha Bank's sustainable financing offering and are included within the scope of the Bank's Sustainable Finance Framework (SFF). These financing instruments are designed to support corporate clients in advancing their sustainability strategies by linking specific financial terms of the loan to the achievement of predefined and measurable sustainability performance targets.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

1.46

[Add row]

(12.7) Has your organization set targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring?

Forests

(12.7.1) Target set

Select from:

- ☒ No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

The Bank addresses the environmental issue on forests through its exclusion list for corporate loans. Specifically, the Credit Policy prohibits financing to commercial logging operations for use in primary tropical moist forest, production or trade in wood or other forestry products other than from sustainably managed forests as well as the production of or trade in any product or activity deemed illegal under national laws or regulations or international conventions and agreements or subject to international phase out bans. The exclusion list also prohibits conversion of natural forests into plantations. These restrictions support the Group's ongoing target of zero financing to specified activities harming species diversity, habitats and waterbodies, introduced in 2023; no new financing was allocated to excluded categories in 2025.

Water

(12.7.1) Target set

Select from:

☒ No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

No material impacts to Water and Marine Resources have been concluded deriving from the Group's products/services (downstream value chain), as the Group's portfolio did not indicate material association with sectors with significant water-related impacts. Furthermore, currently there is no projection of significant changes to the mix of portfolio indicating a material impact to Water and Marine Resources for the future time horizons. The Group nevertheless maintains an ongoing zero-financing target for specified activities harming species diversity, habitats and waterbodies. This targeted commitment is distinct from a portfolio-wide water-secure lending target.

[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☒ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☒ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

All data points in CDP response

☒ All data points in CDP response

(13.1.1.3) Verification/assurance standard

General standards

☒ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

Deloitte has conducted a limited assurance engagement on the consolidated Sustainability Statement of Alpha Bank S.A. (henceforth the “Bank”) and its subsidiaries (collectively the “Group”), included in section “Sustainability Statement FY 2025” of the consolidated Board of Directors’ Annual Report (the “Sustainability Statement”), for the period from 01/01/2025 to 31/12/2025. Only information falling within the defined scope of that engagement should be identified as assured.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Verification of Alpha Bank S.A.pdf

[Add row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Chief of Corporate Center and General Counsel - ExCo Member

(13.3.2) Corresponding job category

Select from:

☒ General Counsel

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub to facilitate collective action in priority basins.

Select from:

☒ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute

