



Sustainability Statement FY 2025



ALPHA BANK

The present document constitutes the Sustainability Statement for the Financial Year 2025 in accordance with Articles 151 and 154 of Law 4548/2018 and, as such, forms an integral part of the Annual Report for the Year 2025, which is available on the following website: <https://www.alpha.gr/en/Group/investor-relations/group-results-and-reporting/Financial-Statements-Bank-and-Group>

Sustainability Statement FY 2025

GENERAL INFORMATION

ESRS 2

[BP-1] General basis for preparation of sustainability statements

The Sustainability Statement covers information for Alpha Bank Group (hereinafter the "Group"), and its value chain. It has been prepared on a consolidated basis, consistent with the Group's financial statements.

Qualitative information for the upstream value chain is presented in sections [G1] "Business conduct" and [S4] "Consumers and End Users" where Group's business conduct with its value chain is described, as well as in [BP-2] "Value chain estimations and relevant uncertainty" describing any estimates used for quantitative figures. Quantitative information for the Group's upstream value chain is included in [E1-6] "Gross Scopes 1, 2, 3 and Total GHG emissions".

Regarding the downstream value chain, qualitative information is included in [BP-2] "Value chain estimations and relevant uncertainty", and [E1] "Climate Change". Quantitative information for the Group's downstream value chain is included in [E1-6] "Gross Scopes 1, 2, 3 and Total GHG emissions".

It is noted that in [SBM-3] "Strategy, business model and value chain" and [IRO-1] "Description of the process to identify and assess material impacts, risks and opportunities" the Group's material impacts, risks and opportunities are described in detail which have been drawn considering the Group's own operations, its upstream and downstream value chain. The Group enhances its business model and aligns its strategy by implementing actions that promote sustainable practices, strengthen transparency, and mitigate reputational, financial, and regulatory risks, while fostering long-term value creation for all stakeholders. The disclosures address material impacts, risks and opportunities pertaining to the Group's value chain without applying omissions or exemptions.

The list of all entities included in the present Sustainability Statement can be found on the "Note 46 Group Consolidated Companies" of the Financial Statements of the Annual Report 2025. The largest subsidiary of the Group is Alpha Bank S.A. (denoted hereinafter as "Alpha Bank" or the "Bank").

The Group is in the process of continuously improving the level of availability of information, methodologies used and alignment of actions and targets currently implemented by the Bank and all its subsidiaries, as well as improving its monitoring and management approach regarding its joint ventures and associates. No subsidiary undertakings included in the consolidation are exempted from consolidated or individual sustainability reporting, and no information is omitted corresponding to intellectual property, know-how or innovation. Furthermore, no exemption has been used for disclosures linked to developments in the course of negotiations.

The Sustainability Statement has received an Independent Limited Assurance in accordance with ISAE 3000 (Revised).

[BP-2] Disclosures in relation to specific circumstances

Time horizons

For Alpha Bank Group the time horizons are classified in alignment with the ESRS definitions as:

- Short-term: One year (2026)
- Medium-term: 2027-from the 2nd year and up to 5 years (2030)
- Long-term: >2030 more than 5 years (2050)

Value chain estimations and relevant uncertainty

Where relevant and applicable, the Group has utilized methods to estimate value chain data. This was the case for the estimation of Scope 3 emissions and their disaggregation per subsidiary, economic activity and source type, as disclosed in [E1-6] Gross Scopes 1,2,3 and Total GHG emissions. More specifically, indirect sources used for the calculation of some Scope 3 emissions categories were:

- For Alpha Bank S.A. DEFRA 2025 Conversion Factor (Business Travel-land/Cars by size/Medium/CNG), as well as PCAF's European building emission factor database, were deployed.
- For Alpha Bank London Ltd, the equivalent carbon footprint factor from DEFRA Guide (2025) was used.
- For Alpha Bank Cyprus, DEFRA 2025 (Business Travel-land» + «WTT- pass vehs and travel- land.), as well as PCAF's European building emission factor database, were deployed.

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

It is noted that regarding quantitative metrics and monetary amounts that are under disclosure, no case of high level of measurement uncertainty has been identified and overall, the uncertainty level of methodologies and estimations used is acceptable. However, the Group continuously aims to increase transparency and accuracy to its sustainability reporting and to improve data quality. Therefore, where primary data is available, the Group prioritizes the utilization of this data over estimations and assesses and improves its methodologies for measurements.

Specific notes to OpEx & CapEx

Due to the nature of the Group's business activities, no significant operational (OpEx) and/or capital expenditures (CapEx) that relate to the implementation of its actions towards the achievement of policy objectives and targets have been specifically attributed to material sustainability matters, unless otherwise stated within the relevant chapters.

Changes in preparation or presentation of sustainability information

For 2025 there is only one Reporting Group compared to the previous reporting year (2024) further to the completion of the merger by absorption of Alpha Services and Holdings S.A. by the Alpha Bank S.A. (Reverse Merger) in June 2025.

During the 2025 reporting year, the Group invested in several subsidiaries and sold others, please refer to the 'Significant events' section in the Board of Directors' Management Report and Notes 55 and 56 to the Consolidated Financial Statements in the Annual Report 2025.

Additionally, in comparison to the previous reporting period, no metrics previously used have been replaced.

Sustainability reporting stemming from other legislation and standards

For the compilation of the present Statement, reporting data stemming from other legislative requirements have been utilized. In addition, to complement information based on other widely accepted sustainability reporting standards, data from generally accepted sustainability reporting standards and frameworks have also been used. The paragraphs per standard are presented in the following table:

Table 1 Paragraphs per standard

Legislation/Standard	Paragraphs
GRI ⁴ 417-2, 417-3, GRI 418-1(b)	S4 Consumers and end-users
SASB ⁵ FN-CB240a.4, FN-CB-230a.2	S4 Consumers and end-users

Additionally, the Group relies on the following International Standards published by ISO, International Organization for Standardization and other management standards, as follows:

Table 2 Management standards

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

The following information has been incorporated by reference:

Table 3 Disclosure requirements incorporated by reference

Disclosure requirements		Location
GOV-1	The role of the administrative, management and supervisory bodies	Section "Corporate Governance Statement" of the Annual Report 2025
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Section "Corporate Governance Statement" of the Annual Report 2025
SBM-1	Strategy, business model and value chain (products, markets, Customers)	Section "Strategic Plan" of the Annual Report 2025

[GOV-1] The role of the administrative, management and supervisory bodies

Board of Directors general information

On 31.12.2025, the Board of Directors (BoD) of Alpha Bank S.A. consisted of 11 Members, who are appointed for a 4-year term, 2 of which are Executive Members, 1 Non-Executive Member and 8 are Independent Non-Executive Members, which is in line with the target of ensuring a majority of Independent Members. There is no representation of Employees and other workers at the BoD, however through its Executive Members interacts regularly with Employee representatives.

In terms of gender balance and diversity, the female BoD Members represented the 45%, while male BoD Members represented the 55%, with the average ratio of female-to-male members being 5:6. In terms of age diversity, it is noted that 55% of BoD Members are under the age of 61, 36% between 61-70, and 9% and over 70 years old. In terms of Independent Non-Executive Members, they comprise 73% of the BoD (based on the composition of the Board of Directors on 31.12.2025).

For the structure and composition of Alpha Bank, please refer to the Corporate Governance Statement.

⁴ Global Reporting Initiative (GRI 2021)

⁵ Sustainability Accounting Standards Board (SASB)

Board of Directors relevant experience

The Members of the BoD have strong experience in the Greek and/or international markets and possess deep knowledge and expertise relating to banking and financial markets, regulatory framework and legal requirements, strategic planning, the understanding of the Group's business strategy or business plan, risk management, accounting and auditing, Information technology and security, ESG factors and risks. An assessment of BoD Members' collective suitability, as well as individual self-assessment, in terms of knowledge, skills and experience, based on the ESMA/EBA "Guidelines on the assessment of the suitability of members of the management body and key function holders" (the "ESMA/EBA Guidelines"), is conducted annually with the support of the Corporate Governance, Sustainability and Nominations Committee (CGSNC). The relevant information is stated in the annual Corporate Governance Statement which is included in the Annual Report 2025.

Responsibility for oversight of impacts, risks, and opportunities

Among others, the BoD has the overall responsibility for the Bank and approves and oversees the implementation of the Bank's strategic objectives, risk strategy and ESG strategy, as well as its internal governance, including relevant impacts, risks and opportunities.

There are four (4) Committees that operate at the BoD level, each with an advisory role and with the possibility to assume delegated authorities, as determined by the BoD. The duties and mandates of each Committee are included in their respective Charters, ensuring accountability and clarity of their respective duties.

The **Audit Committee**, among others, assists the BoD in safeguarding the integrity of the financial and sustainability reporting processes, reviews the scope, frequency and results of the audit assurance on ESG reporting, including statutory requirements. The Committee collaborates with the Risk Management Committee as necessary on the effective oversight of the mitigation of certain key areas of risk, including climate-related or other ESG risks and liaises with other Board Committees in relation to issues on effective ESG control environment, internal controls and compliance. It also ensures adherence to and compliance with the Code of Conduct and Ethics, oversees the Bank's effort to foster a culture of ethics and discourages unethical behavior in all operational levels as well as makes recommendations to the BoD for approval the "Anti-bribery and Corruption Policy". The full scope of the duties and responsibilities of the Audit Committee are set out in its Charter, which is posted on the Alpha Bank S.A. [website](#).

The **Risk Management Committee**, among others, monitors that Alpha Bank S.A. adequately embeds ESG risks in its risk appetite statement and framework, business strategy and risk management framework. Specifically, it collaborates with the Corporate Governance, Sustainability and Nominations Committee, as well as with the Audit Committee as necessary on the effective oversight of the mitigation of certain key areas of risk, including climate-related or other ESG risks, and capital management and their repercussions on the Internal Control System. The Committee reviews and recommends annually to the BoD for approval the Group's risk appetite framework and statement, considering also ESG risks i.e the risks of any negative financial impact on the Bank, stemming from current or prospective impacts of ESG factors on its counterparties, such as climate-related risks, and ensuring alignment with the Group's strategic objectives and capital allocation. The Committee is also responsible for the development of a sound risk culture at all levels throughout the Bank and its Subsidiaries. The full scope of the duties and responsibilities of the Risk Management Committee are set out in its Charter, which is posted on the Alpha Bank S.A. [website](#).

The **Remuneration Committee**, among others, assesses the alignment of the Remuneration Policies with the Bank's ESG objectives, e.g. long-term resilience of the business strategy, including ESG and risk appetite, in order to avoid conflicts of interest when business decisions are made and to facilitate the implementation of ESG risk-related objectives. The Committee is also responsible for ensuring that the Remuneration Policy for Alpha Bank and other Companies of the Group 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 Group, taking into account ESG risks that affect the business environment in the short, medium or long term. Moreover, it discourages excessive risk-taking, promotes effective risk management and prevents the emergence of conflicts of interest or minimizes any conflicts of interest that might arise. The full scope of the duties and responsibilities of the Remuneration Committee are set out in its Charter, which is posted on the Alpha Bank S.A. [website](#).

The **Corporate Governance, Sustainability and Nominations Committee (CGSNC)** is responsible for, among others, assisting the Board in ensuring the implementation of ESG standards according to regulatory requirements and the relevant best practices, ensuring that there is an adequate level of effective communication on ESG issues with the Risk Management, Remuneration, and Audit Committees, reviewing at least semi-annually current and emerging ESG trends and regulatory developments reporting that may significantly affect the Bank's activities; recommending to the BoD areas that may require actions, and reviewing the Sustainability/ESG Policy, at least annually, and if necessary, providing proposal for amendments and recommending its approval by the BoD as needed. The Committee also assists the BoD in achieving objectives such as pursuing the implementation of international corporate governance best practice, including through the implementation of adequate checks and balances across the Group. It is also regularly informed from Heads of internal control functions, concerning the overall risk profile and risk culture of Alpha Bank, and ensures that there is effective communication reinforcing ethical values and good practice in the daily business of the Bank and the Group. The full scope of duties and responsibilities of the CGSNC are set out in its Charter, which is posted on the Alpha Bank S.A. [website](#).

For more information on the Committees, please refer to Corporate Governance Statement 2025.

Reporting lines for the Board of Directors and its Committees

The BoD, through its direct interaction with the four Committees, has the overall responsibility for the Bank and approves and oversees the implementation of the Bank's strategic objectives, risk strategy, and ESG strategy, as well as its internal governance. The BoD also ensures the integrity of the accounting and financial reporting systems, including financial and operational controls and compliance with the law and relevant standards. It oversees the process of disclosure and communications and is responsible for providing effective oversight to the Senior Management.

Through the Risk Management Committee, the Board receives regular reports from the CRO and CFO on the implementation of the risk strategy and risk appetite of the Bank and the Group, including as it relates to ESG risks. All Committee Chairs regularly inform the BoD of the work of the respective Committee.

All Committees can be directly reported to from any relevant corporate and control function (e.g. legal, finance, human resources, IT, internal audit, risk, compliance, including information on AML/CTF compliance and aggregated information on suspicious transaction reports and ML/TF risk factor), as needed and requested, in order to fully discharge their duties.

For the full scope of potential reporting lines in terms of the Committees, please refer to their respective Charters.

Executive Management Level

At the Executive Management level, central to the ESG Governance structure is the Group Sustainability Committee which is chaired by the Chief of Wholesale Banking and its regular members include: the Deputy Chief Executive Officer (Deputy CEO), Chief Risk Officer, Chief Retail Client Strategies Officer, Chief of Corporate Center and General Counsel. Members of the Executive Committee, as well as Executives of the Bank or Group Companies or external partners, may also be invited to participate in the meetings. The Group ESG Coordinator acts as the Secretariat.

The **Group Sustainability Committee** convenes regularly and oversees sustainability matters, steers the Group's ESG Strategy, and oversees its implementation. In addition, it ensures that the Executive Committee is informed on key subjects discussed and decisions taken. The Chief Executive Officer (CEO), as a Member of the Board and Chair of the Executive Committee, is informed on sustainability and ESG matters and, in this capacity, provides input when needed. Finally, it supports the Board of Directors in their oversight of Climate & ESG Risks and Sustainability issues.

The specific duties and responsibilities of the Executive Committee are set out in Alpha Bank's Corporate Governance Statement of the Annual Report 2025.

Operational Implementation Level

The Group ESG Coordinator leads sustainability-related initiatives, oversees the ESG objectives within the cross-functional ESG Working Group and is responsible for its oversight, in addition to being the Secretariat of the Group Sustainability Committee. The ESG Working Group represents all areas of the Group that take ownership of ESG integration and ensures the flow of information across relevant teams. Those teams consist of ESG specialists and dedicated representatives of relevant functions, including Retail Banking, Wholesale Banking, Risk Management, Strategy, Human Resources and Wealth Management and Treasury.

The **Governance and Sustainability** Business Area drives the ESG agenda and ensures the adoption of best market practices across the Group, with an emphasis on ESG Strategy and integration, Sustainable Finance operationalization, stakeholder engagement, and disclosures in line with relevant regulatory requirements. To deliver on the above, a dedicated Program has been established that is governed by the Operating Committee which comprises representatives from all relevant business areas.

The **Climate, ESG and Enterprise Risk Management** is a horizontal risk business area which collaborates and coordinates with the rest of the functions and business areas under the supervision of the Chief Risk Control Officer, while undertaking the management of a limited number of risks under its controlling capabilities, related to Bank-wide and even Group matters. Amongst others, the business area is responsible for maintaining a proficient understanding of climate risk, ESG-related regulations and emerging trends, providing expert guidance for ESG integration into the risk management framework.

Controls and procedures integration with other internal functions

The consideration of ESG impacts, risks and opportunities are embedded in the Group's operating model, which defines how roles and responsibilities concerning sustainability are allocated across the Alpha Bank S.A. ESG risks are considered across all vertical risk types and the dedicated Climate and ESG Risk Team is involved in their assessment.

Specifically, detailed responsibilities are listed and discharged for all internal processes that are instrumental in ESG Integration. For more information on these processes, please refer to [GOV-1] "Responsibility for oversight of impacts, risks, and opportunities".

Oversight of target setting and progress monitoring

The Group has set concrete targets to ensure the continuous attainment of its strategic and operational objectives. Notably, commitments and associated targets developed for each of the ESG pillars are described in [SBM-1] "Strategy, business model and value chain".

In addition, the BoD has approved the targets, while it is informed on a quarterly basis on the progress of KPIs towards the pledged commitments and associated targets through a thorough report across the ESG pillars of the Group.

Ensuring appropriate level of skills and expertise

Ensuring adequate training regarding sustainability matters is a central consideration for the overall suitability of the Members of the BoD. In order to promote effective oversight of sustainability matters, the Members of the BoD receive relevant training. According to the "Induction and Training Policy and Procedure for the Members of the Board of Directors", all the newly-appointed Members of the BoD receive key information one month after taking up their position at the latest, and the induction should be completed within six months. For this purpose, the Alpha Bank offers to all new Members of the BoD an induction program on, among others, the Bank's structure, business model, risk profile and governance arrangements, legal and regulatory requirements in relation to the Bank and the services it provides, the Corporate Governance principles, Risk Management, Compliance and Internal Audit, Wholesale and Retail Banking, Wealth Management and Treasury, External Statutory Audit, Capital Adequacy, Financial and Accounting Services, Credit Risk and NPEs, ESG, Sustainability Information; Information Technology and Security, Human Resources, International Network, Digitalization, Transformation, Strategic Planning. Sustainability matters are incorporated horizontally across these topics, as relevant.

Additionally, Alpha Bank, in the framework of the continuous training of the Members of the BoD, provides informative and/or training sessions to all of them as well as the possibility for relevant informative and/or training seminars and meetings on the abovementioned or on other topics concerning the financial sector. The training places emphasis on conceptual and strategic issues and focus on new developments and on the influence these developments may have on the Bank. As a result of this training, Members of the BoD develop concrete skills and expertise linked to the management of the Bank's sustainability impacts, risks, and opportunities. The Members of the BoD during 2025 participated in the UNEP FI Climate Mitigation Journey program pertaining to ESG.

More information pertaining to the expertise and training programs of the Members of the BoD is available in the "Board of Directors and Committees of Alpha Bank's Corporate Governance Statement within the Annual Report 2025".

Further to the above, Alpha Bank also provides its BoD Members with the opportunity to participate in training and education sessions offered by external institutions. Upon request by any Member, the Bank may offer tailor-made programs to further enhance the Members' knowledge and competences.

[GOV-2] Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The CGSNC acts as the ultimate liaison between the Board Committees with respect to all sustainability/ESG issues at least on quarterly basis and promotes respective communications and feedback from all the BoD Committees. Based on the results of the Double Materiality Assessment, the Group systematically revisits and refines its policies, actions, targets, and metrics to enhance performance monitoring and strengthen the management of material impacts, risks and opportunities stemming from its operations and business relationships.

The CGSNC, among others, ensures and regularly evaluates that its Members collectively possess the required knowledge, skills and experience relating to sustainability and ESG issues as well as to the business of the Bank to assess the appropriate composition of the BoD. For further information on the management oversight please refer to [GOV-1] "The role of the administrative, management and supervisory bodies".

The Bank is committed to identifying and managing the positive and the negative impacts to environmental, social and governance matters created through its business operations, and across its value chain, through a robust due diligence process. The list of the material IROs addressed by the administrative, management and supervisory bodies are presented under [SBM-3] "Material impacts, risks and opportunities and their interaction with strategy and business model".

The Audit Committee, among others, assists the BoD in safeguarding the integrity of the financial and sustainability reporting processes.

The Risk Management Committee, among others, monitors that the Bank adequately embeds ESG risks in the overall risk appetite statement and framework, business strategy and risk management framework. More information pertaining to the responsibilities of the Committees of the Board of Directors is available at the Corporate Governance Statement within the Annual Report 2025.

[GOV-3] Integration of sustainability-related performance in incentive schemes

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

[GOV-4] Statement on due diligence

Table 4 Due diligence process

Core elements of due diligence	Chapters in the Sustainability Statement
Embedding due diligence in governance, strategy and business model	[GOV-2] Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies [GOV-3] Integration of sustainability-related performance in incentive schemes [SBM-1] Strategy, business model and value chain [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
Engaging with affected stakeholders in all key steps of the due diligence	[SBM-2] Interests and views of stakeholders [IRO-1] Description of the process to identify and assess material impacts, risks and opportunities [E1-2] Policies related to climate change mitigation and adaptation [E1-4] Targets related to climate change mitigation and adaptation [E4-2] Policies related to biodiversity and ecosystems [E4-4] Targets related to biodiversity and ecosystems [E5-1] Policies related to resource use and circular economy [S1-1] Policies related to own workforce [S1-5] - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-1] Policies related to Customers [S4-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [G1-1] Business conduct policies and corporate culture
Identifying and assessing adverse impacts	[IRO-1] Description of the process to identify and assess material impacts, risks and opportunities [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
Taking actions to address those adverse impacts	[E1-3] Actions and resources in relation to climate change policies [E4-3] Actions and resources related to biodiversity and ecosystems [E5-2] Actions and resources related to resource use and circular economy
Tracking the effectiveness of these efforts and communicating	[E1-4] Targets related to climate change mitigation and adaptation [E4-4] Targets related to biodiversity and ecosystems [E5-3] Targets related to resource use and circular economy

	[S1-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities Entity-Specific Information Contribution to Healthy Economies
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[GOV-5] Risk management and internal controls over sustainability reporting

The Group has established comprehensive risk management and internal control processes and systems specifically for sustainability reporting.

These ensure the accuracy, reliability, and integrity of our sustainability data and disclosures. This approach leverages the same rigorous processes applied to financial reporting, ensuring consistency and high standards across both areas. The risk management and internal control processes cover all aspects of sustainability reporting, including data collection, processing, and disclosure. This includes risk identification, risk assessment, control activities, information and communication, and monitoring. The Reporting Center of Excellence (RCOE) is critical component in this process serving as the focal point and internal control mechanism for data reporting.

The Sustainability Statement under the CSRD is subject to internal assessment and reviews through which the identified areas for improvement from the previous reporting period have been addressed, and further enhancements are under way including the development and approval of a formal procedure for the production of the Sustainability Statement.

In terms of process the Steering Committee acts as the first control frontier with the participation of Directors of the key business areas and subsidiaries, including Governance and Sustainability, Climate and ESG Risk, Internal Audit, Legal, Accounting, Group Data Protection, Human Resources. The Group Sustainability Committee functions as the second level approval, followed by the Group Sustainability Committee, the CGSNC and the Audit Committee.

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

The Data Governance and Quality Business Area owns the risk assessment process by overseeing the proper implementation of the Data Governance Framework across the Group, ensuring the valuation, and monitoring of data quality. In that context the use of proxies is continuously minimized, as referenced in [BP-2] Disclosures in relation to specific circumstances. Through the framework, a well-structured operating model, with roles and responsibilities concerning data quality, is defined. In addition, the Data Quality Policy provides guidance for data quality monitoring and remediation actions performed by data stewards and overseen by the Data Governance and Quality Business Area. The Finance and Risk Reporting Framework defines the responsibilities of the report owners and producers (the respective business areas within the Group), ensuring consistency and timeliness of reporting. Applied to the entire process, end-user Computing Developed Applications are governed by the end-user Computing Policy, foreseeing the criteria for risk assessment and respective controls, ensuring data integrity across the reporting landscape. As part of the Risk Appetite Framework, four Key Risk Indicators (KRIs) have been defined in order to measure data quality risk – covering data ownership, reliability, accuracy and timeliness. In addition, the Risk Management Committee oversees climate and environmental risks.

Based on the aforementioned process, Non-Financial Risks (NFRs), including Sustainability Reporting risks are identified through various methods, spanning across Risk and Control Self-Assessments (RCSA), scenario analysis, internal and external loss data reviews, regulatory and audit findings, key risk indicators (KRIs), third-party risk assessments, and employee or Customer surveys. Once identified, these risks are prioritized using risk scoring and heat maps, materiality assessments, alignment with risk appetite thresholds, and evaluations of interdependencies or concentration risks. Mitigation strategies include strengthening internal controls, implementing policies and training, transferring risk through insurance or outsourcing, and establishing robust business continuity and incident response plans. Continuous monitoring through regulatory compliance tools, stress testing, assurance reviews, and independent internal audits helps validate the effectiveness of these measures.

Once the reporting by the relevant Business Area has been reviewed internally, in line with the aforementioned process, the Governance and Sustainability Business Area receives the data from the data providers and ensures it is properly incorporated into the report. An external auditor is also engaged to assess the reliability of the data prepared. The Risk Management Committee, the Corporate Governance, Sustainability and Nominations Committee and the Audit Committee also collaborate as necessary to promote effective mitigation.

The Audit Committee and the Risk Management Committee provide oversight of certain areas of risk management, and their repercussions on the Internal Control System.

The Risk Management Committee is regularly informed about the quality of the sustainability reporting and convenes at least once a month, inviting, as appropriate, any Member of the Group's Management or Executive to attend its meetings. The Chief Risk Officer (CRO) is a regular attendee of the Committee meetings and has unhindered access to the Committee Chair and Members.

The Data Governance and Quality Committee, Risk Committee and the Board of Directors are periodically updated on data quality issues and on the implementation of the Data Governance and the development of the Quality Framework.

[SBM-1] Strategy, business model and value chain

Significant groups of products and services offered

The Group's activities span across the Banking sector, Asset Management, Investment Banking and Treasury, Insurance, other Financing services, Financial Services, Provision of Information technology services and consulting, as well as Real Estate management. During 2025, the Group executed the sale of certain subsidiaries, with main activities related to Leasing and Real Estate management as well as the acquisition

of companies with activities in Banking, Real Estate Management, Factoring and Investment Banking⁶. Alpha Bank S.A. is the largest Group Entity, therefore the Group's significant group of products and services relate to banking activities.

Alpha Bank's purpose is to enable progress in life and business for a better tomorrow, which is achieved through its core values of excellence, efficiency, collaboration, and empowerment. These values guide the bank in fostering strong, trusting relationships with clients, supporting businesses for a sustainable economy, and addressing social issues like equality and financial health.

Through serving its clients and the projects it finances, Alpha Bank is cementing its position in improving more people's financial health, helping clients transition to a green and digital economy and driving sustainable returns for its investors. Alpha Bank applies the UN Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking (PRB) framework to align its strategy with the Sustainable Development goals as well as the Paris Agreement on climate change.

The Group strategy integrates material sustainability matters, with the aim of scaling sustainable finance and making positive contribution in the areas of climate and financial health & inclusion, while reducing the negative impacts from its operations.

To support its client needs, the Bank integrates ESG criteria across its financial product suite to support Sustainable investments and consumer choices. Through its Alpha Green Solutions package, the Bank offers a variety of green loans with preferential interest rates for home energy upgrades, eco-friendly transportation (including electric and hybrid vehicles), and energy-efficient home equipment such as photovoltaic panels and heat pumps. Alpha Bank also actively participates in state-supported energy-saving programs like "Exoikonomo 2025" and "e-Astypalea," providing tailored financial support particularly in local communities such as Astypalea. For more information on the 2025 products/services, please refer to [S4.SBM-3] 'Material impacts, risks and opportunities and their interaction with strategy and business model in relation to consumers'.

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

For large corporate clients the Bank draws on its expertise in project finance to provide financing for investments in RES, large infrastructure projects, waste treatment, recycling, and green buildings. The Bank also deploys co-funding initiatives, to support clients' transition plans including the EU Resilience and Recovery Facility (RRF) Green transition pillar to accelerate sustainable investments. Through the Recovery and Resilience Facility, the Bank provides financing for the green transition, with a focus on Renewable Energy Sources. Eligible categories under the "green pillar" include green technologies, green skills, biodiversity, energy efficiency, building renovation, preservation of energy security, circular economy, sustainable development, and creation of jobs.

The Bank continues to expand its offerings, including green mortgages, consumer loans for energy efficiency upgrades, and sustainability-linked loans, aligning with evolving market demands and regulatory frameworks.

Significant groups of Customers and location of operations

For information on significant groups of Customers (denoted hereinafter as "Customers" or the "Clients") and how the Group's activities serve these Customers, please refer to [S4.SBM-3] 'Material impacts, risks and opportunities and their interaction with strategy and business model in relation to consumers'. The Group is active in Greece, its principal market, and in markets in Cyprus through its wholly-owned subsidiary Alpha Bank Cyprus Ltd. The Group also maintains a presence in the United Kingdom (through its wholly-owned subsidiary Alpha Bank London Limited), Luxembourg, Romania, Bulgaria, Serbia, Ireland.

Details on the total number of Employees in 2025 in addition to the breakdown across its geographical scope of operations can be found under [S1-6] "Characteristics of the undertaking's Employees".

Exclusion list and limited activities and revenues from specific sectors

As per its exclusion list, Alpha Bank has limited appetite in financing activities in the production and trade of tobacco, and does not finance controversial weapons, please refer to [E1-2] "Policies related to climate change mitigation and adaptation".

Alpha Bank S.A. and Alpha Asset Management A.E.D.A.K. comply with Regulation (EU) 2019/2088 (SFDR) on sustainability disclosures in the financial services sector, as per its [Sustainable Finance Statement](#) and [ESG sustainability disclosures](#). Alpha Asset Management A.E.D.A.K. product-level sustainability disclosures are available on its [website](#). Currently, no SFDR Principle Adverse Impact indicators are available regarding exposures and revenues from companies active in fossil fuel (coal, oil and gas) or chemical productions; however, the Group may have limited exposure through its financing of clients who may be active in or have exposure to these sectors.

Sustainability-related goals and strategic priorities

The Group commits to create long-term value for its stakeholders, by setting sustainability-related goals in all areas of operation and establishes a comprehensive sustainability strategy to achieve them:

Support an environmentally sustainable economy

- Support its Customers' decarbonization and align its portfolio emissions with the objectives set in the Paris Agreement
- Mitigate key drivers of biodiversity loss
- Support the transition to a circular economy
- Achieve Net Zero emissions in its own operations

Foster healthy economies and societal progress

⁶ For detailed description of the subsidiaries sold in 2025 please refer to the notes 55 and 56 of the Annual Consolidated Financial Statements for the period ended 31.12.2025.

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

Ensure a robust and transparent governance

- Ensure the Diversity and Independence of the Board of Directors
- Embed sustainability in Governance practices and strategy

The Group integrates sustainability into its core business model by offering tailored financial products and services that enable corporate and SME Customers to invest in renewable energy, reduce waste, and transition to sustainable operations.

For retail Customers, the Group provides current and new sustainability-focused products designed to educate and empower individuals to make responsible financial decisions. This includes facilitating access to affordable housing and green financing, contributing to social resilience and inclusive growth.

In line with its commitment to financial inclusion, the Group delivers accessible banking services to underserved communities, reducing inequalities and expanding economic participation. These initiatives reflect the Group's strategic response to material sustainability risks and opportunities, driving systemic change across industries and ensuring alignment with stakeholder expectations and regulatory requirements. In Greece, significant Group products and services include Green Retail and Small Business Banking Products. These products and services support the sustainability-related goals "Support an environmentally sustainable economy" and "Foster healthy economies and societal progress".

Since 2022, the Group has applied the Sustainable Finance Framework (SFF) which was developed in accordance with market practice requirements reflected in the principles established by the International Capital Market Association and the Loan Market Association. The SFF defines in detail the criteria and process to classify financial products and services as sustainable covering both dedicated and general-purpose financing. It also incorporates the EU Taxonomy Regulation on economic activities that significantly contribute to climate mitigation and climate adaptation, enabling the implementation of a multi-step assessment process at the Customer and transaction level. Please refer to [E1-2] "Policies related to climate change mitigation and adaptation" for the detailed Sustainable Finance Framework description.

The SFF identifies eligible activities for sustainable financing grouped into the following themes:

Table 5 Eligible activities for sustainable financing

Green eligible activities for sustainable financing	Social eligible activities for sustainable financing
Energy Efficiency	Economic Inclusion
Renewable Energy	Access to Essential Services
Sustainable Transport	Affordable Basic Infrastructure
Resource efficiency and pollution control	Affordable Housing
Green Buildings	

In 2025, the implementation of the Sustainable Finance Framework (SFF) advanced the Group's commitment to sustainable lending, resulting in Euro 2.1 billion of new financing classified under the SFF criteria.

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

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

With the Green Bond Framework Alpha Bank aims to incorporate the EU Taxonomy requirements and to achieve future alignment with its eligibility criteria wherever feasible.

As a result, in October 2025 Alpha Bank successfully completed the pricing of a Green Senior Preferred Bond of Euro 500 million. The transaction was more than six times oversubscribed, underscoring the depth of investor confidence in Alpha Bank's renewed financial standing and strategic direction.

Main challenges and critical solutions

The rapidly evolving EU regulatory landscape (i.e. Paris Agreement, and EU Taxonomy, Corporate Sustainability Reporting Directive -CSRD and its transposition into the national laws⁷, the Greek National Energy and Climate Plan (NECP)⁸, SFDR, ECB Disclosure Requirements) is putting pressure on all industries to adapt and comply rigorously to the new requirements. Balancing economic growth objectives with climate risk mitigation, decarbonizing operations and financed emissions to align with global net-zero targets and supporting clients in high-emission industries to transition to sustainable business models without significant financial risk are key challenges for the financial sector. In addition, promoting workplace DE&I as well as bridging the financial inclusion gap for underserved communities always remain priorities.

To navigate through these challenges, the Sustainability strategy has been developed by the Group to integrate further sustainability into its core business model and core strategy for the short-term time horizon (2025-2027). The Sustainability strategy considers the UN Sustainable Development Goals (UN SDGs) and reflects the Bank's approach to address Climate change, Biodiversity, and Circularity aspects, related mainly to its portfolio, and own operations, to deliver positive outcomes for its Own Workforce, and Consumers and End-Users, as well as to ensure

⁷ On December 10, 2024, the Greek Parliament approved the legislation (Law 5164/2024), which, among others, incorporates into Greek law the European Directive 2022/2464 on the submission of sustainability reports by companies, also known as the Corporate Sustainability Reporting Directive – CSRD. Cyprus transposed CSRD into Cypriot law on July 29, 2025.

⁸ In August 2024, an Updated version of the NECP 2021-2030 was published and submitted to the European Commission in January 2025.

responsible Business Conduct. The Sustainability strategy has been reinforced further with the adoption of a robust Sustainable Finance Framework from the Bank, as a critical solution to enhance Green and Social Finance, such as renewable energy investments, decarbonization of operations, Climate risk management and Financial Inclusion. The Sustainability strategy and the Sustainable Finance Framework is reviewed and updated regularly, in line with the long-term goals set.

Furthermore, the Alpha Bank Group continuously focuses on the improvement of internal processes and mechanisms for ensuring transparency in all its sustainability disclosures.

Business model and value chain

The Group invests in its Employees, its network and its infrastructures to develop and place high-quality services and products on the market. The Group balances its goals for economic growth with the needs of their Customers, the environment and society as a whole. This requires the Group to consider ESG factors when making business decisions, by supporting a Net-Zero Economy, fostering Healthy Economies that support Society and Safeguard Robust Governance, in line with its purpose for: *“Enabling progress in life and business for a better tomorrow”*.

Table 6 Inputs and expected and achieved outputs and outcomes of the business model

Capitals	Inputs	Outputs	Current and expected benefits
Financial	Interest income, Fees and commission, Investors' funds.	Offering financial products and services, supporting the markets the Group operates in.	Enhanced access and Inclusion to financial products and services to its Customers and improved Customer experience
Human	Skill set and development of the workforce, tools and processes.	Providing a healthy work environment and investing in its People's development.	
Manufactured	The infrastructure, supply chain, and other external resources.	Improving its Customers' experience by investing in the infrastructure.	Increased trust to the Group's governance and ethical practices for all stakeholders, including investors, Employees, business partners and suppliers and Customers
Intellectual	Research and Development (R&D) investments for products, services and infrastructures.	Strengthening advisory and digital services, to meet Customers' changing needs.	
Natural	Use of natural resources, including energy for the operation of the Group.	Constantly improving its environmental footprint via our products and operations.	Provision of a healthy inclusive work environment, with opportunities for career development and promotion of diversity to its Employees
Social	Cooperation with the stakeholders to support society and the local economy.	Focusing on providing a safe and inclusive work environment, the financial inclusion of underrepresented groups and the provision of access to culture and healthcare services.	

Gathering, developing, and securing these inputs requires structured management approach evidenced by the Group robust governance mechanisms, processes, and the utilization of resources to ensure accuracy, efficiency, and alignment with regulatory and stakeholder expectations.

Through its business model the Group aims to create value for its stakeholders across the value chain, i.e. for:

- Upstream value chain, including Main suppliers, providing IT (hardware and software) and multiple other services (e.g. consultants, legal advisory, marketing companies, etc.)
- Downstream value chain, including Customers, including corporate, SMEs, and retail Customers, Broader society, and communities
- Own operations, including Employees

[SBM-2] Interests and views of stakeholders

Key stakeholders and stakeholder engagement

The Group maintains continuous and structured engagement with its key stakeholder groups, as identified through the Double Materiality Assessment (DMA) and the stakeholder-mapping exercise conducted in 2025. This process applied ESRS criteria, assessing stakeholders across based on the following criteria:

- Whether they are an affected stakeholder,
- Whether they are a user-of-sustainability-statement,
- Their power and influence, and
- Their interest in or exposure to the Group's impacts, activities and decisions.

Based on this analysis, the Group recognizes the following four prioritized stakeholder groups with the highest strategic relevance:

- Shareholders and Investors
- Customers (Wholesale and Retail)
- Employees and Society
- Regulatory and Supervisory Authorities

Engagement with primary stakeholders occurs both via structured, regular processes, as well as an ad-hoc basis, throughout the business year in line with each group's level of influence and interest. Activities include bilateral meetings, surveys, roadshows, community-dialogue initiatives, and regulatory interactions. In this context, during 2025, the Group conducted engagement with:

- shareholders and investors, including equity and fixed income analysts
- wholesale and retail Customers
- interactions with regulatory and supervisory authorities, and
- civil-society and community representatives
- Employees and trade union representatives

Other stakeholders including suppliers, business partners, correspondent banks and reinsurers are considered in the context of the stakeholder mapping exercise, but do not form part of the primary stakeholder set due to their lower interest and/or lower power categorization within the 2025 prioritization matrix.

The Group engages with these other stakeholders primarily through value-chain due-diligence processes, contractual onboarding and periodic ESG assessments.

These engagement activities are integral to the Group's strategic discussions, the DMA methodology, and the identification of sustainability-related impacts, risks, and opportunities. Further details on how the interests and views of prioritized stakeholders relate to the Group's strategy and business model are provided in "Interests and views of key stakeholders in relationship with strategy and business model". Effective stakeholder engagement requires clear, structured and consistent communication channels tailored to each group's needs and expectations. The Group uses a range of formal and informal mechanisms to ensure continuous two-way dialogue. These channels support transparency, enable timely feedback, and ensure that stakeholder insights are systematically integrated into strategic decision-making, risk management, and the overall sustainability framework. The primary communication channels per stakeholder group are summarized below.

Table 7 Means of communication per stakeholder group

Stakeholder group	Communication method
Shareholders and Investors	Financial Statements, Quarterly Earnings Reports, Annual Reports, General Meetings, Investor Briefings, Sustainability and Climate Reports, One-to-one meetings, Sustainability and Corporate Governance roadshows, Website, Press releases, Economic Research updates
Customers (Wholesale, Retail)	Branch network, Relationship Managers, Customer Newsletters, Sustainability Statement within the Annual Report, Customer Satisfaction Surveys, Online Customer Portals, Mobile application, Customer service center, Website, Social Media, Press releases, Corporate Service Centers (for Wholesale Customers)
Employees and Society	Internal Newsletters, Intranet, Town Hall Meetings, Training Sessions and Reskilling Programs, Employee Surveys, HR Business Partners, Sustainability Statement within the Annual Report, Community Engagement Reports, Press Releases, Social Media Updates, CSR initiatives, NGO memberships, Volunteering, Sponsorships
Regulatory and Supervisory Authorities	Regulatory Filings, Supervisory Submissions, Compliance Reports, Direct Consultations and Bilateral supervisory dialogue, Participation in thematic regulatory working groups, Climate-risk and ESG-risk reporting required under EU legislation

Through the engagement, the Group aims to understand and anticipate stakeholders' needs, interests, expectations, and concerns, evaluate their significance, and to incorporate them into the Group's strategy, risk-management framework, and sustainability planning. A dedicated team analyses all feedback using a structured approach that includes:

- Mapping and prioritization of stakeholder groups
- Review and categorization of issues raised
- Escalation of key findings to Senior Management and Board Committees
- Integration of stakeholder perspectives into the DMA and strategic planning processes
- Monitoring progress and reporting back to stakeholders.

Outputs from stakeholder engagement are systematically incorporated into decision-making processes across the Group. Key findings from engagement activities are translated into management action plans and inform updates to strategic priorities, policies and sustainability initiatives. For example, investor feedback received during 2025 engagements contributed to further evolving the Group's sustainability strategy, including climate risk mitigation and adaptation, enhancing sustainability disclosures, and ensuring robust Board-level oversight of climate-related risks. Customer feedback informed the development of new sustainability-linked financing products and advisory support, and improvements in digital service delivery. Employee survey results supported Diversity Equity and Inclusion initiatives and highlighted health and safety as an area of prioritization. Community engagement inputs supported financial inclusion and financial literacy initiatives.

Supervisory dialogue informed enhancements in ESG risk integration, the refinement of sustainability reporting processes, and the alignment with European and national supervisory and legal requirements and energy plans.

Emerging themes identified through stakeholder engagement are reviewed during the Double Materiality Assessment and may result in the introduction of new priority sustainability topics or the reprioritization of existing focus areas.

Detailed information on stakeholder engagement for Employees and Customers is provided in chapters "E1-Climate Change", "E4-Biodiversity and Ecosystems", "E5- Resource Use and Circular Economy", "ESRS S1-Own workforce" and "S4- Consumers and End Users".

Interests and views of key stakeholders in relationship with strategy and business model

Stakeholder feedback forms an essential input to the Group's strategic planning. The views and interests of affected stakeholders regarding sustainability-related impacts, risks, and opportunities are systematically communicated to the Group's administrative, management, and supervisory bodies. Key findings from stakeholder engagement activities are summarized in regular reports to Senior Management and relevant Board Committees. These bodies review material stakeholder concerns as part of strategic planning, risk appetite setting, and approval of sustainability-related policies and targets.

Insights gathered through the 2025 engagement cycle and updated stakeholder mapping provide a clear view of expectations regarding the Group's impacts, risks, and opportunities and long-term direction, ensuring that the business model remains aligned with the needs of those who are most affected by, and those who are influential over, its activities.

Based on these insights, the Group has begun to adapt elements of its strategy and business model to better address stakeholder expectations, particularly in relation to sustainable finance growth, ESG risk integration, and Customer value propositions. Outcomes from stakeholder engagement are reviewed as part of the annual strategic planning cycle and may result in adjustments to sector financing policies, product development priorities, risk methodologies, and sustainability targets.

As part of this adaptation, the Group is evolving its business model by strengthening sustainable finance and transition support capabilities across relevant business lines, including through enhanced product design and integration of sustainability considerations into its client engagement processes. This evolution supports the alignment of the Group's offerings with stakeholder expectations and sustainability-related risk management.

Shareholders and Investors, including bondholders, lenders, analysts, and rating agencies, continue to express a strong interest in the Group's long-term climate and sustainability strategy. Engagements throughout 2025 underlined the importance they place on transparent, credible transition plans and on the integration of climate considerations into core business practices. Investors seek clear decarbonization pathways aligned with science-based methodologies, consistent disclosure of financed emissions, and robust scenario-analysis results. Their expectations extend to strengthened governance, with particular attention to Board oversight of ESG risks, the alignment of remuneration with sustainability outcomes, and improved transparency regarding the Group's risk-management framework. The demand for detailed progress reporting and taxonomy-aligned disclosures has also intensified, reflecting investors' emphasis on comparability and accountability. In response to investor feedback, the Group has strengthened its transition planning framework, expanded financed emissions, enhanced sustainability disclosures, and ensured robust Board-level oversight of climate-related risks. Going forward, further steps are planned to increase sustainable finance origination, expand and define sectoral decarbonization pathways, and refine the integration of ESG performance indicators into remuneration. These developments are expected to reinforce long-term investor confidence and deepen engagement with sustainability-focused capital providers.

Customers' expectations reflect both their day-to-day banking experience and their evolving sustainability needs. Retail Customers continued to prioritize accessibility, Customer experience, and secure, transparent handling of data, while also expressing increasing interest in products with positive environmental or social characteristics. Wholesale Customers, including SMEs and large corporates, demonstrated heightened expectations for Sustainability-linked financing solutions and sought advisory support to advance their own decarbonization strategies. Across both segments, Customers highlighted the importance of clarity and simplicity in product information, as well as the need for seamless digital interactions.

Customer insights are considered in product development, service-design and the Group's approach to sustainable finance offerings, ensuring the evolving expectations are reflected in ongoing business model refinements. As a result of Customer feedback, the Group has expanded sustainability-linked financial products and enhanced digital services. Further developments are planned going forward in order to broaden advisory services supporting corporate decarbonization strategies and improve transparency of sustainability features in retail products. These steps are expected to strengthen Customer trust and increase long-term Customer engagement with the Group's sustainable finance offering.

Employees consistently emphasized the need for a workplace culture grounded in fairness, inclusion, and professional development. The 2025 engagement cycle highlighted sustained expectations for stronger diversity, equity and inclusion practices, enhanced health, safety and wellbeing programs, and opportunities for reskilling and career mobility.

Following employee feedback, the Group has introduced enhanced well-being initiatives and reinforced diversity and inclusion efforts, as well as training and development programs. Going forward, further actions are being planned to embed DEI objectives in leadership development processes, extend health and safety assessments across all locations, and increase employee access to well-being support services. These measures are expected to strengthen employee trust, engagement, and retention, and reinforce the Group's culture and alignment with sustainability commitments.

Society and local communities expect the Group to deepen its contribution to social inclusion, financial literacy, and community wellbeing. Local communities expressed the importance of responsible financing practices, especially in relation to activities that may carry environmental or social risks and emphasized the need to transparent communication about the Group's sustainability commitments. Broader societal stakeholders also value the Bank's role in supporting vulnerable groups, promoting accessibility in financial services, and contributing to long-term sustainable development at local and national levels. In response to societal expectations, the Group has prioritized financial inclusion initiatives. Further initiatives are being planned, in order to target community investment in these areas and improve public transparency on sustainability commitments. These steps are expected to enhance trust with communities and civil society stakeholders.

Regulatory and Supervisory Authorities continue to emphasize the importance of accurate, timely, and comprehensive compliance with evolving EU sustainability regulations. Throughout 2025, supervisory authorities focused on the robustness of the Group's management of environmental, social and governance risks, including the integration of climate-related considerations into credit, market and operational risk frameworks. Authorities expect enhanced governance controls, credible climate stress-testing practices, and transparent reporting under CSRD, ESRS and prudential Pillar 3 sustainability standards. Additional dialogue centered on strengthening operational resilience across the value chain and the alignment of the Bank's activities with national and European climate and energy objectives.

Following supervisory dialogue, the Group has enhanced integration of ESG drivers into risk management framework and strengthened internal controls, while further refinements are planned for future time horizons. These developments are expected to support continued constructive supervisory engagement and regulatory compliance.

Stakeholder perspectives gathered through the 2025 engagement cycle remain central to the Group's understanding of its material impacts, risks, and opportunities. These insights continue to guide ongoing strategic planning and business model refinement and support the alignment of the Group's sustainability commitments with the expectations of those most affected by, and influential over, its activities. The Group remains committed to maintaining open dialogue, enhancing transparency, and integrating stakeholder expectations into its pursuit of long-term, sustainable value creation.

[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Material impacts, risks and opportunities

The Group has performed its annual double materiality assessment in 2025 to identify material impacts, risks, and opportunities taking into consideration its business operations, and value chain across countries of operation, drawing also from international best practices. The 2025 results highlight that material topics and associated IROs have been enhanced (where applicable) compared to the previous reporting cycle and are presented in the following table:

Table 8 Materiality Assessment Results

Link with ESRS topics/sub-topics and sub-sub-topics, entity-specific topics		IMPACT	Actual impact	Potential impact			RISK	Current Financial Effect	Anticipated Financial Effect			OPPORTUNITY	Current Financial Effect	Anticipated Financial Effect			Value Chain Segment and Affected Stakeholders
				2026	2030	2050			2026	2030	2050			2026	2030	2050	
E1 Climate Change	<ul style="list-style-type: none"> • Climate Mitigation • Energy 	Negative impact on Climate Stability	●	●	●	●	Climate Transition Risk					●	●	●	●	<p>OWN OPERATIONS: Material negative impact on climate stability through energy consumption in own operations.</p> <p>DOWNSTREAM: Material negative impact on climate stability through GHG emissions created indirectly by the Group's products/services and business relationships. Material risks derive from the Group's exposures to sectors sensitive to transition risk. These risks affect the creditworthiness of counterparties and the recovery value of such exposures (e.g., non-compliance with climate-related regulations, increased cost of raw materials/energy, technological lag, or shift in consumer preferences). Material opportunities derive from Group's sustainable financings related to climate change mitigation.</p>	
	<ul style="list-style-type: none"> • Climate Adaptation 						Climate Physical Risk					●	●		●	<p>DOWNSTREAM: Material risks from physical risk events affecting clients' ability to meet financial obligations and reduce the value of their properties or premises (e.g., collateral values in real estate portfolios). Material opportunities in the long term are expected to derive from the Group's sustainable financings related to climate change adaptation.</p>	

Link with ESRS topics/sub-topics and sub-sub-topics, entity-specific topics		IMPACT	Actual impact	Potential impact			RISK	Current Financial Effect	Anticipated Financial Effect			OPPORTUNITY	Current Financial Effect	Anticipated Financial Effect			Value Chain Segment and Affected Stakeholders
				2026	2030	2050			2026	2030	2050			2026	2030	2050	
E4 Biodiversity and ecosystems	• Impacts on the extent and condition of ecosystems	Negative impact on Habitats (Biodiversity and Ecosystems)	●	●	●	●	Biodiversity & Ecosystems risk				●						DOWNSTREAM: Material negative impact on Habitats (which affects the status of Biodiversity and Ecosystems), through the Group's products/services and business relationships. Material risks derive from exposures to sectors with high negative impact on biodiversity and ecosystems, affecting their creditworthiness in the long term. Companies unable to comply with biodiversity-related regulations or dependent on ecosystem services (e.g., agriculture, forestry, fisheries) may face fines, litigation, or reduced productivity, reducing their financial stability and leading to credit losses. Material opportunities in the long term are expected to derive from the Group's sustainable financings related to biodiversity & ecosystems.
	• Resources inflows, including resource use	Negative impact on Resource Intensity	●	●	●	●											DOWNSTREAM: Material negative impact on Resource Intensity (which affects the development of a Circular Economy), through the Group's products/services and business activities. Material opportunities in the long term are expected to derive from the Group's sustainable financings related to resource use and circular economy.
S1 Own workforce	• Secure employment • Social dialogue • Freedom of association	Contribution to Livelihood of own workforce	●	●	●	●											OWN OPERATIONS: Material positive impact on own workforce through securing employment, social dialogue and freedom of association
	• Training and skills development	Training and skills development	●	●	●	●	Staffing and training issues		●	●	●						OWN OPERATIONS: Material positive impact through training and skills development programs offered to own workforce. Material risks related to inadequate training and skills development within the Group's workforce. Such risks may reduce productivity, limit adaptability to

Link with ESRS topics/sub-topics and sub-sub-topics, entity-specific topics	IMPACT	Actual impact	Potential impact			RISK	Current Financial Effect	Anticipated Financial Effect			OPPORTUNITY	Current Financial Effect	Anticipated Financial Effect			Value Chain Segment and Affected Stakeholders
			2026	2030	2050			2026	2030	2050			2026	2030	2050	
																evolving technologies and processes, heighten dissatisfaction, and increase turnover.
	• Diversity	Contribution to Equality and Justice of own workforce		●	●											OWN OPERATIONS: Material potential positive impact on own workforce by embedding Diversity as a strategic priority in the Group's future plans.
	• Health and safety	Contribution to health and safety of own workforce	●	●	●	●										OWN OPERATIONS: Material positive impact on own workforce through significant investments in Health, Safety and Wellbeing initiatives.
S4 Consumers and end users	• Access to products and services	Access to Housing	●	●	●	●										DOWNSTREAM: Material positive impact on Customers, and broader society/economy through the Group's products/services and business relationships.
		Access to Finance	●	●	●	●										
	• Privacy							●	●	●						OWN OPERATIONS: Material risks related to consumers and end-users typically stem from the potential failure of internal processes and control mechanisms established to ensure data protection, responsible marketing, and access to quality information. While such risks may also indirectly affect the Group's Customers, their root causes and potential impacts are primarily linked to the operational practices and governance framework.
	• Access to quality information							●	●	●						
								●	●	●						
								●	●	●						
• Responsible marketing practices							●	●	●							
Entity-specific	Contribution to Healthy Economies	●	●	●	●											DOWNSTREAM: Material positive impact on Customers and broader society/ economy through the Group's products/services and business relationships.

Link with ESRS topics/sub-topics and sub-sub-topics, entity-specific topics	IMPACT	Actual impact	Potential impact			RISK	Current Financial Effect	Anticipated Financial Effect			OPPORTUNITY	Current Financial Effect	Anticipated Financial Effect			Value Chain Segment and Affected Stakeholders
			2026	2030	2050			2026	2030	2050			2026	2030	2050	
G1 Business Conduct	• Corporate culture	Contribution to Transparency and the Rule of Law	●	●	●											ACROSS THE VALUE CHAIN: Material positive impact on stakeholders across the value chain through initiatives that foster an ethical corporate culture ⁹ .
	• Corruption & Bribery					AML/CFT		●	●	●						ACROSS THE VALUE CHAIN: Material risks related to corruption and bribery risks across the value chain, arising from the Group's own operations and also through interactions with third parties, intermediaries, and clients, where insufficient due diligence or weak controls could expose the Group to compliance breaches and reputational harm.
		<ul style="list-style-type: none"> ● : Positive impact ● : Negative impact ● : Risks and Opportunities 														

⁹ The impact "Contribution to Transparency and the Rule of Law" is governing the way the Group operates across its value chain, regardless of the differing materiality levels of its individual value chain segments.

Impacts

Material impacts of the Group for the short-term, mid-term and long-term time horizon are focused on its own operations, and downstream value chain affecting the natural environment, and society, its Employees and Customers in all areas where the Group has main presence.

This is a result of the inherent nature of the Group's products/services, business model as well as its strategy, which are related to its own operations, portfolio and its business relationships.

Material impacts related to the downstream value chain include:

- **Climate Stability:** Actual and potential negative impact on climate stability in the short-, mid- and long-term time horizons through GHG emissions created mainly through the financing activities of sectors that are contributing negatively to climate stability.
- **Habitats (Biodiversity and Ecosystems):** Actual and potential negative impact on habitats in the short-, mid- and long-term time horizons mainly through the financing activities of sectors that are contributing negatively to habitats, and the preservation of good condition of ecosystems.
- **Resource intensity:** Actual and potential negative impact on resource security in the short-, mid- and long-term time horizons mainly through the financing activities of sectors that are contributing in a negative way to the preservation of natural resources.
- **Access to Housing:** Actual and potential positive impact on accessibility to Housing in the short-, mid- and long-term time horizons mainly through the offering of products/services that support affordable housing for Customers.
- **Access to Finance:** Actual and potential positive impact on access to Finance in the short-, mid- and long-term time horizons mainly through the offering of products/services that support Customers' financial inclusion.
- **Contribution to Healthy Economies:** Actual and potential positive impact on Customers, including small and medium enterprises in the short-, mid- and long-term time horizons mainly through the offering of products/services, that contribute to the creation of healthy economies.

Furthermore, material impacts have also been identified across the Group's own operations, which refer to:

- **Climate Stability:** Actual and potential negative impact on climate stability in the short-, mid- and long-term time horizons due to energy consumption in the Group's facilities.
- **Contribution to Livelihood of own workforce:** Actual and potential positive impact on own workforce in the short-, mid- and long-term time horizons through the provision of secure employment, social dialogue, freedom of association and through the offering of training and skills development programs to own workforce.
- **Contribution to Equality and Justice of own workforce:** Potential positive impact on own workforce in the mid- and long-term time horizons through the Group's strategic priority towards improving diversity.
- **Contribution to Health and Safety of own workforce:** Actual and potential positive impact on own workforce in the short-, mid- and long-term time horizons through the significant investments made by the Group in Health, Safety and Wellbeing initiatives.

Finally, the following material impact governs the Group's relationships with its stakeholders across the entire value chain, however, material impacts related specifically to the upstream activities (supply chain and the natural environment) have not been identified due to their overall low materiality across the entire value chain and the Group's activities and business model.

- **Contribution to Transparency and the Rule of Law:** Actual and potential positive impact on all stakeholders in the short-, mid- and long-term time horizons through initiatives that foster ethical corporate culture.

Risks

The Group has identified material risks to the following sustainability matters:

- **Climate Transition and Physical risk:** The Group has identified risks related to Climate change as material in the medium- and long-term time horizon.
 - Climate transition risks impact both the creditworthiness of counterparties and the recovery value of such exposures, e.g., non-compliance with climate-related regulations, increased cost of raw materials / energy needs, failing to keep up with the pace of technological change, and shift in consumer preferences. Taking into consideration the above, climate transition risks are primarily related to the downstream portfolio of the Group.
 - Climate physical risks affect clients' ability to meet financial obligations and reduce the value of their properties or premises due to physical risk events within sectors or geographies vulnerable to physical risk. For instance, there may be lower collateral valuations in real estate portfolios as a result of increased flood risk. Taking into consideration the above, climate physical risks are primarily related to the downstream portfolio of the Group.
- **Biodiversity & ecosystems:** The Group has identified risks related to Biodiversity and ecosystems as material in the long term, considering the significant impact of biodiversity-related risks on the creditworthiness of its obligors, leading to credit losses for the Bank. For example, companies unable to comply with biodiversity-related regulations, now and more increasingly in the future, may face fines, litigation, or operational restrictions, reducing their financial stability, while companies reliant on ecosystem services, such as agriculture, forestry, fisheries, etc. may face reduced productivity or higher operational costs due to biodiversity loss, affecting their ability to meet financial obligations. Biodiversity and Ecosystems risks are primarily related to the downstream portfolio of the Bank.
- **Staffing and training issues:** Risks related to the Group's own workforce, particularly inadequate "training and skills development" is assessed as material in the short-, medium-, and long-term. Such risks can reduce productivity and cause operational disruptions, as Employees may lack the skills needed to adapt to evolving technologies and processes. Furthermore, insufficient training and development may decrease employee engagement, heighten dissatisfaction, and drive higher turnover rates. Own workforce risks are related to the Bank's own operations.
- **Disclosure and data protection issues, Fiduciary breaches, Unsuitable promotion practices, Product suitability issues/ Inadequate disclosure of product terms, Disputes over advisory activity:** Risks related to consumers and end-users, in particular "Privacy", "Access to quality information" and "Responsible marketing practices" are considered material in the short-, medium- and long-term. Although the financial impact of these risks is not quantified directly in monetary terms, the rapid technological progress and

development in cybersecurity, which can lead to data breaches, highlights the importance of closely monitoring and adapting to the evolving environment. Failure to do so could expose the Bank to substantial financial losses due to fines, legal fees, and compensation costs, as well as damage to the Bank's reputation. In addition, inadequate access to quality information and irresponsible marketing practices can erode consumer trust and also lead to regulatory penalties, further impacting the Bank's financial stability. Although consumers and end-users' risks affect the Bank's clients, the root cause for risk manifestation lies on the Bank's own operations (most typically due to potential failures of internal controls established to prevent such risks).

- Corruption and bribery:** Risks related to corruption and bribery are assessed as material in the short-, medium-, and long-term due to possible reputational damage and material penalties imposed by regulatory authorities. This outcome is driven by the AML/CFT risks associated with this topic, which have a material financial effect as these risks directly impact the institution's financial stability, reputation, and regulatory compliance. Failure to prevent financial crimes like money laundering and terrorist financing can result in significant financial penalties and legal consequences. Additionally, it can damage the Bank's reputation, erode Customer trust, and hinder the ability to attract and retain clients, ultimately affecting long-term growth and profitability. Risks related to corruption and bribery risks are identified across the value chain, since they can arise from the Group's own operations and through interactions with third parties, intermediaries, and clients, in case of insufficient due diligence or weak controls.

Opportunities

The Group has identified material opportunities related to the downstream value chain under the following ESRS topics:

- Climate change mitigation and adaptation:** The Group has identified material opportunities related to both Climate change mitigation and Climate change adaptation. Opportunities in Climate change mitigation are considered material in the current year and are expected to remain material across the short-, medium-, and long-term horizons, supported by current EU Taxonomy-aligned and other sustainable financings and their potential growth. Climate change adaptation is assessed as a material opportunity in the long term, reflecting the expected intensification of physical risks and the increasing demand for financing solutions that enhance resilience and support adaptation measures.
- Protection and restoration of biodiversity and ecosystems:** The Group has identified material long-term opportunities (i.e., sustainable financings in line with its Sustainable Finance Framework) related to the protection and restoration of biodiversity and ecosystems. As transition risk related to biodiversity and ecosystems is expected to intensify for the Group's counterparties, a significant long-term growth is anticipated in financing opportunities that address these challenges.
- Transition to a circular economy:** The Group has also identified material long-term opportunities (i.e., sustainable financings in line with its Sustainable Finance Framework) related to the transition to a circular economy. Client engagement survey results have indicated a rising interest in future investments that support circular economy initiatives. Combined with the strategic importance of this topic, which consistently ranks among the top environmental priorities for corporates in Greece and across Europe, financing solutions that support resource use and circular economy initiatives are expected to grow in the long term.

Connection of material impacts, risks and opportunities with strategy and business model

The identified Impacts, Risks, and Opportunities (IROs) under the Corporate Sustainability Reporting Directive (CSRD) aim at informing and shaping the Group's strategic priorities, driving financing performance and empowering risk governance. The Group strategy is regularly informed by the material IROs presented in Table 8, with the aim to mitigate negative impacts on Climate Stability, Habitats, and Resource Intensity, while strengthening positive outcomes related to Diversity and Employee Health & Safety in future time horizons. In addition, ESG strategy is informed by the material IROs, with the aim of enabling the Group to pursue material opportunities arising from environmental and social matters and reinforcing its overall business resilience against the potential realisation of related risk. Amidst global efforts to address challenges, the Group considers the Sustainable Development Goals (SDGs) and the UNEP FI Principles on Responsible Banking, aiming for a low-carbon future and leveraging digital innovations to empower its Clients and drive innovation in financing. Through concrete impact-linked targets and actions, the Group demonstrates its commitment to sustainability.

In 2025 the Group continued to implement the ESG Workplan, which aims to integrate sustainability and climate risk criteria in the decision-making processes, including strategy, risk management, lending, and operations. As a result, the Bank is directing capital to finance its clients' decarbonization efforts in alignment with the Sustainable Finance Framework's eligible activities.

The Group recognizes that its impacts on the natural environment and people are closely and significantly related to its financial products and services. The Group offers access to financial services through a wide range of high-quality financial products and services, including retail banking, banking for medium-size and large enterprises, asset management and private banking, insurance products, investment banking, brokerage and real estate Management. The Group's most significant entity, Alpha Bank, a leading financial institution in Southeastern Europe, has the ambition not only to cause no significant harm to the environment and society via its activities but also to contribute to the transition of the Greek economy to a sustainable model, through the development of sustainable finance and associated products to support investments in green projects.

The downstream segment of the value chain (portfolio) is particularly significant due to the inherently higher materiality of impacts created through the Group's products and services offered to its clients (lending portfolios) and through its investment activities (own investments portfolio). Nevertheless, material impacts are assessed across the entire value chain. Refer to 'Material impacts, risks and opportunities' section above.

Current financial effects of material risks

Regarding the current financial effects of the material risks the Group has identified the following:

- Climate Change:** For 2025, the operational risk losses related to climate risk are very limited and thus, the current financial effect is considered not material.
- Biodiversity and Ecosystems:** For 2025, there are no operational risk losses related to biodiversity and ecosystems-related risks. Therefore, the current financial effect from such risks is considered not material.
- Own Workforce:** For 2025, the operational risk losses related to employee practices are very limited and thus, the current financial effect is considered not material.

- **Consumers and end-users:** For 2025, the operational risk losses related to disputes over advisory activity, unsuitable promotion practices, disclosure and data protection issues product suitability issues / inadequate disclosure of product terms and fiduciary breaches (miscellaneous) are very limited and thus, the current financial effect is considered not material.
- **Business conduct:** For 2025, the operational risk losses related to corporate governance issues, culture & ethics, anti-bribery & corruption and AML regulation and policy breaches are zero and thus, the current financial effect is considered not material.

Since Climate change and Biodiversity and ecosystems topics are not material in the short-term, no material adjustments within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements are expected. Social and governance risks are effectively managed and mitigated, resulting in limited residual risk and thus no material adjustments in the Bank's balance sheet or P&L are expected.

Current financial effects of material opportunities

Regarding the current financial effects of the material opportunities the Group has identified the following:

- **Climate Change:** For 2025, the Group has identified climate change mitigation-related opportunities (i.e., sustainable financings in line with its Sustainable Finance Framework) above Euro 2.1 billion, which are considered material based on the applicable materiality threshold of circa Euro 1 billion. For climate change adaptation, the Group has not identified any relevant opportunities and therefore, current financial effects are not considered material.
- **Biodiversity and Ecosystems:** For 2025, the Group has not identified opportunities related to Biodiversity & ecosystems and therefore, current financial effects are not considered material.
- **Circular economy:** For 2025, no material opportunities related to the resource use & circular economy have been identified, as the identified amount does not exceed the established materiality threshold of circa Euro 1 billion.

The Group anticipates significant growth of sustainable financing over the next year, which is expected to result in substantial adjustments to the gross carrying amounts of assets reflected in the financial statements for the next annual reporting period.

Anticipated financial effects of material risks

- **Climate Change:** The Group, in order to estimate the anticipated financial effect for climate risk, examines climate change mitigation (transition) and climate change adaptation (physical) risks separately leveraging on the outcome of the materiality assessment performed.
 - Climate change mitigation is identified as a material sub-topic in the medium and long-term, since the percentage of the exposures with High and Medium likelihood of occurrence over the Group Total Assets exceed the established materiality thresholds.
 - Climate change adaptation is identified as a material topic in the medium and long-term considering that for some physical risk factors (e.g., wildfire in case of the regional analysis and floods in case of sectoral analysis) the anticipated occurrence is relatively high.

Table 9: Risks - Materiality outcome of ESRS E1. Climate Change¹⁰

ESRS Sub-topics	Anticipated Financial Effect – Risks		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Climate Change mitigation	Immaterial	Material	Material
Climate Change Adaptation	Immaterial	Material	Material

- **Biodiversity and Ecosystems:** Biodiversity and Ecosystems is identified as a material topic in the long-term since the percentage of the exposures over the Group Total Assets corresponding to High and Medium likelihood of occurrence categories exceed the respective thresholds.

Table 10: Risks - Materiality outcome of ESRS E4. Biodiversity and Ecosystems⁷

ESRS Topic	Anticipated Financial Effect – Risks		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Biodiversity and Ecosystems	Immaterial	Immaterial	Material

- **Social Risks:**
 - **Own Workforce:** The anticipated financial effect from risks related to the Group's own workforce, in particular "inadequate training and skills development", is assessed as material in the short-, medium- and long-term. Although these risks are challenging to quantify, they are considered material due to their potential financial effects to the Group. They can adversely affect the Group's human capital by diminishing operational efficiency and contributing to elevated attrition rates stemming from employee dissatisfaction.

Table 11: Risks - Material Sub-topics of ESRS S1. Own Workforce

ESRS Sub-topics	Anticipated Financial Effect – Risks		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Equal treatment and opportunities for all	Material	Material	Material

¹⁰ The results presented in this table take into consideration the outcome of the materiality assessment performed by Alpha Bank S.A. and Alpha Bank Cyprus Ltd, which are considered material entities in terms of financial materiality. It is noted that the outcome of the assessment of Alpha Bank Cyprus Ltd is aligned with that of Alpha Bank SA. For the remaining entities of the Group, particularly those conducting an ESG Risk Materiality Assessment (i.e., Alpha Leasing, Alpha Bank London and ABC Factors), the financial materiality assessment process included a review of whether any additional material topics are identified as part of their ESG Risk Materiality Assessment process. In 2025 no such cases were identified.

- **Consumers and end-users:** The anticipated financial effect from risks related to consumers and end-users, in particular "Privacy", "Access to quality information" and "Responsible marketing practices" is considered material in the short-, medium- and long-term. Although the financial effect of these risks is not quantified directly in monetary terms, taking into consideration rapid technological progress and development in the area of cybersecurity which can lead to data breaches, highlight the importance of closely monitoring and adapting to the evolving environment otherwise it could be exposed to substantial financial losses due to fines, legal fees, and compensation costs, as well as reputational damage.

Table 12: Risks - Material Sub-topics of ESRS S4. Consumers and end-users¹¹

ESRS Sub-topics	Anticipated Financial Effect – Risks		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Information-related impacts for consumers and/or end-users	Material	Material	Material
Social inclusion of consumers and/or end-users	Material	Material	Material

- **Governance Risks:**

- **Corruption and bribery:** The anticipated financial effect of risks related to corruption and bribery is assessed as material in the short-, medium-, and long-term due to possible reputational damage and material penalties imposed by regulatory authorities. This outcome is driven by the AML/CFT risks associated with this topic, which are challenging to quantify, but they are considered material since they directly impact the institution's financial stability, reputation, and regulatory compliance.

Table 13: Risks - Material Sub-topics of ESRS G1. Business Conduct

ESRS Sub-topics	Anticipated Financial Effect – Risks		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Corruption & Bribery	Material	Material	Material

Anticipated financial effects of material opportunities

- **Climate change:** For the short-term horizon the Group considers climate change mitigation related opportunities material, taking into consideration the fact that sustainable financings towards climate change mitigation are, already, material (exceeding the respective threshold) and the growth of sustainable financings in the following year, that according to Business Plan is estimated at c. Euro 939 million, mainly stemming from Energy and Real Estate sectors in the Business portfolio (with some small amounts being also located in Accommodation and Travel Agencies, Agriculture, Chemicals and Pharmaceuticals, Construction, Wholesale Trade and Other sectors), while a small amount comes from Households (c. Euro 80 million). For the medium- and long-term horizons, although the financial effect of these opportunities is not easily quantified directly in monetary terms, the Group considers climate change mitigation material in both horizons and climate change adaptation in the long-term based on the Group's expectations for the growth of climate-related sustainable financings in the future.

Table 14: Opportunities - Material Sub-topics of ESRS E1. Climate Change

ESRS Sub-topics	Anticipated Financial Effect – Opportunities		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Climate Change mitigation	Material	Material	Material
Climate Change Adaptation	Immaterial	Immaterial	Material

- **Biodiversity and Ecosystems:** The materiality assessment performed by the Bank indicates that opportunities (i.e., sustainable financings) towards protection and restoration of biodiversity and ecosystems activities are considered material in the long-term (2050) horizon, since the Bank anticipates such opportunities to exceed the threshold of circa Euro 1bn. As transition risk faced by the Bank's counterparties with regards to biodiversity & ecosystems are anticipated to intensify over time, financings aimed at this topic are expected to grow in the longer term. Regarding the short- and medium-term horizon the Bank does not expect material opportunities that exceed the established threshold based, also, on its Business Plan.

Table 15: Opportunities - Materiality outcome of ESRS E4. Biodiversity and Ecosystems

ESRS Topic	Anticipated Financial Effect – Opportunities		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Biodiversity and Ecosystems	Immaterial	Immaterial	Material

- **Circular Economy:** Opportunities (i.e., sustainable financings) related to the transition to a circular economy are considered material in the long-term (2050) horizon. Based on the analysis of the Client Engagement survey results, there is an increased interest among clients for potential future investments related to circular economy initiatives. Combined with the strategic importance of this topic—being consistently ranked among the top environmental priorities for corporates in Greece and across Europe—this supports its classification as a material long-term opportunity for the Bank. As sustainable practices and circular models become more embedded in business operations, financing solutions that support resource use and circular economy initiatives are expected to grow significantly over time.

¹¹ The classification of Access to (Quality) Information & Responsible marketing practices as material is further reinforced by the results of the Compliance Risk Assessment conducted by the Regulatory Compliance Division for Customer Conduct Risk, which has been evaluated as Medium-High in terms of inherent risk assessment.

Table 16: Opportunities - Materiality outcome of ESRS E5. Resource use and circular economy

ESRS Topic	Anticipated Financial Effect – Opportunities		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Resource use and circular economy	Immaterial	Immaterial	Material

Resilience of strategy and business model towards addressing impacts risks and advancing opportunities

Group's strategy and business model demonstrate significant resilience in relation to climate change through a well-structured approach to managing climate impacts and risks. The Group's comprehensive framework integrates these risks into its overall risk management processes, addressing both physical risks, such as those arising from extreme weather events, and transition risks associated with the shift to a low-carbon economy. A detailed materiality assessment has been conducted to evaluate the potential impacts of climate risks on financial performance, operations, and key stakeholders. This approach aligns closely with global objectives, including the Paris Agreement, and is supported by the Group's commitment to achieving net-zero greenhouse gas emissions by 2050 through science-based targets.

Climate Change risks

Alpha Bank's resilience analysis is based on the following factors in order to identify sectors sensitive to transition risk: Climate Policy Relevant Sectors (CPRS) perimeter, Net Zero Banking Alliance (NZBA) and Long-Term Strategy for Greece for 2050 (LTS), emission intensities at sector level and forward-looking Probability of Defaults (PDs) based on the ECB short-term disorderly transition scenario, the contribution of the calculated (or estimated if not applicable) Scope 1 and 2 emissions of each sector in the Bank's total Scope 1 and 2 emissions. In the context of this analysis, more recent literature scenarios, strategic plans and roadmaps were used to qualitatively estimate the probability of occurrence of each transition risk driver.

To further examine the impact under different time horizons, the Group has conducted a qualitative materiality assessment for transition risk sub-types (market, technology, reputation, policy and legal), as proposed by the TCFD. This analysis identifies the climate-related transition risks that materially affect each sector lying within the transition risk sensitive perimeter and under different time horizons.

Regarding physical risk, the Group performs a materiality assessment based on IPCC AR5 RCP 8.5 for 2026, 2030 and 2050 horizons. More specifically, the Group utilizes the vulnerability analysis to identify potential significant hazards per subsector as well as across the different geographic regions where real estate properties used as collateral extend.

For further information related to the resilience analysis of climate change risks please refer to [E1.SBM-3] 'Material impacts, risks and opportunities related to Climate Change and their interaction with strategy and business model'.

Biodiversity and ecosystems risks

The Group has performed a resilience analysis to assess biodiversity and ecosystem risks within its portfolio. The Group utilizes the ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) Tool to examine the key negative impact of sectors (at NACE code level) of its Non-Financial Corporate portfolio and a literature review to estimate the likelihood of occurrence of the respective nature-related risks, covering short-, medium-, and long-term horizons.

For further information related to the resilience analysis of nature-related risks please refer to [E4-1] 'Transition plan and consideration of biodiversity and ecosystems in strategy and business model'.

Changes to the material impacts, risks and opportunities compared to the previous reporting period

Changes compared to 2024 refer to the following positive impacts related to:

- Contribution to livelihood of own workforce through the training and skills development (for the actual, short, mid and long-term horizons)
- Contribution to health and safety of own workforce (for the actual, short, mid and long-term horizons).

In addition, the risk "Disputes over advisory activity" was assessed material, based on the outcome of the RCSA, under the ESRS sub-sub-topic "Access to quality information" which had already been identified in the previous submission (2024).

No changes apply to opportunities, compared to previous reporting period.

Specification of impacts, risks and opportunities covered by ESRS Disclosure Requirements

Material impacts, risks and opportunities related to Climate stability, Biodiversity and Circularity, are covered by [ESRS E1] 'Climate Change', [ESRS] 'E4 Biodiversity and ecosystems' and [E5] 'Resource Use and Circular Economy'.

Moreover, material impacts and risks related to Livelihood, Equality and Justice of Employees, are covered by [ESRS S1] 'Own Workforce'.

Material impacts, and risks related to Access to Housing and Finance of Customers, are covered by [ESRS S4] 'Consumers and end-users'.

However, the impact related to Contribution to Healthy Economies, is not covered by an ESRS topical standard, therefore, additional entity-specific disclosures have been included.

Finally, material impacts, and risks related to the Contribution to Transparency and the Rule of Law are covered by [ESRS G1] 'Business Conduct'.

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

The Group's double materiality assessment conducted in 2025¹² aims to encompass both the impact and financial materiality perspectives, along with the interconnections between them, in accordance with the European Sustainability Reporting Standards (ESRS).

¹² The Scoping exercise was performed based on the Group structure as of 30.06.2025 and was informed with the latest available information regarding the Group structure in September and October 2025.

The methodology incorporated tools and resources for impact identification and assessment, peer and ESG standards review, and leveraged output from ongoing engagements with internal and external stakeholders.

For the impact materiality, responses were obtained for the majority of the Group entities and there was no business activity of the Group entities that was not captured in the impact materiality analysis. Regarding the upstream value Alpha Bank S.A. suppliers' data were leveraged as a representative dataset for any assumptions regarding a limited number of entities, as the nature of activities did not differentiate from the rest of the Group activities. Regarding the potential impacts in the downstream value chain, assumptions were made based on static exposures and portfolio mix for the offering of products and services in future time horizons.

For the financial materiality, the methodology covers Alpha Bank SA and Alpha Bank Cyprus which are considered material considering the classification as Relevant Legal Entities (RLEs) in the context of the Group's recovery plan.

Process to identify, assess, prioritize and monitor impacts informed by due diligence

Impact Materiality

The impact materiality assessment considers all environmental, social and governance ESRS topics and follows a structured five-phase approach:

Phase 1: Design the Impact Materiality Assessment Approach

Understand the Context (Internal and External)

In this phase, an overview of the Group's activities and business relationships has been developed, along with the context in which these occur and identifies its key affected stakeholders:

a) **Entity perimeter definition:**

In determining the perimeter for Impact Materiality, the full scope of business activities across all Group entities was taken into account. However, micro entities were excluded from the impact materiality perimeter, due to the fact that no activities of different nature have been identified and due to the small size and negligible impact. In addition, "Holding" and "Special purpose and holding" entities were excluded on the basis that their impacts are reflected indirectly in the value chain through their related entities, and internal or intragroup transactions do not trigger any additional impacts due to the nature of the activity (holding).

b) **The business activities and relationships of the Group with the affected stakeholders** were performed by examining the entities' activities as well as their portfolio data and supply chain needs. It is noted that the understanding of business relationships and affected stakeholders was achieved through the review on existing stakeholder mapping. Through this review, the Group identified its key affected stakeholders. Specifically:

Own Operations:

Activity mapping for the Group entities is performed based on the economic activity description, sector (NACE), and location of operations. The impact materiality process focuses on the entities operating in Greece, Cyprus, UK and the following Group activities: Asset Management, Banks, Financing companies, Insurance, Investment Banking, Provision of Information technology services and consulting, and Real Estate and Hotel.

Downstream Value Chain:

For downstream activities the results stem from the use of the Principles for Responsible Banking portfolio analysis for subsidiaries, leveraging data related to their products and services, which describes the Group's business relationship with its Customers. Alpha Supporting Services S.A. and Alpha Finance A.E.P.E.Y. are excluded, due to the nature of their activities as they already trigger impacts at own operations (no downstream/portfolio relevance).

Upstream Value Chain:

The mapping for upstream activities includes collecting information for major suppliers based on spending for purchased goods and services per NACE of supplier. Alpha Bank S.A.'s major supply categories are identified, and confirmation has been provided by the other Group entities on similar supply chain activities. Responses from entities with business activities due to similar activities and locations of operation to the other Group entities in scope, it is reasonable to assume that no additional impacts could be created

c) **Other contextual information:** research has been conducted on country/sector level sustainability-related priorities and Alpha Bank S.A.'s external sustainability commitments. The aforementioned contextual information has been utilized as sources for potential impacts, risks and opportunities in the future time horizons (please refer to Phases 2, 3).

Time horizons are selected for actual impacts (2025) and potential impacts (short term: 2026, mid-term: 2030, long-term: 2050). Stakeholders have been engaged effectively in the subsequent phases 2 and 3 of the double materiality assessment by leveraging existing stakeholder engagement output that occurred throughout the year, performing dedicated meetings with stakeholder representatives and output from a wholesale Customer engagement survey. See [SBM-2] 'Interests and views of stakeholders' in more detail.

Phase 2: Identify Actual and Potential Impacts

a) **Impact identification - actual impacts**

Own operations:

The basis for the identification of material impacts created by the Group's own operations has been the Group's prior year material impacts (Sustainability Statement 2024) and impacts emerging from ESG Standards Review and Peer Review. Specifically, to ensure completeness, the Bank has further examined whether the identified impacts accurately reflect the actual impacts created to people and the environment.

Downstream: Impacts have been identified by using UNEP FI Portfolio impact Analysis Tools (i.e. [Investment Portfolio Impact Analysis Tool](#), [Consumer Banking and Institutional Banking Identification Modules](#) and [Real Estate Impact Analysis Tool](#), for the respective portfolios) and specifically by using sector-impact associations (as per the UNEP FI Sector-Impact Map), in accordance with the [UNEP FI Impact Protocol](#). Findings from the impact driven risks analysis using the ENCORE tool will be considered as an overlay for identifying and assessing the negative environmental impacts in particular.

Upstream: Similarly to the downstream segment, impact identification is based on the implementation of the UNEP FI Sector-Impact Map. Specifically, to capture impacts generated in the upstream segment of the VC, the Sector-Impact Map has been utilized for selected NACE sectors, which were determined based on the Bank's supplier spending.

b) Impact identification - potential impacts

Potential impacts are identified through inherent analysis of shifts and transitions in the materiality of sustainability impact topics across different time horizons. This analysis is based on desktop research on policies, regulations, sectoral trends, macroeconomic conditions of sustainability themes, academic and scientific evidence, and other relevant sources. The analysis focuses on how the main sectors of the Group's portfolio prioritize the identified actual impacts in future time horizons. The results serve as a proxy for the identification of the material impacts for the Group.

Phases 3 and 4: Assess and Prioritize Impacts

a) Impact assessment and prioritization - actual impacts

b) **Own operations:** For own operations, an overall "severity" scoring for negative impacts, and an overall "significance" scoring for positive impacts, based on the results of the identification phase. The impacts have been evaluated and verified through consultation and stakeholder engagement with HR and Compliance, and Governance and Sustainability- ESG Strategy Business Areas.

Downstream and upstream¹³: The materiality of actual impacts connected to the Group through its products and services and suppliers, for downstream and upstream, respectively, has been assessed based on significance (positive) and severity (negative). The significance (or severity for negative) of an impact has been evaluated from the viewpoint of the affected people or the environment. To this end, it has been determined by the characteristics (criteria) of scope, scale and irremediability (for negative impacts only), taking into consideration monetary figures related to portfolio and supply chain.

Subsequently, based on a top-down approach, significance and severity have been aggregated at the Group level, per impact and have been prioritized based on quantitative thresholds¹⁴.

c) Impact assessment and prioritization - potential impacts

Regarding potential impacts, an inherent analysis (without considering mitigation actions or changes in the current portfolio) of sustainability impact topics has been conducted. The scoring methodology has been applied as an aggregated conclusion of materiality per impact topic across three-time horizons. Additionally, the likelihood criterion is based on desktop research and has been incorporated into the analysis. It is noted that for own operations, the potential impacts have been evaluated and verified through consultation and stakeholder engagement with the respective business areas HR and Compliance, and Governance and Sustainability- ESG Strategy.

Generally, the whole impact materiality assessment process of the Group, informed by the due diligence process, included consultation with subject matter experts, as an additional source for impact identification, assessment and prioritization.

Phase 5: Report on the Process and Outcome

To map the material UNEP FI topics with the respective ESRS topics, sub-topics and sub-sub topics, the UNEP FI's Topics Mapping from the UNEP FI Interoperability Guide has been leveraged.

The reporting phase included the preparation of narratives for the description of the processes to identify and assess material impacts for inclusion in the Sustainability Statement, along with the respective outcomes.

Process to identify, assess, prioritize and monitor risks and opportunities that have financial effects

Financial Materiality

Risks

Current Financial Effect

In order to assess the magnitude of the current financial effect of its material risks, the Group has evaluated if any operational risk losses have been recognized during the current financial year.

Anticipated Financial Effect

Climate Change (ESRS E1):

The Group, in order to estimate the anticipated financial effect for climate risk, examines the anticipated financial effect separately for transition and physical risks.

Climate change mitigation – Transition risk

More specifically, to evaluate the anticipated financial effect for climate change mitigation (transition risk), the Bank leverages on the outcome of the materiality assessment performed that takes into consideration the following dimensions:

a) Likelihood of occurrence:

The Bank has identified the sensitive to transition risk perimeter by taking into consideration several factors such as the CPRS perimeter, the NZBA and LTS for Greece for 2050, emission intensities and forward-looking PDs, contribution of calculated (or estimated if not applicable) Scope 1 and 2 emissions as well as exclusion of sustainable loans related to climate change mitigation objective.

The transition risk score is derived from the qualitative materiality assessment for transition risk (climate change mitigation) sub-types (market, technology, reputation, policy and legal) as proposed by the TCFD, that identifies the climate-related transition risks that materially affect each sector lying within the transition risk sensitive perimeter and under different time horizons. This score is considered as a proxy for the likelihood of occurrence of an anticipated financial effect for the Bank.

¹³ The Scoping exercise was performed based on the Group structure as of 30.06.2025 and was informed with the latest available information regarding the Group structure in September and October 2025.

¹⁴ As per IG 1, par. 27, "ESRS 1 sets criteria for the materiality assessment but not specific thresholds to determine when a matter or information is material or not. Therefore, the assessment requires the exercise of judgement. The undertaking needs to set thresholds based on ESRS 1 criteria as well as its own specific facts and circumstances."

b) Potential Magnitude:

After recognizing the sectors lying within the sensitive perimeter that have High, Medium, or Low likelihood of occurrence, the Bank has proceeded with the calculation of the percentage of the Bank's exposures within the sensitive perimeter over Total Group Assets categorized under High, Medium and Low likelihood of occurrence, across different time horizons and set thresholds for materiality.

Climate change adaptation - Physical risk

In addition, to evaluate the anticipated financial effect for climate change adaptation (physical risk), the Bank leverages on the outcome of the materiality assessment performed that takes into consideration the following dimensions:

a) Likelihood of occurrence:

The vulnerability assessment outcome per sector and region. The Bank has laid down a methodology based on sensitivity and exposure analysis (when separately assessed) to derive vulnerability to physical risk factors. Vulnerability analysis is performed to identify potential significant hazards per subsector covered by the analysis for Business portfolio, as well as across the different geographic regions where real estate properties used as collateral extend. The vulnerability assessment outcome is considered as a proxy for the likelihood of occurrence of an anticipated financial effect for the Bank.

b) Potential Magnitude:

After recognizing the sectors and regions that have High, Medium, or Low likelihood of occurrence, the Bank has proceeded with the calculation of the percentage of the Bank's exposures over Total Group Assets categorized under High, Medium and Low likelihood of occurrence across the different time horizons and set thresholds for materiality (the materiality threshold has been set on Bank's 'exposures over Group Total Assets' under High Likelihood of Occurrence). Given that multiple physical risks (both chronic and acute) are separately examined and then aggregated, with an averaging effect on the materiality results overlays are applied to account for the fact some physical risks (e.g., flood) may individually have a high likelihood of occurrence.

It is noted that Alpha Bank Cyprus also performs a materiality assessment to evaluate the anticipated financial effects from climate-related risks, which is taken into consideration to determine the overall materiality of such risks for the Group.

Further information related to the materiality assessment methodology for climate risks is provided under [E1.IRO-1] 'Description of the processes to identify and assess material climate-related impacts, risks and opportunities'.

Nature-Related risks (ESRS E2-E5):

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

a) Likelihood of Occurrence

For sectors with a key negative impact on each nature-related topic, a risk assessment is performed to estimate the likelihood of occurrence of the respective nature-related risks, covering short-, medium-, and long-term horizons. The scale of the likelihood of occurrence is defined by combining the outcome of the Likelihood and the Impact analysis which are performed at sector level.

- **Likelihood:** the probability of occurrence within a provided time horizon
- **Impact analysis:** the extent to which the impact, if occurred, would affect nature

b) Potential Magnitude:

To evaluate the anticipated magnitude of financial effect per nature-related ESRS topic, the Bank calculates the percentage of its exposures classified as High, Medium, or Low Likelihood of Occurrence over the Total Group Assets, across the different time horizons set thresholds for materiality.

It is noted that Alpha Bank Cyprus also performs a materiality assessment to evaluate the anticipated financial effects from nature-related risks, which is taken into consideration to determine the overall materiality of such risks for the Group.

Further information related to the materiality assessment methodology for nature-related risks, is provided under [E4.IRO-1] 'Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities'.

Social Risks related to Own workforce and Consumers and end-users (ESRS S1 and S4):

To evaluate the anticipated financial effect of social risks, the Group has conducted a mapping of the respective ESRS sub-topics with the risk types identified within the Operational Risk Taxonomy framework and the corresponding inherent risk assessment outcomes derived from the RCSA. ESRS sub-sub-topics that are assessed as having a High or Medium High inherent risk are deemed material. For ESRS sub-sub-topics and associated operational risks that encompass multiple RCSA risk events, a conservative approach has been utilized, taking into account the highest observed risk assessment outcome. It is noted that the inherent risk assessment considers which is the impact for the Bank in case the risk is manifested within the next year (short-term) without additional mitigation actions going forward. It is assumed that the same conclusions are, also, applicable in the medium- and long-term horizons. Overlays on the outcome of the RCSA have been applied to ensure that limitations of the assessment are addressed and drivers leading to the classification of the topic as material are the most relevant for the Group.

Social Risks related to workers in the value chain and affected communities (ESRS S2-S3):

The Group's financial materiality assessment concludes that [ESRS S2] 'Workers in the Value Chain' and [ESRS S3] 'Affected Communities' are not material since the impact analysis conducted did not identify any significant impacts related to these topics, nor does the Group have dependencies on such aspects. Additionally, the Group's policies and processes ensure compliance with minimum regulatory requirements.

Governance Risks:

To evaluate the anticipated financial effect of governance risks, the Group conducted a mapping of the respective ESRS sub-topics with the risk types identified within the Compliance Risk Assessment and the corresponding inherent risk assessment outcomes.

ESRS sub-sub-topics that are assessed as having a High or Medium High inherent risk are deemed material.

Further information related to the double materiality assessment methodology for Governance risks is provided under [G1.IRO-1] 'Description of the processes to identify and assess material business conduct impacts, risks and opportunities'.

Opportunities**Current Financial Effect**

In order to assess the magnitude of the current financial effect, the Group has evaluated if any material ESG-related opportunities (i.e., EU Taxonomy aligned and other sustainable financings according to the Bank's Sustainable Finance Framework) have been recognized during the current financial year.

Anticipated Financial Effect

In the short-term horizon, the Group identifies material opportunities by leveraging the projected growth of sustainable financing, as outlined in its Sustainable Finance Framework and reflected in its Business Plan. For the medium- and long-term horizons, the materiality assessment is based on the Group's expectations for the growth of sustainable financing in the future. This is supported by the anticipated increase in relevant risks where applicable (e.g., physical risks are expected to intensify over time, leading to a rise in adaptation-related financings). Regarding the monitoring process, the Group has integrated climate risks into its overall risk management framework. Specifically, the Group has already incorporated in its Risk Appetite Framework (RAF) a set of quantitative indicators and qualitative commitments regarding climate risks. In terms of quantitative indicators, the Bank has defined several C&E indicators designed to improve the sustainability of the portfolio and mitigate potential exposure to risk and are incorporated in Risk Appetite Framework as supporting elements. Additionally, limits have been established in part of the existing C&E indicators. The indicators cover the area of business planning and green financing, collateral vulnerability to physical and transition risk, financial activity vulnerability to physical risk and sustainable investing.

Description of how connections of impacts and dependencies with risks and opportunities that may arise from those impacts and dependencies have been considered

The relationship between risks/opportunities and impacts/dependencies is not considered simple/ one-dimensional. Instead, risks and opportunities may arise from a combination of underlying factors, including impacts, dependencies, and other external factors such as regulatory requirements and the associated obligations of the Group.

Generally, risks and opportunities related to climate change mitigation and biodiversity and ecosystems (also referred to as habitat and species) are primarily linked to impacts in the downstream portfolio and the transition efforts of clients aimed at minimizing these negative effects. In contrast, risks associated with climate change adaptation are predominantly tied to dependencies and damages from extreme physical events. The training and skills development related risks are primarily linked to the Bank's dependency on human capital. Privacy risks are mainly connected with external factors, including regulatory changes such as GDPR and cyber threats, which can undermine trust and reputation and potentially result in significant financial losses. Risks related to access to quality information and responsible marketing practices are primarily linked to external factors such as evolving regulatory requirements, industry standards, and societal expectations. Failure to provide accurate, transparent, and accessible information or to adhere to responsible marketing practices could damage the Group's reputation, erode Customer trust, and potentially result in regulatory penalties or financial losses. Business conduct-related risks are linked to both impacts and dependencies and are strongly influenced by strict compliance requirements. Failure to meet these obligations adequately could result in significant financial impacts for the Group.

Decision-making process and the related internal control procedures

The process is based on existing methodologies and capabilities, such as the ESG Risk Materiality Assessment for financial materiality, as well as widely adopted tools for impact materiality like the UNEP FI Portfolio Impact Analysis Tool. Various alternative methodological assumptions were carefully assessed and discussed to conclude to the more appropriate methodology to be followed for double materiality assessment purposes.

A close collaboration between Business Areas of the Group (Governance and Sustainability and the Climate, ESG, and Enterprise Risk Management, Human Resources, Compliance and Finance) was ensured to derive the final double materiality assessment outcome. Oversight and frequent input from senior staff, along with regular Steering Committee meetings, were key to safeguarding the soundness of the analysis. The meetings involved the participation of the Directors of the Business Areas involved (e.g. Governance and Sustainability, Climate, ESG, and Enterprise Risk Management, Internal Audit, Data Privacy, HR, etc.). The Governance and Sustainability Business Area was responsible for impact materiality and opportunities assessment. Climate, ESG, and Enterprise Risk Management Business Area were the primary responsible for the financial materiality assessment of risks. Additionally, an external consultant provided support by contributing to high-level design principles and assisting with or reviewing and challenging quantitative and qualitative analyses and key assumptions, review and benchmark of analyses against relevant market practices, providing recommendations to the working group as needed.

The materiality assessment, along with the calculations and assumptions, has been subsequently reviewed and thoroughly examined at both the working group level (involving all process stakeholders) and the Steering Committee level.

Integration of risk and impact assessment into the Group's overall risk management process

The Group adopts a proactive approach to the management of ESG risks. Emphasis is placed on risks arising from climate change, which is a key component of its Risk Management Strategy. Following the recommendations of the TCFD, the Group assesses current and upcoming environmental policies, legal requirements and regulatory guidelines relating to climate and the environment, in order to record and efficiently manage any transitional risks related to its activities. The Group has developed a comprehensive action plan, submitted to the European Central Bank (ECB) in May 2021, in which it presented how the climate risk assessment would be incorporated in its operations and in the risk management process. The implementation of the plan began in June 2021, continued throughout 2022 and was enhanced, taking into consideration the feedback provided by the Single Supervisory Mechanism (SSM) in the context of the Climate Stress Test, conducted in January 2022, and the Thematic Review of Climate-related and Environmental Risk Strategies, Governance and Risk Management Frameworks, conducted in June 2022. Leveraging on the work already performed in 2022 the Group has proceeded with targeted implementations in accordance with Group's ESG plan commitments, which continues to be applicable in 2025.

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

- The Group has enhanced its credit policy to incorporate the **ESG obligor**, transaction and overall, per transaction (combination of obligor and transaction) assessment, into its credit approval process.
- The Bank has updated its **Risk Inventory** to provide a comprehensive overview of the enhancements and progress achieved in climate and nature-related risks in the Bank's Risk Registry. The main climate-risk transmission channels in the area of risk management include transition risk (e.g. the risk of any negative financial impact on the institution, stemming from the current or from prospective impacts of the transition to an environmentally-sustainable economy on its counterparties or its invested assets),

physical risk (e.g. the risk of any negative financial impact on the institution, stemming from the current or prospective impacts of the physical effects of environmental factors on its counterparties or its invested assets) and other social and nature-related risk aspects. p.133 Pillar III Disclosures June 30, 2025

- The Group has updated its **Materiality Assessment of ESG risks** identifying the sectors that are most vulnerable to climate and environmental-related risks. In alignment with the guidance across different sources (e.g. ECB, European Banking Authority (EBA), European Commission), the Group considers Climate and Environmental risks as a theme, i.e., as a transversal risk, incorporating such factors as drivers of existing financial and non-financial risk categories in its risk management framework

The abovementioned ESG Risk Materiality assessment process has been leveraged for the financial materiality assessment of risks in the context of CSRD. Therefore, the foundations of the approach followed are common, while some differentiations are applied in the methodology followed in order to accommodate the specificities of each assessment.

Furthermore, Risk and Control Self-Assessment (RCSA) and Compliance Risk Assessments, which are considered integral part of the Bank's Risk Management Framework, have been leveraged for the financial materiality assessment of social and governance risks.

More information regarding the identification and mitigation of risks associated with other environmental and social factors is provided under [E1-2] 'Policies related to climate change mitigation and adaptation'.

Description of how the process to identify, assess and manage opportunities is integrated into the undertaking's overall management process where applicable

Alpha Bank Group uses its Sustainable Finance Framework and EU Taxonomy to identify ESG-related opportunities. These frameworks provide a structured approach to classify and identify sustainable finance opportunities, ensuring that the Group's opportunity management practices are aligned with its overall management strategy.

More specifically, the Sustainable Finance Framework ("SFF" or "the framework") can be defined as a guide that sets out a series of approaches and procedures required for classifying financing as sustainable. Specifically, the framework stipulates the decision and classification process, that the Group implements, to categorize its financial products or services as sustainable (i.e., green, or social). The main purpose of the framework is to enable the identification and categorization of sustainable activities and to lay out the criteria to characterize specific loans as sustainable.

The Group's actions focus on the increase in Sustainable Financings and the reduction of financings that may have a negative impact on the environment and people's health and wellbeing. In addition, policies and procedures are developed to reduce the operational environmental footprint and to strengthen the commitments associated with this objective.

The Group's strategic plan aims to address the risks and utilize new business opportunities to increase its positive effect on society and the environment, while effectively generating value for its stakeholders. In this respect, strategic commitments and targets are being updated with the ultimate objective to effectively manage any ESG related issues and improve environmental and social impacts.

With the operationalization of the framework, information on lending transactions is being processed and stored internally along with any relevant documentation, analyzed, and monitored by relevant areas of the Group.

The Bank is expected to regularly report its performance against its strategic plan and specifically its progress in meeting the sustainable financing target. The Bank intends to disclose information in relation to the financings which are characterized as sustainable and to the extent possible, a breakdown of the use of proceeds by eligible themes, in scope business areas, geographical location and refinancing versus new financing. Reporting information will be made publicly available on an annual basis through its Sustainability Report or dedicated Sustainable Finance report.

Integration into Overall Management Process

The process to identify, assess, and manage impacts, risks, and opportunities is fully integrated into Alpha Bank's overall risk management process. This integration allows the Bank to evaluate our overall risk profile comprehensively, ensuring that all potential and actual impacts and risks are identified, assessed, and managed effectively.

Description of how process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period

As part of our preparation for CSRD reporting, the Group has conducted a double materiality assessment (DMA) in conformance with the ESRS standards. This marks a significant change from the previous materiality assessment methodology. Specifically:

Transition to Double Materiality: For a second consecutive year the Group has implemented a double materiality to capture both the inside-out impacts of its operations on the environment and society, as well as the outside-in risks and opportunities that various ESG matters could generate for the Group's business.

Due Diligence: A more detailed exercise was performed in the content of the CSRD requirements, regarding thorough investigation of its business activities and operations across geographical areas, business relationships, as well as policies, processes and actions in place for achieving its strategic targets and long-term goals.

Last Modification Date: The process was last modified in 2024 to incorporate these enhancements and to align with the double materiality principles outlined in the ESRS. Regarding impact materiality assessment completed in 2025, the Group utilized, in addition to the UNEP FI resources, the ENCORE tool and enhanced the stakeholder engagement process for materiality purposes compared to the previous reporting period.

Future Revision Dates: Future revisions of the materiality assessment have not been planned yet however all three short, medium, and long-term time horizons shall be considered.

E1.IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Impact

Impact materiality analysis identified that climate-related impact was deemed material as a result of the Group's activity in the following sectors (table includes the top contributing sectors, as a result of the Group's Banking sector activity):

Table 17 Top contributing sectors for climate-related impact

a/a	Sectors
1	50 Water transport
2	35 Electricity, gas, steam and air conditioning supply
3	68 Real estate activities

a/a	Sectors
4	19 Manufacture of coke and refined petroleum products
5	24 Manufacture of basic metals
6	41 Construction of buildings
7	42 Civil engineering
8	51 Air transport

Material negative impact to climate stability through GHG emissions is resulting from the Group's exposure to a number of sectors, such as water transport, electricity/gas/steam supply, real estate activities, and more. The impact materiality analysis was performed using the UNEP FI Impact Analysis Tools and resources. Through these, the Group's downstream impacts could be identified by utilising the Group's financing to specific client sectors; for example, for banking services, the exposure of loans per NACE code was used for corporate clients. For more information please refer to the section [IRO-1] 'Description of the process to identify and assess material impacts, risks and opportunities', regarding own operations, negative impact is owing to energy consumption in the Group's buildings.

Risks

Definition & Identification

Climate-related risks are the financial risks posed by the exposure of institutions to counterparties that may potentially contribute to or be affected by climate change. This could, for example, take the form of physical damage caused by extreme weather events or a decline in the asset value of a counterparty that operates in carbon-intensive sectors subject to taxation on CO₂.

- **Physical:** Physical risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of the physical effects of environmental factors on its counterparties or invested assets. They are typically defined as risks which arise from the physical effects of climate change and environmental degradation and can be categorized as following:
 - Acute: which arise from particular/extreme events, especially weather-related events such as droughts, storms, floods, fires or heatwaves, or other environmental hazards that may damage production facilities and disrupt value chains.
 - Chronic: which arise from longer-term trends (progressive shifts in climate and weather patterns or a gradual loss of ecosystem services), such as temperature changes, rising sea levels, reduced water availability, biodiversity loss and changes in land and soil productivity.
- **Transition:** Transition risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of the transition to an environmentally sustainable economy on its counterparties or invested assets, including:
 - climate and environment related policy changes, for example, as a result of energy efficiency requirements, carbon-pricing mechanisms that increase the price of fossil fuels, or policies to encourage a sustainable use of environmental resources;
 - technological changes, for example, if a technology with a less damaging impact on the climate or the environment replaces a technology that is more damaging, hence making it obsolete or uncompetitive;
 - behavioral changes, for example, if the choices of consumers and investors shift towards products and services that are more sustainable; or if it becomes more difficult to attract and retain Customers, Employees, business partners and investors when a counterparty has a reputation for damaging the climate and the environment.
- **Liability:** Liability risk in the context of ESG factors relates to the risk stemming from people or businesses seeking compensation for losses they may have incurred due to ESG factors, e.g., when institutions' counterparties are held accountable for the negative impact, they have on ESG factors through their activities.¹⁵

In alignment with the relevant external guidance across different sources¹⁶, the Group has incorporated ESG factors as drivers of existing financial and non-financial risk categories (e.g. credit risk, operational risk, market risk, liquidity risk etc.) in its risk management framework. The table below provides an indicative mapping of risk drivers to some of the key transmission channels, along with their potential financial impact on Bank's risk types:

Table 18 Indicative impact of Climate related risk drivers

Risk Type	Indicative impact of Climate related risk drivers	
	Transition	Physical
Credit risk	- Impact on credit risk parameters (PD, LGD, EAD) as a result of transition risk events affecting counterparties' ability to service debt (e.g.	- Impact on credit risk parameters (PD, LGD, EAD) from physical risk events in vulnerable sectors or geographies (e.g. through lower collateral

¹⁵ Liability risks are sometimes considered either physical or transition risks. They could, however, also be considered a separate risk category as they may not only arise from

¹⁶ Some indicative regulatory and other references are:

- i) In the 2020 ECB Guide on climate-related and environmental risks: "Institutions are expected to incorporate climate related and environmental risks as drivers of existing risk categories into their risk management framework." and "Climate-related and environmental risks may, in fact, be drivers of several different risk categories and subcategories of existing risk categories simultaneously."
- ii) In the 2021 EBA Report on management and supervision of ESG risks for credit institutions and investment firms: "The EBA recommends that institutions manage ESG risks as drivers of financial risks, in a manner consistent with the risk appetite, and as reflected in both the ICAAP and ILAAP frameworks." In the 2021 European commission final study, "Development of tools and mechanisms for the integration of environmental, social and governance (ESG) factors into the EU banking prudential framework and into banks' business strategies and investment policies": "The majority of banks mentioned that this requires a clear mapping of ESG risks as drivers of existing risk types, rather than treatment as a stand-alone risk type", "Most banks that include ESG risks in their RAF fall under the second category, meaning they consider ESG risk as a transversal risk driver." and "Participants acknowledged the impact ESG risks can have on financial and non-financial risks, as opposed to considering ESG risk as a standalone risk type." In the Climate Financial Risk Forum Guide 2020, "Risk Management Chapter": "Good practice is to treat climate risk as a cross-cutting risk type that manifests through most of the established principal / standalone risk types."

Indicative impact of Climate related risk drivers		
Risk Type	Transition	Physical
	increased PD for companies sensitive to transition risk factors such as policy, regulatory or market-driven changes; impact on collateral valuations due to shifts in asset preferences or devaluation of high-emission assets)	valuations in real estate portfolios due to e.g., flood or wildfire)
Market risk	- Volatility and decline in asset values and risk returns (corporate/sovereign bonds, equities) from transition risk drivers leading to repricing of securities and derivatives (e.g. carbon price shocks, policy tightening, or sectoral reallocation of capital)	- Volatility and decline in asset values and risk returns from physical risk events leading to repricing of securities and derivatives
Liquidity risk	o Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from transition risk events which may reduce the value of high-quality liquid assets, thereby affecting the liquidity buffer, due to transition-driven repricing; potential reduction in investor appetite; increased funding costs due to perceived sustainability risk, reduced ability to access stable sources of funding, to raise funds or liquidate assets	- Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from physical risk events which may reduce the in value of high-quality liquid assets, thereby affecting the liquidity buffer, due to physical damage or repricing; potential funding pressure from counterparties (e.g. deposit and credit lines drawdowns), reduced ability to access stable sources of funding, to raise funds or liquidate assets
Operational risk	- Fines or losses due to non-compliance with environmental standards, greenwashing or failure to meet disclosure requirements, leading to conduct risk	- Disruption to operations or critical infrastructure (branches, data centers, energy supply) due to physical risk events (e.g. extreme weather events)
Business and Strategic risk	- Failure to integrate ESG and climate considerations in business strategy (e.g., potential shift in consumer preferences, behavioral/ demand patterns, market sentiment), leading to loss of competitiveness, misalignment with investor expectations	- Failure to account for the occurrence of extended physical risk events impacting financed activities /sectors more vulnerable to such risks and consequently the Bank's business model
Reputational risk	- Negative public perception or investor reaction due to association with environmentally harmful activities and/or counterparties or perceived lack of credible transition strategy, potentially affecting valuation and stakeholder trust. Continually rising stakeholder expectations in the area of climate risk could lead to reputational risk, if the Bank does not deliver fully on its position	

Materiality Assessment Methodology

Current Financial Effect

In order to assess the current financial effect of climate risks, the Bank has evaluated if any material climate-related operational risk losses (referring to both climate change mitigation and climate change adaptation) have been recognized during the current financial year.

Anticipated Financial Effect – Transition Risk

For financial materiality purposes, Alpha Bank S.A. defines the reference time horizons in alignment with CSRD guidance as described in [BP-2] 'Disclosures in relation to specific circumstances'. These horizons were chosen to also align with scientific pathways that limit warming to 1.5°C. This requires halving global GHG emissions by 2030 and approaching zero by 2050. These time horizons are also in line with the Greek Climate Law that has set a target for net zero by 2050, and an interim target of reducing GHG emissions by 55% in 2030 compared to 1990 emissions.

As a first step, the Bank has recognized the sectors that are sensitive to transition risk (climate change mitigation), by taking into consideration the following factors:

- Climate Policy Relevant Sectors (CPRS) perimeter,
- Sectors sensitive to transition risk according to Net Zero Banking Alliance (NZBA) and Long-Term Strategy for Greece for 2050 (LTS),
- The emission intensities at sector level and forward-looking Probability of Defaults (PDs) based on the short-term disorderly transition scenario that ECB published as part of the 2022 ECB climate stress test exercise,
- The contribution of the calculated (or estimated if not applicable) Scope 1 and 2 emissions of each sector in the Bank's total Scope 1 and 2 emissions,
- Exclusion of: i) RES loans, ii) dedicated-purpose sustainable loans that are aligned with EU Taxonomy (and substantially contribute to Climate Change Mitigation (CCM) objective) and iii) other loans that are sustainable according to the Bank's Sustainable Finance Framework, provided that they are linked to and affect Climate Change Mitigation (CCM) objective.

In addition to the above, the Bank has conducted a top-down qualitative materiality assessment for transition risk sub-types (market, technology, reputation, policy and legal) as proposed by the TCFD, in order to identify the climate-related transition risks that materially affect each sector. Each transition risk sub-type is comprised of risk drivers, such as:

- Policy and legal: policy developments (carbon pricing mechanisms, reporting obligations, policy mandates) that attempt to constrain actions that contribute to the adverse effects of climate change or policy developments that seek to promote adaptation to climate change, as well as climate-related litigation claims.
- Market: all shifts in supply and demand for certain commodities, products, and services. Capital markets are well-versed in identifying and assessing market risks. However, climate change will have unique implications in the supply and demand of certain commodities, products, and services.

- Reputation: all risks tied to changing Customer or community perceptions of an organization's contribution to or detractor from the transition to a lower-carbon economy.
- Technology: all risks associated with technological improvements or innovations that support the transition to a lower-carbon, energy-efficient economic system. Financial risks may arise if no new investments are made in new technologies that contribute to climate-related adaptation and risk mitigation.

Following the assessment for transition risk sub-types, a Total Average transition risk score per sector and for all the time horizons was calculated through the examination of recent literature scenarios, strategic plans and roadmaps. More specifically:

- IEA, 2021, Net Zero by 2050 "A roadmap for the global energy sector"
- Ministry of Energy and Environment, 2023, National Plan for Energy and Climate (Draft version)
- Ministry of Energy and Environment, 2019, National Plan for Energy and Climate
- National Inventory of Greece Report 2023
- UN Environment Program, Sectoral Risk Briefings: Insights for Financial Institutions, 2024
- Ministry of Energy and Environment, 2024, National Plan for Energy and Climate
- UNEP FI – Climate Risks in the Power Generation Sector, 2024
- UNEP FI – Climate Risks in the Metals and Mining Sector, 2024
- UNEP FI – Climate Risks in the Transportation Sector, 2024
- UNEP FI – Climate Risks in the Industrials Sector, 2023
- European Cement Association, 2021
- Science-based decarbonization pathways for the European Aluminium Industry – European Aluminium
- European Commission – Reducing emissions from the shipping sector

This score, representing the combination of impact and likelihood, serves as a proxy for the likelihood of occurrence of the Bank's anticipated financial effect component.

Likelihood of occurrence

The Bank has undertaken a qualitative materiality assessment for transition risk sub-types to identify the climate-related transition risks that materially impact each sector within the transition risk-sensitive perimeter across different time horizons. The scale of the transition risk is defined by combining the outcome of the Likelihood and the Impact analysis which are performed at sector level:

- **Likelihood:** the probability of occurrence within a provided time horizon
- **Impact analysis:** the extent to which the impact, if occurred, would affect the business

Following the assessment for transition risk sub-types, a Total Average transition risk score per sector and for all the time horizons is calculated. This score is considered as a proxy for the likelihood of occurrence of an anticipated financial effect for the Bank.

Anticipated Magnitude of Financial Effect

In order to evaluate the potential magnitude of financial effects for transition risk, the Bank has calculated the percentage of the Bank's exposures lying within the Sensitive perimeter over Total Group Assets categorized under High, Medium and Low likelihood of occurrence categories across different time horizons.

The following materiality thresholds (that should apply simultaneously) are considered, in order to characterize climate change mitigation risk as material:

- at least 5% of exposures within the Sensitive perimeter over Group Total Assets under High likelihood of occurrence, and
- at least 10% of exposures within the Sensitive perimeter over Group Total Assets under a combination of High and Medium likelihood of occurrence.

It is noted that Alpha Bank Cyprus also performs a materiality assessment to evaluate the anticipated financial effects from climate transition risks, which is taken into consideration to determine the overall materiality of such risks for the Group. The methodology applied is conceptually aligned with that of Alpha Bank S.A., taking also into account country-related specificities. In particular, Alpha Bank Cyprus assessed the transition risk impact on its credit risk through the determination of the Wholesale portfolio clients that are allocated in NACE sectors with high transition risk. For this purpose, the Climate Policy Relevant Sectors (CPRS) approach used by the European Banking Authority (EBA) was applied. Also, scientific research is used for the identification of the transition risk sub-types that can have a financial impact on the entity. The process involves a detailed analysis of several risks and their potential impacts on several high transition sectors within the CPRS framework, marking which combination of risks and impacts are considered relevant. The analysis concluded on 13 individual risks. The methodology followed, was based on a multi-criteria assessment based on the following:

- Expected Impact: potential effect on the bank if the risk materializes (in short, medium-, and long-term) and
- Likelihood: the likelihood with which a consequence may materialize, and the level of mitigating actions to be taken by the Group to counter the risk or the availability of time for mitigating actions to be taken (in short-, medium-, and long-term).

Anticipated Financial Effect – Physical risk

As already mentioned in [IRO-1] Description of the process to identify and assess material impacts, risks and opportunities, the Group performs a vulnerability assessment (at both sectoral and regional level) to identify potential significant hazards per sector covered by the analysis for Business portfolio, as well as across the different geographic regions where real estate properties used as collateral are located.

a) Sectoral analysis - Vulnerability analysis of Business Portfolio on Physical climate risk

Sensitivity Analysis

Regarding the sectoral analysis conducted at NACE code level, the sensitivity analysis is focused on the sensitivity of the top subsectors, for the 27 climate hazards.

Table 19 Categorization of Climate hazards

Chronic Climate Risks	Acute Climate Risks
Changing temperature (air, freshwater, marine water)	Heatwaves
Temperature variability	Coldwaves/frost
Heat stress	Wildfire

Chronic Climate Risks	Acute Climate Risks
Permafrost thawing	Cyclone, hurricane, typhoon
Changing wind patterns	Storm (blizzards, dust, sandstorms)
Changing precipitation patterns and types (rain, hail, snow/ice)	Droughts
Precipitation or hydrological variability	Tornado
Sea level rise	Heavy precipitation (rain, hail, snow/ice)
Water stress	Floods
Saline intrusion	Avalanches
Soil erosion	Landslide
Coastal erosion	Subsidence
Soil degradation	-
Solifluction	-
Ocean acidification	-

The sensitivity is assessed for each sub-sector per climate hazard using a 3-level score of 'High', 'Medium' or 'Low':

- **High sensitivity:** the climate hazard may have a significant impact
- **Medium sensitivity:** the climate hazard may have a moderate impact
- **Low sensitivity:** the climate hazard has no (or an insignificant) impact

The sensitivity has been assessed in three different time-horizons in alignment with the ESRS recommendations. These horizons were selected both because they reflect scientific pathways and because they are consistent with the Energy and Climate National Plan and the Greek Climate Law. In addition, the chosen time horizons are aligned with the EBA Guidelines on the management of ESG risks.

Exposure Analysis

The analysis resulted in the assessment of the exposure to future climate risks in country level using the maximum value in the geographic unit under assessment (country or climate zone) for the three-time horizons (2026, 2030, 2050).

Vulnerability Analysis

The vulnerability analysis is derived by combining the outcome of the sensitivity analysis and the exposure analysis. Based on the methodology, the vulnerability equals the sensitivity of a sector to a climate hazard times the exposure of that hazard to the location of the sector. The 3-level scores have been used to assess both the sensitivity and the exposure, which, when combined, form a 9-level score that can be mapped to a 3-level vulnerability score (High – Medium – Low). The vulnerability assessment outcome is considered as a proxy for the likelihood of occurrence of an anticipated financial effect for the Bank.

b) Regional analysis - Vulnerability analysis of Real Estate properties on Physical climate risk

It is worth noting that some of the loan exposures of the may be covered by both the approach applied at NACE sector level (covered in previous section) and the approach described here. The previous approach examines the activity/sector of borrowers and their degree of vulnerability to physical risk, while this approach examines the vulnerability of real estate property collaterals that may exist and, to that extent, the potential vulnerability of loan exposures is linked to these collaterals. Therefore, the drivers or “transmission mechanisms” of physical risks are different between these two cases.

The analysis developed for all climate physical risks, which are considered the most relevant to affect the structural characteristics of real estate properties in Greece is based on relevant literature. The selected climate physical risks are:

- Chronic: sea level rise, soil & coastal erosion
- Acute: wildfire, cyclone/ hurricane/ typhoon/ storm/ tornado, floods

To achieve a higher granularity level in the exposure analysis regarding real estate properties portfolio, a location-specific risk analysis has been conducted, using geospatial mapping and local geographical characteristics based on identified NUTS 3 levels. In this way, the Group can assess materiality to different hazards in more detail in terms of location of collaterals. The final assessment outcome is presented in terms of High/Medium/Low exposure levels, using relevant hazard metrics averaged to provide the results resolution of location data of the Group under the three time horizons (short – 2026 / medium 2030 / long 2050). For each NUTS 3 level region, a comprehensive grid of points is plotted on the map to ensure detailed coverage of each different prefecture. The physical risk level presented is an average derived from these specific locations (with averaging over several nearest neighbor grid points), for each NUTS 3 level, ensuring a comprehensive understanding of risks at a localized level. However, variations from the reported average risk level may occur when compared to the individual grid points within a NUTS 3 level region.

More specifically, for the estimation of exposure to existing climate conditions, available historical data are used for the specific geographical regions falling under the scope of the current analysis. For the estimation of exposure to future conditions, climate simulation models and climate projections were considered for the adverse scenario of evolution of greenhouse gas emissions RCP8.5, with horizons of 2030 and 2050.

RCP8.5 projects the reasonable worst-case scenario and is widely used for climate risk assessment and stress-testing. RCP8.5 was specifically selected as a high-end baseline scenario and was not intended to be portrayed as the most likely “business as usual” no-policy outcome. It is important to note that climate variables' values and impacts will only strongly differ with other scenarios in the long-term (2070-2100), while being close to others up to 2050. Different time horizons have been defined by means of 30-year or 20-year timeframes following literature best practices. The assessment of the exposure level provides a detailed analysis of physical climate risks at a corporate level. This is based on a common clear and defined system for all climate parameters, accepted by the scientific community, that takes into account changes in climate parameters in different chronological periods and corresponds to percentage changes in corresponding exposure categories.

Climate Analysis

Inputs are composed of experiments under the CORDEX initiative, which combines global and regional climate models with a horizontal spatial resolution of 11 km. For the current conditions, the timeframe climate (1981-2010) was considered, whereas two different timeframes (2030 and 2050) were used for the analysis of future conditions. For each climate risk, indicators are provided to measure exposure, based on the climate scenarios of the evolution of GHG gas emissions (RCP 8.5), as determined by the IPCC and the scientific community.

Selection of Climate Indicators

Physical climate risks have been analyzed using the following climate indicators. Where datasets were not available, dynamic maps and variables were used to estimate the local exposure. An example of this is the sea level rise indicator, for which some locations are not covered.

In this case, the external source of NASA - IPCC AR6 Sea Level Projection Tool¹⁷ is used, in order to complete the exposure assessment. For the flood risk, the retention of the worst-case scenario for either pluvial or fluvial floods in each NUTS 3 region, alternating between the two indicators each time, is ensured.

Table 20 Climate indicators used for the exposure analysis

	Hazard	Indicator description	Unit
Acute	Wildfire	Annual average FFDI for days where FFDI > 10	index
	Cyclone, hurricane, typhoon, storm and tornado	Annual maximum of daily wind speed	m/s
	Flood (fluvial)	Average fluvial flooding elevation related to a 100-year frequency event	m
	Flood (pluvial)	Average pluvial flooding elevation related to a 100-year frequency event	m
Chronic	Sea level rise	Mean local sea level rise compared to the reference period baseline	cm
	Soil erosion	Annual average of soil erosion	t/ha/year

Geospatial Mapping & Averaging from Grid Points to NUTS3 Level

Greek territory is divided in four climate zones based on the temperature conditions that prevail in each prefecture. According to the current building energy efficiency regulation, the country is divided into four climate zones.

Climate data of the RCA4 results were retrieved at a horizontal resolution of ~11 km for the Greek domain. The domain consists of approximately 75 x 82 grid cells. NUTS 3 level results are an outcome of an aggregated approach, by taking the average of the corresponding grid-cell points belonging in this NUTS 3.

For each indicator and each point of the grid, the value displayed is computed by averaging the projections of several climate models for a given combination of {geography x scenario x horizon} and corresponds as such to the "mean" value of the indicator for the given combination. The value displayed for each indicator and grid point is computed by averaging the projections specifically for the RCP 8.5 scenario and the horizons 2030 and 2050. Exposure fields are defined for each combination of indicator, RCP 8.5 scenario, time horizons 2030 and 2050, and climate type, based on predefined global thresholds derived from scientific literature for assessing exposure levels (low, medium, high).

Regarding the definition of the thresholds, whenever possible, absolute thresholds across all climate types have been derived from recognized scale as presented in the following table. For instance, flooding thresholds defined are based on World Bank classification, while water stress thresholds directly derive from WRI classification.

Table 21 Sources for exposure thresholds definition per climate risk

Climate risk	Source
Wildfire	Using alternative soil moisture estimates in the McArthur Forest Fire Danger Index ¹⁸
Cyclone, hurricane, typhoon, storm and tornado	Quantifying the Occurrence of Multi-Hazards Due to Climate Change ¹⁹
Max value of Flood (fluvial – pluvial)	AMBIENTAL GlobalFloodMap dataset, 30m resolution resampled ²⁰
Sea level rise	NASA - IPCC AR6 Sea Level Projection Tool ²¹ Global and European sea level rise ²²
Soil erosion	European Soil Data Centre (ESDAC) ²³

Likelihood of occurrence

Based on the Vulnerability assessment (at both sectoral and regional level) as described above, the vulnerability assessment outcome is considered as a proxy for the likelihood of occurrence of an anticipated financial effect for the Bank.

Potential Magnitude of Financial Effects

Following the aforementioned vulnerability assessment, the Bank has identified sectors and regions categorized under High, Medium, and Low Likelihood of Occurrence. Subsequently, the Bank has calculated the percentage of its exposures classified as High, Medium, or Low Likelihood of Occurrence over the Total Group Assets, considering regional and sectoral analyses over different time horizons.

A materiality threshold has been set, taking into consideration Bank's 'exposures over Group Total Assets' lying under High Likelihood of Occurrence category (set at 10% of the Bank's 'exposures over Group Total Assets' under High Likelihood of Occurrence).

Given that multiple physical risks (both chronic and acute) are separately examined and then aggregated, with an averaging effect on the materiality results overlays are applied to account for the fact some physical risks (e.g., flood) may individually have a high likelihood of occurrence. This conclusion is further supported by the fact that the materiality assessment incorporates the worst-case outcome for each physical risk type before averaging across the Acute, Chronic, and both Chronic and Acute buckets. By using the highest-severity result for each category, the assessment ensures that the potential impact of significant hazards is fully captured, even if other risks dilute the aggregated outcome.

It is noted that Alpha Bank Cyprus also performs a materiality assessment to evaluate the anticipated financial effects from climate physical risks, which is taken into consideration to determine the overall materiality of such risks for the Group. The methodology applied is conceptually aligned with that of Alpha Bank S.A., taking also into account country-related specificities, and includes the following elements:

- **Sectoral Analysis:** The Bank performs a materiality assessment for physical risks by identifying relevant climate impact categories for Cyprus using authored resources. Each impact category is then mapped to the sectors expected to be affected. The assessment for identifying the level of risk is based on: i. Vulnerability: Assessed the likelihood and severity of the impacts associated with the hazards identified as relevant for Cyprus, ii. Urgency: Assessed the urgency for the bank to take actions and iii. Impact Assessment: Assessed the exposure of the Bank to each sector.

¹⁷ NASA, IPCC AR6 Sea Level Projection Tool

¹⁸ Using alternative soil moisture estimates in the McArthur Forest Fire Danger Index, 2017

¹⁹ Quantifying the Occurrence of Multi-Hazards Due to Climate Change, 2022

²⁰ Flood Exposure and Poverty in 189 Countries

²¹ Sea Level Projection Tool, Nasa

²² Global and European sea level rise, 2024

²³ Global Soil Erosion

- **Geospatial Analysis:** In addition, using geospatial analysis, all collateral properties in Cyprus were assessed for wildfire, flood, landslide and land subsidence risks. Likelihood and severity were combined under a damage function, to derive the materiality of each risk.

Opportunities

Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material opportunities related to climate change mitigation and climate change adaptation (i.e., EU Taxonomy aligned and other sustainable financings according to the Bank's Sustainable Finance Framework) have been recognized during the current financial year. A threshold of circa Euro 1 billion has been set in order to consider an opportunity as material.

Anticipated Financial Effect

The materiality assessment performed by the Bank indicates that there are material opportunities related to climate change mitigation in the short-, medium- and long-term. Regarding the short-term horizon the Bank expects increase of the sustainable financings towards climate change mitigation objective (thus they will continue, exceeding the threshold of circa Euro 1bn) within the Business Plan horizon. Accordingly, in the medium and long-term horizon the expectation is that this type of financing will continue increasing. Climate change adaptation is considered a material opportunity only in the long-term horizon. As physical risks are anticipated to intensify over time, financings aimed at climate change adaptation are expected to grow in the longer term, surpassing the materiality threshold of circa Euro 1 bn. Regarding the short-term and medium-term horizons the Bank does not expect material opportunities – that exceed the relevant threshold considering also its Business Plan.

The average maturity of the Bank's NFC portfolio is approximately five years and therefore the majority of the Bank's NFC portfolio (c. 65%) has a residual maturity equal or below five years, while the average maturity of the Bank's real estate portfolio is c. 14 years, with the majority of the Bank's real estate portfolio (c. 58%) having a residual maturity between one and 16 years.

Identification of assets and business activities that are incompatible with or need significant efforts to be compatible with a transition to a climate-neutral economy

The Group does not have any operational or financed locked-in emissions, or any other assets or activities that could jeopardize the achievement of its net zero target.

Compatibility of climate scenarios with climate-related assumptions made in the financial statements

As part of its financial materiality assessment, Alpha Bank utilizes widely recognized science-based decarbonization scenarios (e.g., IEA NZE) and other climate scenarios to evaluate the likelihood of transition risks, quantify the anticipated financial effects of climate risk, and derive the financial materiality outcome. In the context of its decarbonization strategy, Alpha Bank has incorporated decarbonization targets in specific sectors (Cement, Power generation, Oil and Gas, Iron and Steel), leveraging on the IEA NZE scenario, which is in alignment with the scenarios utilized for DMA purposes. In addition, the scenarios utilized in the context of the financial materiality assessment of climate physical risks reflect the resilience analysis performed by the Bank to estimate the impact of climate physical risks, in the context of ICAAP or other similar processes or one-off exercises. Please refer to [E1-1] "Transition plan for climate change mitigation for more information".

[E2.IRO-1] Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

Impact

The process followed regarding pollution-related impacts is described in the subsection "Process to identify, assess, prioritize and monitor impacts informed by due diligence".

The Impact materiality analysis has not identified any Pollution impact as material to the Group's downstream activities.

No material impacts to Pollution of water, soil and air 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 contributing significantly to pollution. Furthermore, currently there is no projection of significant changes to the mix of portfolio indicating a material impact to Pollution for the future time horizons.

Risks

Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material pollution-related operational risk losses have been recognized during the current financial year. For 2025, no pollution-related operational losses have been recognized.

Anticipated Financial Effect

The materiality assessment performed by the Bank for Pollution follows the same methodology with Biodiversity and ecosystems, and is explicitly described [E4.IRO-1] Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities. The results of this assessment are presented in the following table:

Table 22 Anticipated Financial Effect – Risks (Pollution)

	Anticipated Financial Effect - Risks		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Pollution	Not material	Not material	Not material

Opportunities

Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material pollution-related opportunities have been recognized during the current financial year. For 2025, no pollution-related opportunities were identified.

Anticipated Financial Effect

The materiality assessment performed by the Bank indicates that there are no material opportunities related to pollution (i.e., sustainable financings towards pollution prevention and control related activities in line with the Bank's Sustainable Finance Framework) in the short- (2026), medium- (2030) and long-term (2050) horizons.

Table 23 Anticipated Financial Effect – Opportunities (Pollution)

	Anticipated Financial Effect - Opportunities		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Pollution	Not material	Not material	Not material

[E3.IRO-1] Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities
Impact

The process followed regarding water and marine resources-related impacts is described in the subsection “Process to identify, assess, prioritize and monitor impacts informed by due diligence”.

The Impact materiality analysis has not identified any Water and marine resources impact as material to the Group’s downstream activities. 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 contributing significantly to water. 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.

Risks
Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material water and marine resources-related operational risk losses have been recognized during the current financial year. For 2025, no water and marine resources-related operational losses have been recognized.

Anticipated Financial Effect

The materiality assessment performed by the Bank for Water and marine resources follows the same methodology as Biodiversity and ecosystems, which is explicitly described under [E4.IRO-1] ‘Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities’. The results of this assessment are presented in the following table:

Table 24 Anticipated Magnitude of Financial Effect – Risks (Water and Marine Resources)

	Anticipated Financial Effect - Risks		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Water and Marine Resources	Not material	Not material	Not material

Opportunities
Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material water and marine resources -related opportunities have been recognized during the current financial year. For 2025, no water and marine resources -related opportunities were identified.

Anticipated Financial Effect

The materiality assessment performed by the Bank indicates that there are no material opportunities related to water and marine resources (i.e., sustainable financings towards activities related to the sustainable use and protection of water and marine resources are in line with the Bank’s Sustainable Finance Framework) in the short- (2026), medium-(2030) and long-term (2050) horizons.

Table 25 Anticipated Magnitude of Financial Effect – Opportunities (Water and Marine Resources)

	Anticipated Financial Effect - Opportunities		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
Water and Marine Resources	Not material	Not material	Not material

[E4.IRO-1] Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities
Impacts

The process followed regarding biodiversity and ecosystem-related impacts is described in the subsection “Process to identify, assess, prioritize and monitor impacts informed by due diligence”.

Impact materiality analysis identified that impact on Habitat was deemed material as a result of the Group’s downstream activities. The following table lists the top 10 sectors (2 digits NACE codes) with the highest negative impacts on Habitats as this derived from Group’s downstream portfolio analysis:

Table 26 Top 10 sectors with highest negative impacts on Habitats (Biodiversity & ecosystems)

a/a	Sectors
1	50 Water transport
2	35 Electricity, gas, steam and air conditioning supply
3	68 Real estate activities
4	52 Warehousing and support activities for transportation
5	41 Construction of buildings
6	42 Civil engineering
7	24 Manufacture of basic metals
8	51 Air transport
9	01 Crop and animal production, hunting and related service activities
10	46 Wholesale trade, except of motor vehicles and motorcycles

Impact materiality analysis identified that negative impact on Habitat is material as a result of the Group's downstream activities. No material impact from own operations was identified, as the Group's own activity takes place in building stock located in urban environment. For more information please see subsection "Process to identify, assess, prioritize and monitor impacts informed by due diligence".

Risks

Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material Biodiversity and ecosystems-related operational risk losses have been recognized during the current financial year.

Anticipated Financial Effects

Impact Analysis

The Bank has utilized the ENCORE Tool to examine the materiality of the anticipated financial effect for nature-related risks.

Based on this tool, the Bank assessed the negative impact of its portfolio per sector for the following pressures: Disturbances (e.g. noise, light), Area of freshwater use, Emissions of GHG, Area of seabed use, Emissions of non-GHG air pollutants, Other biotic resource extraction (e.g. fish, timber), Other abiotic resource extraction, Emissions of toxic soil and water pollutants, Emissions of nutrient soil and water pollutants, Generation and release of solid waste, Area of land use, Volume of water use, Introduction of invasive species).

For the purposes of the analysis, ESRS Topics and their scores are subsequently aggregated following a conservative assessment approach (i.e., an ESRS topic was assigned a Very High (VH) score if at least one of its associated pressures received a Very High (VH) rating).

Likelihood of Occurrence

For sectors with High (H) or Very High (VH) rating in ENCORE, a risk assessment is performed to estimate the transition risk of the respective nature-related risks (including Biodiversity & ecosystems), covering short-, medium-, and long-term horizons. The scale of the transition risk is defined by combining the outcome of the Likelihood and the Impact, which are performed at sector level.

This score is considered as a proxy for the likelihood of occurrence of an anticipated financial effect.

- **Likelihood:** the probability of occurrence within a provided time horizon
A risk assessment is performed using a literature review, through which each nature-related topic (including Biodiversity and ecosystems) and each sector is assigned a score (Low, Medium, High) across different time horizons (short-, medium-, long-term) based on existing and future legislation, regulations, market pressures, technology advancements/innovation, and reputational risks. These factors may affect the financial performance and credit capabilities of companies in affected sectors that lag in the transition, posing a risk for the Bank relative to its exposure to these sectors. A three-level scale was adopted:
 - Low: There are no specific regulations or policies affecting this sector.
 - Medium: There are specific regulations or policies affecting this sector, but there is no defined or pressing time-horizon.
 - High: There are strict regulations and/or policies in place, with specific time-horizons.
- **Impact:** the extent to which the impact, if occurred, would affect nature
To estimate the impact score of the nature-related topics (including Biodiversity and ecosystems), a methodology which leverages both Exiobase and ReCiPe, is used to quantify commodity-level impacts across each pressure category. The commodities are mapped to their corresponding NACE level-4 categories, and ReCiPe's pressure categories are aligned with those of ENCORE. Finally, the impact score per 1-digit NACE code (Low, Medium, High) is calculated for each ESRS topic (including Biodiversity and ecosystems) by aggregating the corresponding ENCORE pressures, following a conservative approach.

Anticipated Magnitude of Financial Effects

After identifying the sectors within perimeter with key negative impact and categorizing them under High, Medium, and Low Likelihood of Occurrence, the Bank calculated the percentage of its exposures classified as High, Medium, or Low Likelihood of Occurrence over the Total Group Assets, across the different time horizons.

The following materiality thresholds (that should apply simultaneously) are considered, in order to characterize Biodiversity and Ecosystems as material:

- at least 5% of the exposures in sectors within perimeter with key negative impact per nature-related topic (including Biodiversity) over the Group Total Assets under the category of high likelihood of occurrence, and
- at least 10% of the exposures in sectors within perimeter with key negative impact per nature-related topic (including Biodiversity) over the Group Total Assets under the combined amount of high and medium likelihood of occurrence.

Dependency Analysis

The Bank proceeds with the dependency analysis, adhering to EBA's Consultation paper on Guidelines for managing ESG risks, which states that "Large institutions should develop methods to identify sectors that are highly dependent on, or have significant impact on, ecosystem services." More specifically, in addition to the previously described Impact analysis, the Bank evaluates the environmental dependencies of its business portfolio on natural and ecosystem services.

For this purpose, the bank utilizes the tool, which is designed to also assist with evaluating nature-related risks by providing insights into the dependencies on natural resources. For each ecosystem service and economic activity combination, literature reviews were conducted using scientific journals, peer-reviewed papers, key document searches, and grey literature. Industry experts from various economic sectors reviewed the identified dependency links, resulting in a complete evaluation of which of the 25 ecosystem services are essential for the production of each of the 271 economic activities. As a result, a materiality rating was assigned for each identified dependency link between an economic activity and an ecosystem service. When no connection was established, the combination of the economic activity and ecosystem service was marked either as N/A (Not Applicable) or, in cases of insufficient data, as ND (No Data). The materiality rating varies based on the following:

- the significance of the loss of functionality in the production process if the ecosystem service is disrupted, and
- the significance of the financial loss due to the loss of functionality in the production process.

In this context the Bank acknowledges the 25 ecosystem services set out in the ENCORE tool and assesses the economic sectors' potential dependency on these ecosystem services, by using existing classifications of ecosystem services and economic sectors.

Dependency to an ecosystem service (such as Water purification, Soil quality regulation), is assessed in terms of materiality, by examining the exposures' distribution to High and Very High scores. The analysis depicts that a significant percentage of its obligors are dependent on some

ecosystem services including “Visual Amenity services”, “Recreation-related services”, “Water purification” and “Flood mitigation services”. Even though material dependencies to ecosystem services do not reflect material risks on their own, the analysis is well aligned to the materiality conclusions drawn by the Bank, in particular with respect to Physical Climate risk and Biodiversity risks (mentioned in impact analysis above).

It is noted that Alpha Bank Cyprus also performs a materiality assessment to evaluate the anticipated financial effects from nature-related risks, which is taken into consideration to determine the overall materiality of such risks for the Group. The methodology applied is conceptually aligned with that of Alpha Bank S.A., taking also into account country-related specificities. Utilizing datasets from the United Nations Environment Program (ENCORE), more than 6700 Ecosystem services dependencies of economic activities were considered in the assessment. The analysis consolidated findings in 21 risks that pose a High or a Very High risk to the industries that the Alpha Bank Cyprus is exposed to. These risks were then mapped to the equivalent NACE codes of each industry/ies that are relevant to its loan portfolio. The materiality of the 21 identified risks was assessed using the following criteria:

- **Anticipated Financial Effect:** The current magnitude of Financial Effect was calculated using the Bank’s portfolio exposure to each sector,
- **Likelihood:** The likelihood of a risk occurring was defined utilizing local context and business judgement
- **Urgency:** The urgency of the risk was defined as High or Very High depending on the classification by the United Nations Environment Program.

The methodology and the tool utilized for the materiality assessment of biodiversity and ecosystems (ENCORE tool) are inherently systemic, taking into consideration that it is applied across NACE sectors and nature-related topics. Similarly, the transition risk analysis that is performed for each nature-related topic and for each sector is also considered systemic, as it incorporates key environmental regulations or policies which reflect the EU’s commitment to environmental protection and sustainable development.

Opportunities

Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material biodiversity and ecosystem related opportunities have been recognized during the current financial year.

Anticipated Financial Effect

The materiality assessment performed by the Bank indicates that opportunities (i.e., sustainable financings in line with the Bank’s Sustainable Finance Framework) towards activities related to the protection and restoration of biodiversity and ecosystems activities are considered material in the long-term (>2030) horizon, since the Bank anticipates such opportunities to exceed the threshold of circa Euro 1 bn. As transition risk faced by the Bank’s counterparties with regards to biodiversity & ecosystems are anticipated to intensify over time, financings aimed at this topic are expected to grow in the longer term. Regarding the short- and medium-term horizon the Bank does not expect material opportunities that exceed the established threshold based, also, on its Business Plan.

[E5.IRO-1] Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

Impacts

The process followed regarding resource use and circular economy-related impacts is described in the subsection “Process to identify, assess, prioritize and monitor impacts informed by due diligence”.

Impact materiality analysis identified that Resources impact was deemed material as a result of the Group’s downstream activities. The following table lists the top 10 sectors (2 digits NACE codes) with the highest negative impacts on Resources as this derived from Group’s downstream portfolio analysis:

Table 27 Top 10 Sectors with highest negative impacts on Resource Intensity

a/a	Sectors
1	50 Water Transport
2	35 Electricity, gas, steam and air conditioning supply
3	68 Real estate activities
4	10 Manufacture of food products
5	24 Manufacture of basic metals
6	19 Manufacture of coke and refined petroleum products
7	42 Civil Engineering
8	27 Manufacture of electrical equipment
9	41 Construction of buildings
10	51 Air transport

Impact materiality analysis identified that Resource Intensity impact is material as a result of the Group’s downstream activities. No material impact to Resource Intensity from own operations was identified, as the Group’s own activity is not resource intensive. No material impact to resource sourcing in the upstream value chain was identified either, due to the lower overall materiality of the upstream segment for the banking sector (compared to downstream). For more information please see subsection “Process to identify, assess, prioritize and monitor impacts informed by due diligence”.

Risks

Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material circular economy-related operational risk losses have been recognized during the current financial year.

Anticipated Financial Effect

The materiality assessment performed by the Bank for Circular economy follows the same methodology with biodiversity and ecosystems explicitly described under [E4.IRO-1] Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities. The results of this assessment are presented in the following table:

Table 28 Anticipated Financial Effect – Risks (Circular Economy)

Circular Economy	Anticipated Financial Effect - Risks		
	Short-Term (2026)	Medium-Term (2030)	Long-Term (2050)
	Not material	Not material	Not material

Opportunities

Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material opportunities related to circular economy have been identified during the current financial year. For 2025, no material circular economy-related opportunities were identified, since they do not exceed the threshold of Euro 1 billion that has been set.

Anticipated Financial Effect

The materiality assessment performed indicates that opportunities related to circular economy (i.e., material sustainable financings towards transition to circular economy related activities) are considered material in the long-term (>2030) horizon, while for the short- and medium-term horizon the Bank does not expect material opportunities based, also, on its business plan.

[G1.IRO-1] Description of the processes to identify and assess material business conduct-related impacts, risks and opportunities

Impacts

The process followed regarding business conduct-related impacts is described in the subsection "Process to identify, assess, prioritize and monitor impacts informed by due diligence".

Risks

Current Financial Effect

In order to assess the current financial effect, the Bank has evaluated if any material business conduct-related operational risk losses have been recognized during the current financial year.

Anticipated Financial Effect

To evaluate the anticipated financial effect of business conduct related risks, the Bank conducted a mapping of the respective ESRS sub-topics with the risk types identified within the Compliance Risk Assessment and the corresponding inherent risk assessment outcomes. A four-level scale (Low, Medium Low, Medium High, High) is utilized in the context of the Compliance Risk Assessment. The following dimensions are considered to derive the inherent risk assessment outcome:

- Impact: the potential effect on the entity's objectives should the risk be manifested (Magnitude of financial effects).
- Likelihood: the possibility that the risk will manifest over a pre-defined period of time (Likelihood of occurrence).

ESRS sub-sub-topics that are assessed as having a High or Medium High inherent risk are deemed material. It is noted that the inherent risk assessment considers which is the impact for the Bank in case the risk is manifested within the next year (short-term) without additional mitigation actions going forward. It is assumed that the same conclusions are, also, applicable in the medium- and long-term horizons.

[IRO-2] Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

Table 29 Table of all the datapoints deriving from other EU legislation

Disclosure Requirement and related datapoint	SFDR Reference	Pillar 3 Reference	Benchmark Regulation reference	EU Climate Law Reference	Location in the sustainability statement/ Not Material
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27) , Annex II		[GOV-1] The role of the administrative, management and supervisory bodies
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		[GOV-1] The role of the administrative, management and supervisory bodies
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				[GOV-4] Statement on due diligence
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		[SBM-1] Strategy, business model and value chain
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		[SBM-1] Strategy, business model and value chain

ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (29) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		[SBM-1] Strategy, business model and value chain
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		[SBM-1] Strategy, business model and value chain
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	[E1-1] Transition plan for climate change mitigation
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		[E1-1] Transition plan for climate change mitigation
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		[E1-4] Targets related to climate change mitigation and adaptation
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				[E1-5] Energy consumption and mix
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				[E1-5] Energy consumption and mix
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				[E1-5] Energy consumption and mix
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		[E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		[E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		N/A (Utilization of the Phase-In provision)
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book -			N/A (Utilization of the Phase-In provision)

Location of significant assets at material physical risk paragraph 66 (c).		Climate change physical risk: Exposures subject to physical risk.			
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2:Banking book -Climate change transition risk: Loans collateralized by immovable property - Energy efficiency of the collateral			[E1-9] Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		N/A (Utilization of the Phase-In provision)
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not material
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material
ESRS E3-4 Total water consumption in m 3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material
ESRS 2- SBM-3 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS 2- SBM-3 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS 2- SBM 3 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				[E4-2] Policies related to biodiversity and ecosystems
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				[E4-2] Policies related to biodiversity and ecosystems
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				[E4-2] Policies related to biodiversity and ecosystems
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Not material
ESRS E5-5	Indicator number 9 Table #1 of Annex 1				Not material

Hazardous waste and radioactive waste paragraph 39					
ESRS 2- SBM-3 - S1 Risk of incidents of forced labor paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS 2- SBM-3 - S1 Risk of incidents of child labor paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				[S1-1] Policies related to own workforce
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		[S1-1] Policies related to own workforce
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				[S1-1] Policies related to own workforce
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				[S1-1] Policies related to own workforce
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				[S1-3] Processes to remediate negative impacts and channels for own workforce to raise concerns
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		[S1-14] – Health and Safety Management System
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				[S1-14] – Health and Safety Management System
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Not material
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				[S1-17] Incidents, complaints and severe human rights impacts
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		[S1-17] Incidents, complaints and severe human rights impacts
ESRS 2- SBM-3 – S2 Significant risk of child labor or forced labor in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Not material
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Not material
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Not material
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated		Not material

Rights principles and OECD guidelines paragraph 19			Regulation (EU) 2020/1818, Art 12 (1)		
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material
ESRS S4-1 Policies related to Customers paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				[S4-1] Policies related to Customers
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		[S4-1] Policies related to Customers
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				[S4-4] Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				[G1-1] Business conduct policies and corporate culture
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				[G1-1] Business conduct policies and corporate culture
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		[G1-4] Incidents of corruption or bribery
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				[G1-4] Incidents of corruption or bribery

ENVIRONMENTAL INFORMATION

EU TAXONOMY

Disclosures pursuant to Article 8 of Regulation 2020/852 ("EU Taxonomy Regulation")

EU Taxonomy Regulation was created to meet the need for a common system for the classification of environmentally sustainable economic activities. It forms an integral part of the European Green Deal, as well as of the EU Action Plan on Sustainable Finance.

The EU Taxonomy Regulation is effective since July 12th, 2020, and establishes the following six environmental objectives:

1. Climate change mitigation (CCM);
2. Climate change adaptation (CCA);
3. Sustainable use and protection of water and marine resources;
4. Transition to a circular economy;
5. Pollution prevention and control; and
6. Protection and restoration of biodiversity and ecosystems.

On June 4th, 2021, Commission Delegated Regulation 2021/2139 (commonly known as the "Climate Delegated Act") was adopted, establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives. The Climate Delegated act is effective as from January 1st, 2022.

Additionally, the EU Commission adopted Delegated Regulation (EU) 2021/2178 of 6 July 2021 (hereinafter "Disclosures Delegated Act"), which supplements Article 8 of the EU Taxonomy Regulation and outlines the required content and format for information disclosure by companies under Articles 19a or 29a of Directive 2013/34/EU. It also details the methodology for fulfilling the disclosure requirements related to environmentally sustainable economic activities.

On July 15th, 2022, a Complementary Climate Delegated Act (EU) 2022/1214 was published in the Official Journal of the EU, expanding the Taxonomy framework to include specific nuclear and gas energy activities under strict conditions (hereinafter "Complementary Climate Delegated Act").

In 2023, two new Delegated Acts issued by the European Commission were adopted:

1. The Delegated Act 2023/2485 which includes technical screening criteria of new activities for the substantial contribution to the first two environmental objectives (CCM and CCA), and
2. The Delegated Act 2023/2486 which includes technical screening criteria of new activities for the substantial contribution to the remaining four environmental objectives.

According to the EU Taxonomy Regulation, an economic activity is considered "eligible" if it is included in the abovementioned Delegated Acts, while it is considered "sustainable" or "EU Taxonomy aligned" when it complies with all the following criteria: i) it contributes substantially to one or more of the environmental objectives described above; ii) does not significantly harm (DNSH) any of these environmental objectives; iii) it is carried out in compliance with the minimum safeguards.

On January 8th, 2026, Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 (hereinafter "Delegated Regulation (EU) 2026/73"), was published in the Official Journal of the European Union, amending the Disclosures Delegated Act as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and the Climate Delegated Act and Delegated Regulation (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives. Delegated Regulation (EU) 2026/73 aims to reduce administrative burdens and to simplify reporting obligations. According to paragraph 23 of the Delegated Regulation (EU) 2026/73, undertakings can apply the Disclosures Delegated Act, Climate Delegated Act, and Delegated Regulation (EU) 2023/2486 as applicable on 31 December 2025 for the financial year of 2025, to avoid undue costs of compliance with the amendments laid down in the Regulation. Therefore, for the financial year of 2025, the Group has prepared its EU Taxonomy disclosures in accordance with the EU Taxonomy disclosure requirements applicable as of 31 December 2025, prior to the application of the simplified disclosure framework introduced by the Delegated Regulation (EU) 2026/73.

It is also noted that, in accordance with Article 10(5) of the Disclosures Delegated Act, as amended by Article 1(8) of the Delegated Regulation (EU) 2026/73, the application of the reporting requirements related to the Fees and Commissions income KPI (Section 1.2.3 of Annex V) and the Trading Book KPI (Section 1.2.4 of Annex V) has been postponed until 1 January 2028. Accordingly, these KPIs are not required to be disclosed for the 2025 financial year.

Table 30 Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation

The table below provides an overview of the key EU Taxonomy-related ratios as of 31.12.2025, while Appendix "EU Taxonomy Reporting Templates" includes the relevant disclosure templates, as per the EU taxonomy disclosure requirements.

		Total environmentally sustainable assets (Turnover)	Total environmentally sustainable assets (CapEx)	Turnover KPI ***	CapEx KPI ****	% coverage (over total assets) **	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	1,247	1,778	2.13%	3.04%	76.77%	49.45%	23.23%

		Total environmentally sustainable assets (Turnover)	Total environmentally sustainable assets (CapEx)	Turnover KPI	CapEx KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	365	657	9.27%	16.66%			
	Trading book*	N/A	N/A	N/A	N/A			
	Financial guarantees	243	518	9.98%	21%			
	Assets under management	361	819	2.23%	5%			
	Fees and commissions income*	N/A	N/A	N/A	N/A			

* Fees and commissions income from services and Trading Book KPIs

** % of assets covered by the KPI over Groups' total assets

*** based on the Turnover KPI of the counterparty

**** based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

Implementation in business strategy and engagement with clients and counterparties

The Group seeks to increase its positive effect on society and the environment, utilizing new business opportunities and generating value for all stakeholders. Through its Sustainable Finance Framework (SFF), the Group supports lending activities as well as other funding instruments with clear environmental and social credentials in alignment with the EU Taxonomy regulation and with the principles established by the International Capital Market Association.

Approach for Taxonomy eligibility and alignment assessment

The information presented follows the requirements described in Article 7 and Article 10 of the Disclosures Delegated Act. The information relating to Taxonomy is prepared following the prudential approach and consolidation of Alpha Bank Group, in accordance with the applicable laws.

The taxonomy eligibility assessment shows the proportion of the Group's assets financed and invested in taxonomy - eligible economic activities as a proportion of total covered assets. The taxonomy alignment assessment, and specifically the GAR ratio, shows the proportion of the Group's assets financed and invested in taxonomy - aligned economic activities as a proportion of total covered assets. The numerator covers the loans and advances, debt securities, equities and repossessed collaterals, financing taxonomy - aligned economic activities based on the relevant turnover and CapEx KPIs.

The following categories of exposures have been excluded from the calculation of the GAR ratio as necessary:

- exposures to central governments, central banks, and supranational issuers (excluded from both the numerator and denominator of KPIs);
- exposure in trading portfolio securities (excluded from both the numerator and denominator of KPIs);
- exposures in derivatives excluded from the numerator of KPIs;
- exposures to entities that are not obliged to publish sustainability information pursuant to Article 19a or Article 29a of Directive (EU) 2013/34 excluded from the numerator of KPIs;
- On demand interbank loans excluded from the numerator of KPIs;
- Cash and cash-related assets excluded from the numerator of KPIs;
- Other categories of assets (e.g. Goodwill, commodities etc.) excluded from the numerator of KPIs;

For its wholesale banking portfolio, for financings with unknown use of proceeds, the assessment of Taxonomy eligibility and alignment is performed using the Taxonomy KPIs disclosed by CSRD counterparties - in terms of turnover and capital expenditure - as reported in their latest annual reports. The counterparties that are not in scope of CSRD, and hence not required to report Taxonomy information, are not included in the assessment for taxonomy-eligibility and alignment.

For dedicated purpose financing, which is defined as exposures that have the purpose of financing specific identified activities, ('known use of proceeds'), alignment with the EU Taxonomy is assessed on the basis of the financed activity.

KPIs for off-balance sheet exposures include financial guarantees granted by the credit institution to financial and non-financial undertakings (FinGuar KPI) and assets under management (AuM KPI).

According to Complementary Climate Delegated Act (ANNEX XII), credit institutions shall disclose their exposure to economic activities related to fossil gas and nuclear energy. Exposures relevant to taxonomy-aligned economic activities of nuclear energy and fossil gas are included in the numerator and denominator of their KPIs, and exposures relevant to taxonomy-non-eligible nuclear energy and fossil gas related activities are included in the denominator of their KPIs.

In view of the CSRD requirements and the continuous amendments on Taxonomy regulation, the Group closely monitors all relevant announcements to ensure transparency and completeness of the information.

Limitations in data and information

The adoption of the EU Taxonomy framework is subject to several practical constraints and considerations that influence the calculation and interpretation of the GAR. More specifically:

- Due to the publication timelines of disclosures by reporting entities, the GAR is calculated using counterparties' eligibility and alignment ratios as of 2024, as these represent the most recent data available.
- A limited perimeter of the Group's portfolio is considered in the calculation of GAR. This is largely attributable to the structure of the Greek market, which includes many unlisted and SME companies outside the scope of CSRD.
- In relation to mortgage lending to households, the assessment of technical screening criteria is also constrained due to the lack of complete datapoints for the Energy Performance Certificate (EPC) labels of collaterals. At present, no publicly accessible central registry exists that provides energy-performance information (such as Energy Class ratings) for certified properties.
- For dedicated-purpose financing, obtaining sufficient documentation to substantiate alignment (e.g., Substantial Contribution Criteria (SCC), Do No Significant Harm (DNSH), and minimum safeguards) remains challenging. For example, in the case of motor vehicle loans, the assessment of DNSH criteria was not possible due to unavailability of relevant data (i.e. tires of the motor vehicle etc).

The Group will continue to enhance its reporting methodology over EU taxonomy requirements to ensure transparency and completeness of the information disclosed as further robust information becomes available from counterparties.

ESRS E1 CLIMATE CHANGE

[E1-1] Transition plan for climate change mitigation

Alpha Bank has developed a comprehensive Transition Plan that aligns with EU climate corporate disclosure regulations (**CSRD, ESRS E1 Climate Change**) and prudential requirements (**EBA Guidelines on the management of ESG Risks**), integrating climate and environmental considerations across strategy, governance, risk management, and portfolio steering.

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

- (1) Strategic Foundations & Objectives
- (2) Implementation Strategy
- (3) Monitoring, Metrics & Reporting
- (4) Governance

The Transition Plan provides a structured and credible, forward-looking approach for addressing ESG financial risks and climate change mitigation aligned with Paris Agreement, while maintaining prudence in risk management and supporting clients in the transition to a more sustainable economy.

Strategic Foundations & Objectives

Long-term Commitment

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.

This Strategy is designed to guide the transition toward a low-carbon, resilient, and sustainable future. It reflects the Group's commitment to align with international objectives set by the Paris Agreement on Climate Change and the United Nations 2030 Agenda for Sustainable Development and supports the broader economy through responsible financing practices. It aims to strengthen financial stability, meet regulatory expectations, and create long-term value for stakeholders including investors, Employees, clients, while ensuring responsible business conduct.

Strategic objectives in supporting an environmentally sustainable economy:

- **Enable client and economy-wide decarbonization** through targeted financing, advisory services, and strategic partnerships.
- **Align portfolio emissions with Paris Agreement objectives** and credible Net Zero pathways.
- **Promote biodiversity protection and circular economy principles** across banking activities and financed projects.
- **Achieve Net Zero in own operations** while enhancing resilience to transition and physical climate risks.

As a result, the Group is expected to strengthen long-term balance sheet quality and financial stability under evolving risk scenarios, while ensuring compliance with EU sustainability and supervisory requirements.

As a financial institution, Alpha Bank recognizes the opportunity to help steer financial flows toward the transition to a low-carbon economy. Mainly, to enhance the Bank's resilience by managing and mitigating Climate/ESG risks and to support our clients' investment needs. The key

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

In line with the EU Climate Law, the Bank is committed to achieving **net-zero greenhouse gas emissions across its lending and investment portfolio by 2050** and has set interim 2030 climate targets. The targets take into account the **UNEP FI's guidelines and the Net Zero Banking Alliance (NZBA)** target setting framework. This commitment anchors the Bank's long-term strategy and informs its approach to portfolio steering, client engagement, and risk management.

Interim Targets and Target-Setting Approach

In 2024, the Bank introduced its first wave of intermediate decarbonization targets for four carbon-intensive sectors — **Power Generation, Oil & Gas, Cement, and Iron & Steel** — which collectively account for more than half of the Bank's total financed emissions. After accounting for the appropriate value chain, these sectors correspond to ~15% and ~54% of the Bank's outstanding exposure and financed emissions (excluding shipping), respectively, of the sectors in scope for the NZBA. These targets follow NZBA requirements and are grounded in PCAF-compliant emissions baselines.

The Bank recognizes that there is a significant amount of uncertainty and complexity associated with the net zero transition. Progress towards net zero in Greece will depend on the policy landscape, the scale and pace of technological developments, economic and geopolitical factors. In addition, climate data, scenarios and methodologies continue to evolve, which may require the Bank to evolve its methodology and target setting approach over time.

In this context, the Bank recognizes that the targets rely to a great extent on Alpha Bank's key clients meeting their decarbonization commitments. The Bank will regularly engage with its clients on their level of progress and commitments. While changes in the operating and macroeconomic environment (for example, prevailing macroeconomic conditions or systemic events) may adversely impact progress towards the target, the Bank has not identified material locked-in emissions that would prevent achievement of its Net Zero targets, based on current portfolio composition and available data. Alpha Bank is following NZBA guidelines and recommendations to make progress in defining decarbonization targets and achieving net zero emissions by 2050.

A **second wave of sectoral Net Zero targets** is expected to be finalized by **H1 2026**, depending on regulatory and methodological developments. The Bank is developing an internal process for both lending and investment portfolios, effectively enhancing the client assessment for net zero target alignment and integrating the net zero target information to the credit decision making process. The net zero targets are expected to be incorporated in new client onboarding and existing client review for in scope sector financing.

Purpose of the Transition Plan

The Transition Plan describes the operationalization of the Group's sustainability strategy, by defining the actions, tools, and decision frameworks that will enable the portfolio to align with a 1.5°C pathway. It links Alpha Bank's climate ambitions to its core business activities, including:

- Enhancing the sustainability and resilience of the bank's asset portfolio
- Increasing volumes of Sustainable financings to support the economy's low carbon transition
- Addressing the needs of clients and engaging with them on sustainability related issues
- Incorporating sustainability criteria in Risk Assessment and credit under-writing
- Enhancing the skills and capabilities of the Bank's Business Units to identify climate related risks and opportunities
- Creating appropriate structures and processes for the integration of future sustainability-related themes

Decarbonization Levers

Sustainable Finance Expansion

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
- Within the Sustainable Financings, achieve at least Euro 2.6 billion to Renewable Energy Systems by 2026.

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. Please refer to [E2-Policies] for the detailed Sustainable Finance Framework description.

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.

Managed Decline of High-Impact Activities

Alpha Bank applies an **Exclusion List** of economic activities that impose environmental or social threat, including zero financing of:

- Thermal coal mining
- Coal-fired electricity generation
- Upstream oil exploration and extraction
- Activities with significant biodiversity harm

The Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending defines the activities that the Group does not consider financing due to the environmental and social risks they entail.

Portfolio Steering and Scenario Alignment

Application of the NZBA guidelines on sector pathways and specifically, the use of the **science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE2050) scenario** as its benchmark pathway to steer the Bank's portfolio transformation. To measure its financed emissions, Alpha Bank follows the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials. Financed emissions calculations include clients' Scope 1, Scope 2 and Scope 3 emissions, where data allows. In this context, the Bank uses physical emissions intensity metrics and/or absolute emissions to set and monitor sector portfolio progress towards both long-term and intermediate targets. It is important to recognize the role that is played in filling critical funding gaps for sectors actively working towards reducing their carbon footprint and facilitating the transition to a low-carbon economy.

External Dependencies and Enablers

The effectiveness of the plan depends to an extent on the evolution of EU and national decarbonization policy as well as the development of legal frameworks, and the availability of client-level emissions and transition plan data. Regulatory convergence (EC, ECB, EBA, ESMA, national authorities) on climate-related risk management expectations is expected to continue driving the integration of ESG risk in the short, medium and long-term, including resilience analysis and processes to identify and assess climate-related impacts, risks and opportunities.

The Bank will adapt its implementation priorities in line with the evolution of these external factors while continue to collaborate with peer institutions through its membership in the United Nations – Environment Programme Finance Initiative (UNEP FI) on advancing the finance sector sustainability journey.

Governance Architecture

The Bank has established a strong governance framework to oversee its ESG initiatives, including dedicated ESG committees at the Board and executive levels. This ensures that financial commitments are monitored, reported, and aligned with international best practices.

The Bank's Transition Plan is overseen through the Bank's existing sustainability and risk governance:

At **Board level**, the Corporate Governance, Sustainability and Nominations Committee (CGSNC) acts as the ultimate liaison/responsible Board Committee with respect to all sustainability issues and promotes respective communications and feedback from all the Board of Directors Committees.

At the **Executive level** the Group Sustainability Committee oversees ESG topics and implementation while steering the Group's sustainability Strategy. At the operational level, an ESG Working Group has been established to implement key initiatives, led by the Group ESG Coordinator, who is also responsible for providing direction to subsidiaries and other Units. The Bank's Governance and Sustainability Division drives the ESG agenda and ensures internal adoption of best practice across the Group.

The Bank has developed the **Sustainable Finance Framework (SFF)** to provide the classification mechanism, decision pathways, and governance for all sustainable finance products. In addition, climate and environmental risk drivers are embedded into the credit approval process, reputation policy, RAF, ICAAP, stress testing, and risk inventory. The implementation of the Bank's transition plan rests on the integration of climate considerations into the business planning by setting limits through the Risk Appetite Statement and specific sustainability targets.

The Bank's governance structure emphasizes the development of its human resources and re-skilling. Incentives are being incorporated into remuneration policies and practices, while data and IT systems are important in supporting business development and further ESG integration.

Alignment with CSRD and EBA Guidelines

This Transition Plan has been designed to fully reflect:

- **ESRS E1-1** requirements on transition planning
- **EBA Final Guidelines on ESG Risk Management** on governance, strategy, risk integration, data, methodology and credit processes
- expectations under **Article 449a of CRR** for climate-related disclosures
- ECB supervisory expectations, including sectoral analysis, time horizons, and scenario-based analysis.

The objective is to provide a coherent, forward-looking framework that supports transparent communication with stakeholders.

Implementation Strategy

The Implementation Strategy sets out a plan to monitor and address financial forward-looking ESG risks arising from the transition to a more sustainable economy, with a focus on addressing climate mitigation in alignment with the Paris Agreement and peer practice. The plan focuses on strengthening capabilities, embedding transition-related processes across the Bank, and supporting clients transition to a low-carbon economy. Consistent with CSRD and the EBA Guidelines on the management of ESG Risks, the Bank adopts a progressive, multi-year approach, taking account of methodological developments, sectoral policy evolution, and data availability.

The Implementation Strategy is organized in five core pillars: Sectoral target development, Portfolio steering towards net zero ambitions, Client engagement, Sustainable opportunities and Risk integration.

Sectoral Target Development and Methodology Enhancement

In 2024, Alpha Bank announced a first-round of sector targets across its lending and investment portfolios to align with the NZBA overarching principles of setting and disclosing long-term and intermediate targets to support meeting a net zero by 2050 greenhouse gas emissions goal. The Bank employs the widely used, science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE2050) scenario as its benchmark pathway to set 2030 interim targets and ultimately converge towards net zero by 2050.

The Bank prioritized setting targets for the Power Generation, Oil & Gas, Cement and Iron & Steel sectors, taking into consideration each sector's materiality based on the financed emissions measurement, outstanding exposure, sectoral contribution to Greece's emissions, the availability of credible sectoral target-setting guidance, data quality and availability, as well as peer practice. 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 by H1 2026 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. At the same time, it has set voluntary GHG emission reduction targets for its own operations that contribute to the achievement of the Group's sustainability objectives. For further information, please refer to section [E1-4] "Targets related to climate change mitigation and adaptation".

Table 31 Progress on Sectoral Targets

Sector	Emissions scope	Metric	Benchmark	Scenario	Base year	Baseline	Target year	Target	Baseline vs 2025
Power	1	kgCO ₂ e/MWh	132	IEA NZE2050	2022	223	2030	-41%	-36.4%
Oil & Gas	1 and 2	Index to 100 (2022)	74	IEA NZE2050	2022	100	2030	-26%	4.3%
Cement	1 and 2	kgCO ₂ e/ t cement. prod.	584	IEA NZE2050	2022	687	2030	-15%	-9.4%
Iron & Steel	1 and 2	kgCO ₂ e/ t steel	1,260	IEA NZE2050	2022	540	2030	Below Benchmark	-27.8%

Actions with clients to support climate mitigation objectives

- Support financing of economic activities included in the Bank's Sustainable Finance Framework
- Support clients active in the expansion of renewable energy investments
- Focus on actions to enable the transition of hard-to-abate sectors
- Active engagement with clients on their Net Zero target setting
- Active engagement with clients investing in new technologies to meet their decarbonization goals
- Collect information on new clients decarbonization trajectories
- Discuss carbon emissions measurement and how to close disclosure gaps

Portfolio Steering and Risk Appetite Integration

Alpha Bank's portfolio steering framework ensures that the lending and investment activities progressively align with a 1.5°C pathway, in line with NZBA, CSRD, and EBA expectations. The Net Zero portfolio framework integrates science-based sector pathways and defined risk appetite thresholds for key priority sectors critical for the transition to a low carbon economy. Sector heatmaps and exposure analytics are being leveraged to inform the client engagement process and prioritize possible actions to enact.

This enables Alpha Bank to systematically reduce financed emissions while supporting the real economy through a credible, orderly, and client-centric transition.

Portfolio Steering Mechanisms

The Bank uses a diversified suite of steering mechanisms, applied proportionately across sectors as it continues to embed transition-risk considerations into the Risk Appetite Framework (RAF), including refinement of Early Warning and Risk Tolerance thresholds for sectors with climate targets. Both RAF indicators and client transition trajectories offer the Bank a structured process to apply to business decision making and credit underwriting guidelines.

Exposure Steering

Exposure changes in the Bank's lending and investment portfolio cover achieved or prospective emission reductions resulting from Alpha Bank's zero financing in excluded activities and from portfolio composition changes (e.g. due to high ESG risk classification, capital allocation into less carbon-intensive sectors vis-à-vis high carbon-intensive sectors). Through the Credit Policy's exclusion list, the Bank has established clear boundaries in what activity should be considered for financing due to their nature as well as ESG risk and implications they entail. Financing can also be influenced by the alignment of the Bank's credit appetite with decarbonization pathways, by pricing adjustments for transition risk and by sustainability-linked covenants. The operationalization of the ESG obligor assessment and Net Zero target setting offers a mechanism to control for changes in new and existing clients with respect to ESG risk and to the future achievement of decarbonization targets while also enables management of the exposure to high-emissions sectors.

Engagement-Based Steering

Effective client engagement is an important lever in steering the Bank's Customers to more sustainable business practices. Engagement frequency is prioritized based on ESG risk and sector relevance. For Customers assessed with high ESG risk score, engagement is warranted on a biannual or more frequent basis whereas engagement with medium ESG risk Customers happens at least annually. For Customers in net zero target sectors, more frequent engagement is performed to support Customers in high-emitting sectors transition. The majority of financed emissions reductions, attributed to the Bank's lending portfolio, is expected to be driven by Customers' emission reductions. As a result, the Bank contributes to Customers' emissions reductions with its own mitigating actions through an effective engagement process. Engagement priorities are also set on a case-by-case depending on a Customer's performance deterioration, exposure size, and alignment gaps.

Business Decisions Through RAF Thresholds

The Bank regularly monitors its performance with regards to the sectoral emission-reduction targets, reflected in defined RAF KPIs and thresholds, including values for Early Warning (EW) bands and Risk Tolerance (RT) bands.

These thresholds act as triggers for relationship decisions:

- When a client's performance falls in the EW-RT band, the Bank assesses the transition plan and progress to determine if the relationship can be initiated or maintained.
- When RT is surpassed, possible actions include no financing for new clients unless a credible transition plan exists., and for existing clients, the Bank will evaluate all available options, including engagement to identify additional decarbonization actions, exposure reduction or sector portfolio rebalancing.

These thresholds ensure a consistent, forward-looking portfolio alignment approach, even if not publicly disclosed.

Client Engagement Framework

Alpha Bank has developed a Client Engagement Framework to ensure a consistent, and forward-looking engagement process across sectors and client segments. 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.

The Client Engagement Framework operationalizes the Bank's engagement approach covering all clients above a predefined threshold. Defines annual or more frequent engagements depending on the client's risk profile. Establishes client action plans and transition-readiness monitoring and ensures the utilization of collected data in reviewing the progress achieved by clients. Gradually it serves to strengthen data flows across Wholesale Banking, Governance & Sustainability, and Risk functions for consistent monitoring.

Client ESG Assessment and Risk Stratification

All corporate clients – legal entities are required to complete a standardized ESG questionnaire developed jointly by the **Hellenic Banks Association (HBA)** and implemented across Greek banks. The questionnaire is hosted on a **common IT platform** accessible to all participating banks to be used in evaluating and scoring their client responses independently based on internal methodologies. As a result, Alpha Bank converts the output of the ESG questionnaire into an **ESG Risk Score (High, Medium, Low) at the obligor level**.

The ESG Risk Score is incorporated in the Bank's Credit Policy leading to an adjustment in pricing after taking into account the ESG features of the transaction. In addition, the ESG assessment influences the client engagement strategy. It serves to monitor clients' ESG progress and transition readiness, propose remedial action when appropriate and for early detection of potential transition or reputational risks. This stratification acts as the backbone of the Bank's client engagement strategy.

Engagement Strategy

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.

- 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.

Examples of Action Plan outcomes:

- Adoption of energy efficiency measures
 - Development of baseline emissions
 - Establishment of governance practices
 - Initiation of sustainability reporting
 - Steps to prepare a credible Transition Plan
- 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.

Actions to manage alignment within the Net Zero sector perimeter include:

- Identifying gaps between client pathways and the Bank's sectoral decarbonization trajectories
- Supporting clients to access sustainable finance solutions (e.g. SLLs, green CapEx loans)
- Advising on transition strategies, financing proposals and reporting structures
- Early identification of clients whose plans are misaligned (potential escalation)

This reflects the EBA requirement for banks to monitor client alignment with science-based sector pathways.

- 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.

Engagement Focus:

- Provide guidance on improving sustainability maturity
- Identify opportunities for energy efficiency, circularity, clean mobility, etc.
- Support clients in exploring sustainability-linked financing
- Improve data quality

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.

Engagement Process:

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 key objectives reflect the assurance of the resilience of the Bank's portfolio and the encouragement of the sustainable development of its clients.

All corporate clients subject to the ESG questionnaire must be engaged **at least once annually**. 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 could increase (biannual or quarterly depending on severity and credit exposure).

The Wholesale Banking, Governance & Sustainability Division and Climate, ESG and Enterprise Risk Business Area cooperate to ensure coordination, quality control and consistent interpretation across the Bank. As a result, Relationship Managers (RMs) receive consistent guidance to apply fairly and transparently the Client Engagement Framework.

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:

(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

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.

Data Systems and Information Flow

Client engagement data and ESG risk assessments are maintained across dedicated systems that allow for:

- **Consistent tracking** of engagement activity
- **Monitoring of Action Plan progress**
- Maintenance of **audit trails** for supervisory review
- Integration of ESG risk parameters into credit-risk systems
- The ability to generate client-specific reports for RMs in advance of meetings
- Aggregation of metrics for reporting to the Group Sustainability Committee and other governance bodies

The **ESG Risk Assessment** results are stored in an internal system, ensuring alignment with the Bank's broader risk frameworks. Additionally, onboarding processes are modified to incorporate the ESG data reported by clients to be used for both business and risk management purposes. Alpha Bank employs a comprehensive suite of tools and analytical methodologies to support its client engagement framework, ensure consistent risk assessment, and align portfolio decisions with the Bank's Net Zero pathways. These tools are used across Wholesale Banking, Risk Management, and Sustainability functions, ensuring an integrated and forward-looking approach as required by the EBA Guidelines.

Alignment with Risk Management Frameworks

The integration of governance across the Bank's Wholesale Banking, Sustainability, and Risk Management Business Areas ensures that:

- ESG risks are considered as **drivers of credit, operational, reputational and strategic risk**, consistent with EBA guidelines
- Transition misalignment is captured in risk identification and monitoring
- Action Plan progress can influence credit terms, review frequency and risk ratings
- Client engagement outputs inform the Bank's sector heatmaps, portfolio steering and transition-risk assessment methods

Climate Policy Relevant Sectors (CPRS) and Equivalent Sector Classifications

The Bank uses the CPRS perimeter to identify sectors most exposed to transition risk. These sectoral classifications:

- guide prioritization of client engagement intensity
- inform sector-level heatmaps
- support alignment with NZBA priority sectors
- structure risk identification and early warning indicators

In addition, the Bank identifies material exposures in non-financial corporates according to the measurement of financed emissions.

Physical Risk Assessment

Physical climate risks are assessed using the Bank's dedicated methodologies at obligor level, collateral level (e.g., real estate exposure) and sector and geographical levels.

Outputs include vulnerability scores and scenario-based indicators that feed into credit reviews, pricing considerations, and engagement dialogues. These assessments support compliance with EBA requirements for physical risk integration into credit risk, operational risk, and stress testing.

Reputational Risk Assessment

A dedicated **Reputational Risk Questionnaire** evaluates clients' exposure to ESG-related reputational risks, including environmental incidents, governance deficiencies, or social controversies. This tool is used to trigger the escalation process to the Reputational Risk Committee, to support the development of an Action Plan and to enhance monitoring for clients with heightened reputational sensitivity.

ESG Risk Assessment (ESGr Questionnaire Scoring)

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:

- Determine High/Medium/Low ESG Risk categories
- Influence loan pricing and credit structuring
- Trigger proposal on client Action Plan
- 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.

Opportunities in sustainable products and services

Alpha Bank has introduced ESG criteria across its financial products suite to support Sustainable investments and consumer choices. Moreover, mechanisms have been developed to drive capital allocation towards sustainable investments through pricing adjustments and incentives.

For large corporate clients the Bank draws on its expertise in deploying co-funding initiatives, to support clients' transition pathways including the EU Resilience and Recovery Facility (RRF) Green transition pillar to accelerate sustainable investments. Through the Recovery and Resilience Facility, the Bank provides financing for the green transition, with a focus on Renewable Energy Sources. Eligible categories under the "green pillar" include green technologies, green skills, biodiversity, energy efficiency, building renovation, preservation of energy security, circular economy, sustainable development and creation of jobs.

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

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

The Bank's sustainable lending operations are part of the Transaction Assessment & Loan Approval Process enabling favorable pricing scenarios with respect to the categories of the Sustainable Finance Framework. For wholesale clients, pricing differentiates on the basis of obligor High ESG risk and when the outcome of the transaction assessment is sustainable financing. In terms of retail clients, the pricing scenarios address green mortgages, property renovation and green consumer loans.

Table 32 Sustainable financing²⁴

	2025	2024	2023
Corporate Loans in Green thematic categories	3,251.3	2,068.6	1,517.4
of which renewable energy	2,134.7	1,400.5	1,066.8
of which energy efficiency	22.2	23.5	2.1
of which green buildings	1,040.2	613.1	378.2
of which sustainable transport	-	-	-
of which resource efficiency and pollution control	54.2	31.5	70.3
Green mortgages	475.1	500.7	345.0
Total (corporate green loans & green mortgages)	3,726.4	2,569.3	1,862.4
Sustainability-linked loans	1,100.4	925.9	303.4

According to the total sustainable stock breakdown for 2025, dedicated purpose loans to green eligible economic activities cover APPROX. 68% of total sustainable wholesale loans. In addition, Renewable Energy is identified as the Sustainable Finance Framework green category with the largest loan coverage.

The Bank continues to expand its offerings aligning with evolving market demands and regulatory frameworks.

Cornerstone of the Group's Sustainable Finance Strategy is the design of financial products to enable its clients transition to low-carbon business models, the provision of "green" retail loans with preferential interest rate to cover Customers' needs and offering financing opportunities through EU and state-funded programs covering green and sustainability-related categories as well as dedicated green solutions for small and medium size businesses.

Table 33 Sustainable Financing Strategy delivery mechanism

Initiative	Description
Project Finance	Through its specialized Project Finance Unit the Bank supports green/low carbon investments: <ul style="list-style-type: none"> - Providing financing for new investments in wind farms and solar parks. - Providing financing for Commercial Real Estate (CRE) projects certified under an internationally or nationally recognized green building certification scheme.
Co-Funding Programs	Utilize the Bank's significant expertise in deploying co-funding initiatives, to support decarbonization: <ul style="list-style-type: none"> - Leveraging the EU Recovery and Resilience Facility (RRF) Green transition pillar to accelerate green investments. - Enabling small businesses to improve their environmental footprint and reduce their energy use, via the Hellenic Development Bank programs.
Green and Home Energy Solutions	Enhancement with new services and financial incentives in the context of the Green Loan Portfolio to encourage consumer sustainability journey via: <ul style="list-style-type: none"> - Home improvement or equipment loans (thermal insulation, solar panels, heat pumps, energy-efficient electrical appliances). - New Green mobility financing solutions to support electrification of transport (plug-in electric vehicles, electric vehicles, scooters, public transport). - Incorporation of sustainability criteria into mortgage and real estate lending policies, including financing terms and pricing. - Provision of other incentives to existing clients to accelerate the adoption of energy efficiency standards.

²⁴ Data presented in the table refer to Alpha Bank S.A.

Sustainable Investment Products	<ul style="list-style-type: none"> – Enriching the offering of mutual funds that promote sustainable investment characteristics. – Endorsing labelled Green and Social Bonds and promote impact investment-linked structured notes that incorporate environmental and social characteristics. – Engaging in training initiatives and dialogue with clients on sustainability themes.
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Being a financial institution, Alpha Bank's climate change mitigation actions do not directly link to EU Taxonomy metrics, such as CapEx plans for aligning economic activities. The most relevant KPIs in this space come from the Pillar III disclosures and include KPIs such as the Green Asset Ratio (GAR). GAR calculations include loans, advances, and securities linked to aligned activities, excluding exposures such as central government assets, trading securities, and non-NFRD entities.

Risk Management, Stress Testing and Data Integration

The Bank is committed to integrating ESG and Climate risks into its overall risk management framework. In this context, the Bank regularly monitors its exposure concentration in climate sensitive sectors for its loan and investment portfolio, while updating its policies and processes, improving data quality, coverage and calculation approaches. Key actions are summarized below:

- Continue integrating C&E drivers across ICAAP, credit risk, operational risk, reputational risk and strategic planning.
- Expand the application of physical and transition risk assessments using CPRS, sector vulnerability mapping, nature-related transition risks, and financed-emissions analytics.
- Enhance climate and nature integration in stress testing, in line with supervisory expectations and developments in ECB/NGFS scenarios.
- Maintain BCBS 239-aligned risk data aggregation processes to support ESG and climate reporting.

Alpha Bank recognizes climate, environmental and social (C&E/ESG) risks as **transversal risk drivers** that influence traditional financial and non-financial risk categories.

Alpha Bank incorporates ESG and climate characteristics into the risk identification and materiality assessment processes and in the overall risk management framework. Key elements include:

- The Bank's materiality assessment analysis identifies the sectors most sensitive to climate-related risks. The Bank performs the identification and materiality assessment of Climate and ESG risks on an annual basis, as part of its broader recurring risk materiality assessment process.
- The Bank has developed The Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending. The Policy defines the exclusion list which comprises activities that the Group should not consider for financing due to their nature as well as the ESG risks and implications they entail.
- The Bank's Credit Policy incorporates the ESG client, ESG transaction and ESG overall assessment, into its credit approval process.
- The Bank regularly monitors its exposure concentration to climate-sensitive sectors in its loan portfolio, through the introduction of credit concentration risk indicator within its Risk Appetite Framework.
- The integration is already operational, reflecting enhancements delivered since 2023 and publicly disclosed.

Risk Identification and Materiality Assessment

The Group conducts a **double materiality assessment** that leverages UNEP FI tools, CPRS classifications, and sector-level vulnerability mapping. This identifies material impacts, risks and opportunities across climate, environmental, social and governance dimensions.

Climate-Related Risk Drivers

The Bank assesses both climate **transition** and **physical** risks for credit risk, market/liquidity risk, operational risk, reputational risk, and strategic risk across relevant time horizons (short, medium, long-term).

Examples disclosed in the Bank's Sustainability Statement include:

- Transition risk materially affects NFCs and Retail Real Estate portfolios in the medium and long term.
- Physical risk materially affects NFCs and real estate exposures across the same horizons.
- Reputational risk is materially affected by climate/environmental drivers.
- Transition risk also materially affects business and strategic risk.

Nature-Related Risk Drivers

The Bank integrates **nature-related risks**, using the UNEP FI and ENCORE tools to identify dependencies on ecosystems, biodiversity loss implications, and "inside-out / outside-in" impacts. These assessments feed into client-level and portfolio-level risk identification. Please refer to [IRO-1] Description of the process to identify and assess material impacts, risks and opportunities for details.

Integration into Credit Risk Management

The Bank's Credit Policy incorporates the ESG client, ESG transaction and ESG overall assessment, into its credit approval process.

At the client level, the Bank applies a granular client screening during the credit origination process, against certain environmental, social and governance criteria collected through the application of inter-banking client ESG questionnaires sectoral or cross sectoral considering the size of the company. At the transaction level, the activity for which the client is applying or has received financing is assessed for alignment with the Sustainable Finance Framework. The ESG overall assessment represents a combination of the client and transaction assessment and is captured per transaction. These assessments are integrated into the credit decision-making process, influencing pricing.

In addition, the Bank has developed a **Reputational Risk Policy** which defines the main principles, processes and governance structure for effectively managing reputational risk exposures, including those stemming from ESG factors.

The Bank has introduced additional indicators within the Environmental, Social and Governance (ESG) category of its RAF which incorporates both **quantitative indicators** and **qualitative commitments** for climate and ESG risks.

Enhancements disclosed include:

- Climate & Environment indicators upgraded to **Tier II status**, with limits for effective monitoring.
- Integration of sector-specific emission reduction targets into RAF thresholds (EW/RT bands) for Net Zero sectors.
- Commitment to zero financing for exclusion-list activities (coal mining, coal power, upstream oil exploration, biodiversity-harmful activities).

The RAF ensures that transition risk and misalignment are addressed through exposure appetite, underwriting decisions and escalation process.

The Bank has updated its **Risk Inventory** and ICAAP to reflect climate and environmental risks as transversal drivers. Specifically, the Bank has developed climate risk-specific methodologies to estimate the impact of climate scenarios under both the Economic and Normative perspective. The current methodologies focus on the impact of both transition and physical risks (Flood & Drought) on credit risk, as well as the impact on operational risk and business & strategic risks considering the relevant risk materiality assessment that has been performed.

ICAAP integration includes:

- sector transition risk assessments
- sector vulnerability analysis
- linkage to PD/LGD adjustments where relevant
- alignment with supervisory expectations for forward-looking capital adequacy

Stress Testing and Forward-Looking Analysis

Stress testing follows regulatory requirements and incorporates climate-related elements. The Bank has developed a Climate Risk Stress Testing Framework enhanced with the integration of C&E risks into **macro-scenarios**, examination of Gross Interest and Fees & Commissions sensitivity to transition shocks and physical risk overlays for real estate and vulnerable sectors.

Climate-related stress testing applies the NGFS scenarios, where applicable, and a sector-specific calibration informed by CPRS, NZBA, ECB and national LTS data. The Bank's approach responds directly to EBA's requirement for scenario-based analysis of ESG risks over short, medium, and long-term horizons.

Operational Risk

Climate and environmental factors are deemed **material**, especially regarding Own-Use Real Estate, data centers, and environmental events.

Reputational Risk

Reputational risk is **materially affected** by climate and environmental drivers. The Bank has established the Reputational Risk Committee responsible for the oversight over any ESG-related reputational concerns.

Business & Strategic Risk

C&E risk materially affects long-term strategic risk due to economic shifts, client transitions, and regulatory developments. As a result, the Bank conducts a materiality assessment of business and strategic risk for the Gross Interest and Fees & Commissions income generated by the Non-Financial Corporations (NFC) portfolio broken down to activities/sectors more sensitive to transition risk, based on the CPRS perimeter.

Data, Models and Risk Reporting

The Bank follows an integrated approach ensuring that identification and materiality assessment of ESG risks are performed on an annual basis, as part of the broader recurring risk materiality assessment process.

Specifically,

- ESG drivers influence PD/LGD, credit decisions, and portfolio strategy
- Climate and nature risks feed into ICAAP and capital planning
- RAF thresholds operationalize sector targets
- Escalation processes intervene early in cases of misalignment
- Data aggregation supports Article 449a CRR disclosures and CSRD reporting
- Governance bodies maintain oversight across risk and strategy

A dedicated **ESG report** is presented quarterly to the Group Sustainability Committee (GSC) and Risk Management Committee (RMC), and onward to the Board. In addition, transparent monitoring and annual external reporting ensure accountability and compliance with regulatory frameworks.

Alpha Bank continues to validate risk models and implement a "Risk Data Aggregation and Reporting Validation Framework" to comply with BCBS 239 and has centralized data for Obligor-level CPRS classification and Physical risk assessment for obligors and real estate collateral.

IT, Tools and Workflow Enhancement

Emphasis is placed on the integration of ESG client and transaction-related data into the Bank's credit systems and workflow environments. Specifically, IT tools are used to expand internal analytics capabilities for portfolio-level steering and monitoring. In addition, planned development of client dashboard is expected to provide a consolidated view of ESG risk scores, alignment indicators, engagement outcomes and sector benchmarks. These enhancements support business management and decision-making, oversight, and regulatory compliance while facilitating team collaboration and client servicing.

Phasing and Milestones

The implementation activities follow a phased, multi-year timeline, aligned with methodological development, sectoral policy updates and UNEP FI/NZBA guidance.

Without disclosing sensitive or operational details, the Bank's implementation logic can be summarized as follows:

- Focus on improving data collection, emissions measurement methodologies, risk identification, RAF monitoring, client engagement, and governance reporting.
- Ongoing refinement of risk integration, model enhancements, stress-testing practice, and alignment with evolving supervisory expectations.
- Further operationalization of transition analytics, client transition readiness assessments, improved workflow integration, and development of future metrics.
- Expansion of the sectoral target perimeter, second wave of target setting to be finalized by H1 2026.

Monitoring, Metrics & Reporting

Effective monitoring and transparent reporting are essential components of Alpha Bank's Transition Plan. They ensure that progress toward the Bank's Net Zero objectives is tracked systematically, that risks are adequately identified and managed, and that senior leadership and stakeholders receive reliable, forward-looking information.

The monitoring framework integrates quantitative indicators, qualitative assessments, and escalation mechanisms across client, sector and portfolio levels. It is designed to comply with **CSRD ESRS [E1-1]** and the **EBA Guidelines on management of ESG Risks**, as well as broader supervisory expectations under the ECB and Article 449a CRR.

Portfolio-Level Monitoring

The Bank regularly measures its financed emissions, covering investment and lending products of its corporate portfolio across all the sectors it finances, based on the GHG emissions of its borrowers or investee companies. To measure its financed emissions, the Bank follows the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials (PCAF, version Dec. 2022). Specifically, the Bank measures:

- **Physical emissions intensity metrics** for relevant Net Zero sectors
- **Absolute emissions measured in tCO₂e**, where required (e.g. Oil & Gas)
- **Portfolio emission trajectories** relative to sector-specific science-based pathways
- **Financed emissions** captured in sectors the Bank has not set climate targets
- **Exposure to PAB-excluded activities**, as reported in the Bank's Pillar 3 disclosure

These indicators support regular assessment of whether the portfolio is converging toward Net Zero.

To strengthen its portfolio and client monitoring process, the Bank is developing additional metrics in relation to the assessment of key clients' transition plans and disclosure of key information (current GHG performance, impact of a low carbon transition on business, strategy and financial planning, actions and activities to accelerate the transition). Building on clients' transition plans, the Bank focuses on mapping clients' decarbonization projects included in the Net Zero target perimeter to the Sustainable Finance Framework eligible economic activities to support sustainable financing solutions proposed during client engagement.

These metrics will track the clients' transition readiness and alignment with sectoral decarbonization pathways.

Client-Level Monitoring

To support early identification of misalignment or deterioration, the Bank incorporates tools to monitor client performance and risk assessment. In this context, the Bank calculates client **ESG Risk Scores** derived from the inter-banking ESGr questionnaire and based on internal methodology. For clients assessed as High ESG Risk, the implementation of actions set to improve performance is reviewed and included in the engagement output. **Transition-readiness indicators** support the Bank's monitoring of client progress against climate targets and assessment of CapEx consistency with decarbonization commitments. For clients in Net Zero target sectors, Early Warning to Risk Tolerance and Risk tolerance limits and thresholds are introduced in the RAF.

For all clients above eligibility threshold, a structured engagement process is followed at least annually. High ESG risk or clients in the Net Zero target perimeter are monitored more frequently on a case-by-case basis. Engagement outputs are expected to be logged in structured IT systems, ensuring consistency, traceability and auditability.

Sector-Level Monitoring

At sector level, the Bank monitors regularly **sector vulnerability** based on the CPRS perimeter, nature-risk assessment, physical risk indicators, and transition risk indicators. The Bank also monitors **sector decarbonization pathways** against the progress made in its own sector portfolios, in addition to client alignment to the net zero targets. **Sector-level risk limits and thresholds** as defined in the Risk Appetite Framework are calculated and assessed regularly offering early signals and escalation triggers for further actions.

Sector-level insights feed into portfolio steering, model updates, ICAAP and strategic planning.

Risk Management and Internal Reporting

A detailed ESG report is produced quarterly to ensure continuous senior oversight to inform the **Group Sustainability Committee**, the **Risk Management Committee**, and the **Board of Directors**.

The report includes progress on key metrics that enable the assessment of the Bank's performance towards its commitments. Specifically, these metrics include the Bank's financed emission measurement, RAF KPIs, exposure to high-emitting sectors, progress against climate targets in the Bank's Net Zero sector perimeter, as well as any information on material developments in methodologies or regulatory expectations.

Outputs from the monitoring framework feed into Internal Capital Adequacy Assessment Process (ICAAP), portfolio vulnerability analysis, stress testing and strategic planning and capital allocation, ensuring alignment of the Transition Plan with the Bank's long-term financial resilience.

Governance

The Transition Plan is integrated in the Group ESG Governance model for effective oversight, management, and implementation of sustainability-related matters across all levels of governance:

- **Board level:** The Corporate Governance, Sustainability, and Nominations Committee (CGSNC) oversees ESG issues, ensuring alignment with sustainability goals and regulatory requirements.
- **Executive level:** The Group Sustainability Committee directs ESG initiatives and ensures alignment with strategic objectives.
- **Operational level:** The Governance & Sustainability Business Area, led by the Group ESG Coordinator, implements ESG and sustainability initiatives across the Group.

Please refer to [GOV-1] "The role of the administrative, management and supervisory bodies in the Sustainability Statement for the detailed governance and oversight".

Remuneration linked to ESG and Sustainability

The **Remuneration Policy** of the Members of the Board of Directors has been revised to incorporate ESG and sustainability considerations by aligning variable remuneration elements with both financial and non-financial Key Performance Indicators (KPIs), including environmental, social, and governance (ESG) goals. The 2025 Remuneration Policy can be accessed on the Group's [website](#).

- The short-term targets of the Combined Bonus Plan CBP include criteria linked with corporate social responsibility and/or wider ESG-related goals, e.g. the balanced scorecard for Senior Executives includes targets on Group Sustainable Financing products. These targets may vary each year and are always subject to the approval of the Board of Directors.
- The long-term (3-year) performance targets of the CBP, additionally to the short-term targets, include Sustainable Finance disbursements and female participation at middle management level and above. These targets bear specific weights and aim to incorporate ESG criteria in long-term incentive remuneration.

Skills

The **Group provides ESG training through the ESG Academy and by prioritising three learning paths for its Employees: (i) ESG Awareness, (ii) Fundamentals towards ESG integration, (iii) Technical capabilities for ESG**. The training topics aim to build an understanding of ESG and how it is being integrated into the Bank's core operations and procedures as well as to improve communication with the Bank's Customers. Details for the ESG Academy progress in 2025 are provided under [E1-3] "Actions and resources in relation to climate change policies".

Specifically, the training dedicated to operationalizing ESG covers the client and transaction assessment process and provides information to support the RMs when engaging with clients on completing the annual ESG questionnaires.

Disclosure and External Reporting

The Group reports on climate-related metrics and transition progress through:

- Annual Sustainability Statement (CSR)
- Article 449a CRR disclosures
- EU Taxonomy disclosures
- Pillar 3 report
- relevant investor and supervisory dialogues

These disclosures are made using verifiable methodologies, subject to internal governance controls and external assurance where required. The Group maintains a commitment to clear, factual, non-promotional reporting, consistent with the expectations of regulators, investors, clients, and other relevant stakeholders.

Continuous Improvement

Monitoring processes will evolve as sectoral pathways are refined, more granular data becomes available from clients, regulatory and methodological guidance advances, and the Bank's maturity expands to enable further ESG integration.

Alpha Bank aims to maintain alignment with the most credible methodologies available, while adapting monitoring frameworks proportionately to risk, materiality and regulatory expectations.

[E1.SBM-3] Material impacts, risks and opportunities related to Climate Change and their interaction with strategy and business model

Climate related-risks

Regarding climate-related risks, the Group performs materiality assessment separately for Transition and Physical Risks.

In accordance with the scientific literature and regulatory guidance the Group acknowledges that transition risks are the risks of any negative financial impact on the institution, stemming from the current or prospective impacts of the transition to an environmentally sustainable economy on its counterparties or invested assets. The following transition risk sub-types are considered for the materiality assessment of transition risk: policy and legal, market, reputation and technology.

Physical risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of the physical effects of environmental factors on its counterparties or invested assets. They are categorized either as acute - if they arise from particular extreme events, or chronic - if they arise from progressive shifts in climate and weather patterns or a gradual loss of ecosystem services.

Detailed information on the Group qualitative materiality assessment for transition and physical risk sub-types, is provided under [E1.IRO-1] Description of the processes to identify and assess material climate-related impacts, risks and opportunities.

Resilience analysis

Scope & Methodology

Transition Risks

The Group has performed an assessment to identify sectors sensitive to transition risk, while for those sectors lying within the transition risk sensitive perimeter a risk assessment has been performed under different time horizons (i.e., 2026, 2030, 2050). The scale of the transition risk is defined by combining the outcome of the Likelihood (the probability of occurrence within a provided time horizon) and the Impact analysis (the extent to which the impact, if occurred, would affect the business). In order to estimate the likelihood of the transition risks more recent literature scenarios, strategic plans and roadmaps were used, to qualitatively estimate the probability of occurrence of each transition risk driver, as explicitly described under [E1.IRO-1]. The analysis covers the Group's Non-Financial Corporate portfolio.

Alpha Bank in the context of the Internal Capital Adequacy Assessment Process (ICAAP Report), aligned with International best practices, has developed climate risk-specific methodologies to estimate the impact of transition on credit risk across different time horizons (short, medium and long term) by making use of leading global macroeconomic and sectoral models. Additional characteristics such as buildings' energy efficiency, geographic and counterparty level characteristics are also incorporated in the estimation to further account for heterogeneity of impacts inherent in climate risks. These are examined as stand-alone climate scenarios and used under both the Economic and Normative perspective. Where applicable these scenarios are also applied on operational risk and business & strategic risks considering the relevant risk materiality assessment that has been performed. More details on the above is provided in the ICAAP climate scenarios section below.

Physical Risks

As part of the physical risk assessment, multiple IPCC climate scenarios were reviewed - RCP 4.5, RCP 6.0, and RCP 8.5. Each climate scenario represents a distinct transition pathway, shaped by varying assumptions about global emissions, policy actions, technological developments, and societal behavior. The RCP 8.5 pathway reflects a high-emissions, business-as-usual scenario, where minimal global action is taken to mitigate climate change. It is commonly used in stress testing and materiality assessments to evaluate worst-case climate impacts. In contrast, the Net Zero Emissions (NZE) pathway represents a transition to a low-carbon economy, driven by ambitious decarbonization efforts aligned with global climate targets. RCP 8.5 was selected due to its conservative nature and alignment with worst-case outcomes and the assessment was performed for 2026, 2030 and 2050 horizons.

More specifically, as described under data point [E1.IRO-1] "Description of the processes to identify and assess material climate-related impacts, risks and opportunities", and [SBM-3] "Material impacts, risks and opportunities and their interaction with strategy and business model", the Bank has laid down a methodology based on sensitivity and exposure analysis to derive vulnerability to physical risk factors. Vulnerability analysis is performed to identify potential significant hazards per subsector covered by the analysis for Business portfolio, as well as across the different geographic regions where real estate properties used as collateral extend. More details regarding the sensitivity & exposure analysis as well as the scenarios utilized, may be found under [E1.IRO-1] "Description of the processes to identify and assess material climate-related impacts, risks and opportunities".

Alpha Bank in the context of the Internal Capital Adequacy Assessment Process (ICAAP Report), aligned with International best practices, has developed climate risk-specific methodologies to estimate the impact of physical risk (chronic and acute risks – specifically flood and wildfire) on credit risk across different time horizons (short, medium and long term) by making use of leading global macroeconomic and sectoral models, as well natural catastrophe models for Greece. Additional characteristics such as geographic and counterparty level characteristics are also incorporated in the estimation to further account for heterogeneity of impacts inherent in climate risks. These are examined as stand-

alone climate scenarios and used under both the Economic and Normative perspective. Where applicable these scenarios are also applied on operational risk and business & strategic risks considering the relevant risk materiality assessment that has been performed. More details on ICAAP climate scenarios are provided below.

ICAAP climate scenarios

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

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

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

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

Regarding medium-term transition risk a proprietary disorderly transition scenario is used in a 3y horizon. Regarding long-term (2050) scenarios the Bank based on the above-mentioned macro model utilizes NGFS' Net zero, Delayed transition and a proprietary Baseline aligned with NGFS NDC scenario for transition risk, while for physical risk it utilizes a proprietary physical risk scenario aligned with IPCC's RCP 8.5.

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

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

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

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

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

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

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

Additionally, regarding the climate risk impact on operational risk, the Group has adopted an AMA oriented quantification methodology with the intention to introduce a more risk sensitive estimation of the internal operational risk capital. In this respect, data from the Operational Risk Framework components (the operational risk events, the RCSA results and the Scenarios) are used in the capital calculations through a specific internal statistical model. For ESG Risk purposes, the Group has developed operational risk ESG related scenarios and has flagged ESG Risk-related operational risk events and RCSA risks accordingly. The abovementioned data is used in the model for capital calculation purposes.

Using allocation techniques, the contribution of the ESG Risk factors to the Total Capital requirements is calculated. In addition to the above, a long-term horizon (2050) analysis providing an additional Pillar 2 add-on (yet without leading to a capital add-on considering the P1 capital is higher) has, also, been considered.

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

The resilience analysis has been performed by Alpha Bank, with reference date 31.12.2025.

Results

The results of the materiality assessment performed are illustrated under [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business.

Transition to Net-Zero

As per previous references, Alpha Bank Group actively participates in the global effort to build a sustainable future for the economy and the planet. In this context, the Bank joined the UN-convened Net Zero Banking Alliance (NZBA), committing to net zero greenhouse gas emissions by 2050. This reflects the Group's social responsibility, as a leading financial institution in Greece, to help mitigate climate change and drive the transition to a Net-Zero economy. As part of its commitment to environmental stewardship, the Group focuses on reducing operational emissions, supporting its Retail and Wholesale Customers transition to a low carbon economy, increasing awareness and foster sustainable practices to the entire spectrum of financial and social activity.

Further, the Group continues to implement the ESG Client Engagement Process, additional details which may be found under [SBM-3] Material impacts, risk and opportunities and their interaction with strategy and business model.

This has resulted in increased portfolio of green loans and investments, supporting projects that contribute to renewable energy and sustainable economy. In line with the SFF and GBF, the Group allocates capital to Green and Social investments, with emphasis on the power generation sector, buildings and transportation. Through sustainable financing, the Group aims to support the development of low-carbon infrastructure and accelerate Greece's transition to an environmentally sustainable and resilient economy.

Taking the above into account, along with the lack of any significant risk impacting access to funding in the bond markets, the Group reflects the trust of its counterparties, borrowers, and investors in its ability to adapt its strategy and business model to address climate change over the short, medium, and long term.

[E1-2] Policies related to climate change mitigation and adaptation

The Group adopts a proactive approach to the management of ESG risks, with particular emphasis placed on risks arising from climate and environmental change, which is already a key component of its Risk Management. Specifically, it aims to:

- Support Customers' decarbonization and the alignment of their portfolio emissions with the objectives set in the Paris Agreement.
- Invest in activities dealing with climate change and reduction of environmental effects from the Group's operation.
- Support the development of sustainable solutions for cities and communities.

The Policies included in this section relate to the Negative Impact on Climate Stability, the Climate Transition and Climate Physical Risks, as well as Opportunities linked to Climate Change Mitigation and Climate Change Adaptation as per the Double Materiality Assessment conducted by the Group in the reporting year.

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

The Group is committed to providing sustainable finance and in this context has incorporated the "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending" (hereinafter referred to as the "Policy") in its existing Credit Risk Management Framework and Credit Policy. The Policy presents the responsibilities and the approach followed in managing ESG risks in business lending both in credit origination and monitoring process. The purpose of the Policy is:

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

Key principles and requirements:

- Definition of critical industry sectors that are connected with potential climate and ESG risks. In particular, definition of the Exclusion List, i.e., a list of activities that the Group does not finance, and the transition risk sensitive sector's classification which is a classification of economic activities for the assessment of the transition to a low-carbon economy.
- The applicable national and international laws and regulations on climate, environment, society and governance and relevant standards established with the Policy.
- The definition and implementation of climate and ESG risks assessment and monitoring procedures including ESG assessment at obligor, transaction and overall level in accordance with the provisions of the relevant Credit Policy Manuals, the due diligence conduction, the guidelines on the "Environmental and Social Requirements" of the European Bank for Reconstruction and Development (EBRD), as well as the national and EU laws and regulations.
- Monitor and Control of the ESG Obligor's/ Project's performance.
- Managing Obligor's/ Project's Non-Compliance with the Policy Rules and Standards.
- Internal and External Reporting

Among the main responsibilities of the Credit Control Business Area are to:

- Developing and updating the Policy in collaboration with the competent Units, taking into account the regulatory framework, the international best practices and any current developments.
- Monitoring the implementation of the Policy, conducting credit controls and notification of the Credit Risk Committee which is responsible for its approval, the General Manager – Chief Risk Officer (CRO), the Chief Risk Control Officer and Senior Management on the significant arising issues.

ESG in Loan Origination

In 2024, the Group enhanced its credit assessment process according to the “Climate related, Environmental, Social and Governance Risk Management Policy on Group’s Business Lending”, “Retail Banking Credit Policy Small Businesses” and “Wholesale Banking Credit Policy”, incorporating additional dimensions of climate related and governance risks. The main amendments concern ESG assessment, which is more holistic and is carried out at obligor, transaction and overall level per transaction. More specifically:

- ESG assessment at obligor level is based on specific inter-banking client ESG questionnaires on a sectoral, cross sectoral or on a simplified basis, completed by the Clients. The answered questionnaires are scored via internal rating models and the outcome of the assessment may be Low, Medium or High ESG risk. The Bank has rolled out a bottom-up process, at the obligor level, which is used to evaluate the performance of each obligor around ESG topics and better inform the credit origination processes in place. This process embeds a materiality assessment, through which the Bank concluded environmental and social topics for several economic sectors in its portfolio. Through the questionnaires climate-related information is captured (e.g., emissions data, energy consumption data etc.).
- ESG assessment at transaction level, through Alpha Bank’s Sustainable Finance Framework Tool, concerns the activity for which the Customer is applying or has received financing based on the information provided during the preparation of the credit request. The outcome of this assessment may be “sustainable” or “non-sustainable” financing. Sustainable financings are further divided into aligned or not aligned with the EU Taxonomy. Non-sustainable financings are rated and classified as Low, Medium, or High ESG risk. In case the transaction is non-sustainable Medium or High Risk and the request under consideration concerns new specific purpose financing of an investment nature (i.e. project financing), an ESG due diligence (i.e. on-site visit by specialized technical advisors) is carried out and a respective plan of corrective actions is drawn up with a specific implementation schedule on behalf of the Customer, if needed. An additional functionality of the SFF Tool is the possibility for the user to attach documents that confirm the Transaction Assessment Result. This is particularly relevant in the case of Sustainable transactions, since it ensures compliance with the requirements of the Bank’s Sustainable Finance Framework and prevents Greenwashing.
- ESG overall assessment which is a combination of the ESG assessment at obligor and transaction level. The outcome of this assessment may be Low, Medium, High ESG risk outcome or Sustainable.

The Group has enhanced its due diligence process with respect to the assessment of its Customers’ ESG/climate risk profile, through the collection of relevant information. This effort aims to ensure obligors’ compliance with the Group’s Environmental and Social (E and S) requirements. The Group aims to finance its counterparties’ green/sustainable transition both in the short-and in the long-term. In this respect the Group collaborates with High-Risk Obligors to develop an action plan outlining a timeframe and appropriate mitigation measures, while in the case of new lending investment nature Medium and High-Risk transactions an on-site visit is conducted by specialists. Also, with the aim to mitigate reputational risks, the Group has designed a robust process that involves identifying and assessing the potential participation of its Obligors in controversial activities. Additionally, as a mitigating action to physical risk impact, the mandatory property insurance securing new financing that is provided to the Bank also includes the risk of flooding.

Reputational Risk Policy

The Group has developed the Reputational Risk Policy to effectively manage its reputational risk exposures, including reputational risk exposures stemming from ESG factors. In this context, the processes that may arise are presented below: By financing Obligors who are involved in Controversial Activities. This reputational risk exposure is assessed and is taken into account in the Credit Approval process. By initiating new activities, such as Bond Issuing, Investment Banking activities, Public Offerings, Outsourcing Arrangements, new Suppliers, new partners or step-ins, new investors or new services / fees charges to the Bank’s clientele. From existing activities, such as Obligors (regular review), existing Outsourcing Activities (annual review), existing Suppliers, etc.

Sustainable Finance Framework

Alpha Bank’s Sustainable Finance Framework (“SFF”) was developed in 2023 and sets out a series of approaches and procedures required for classifying financing as sustainable. Specifically, the Sustainable Finance Framework stipulates the decision and classification process, that the Group implements, to categorize its financial products or services as sustainable (i.e., green, or social). The SFF follows a set of globally accepted industry guidelines, including: The Green Bond Principles (2021), the Green Loan Principles (2021), the Sustainability-Linked Loan Principles (2021), the Social Bond Principles (2020), and the EU Taxonomy Climate Delegated Act (2021). The Bank aims at aligning the framework with the requirements of the EU Taxonomy eligibility criteria to the extent possible; thus, it will keep monitoring any developments of the Taxonomy regulation for the framework to remain up to date. The SFF is publicly available on Alpha Bank’s [website](#).

Green Bond Framework

The Bank’s Green Bond Framework (GBF) was developed in 2025 and represents the governing document for the issuance of green bonds by the Group, providing a structured and transparent approach to financing environmentally beneficial activities. Developed in alignment with the ICMA Green Bond Principles (GBP), the GBF establishes a rigorous set of methodologies, eligibility criteria, and internal processes that ensure the environmental integrity and credibility of all green financing activities carried out under it.

The GBF outlines the process for identifying, selecting, and categorizing eligible green projects and assets, with the aim of directing capital towards initiatives that contribute meaningfully to the transition to a climate-neutral, resilient, and environmentally responsible economy. Eligible categories include, among others, renewable energy, energy efficiency, green buildings, clean transportation and resource efficiency & pollution control, in alignment with the Sustainable Finance Framework green theme. The Framework governance is supported by a dedicated Working Group and specialized teams responsible for evaluating the suitability of each loan or investment included in the Green Bond Portfolio. This evaluation process incorporates environmental due diligence, technical assessments, and verification of certifications or performance indicators that demonstrate the project’s contribution to decarbonization and environmental sustainability.

Reporting is a key component of the Green Bond Framework and includes the annual Allocation and Impact Reports for as long as green bonds remain outstanding.

The Green Bond Framework is published on the Group’s [website](#) and is periodically reviewed and updated to remain in line with evolving European standards, , as well as with market expectations for sustainable finance.

Exclusion list

As part of the aforementioned policies, the Group applies, maintains, and updates an exclusion list that determines specific activities, which are not allowed to be financed. This is applicable to all business lending obligors across all geographies and industry sectors. The criteria for exclusion span across various environmental and social matters. Specifically, the Group does not finance the following activities:

- The production of or trade in any product or activity deemed illegal under host country (i.e. national) laws or regulations or international conventions and agreements or subject to international phase out or bans, such as PCBs, pharmaceuticals, pesticides/herbicides and other hazardous substances, ozone-depleting substances, persistent organic pollutants, trade in wildlife or production of or trade in wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES), transboundary movements of waste prohibited under public international law.
- a) Activities of Defense Sector Groups in alignment with the "Defense Sector Financing Policy" that are:
 - Involved in the development, production, trade, or maintenance of
 - controversial weapons related activities;
 - nuclear weapons related activities in violation of the International Non-Proliferation Treaty ("NPT"). Any kind of support to activities related to nuclear weapons is not in the risk appetite of the Group and is prohibited from any form of financing;
 - listed under EU sanctions, UN Security Council sanctions, National Arms Embargoes, sanctions imposed by the US Government Services, namely the Office of Foreign Assets Control of the US Department of the Treasury (OFAC), or the United Kingdom, namely (His Majesty's Treasury – HMT);
 - exporting defense and security equipment to countries subject to EU / UN Security Council embargoes and / or in violation of EU export controls.
- b) The following categories which are out of the scope of the "Defense Sector Financing Policy":
 - The non-military use of goods and services, even when supplied to defense related entities.
 - Munition retail stores.
 - Groups of companies and/or entities involved in dual use goods that provide a declaration confirming that all supplied goods and services are exclusively for civilian use (including but not limited to Civil Protection).
 - Groups of companies and/or entities whose defense related activities account for less than 20% of total turnover for three consecutive years, provided that they have not received any defense related financing from the Bank.

The Bank allows financing of Defense Sector Groups up to Euro 500 million, limited to conventional weapons related activities in the scope of the "Defense Sector Financing Policy".

- Production or trade in alcoholic beverages (excluding beer and wine) Tobacco, Gambling, Casinos and equivalent enterprises. The funding of these activities is permissible on a combined basis up to 5% of the total loan portfolio.
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the radioactive source is considered to be trivial and/or adequately shielded in accordance with international practices.
- Forced evictions.
- New investments in thermal coal mining or coal-fired electricity generation capacity.
- 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 from existing producing fields.
- Activities involving force-feeding of ducks and geese.
- The keeping of animals for the primary purpose of fur production or any activities involving fur production.
- The manufacture, placing on the market and use of asbestos fibers and of articles and mixtures containing these fibers added intentionally. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
- The export of mercury and mercury compounds and the manufacture, export and import of a large range of mercury-added products.
- Activities prohibited by host country legislation or international conventions relating to the protection of biodiversity resources or cultural heritage.
- Drift net fishing in the marine environment using nets in excess of 2.5 km in length.
- Shipment of oil or other hazardous substances in vessels, which do not comply with International Maritime Organization (IMO) requirements.
- Trade in goods without required export or import licenses or other evidence of authorization of transit from the relevant countries of export, import and, if applicable, transit.
- Conversion of natural forests into plantation.
- Wholesale and retail trade of thermal coal.
- Construction of new nuclear power plants. The Group will continue to consider funding for safety improvements of operating plants as well as for radioactive waste management and decommissioning of nuclear facilities.
- Any activity involving degradation, conversion or destruction of the UNESCO World Heritage Sites.
- Any activity involving significant degradation, conversion or destruction of the sites included in the Natura map.
- Health technology activities relevant to human cloning for research or therapeutic purposes and genetically modified organisms/food.
- Clients who are involved in violations of human rights, according to the United Nations' "Universal Declaration of Human Rights".

The Group should apply the following exclusions, in addition to the Exclusion List:

- Production or activities involving harmful or exploitative forms of forced labor / harmful child labor;
- 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.

Monitoring Process

The BoD supervises and approves the ESG objectives and commitments of the abovementioned policies, and it has the oversight of the Group risk management framework. Within this context, the BoD reviews the risk management strategy, delegates authorities to Committees and Senior Management for implementing the risk management strategy, reviews the overall risks assumed under the delegated authorities, provides guidelines, and ratifies the Group's risk appetite.

One of those committees is the Group Sustainability Committee (GSC) which was established in November 2021 to approve and oversee the sustainability strategy and to steer all related initiatives. The Committee takes cognizance of and decides upon Sustainability and ESG-related matters to ensure an internal governance framework that allows the Group to manage ESG risks and consider all sustainability topics. GSC membership includes 5 General Managers as permanent members and additional members at the General Manager or senior executive level could attend.

During 2025, the Committee convened 8 times, highlighting Management's commitment to enhancing the Group's sustainability position. The Group Sustainability Committee's agenda covered a range of topics, including progress of the Group's ESG Action Plan, risk identification and materiality assessment of Climate Risk, the SFF operationalization, the GBF publication and operationalization, updated Policy documents, as well as key disclosures and regulatory submissions. The role of the Group ESG Coordinator was also established, to lead sustainability initiatives and steer operational teams on implementation.

Implementation of climate-related policies

In the context of ESG and Climate Risk Governance, Alpha Bank Group has implemented a comprehensive structure, addressing relevant decision making and implementation at all levels, from the BoD down to the operational level.

The BoD approves and oversees the implementation of the Group's strategic objectives, risk strategy, ESG strategy and internal governance. The overall Organizational Structure for supervising and managing the implementation of the climate-related objectives, strategy, and policies, is presented in [IRO-1] Description of the process to identify and assess material impacts, risks and opportunities and [SBM-2] Interests and views of stakeholders.

With reference to the Climate related, ESG Risk Management Policy on Group's Business Lending, Credit Control Business Area is responsible among others of monitoring the implementation of the Policy, conducting credit controls and notification of the Credit Risk Committee, the General Manager – Chief Risk Officer (CRO), the Chief Risk Control Officer and Senior Management on the significant arising issues; Communicating with the competent Group Units to ensure the proper comprehension of the principles and rules set out in this Policy.

The Climate related, ESG Risk Management Policy on Group's Business Lending is established according to the regulatory framework, including but not limited to the Greek and EU legislation, the guidelines of the European Central Bank (ECB), of the European Banking Authority (EBA), as well as other international guidelines and best practices.

Stakeholder engagement for policy setting and implementation

The development of the Group policies has been largely informed and shaped by the climate-related interests of stakeholders across the Group's value chain, as these were identified and assessed through direct and indirect engagement with a broad range of stakeholders. Policies with relevance to external stakeholders are publicly available while policies with internal use are available to the Group's intranet. As previously mentioned, the Group has adopted policies to manage ESG risks, including climate change-related risks. However, policies are not particularly dedicated to a specific area, as they are defined in ESRS (i.e. climate change mitigation/adaptation, energy efficiency, renewable energy deployment, biodiversity and ecosystems and circular economy).

[E1-3] Actions and resources in relation to climate change policies
Key actions in relation to climate change

From policies and pledges to action, Alpha Bank Group supports the decarbonization journey of its Customers and own operations across the markets it operates in. The following table presents how its pledged actions are linked to time horizon, policies, value chain segment of the Group, the geographies, and stakeholders. Most actions have been taken so far at Alpha Bank S.A level, while subsidiaries are expected to follow in the coming years.

Table 34 Key actions (existing and planned) in relation to climate change policies

List of actions	Time horizon	Expected outcome	Relation to policy objectives / targets (where relevant)	2025 Progress on Action	Scope of Action		
	Completion year				Value Chain Segment	Geographical boundaries	Affected Stakeholders
Upgrade lighting to LED lighting throughout the network of Branches	Completion year: 2028	Reduce the energy consumption and the relevant emissions by at least 10% comparing with the existing lighting systems. The expected reduction of electricity consumption for lighting is 50%, which corresponds to approximately 13% reduction of the total energy consumption of the relevant Branches, improving at same time the Customer Experience.	Energy saving affecting energy footprint and target setting	45 Branches	Own Operations	Greece: Branches operated by Alpha Bank SA	Employees/ Customers
Replace 85% of the Bank's fleet with electric and/or plug-in and hybrid vehicles	Completion year: 2025	Reduce emissions and lower fuel cost ²⁵ . <ul style="list-style-type: none"> 2023: Average 110gr/km CO₂ 2024: Average 74gr/km CO₂ 2025: Average 70gr/km CO₂ Also, the required percentage of ¼ of new leases with pollutant emissions below 50gr CO ₂ was also covered, as defined by the new Climate Law.	Energy saving affecting energy footprint and target setting	Vehicles fleet renewed: PHEV ²⁶ 69 total: 26- new leases 43- replacements EV ²⁷ 7 (3 new leases, 4 replacements) PETROL 3 (1 new lease, 2 replacements) HEV ²⁸ 56 (2 new leases, 54 replacements) TOTAL LEASES 135 Percentage of electric, plug-in and hybrid vehicles 97%	Own Operations	Greece: Alpha Bank S.A. transportation	Employees

²⁵ The following figures refer to Alpha Bank S.A.

²⁶ Plug-In Hybrid Electric Vehicle

²⁷ Electric Vehicle (EV)

²⁸ Hybrid Electric Vehicle (HEV)

Continue to procure Certification of Origin from renewable energy systems for all our office buildings, warehouses and Branches	Ongoing	To compensate the 100% of the emissions related to the operation of our office buildings, warehouses and Branches, taking advantage of appropriate market solutions.	-	Alpha Bank S.A. has a contractual agreement for receiving Certificates of Origin from renewable energy sources covering 100% of its own electricity consumption. Additionally, in 2025 Alpha Bank London Ltd and Acarta Construct SRL received Certification of Origin from renewables for their total electricity consumption.	Own Operations	Alpha Bank S.A. and subsidiaries operating in buildings operated by Alpha Bank S.A. (Greece), Alpha Bank London Ltd (UK) and Acarta Construct SRL (Romania).	Employees
Fossil Fuel- Limit operational emissions, enable the supply of low carbon liquids and gases, carbon, capture, utilization and storage technologies	Completion year: 2030	Eliminate the use of fossil fuel for heating purposes	Replacement of oil / gas burners with heat pumps	In 2025, 3 oil burners were replaced in Branches ²⁹ due to the upgrade of the air - condition system.	Own Operations	Greece: office buildings, warehouses and Branches operated by Alpha Bank SA	Society (local environment), Employees
Zero financing to new investments in thermal coal mining, upstream oil exploration or coal-fire	Ongoing	No new financing volumes		No new investments to sectors that may have a negative impact on the environment.	Downstream	Alpha Bank S.A.	Customers/ Society
Oil and Gas – Reduction of financed emissions in the sector.	Completion year: 2030	Achieve a 26% reduction in absolute financed emissions from 2022 to 2030. The Bank's target exceeds the 23% reduction required by the IEA NZE, reflecting the ambitious decarbonization commitments of the Bank's key clients in the sector.	Achievement of Bank's Strategy: Membership with NZBA and PRB, compliance with EU Green Deal, alignment with EBA Guidelines	Monitoring the Oil and Gas sector new disbursements in alignment with the relevant risk indicators established to safeguard the progress towards meeting the target.	Downstream	Spanning the Group's geographical footprint	Customers/ Society/ Shareholders
Power generation - Deployment of renewable energy technologies	Completion year: 2030	Target for Power sector is 132 kgCO ₂ e/MWh, which represents a 41% reduction in physical intensity from 2022 to 2030. The Bank's target is below the IEA NZE in 2030, reflecting the lower starting point relative to the industry average – driven by the high share of	Achievement of Bank's Strategy: Membership with NZBA and PRB, compliance with EU Green Deal, alignment with EBA Guidelines	Increase in Sustainable Financings based on Alpha Bank's Sustainable Finance Framework	Downstream	Spanning the Group's geographical footprint	Customers/ Society/ Shareholders

²⁹ This refers exclusively to Alpha Bank S.A.

		renewables in the Bank's portfolio – and the ambitious decarbonization commitments of the Bank's key clients.					
Cement - Employ green financing included in the Bank's Sustainable Finance Framework and use regular engagement with key sector clients on decarbonization opportunities	Completion year: 2030	584 kgCO ₂ e/t Cementitious product, which represents a 15% reduction in physical intensity from 2022 to 2030. The Bank's target for 2030 is above the IEA NZE pathway, reflecting the fact that Cement is a hard-to-abate sector, with limited cost-effective opportunities to decarbonize to 2030 and much of the abatement expected to occur after 2030. The Bank will continue to engage with its key clients in the sector to support their decarbonization efforts.	Achievement of Bank's Strategy: Membership with NZBA and PRB, compliance with EU Green Deal, alignment with EBA Guidelines	Application of Alpha Bank's Sustainable Finance Framework to support clients' decarbonization efforts and targets	Downstream	Spanning the Group's geographical footprint	Customers/ Society/ Shareholders
Iron and Steel - Employ green financing included in the Bank's Sustainable Finance Framework and use regular engagement with key sector clients on decarbonization opportunities	Completion year: 2030	The Bank's starting position in the Iron and Steel sector is well below the IEA NZE pathway, with a portfolio intensity of 540kgCO ₂ e/t Steel in 2022, compared to the IEA level of 1,737 kgCO ₂ e/t Steel. This is because the Bank's exposure in the sector is primarily to secondary steel producers. In this context, the Bank is not setting a quantitative target for its Iron and Steel portfolio. The Bank remains committed to support its clients in the sector decarbonize and will aim for its emissions intensity to remain below the IEA NZE pathway to 2030.	Achievement of Bank's Strategy: Membership with NZBA and PRB, compliance with EU Green Deal, alignment with EBA Guidelines.	Application of Alpha Bank's Sustainable Finance Framework to support clients' decarbonization efforts and targets	Downstream	Spanning the Group's geographical footprint	Customers/ Society/ Shareholders

Green Bond Issuance

In October 2025 Alpha Bank successfully completed the pricing of a Green Senior Preferred Bond of Euro 500 million, attracting demand that exceeded Euro 3 billion through an international book building process. Please refer to [ESRS 2] for more information.

ESG Academy

In 2025, Alpha Bank's strategic commitment to sustainable growth remains extended, focusing strongly on empowering its People to unleash their potential. Central to the Group's Learning and Development capabilities is Alpha Bank's learning ecosystem ACE "#together we grow", which was enriched with the design and launch of specialized Academies (Digital, ESG). Through the ESG Academy, the Bank aims to provide awareness and training to its Employees on ESG and climate risks, aiming also to add the power of its brand name to the wider sustainability transition effort. The ESG Academy is an ongoing action with no defined end date and is fully embedded in Alpha Bank's Learning & Development framework, following its launch in 2024 and implementation throughout 2025 and beyond. No exclusions apply to this action, as all Employees of Alpha Bank are eligible to participate in ESG Academy training activities. The ESG Academy aims to cover the following thematic areas:

Table 35 Thematic areas addressed through ESG Academy

Horizontal Awareness	Technical capabilities for ESG
<ul style="list-style-type: none"> • Introduction to ESG • Health & Safety: Flood in the Building • Health & Safety: Earthquake • Introductory Training on Health & Safety in the Workplace • Health & Safety at Work: We Act Responsibly, We Live Better • ESG Risks and Opportunities • Energy Saving Awareness • Health & Safety: Fire Incident in the Building • Nutrition as a Key Factor for Quality Sleep and Mental Balance • Act on Climate Climate Action (20 minutes) • Building Well-Being and Balance at Work 	<ul style="list-style-type: none"> • Sustainable Finance Framework Operationalization

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

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

Furthermore, Alpha Bank fostered employee engagement in sustainability initiatives through its collaboration with "Do Good People", an ESG-focused digital platform that achieved notable recognition in Alpha Bank's FinQuest competition in 2022. The Bank launched the program in December 2025 and will continue with multiple participation cycles throughout 2026. This initiative complements the ESG Academy by supporting the transition from ESG awareness to action and fostering sustainable behaviors within and beyond the workplace through interactive challenges across ESG pillars.

Decarbonization of portfolio

Providing zero finance to new investments in thermal coal mining, upstream oil exploration or coal-fire is an existing and continuing commitment for Alpha Bank. Alpha Bank has committed to employ green financing included in the Bank's Sustainable Finance Framework and use regular engagement with key sector clients on decarbonization opportunities- please refer to [E1-1] "Transition Plan for Climate Change Mitigation" for further details.

Decarbonization of own operations

Reduction of operating footprint: Regarding the decarbonization of the operational footprint of the Group, the actions mentioned on table 33 relate to the rational use of energy, the elimination of fossil fuel use and implementation of energy conservation and high energy efficiency measures are foreseen. For example, in 2025 Alpha Bank S.A. replaced 19 old HVAC systems with new, high energy efficient equipment that reduce significantly the final energy consumption, proceeded to the upgrade of lighting systems with LED luminaires throughout the network of 45 Branches, used FSC MIX paper, where possible.

Transition to renewable energy: Alpha Bank S.A., Alpha Bank London Ltd, and Acarta Construct S.R.L. have annual contracts for the purchase of electricity with Guarantees of Origin from renewable energy sources for their own operating premises (e.g. branches, office buildings, warehouses, ATMs). These contracts also cover subsidiaries operating within Alpha Bank S.A. premises. Furthermore, Alpha Bank S.A. has already operated a small photovoltaic system at one of its branches and is currently awaiting the issuance of permits for an additional 10 small rooftop PV systems. In addition, Alpha Bank S.A. is exploring the potential installation of larger-scale photovoltaic systems.

Resources for implementation of actions

Alpha Bank Group acknowledges the importance of allocating appropriate financial and other resources to effectively implement its action plans. The Group incurs operating (OpEx) and capital expenditures (CapEx) in connection with initiatives aimed at reducing emissions from its business activities and its own operations. However, they are not presented in the statement as they are not considered significant.

[E1-4] Targets related to climate change mitigation and adaptation

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 Euro 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).

Table 36 Targets related to downstream activities

Target description	Target level	Absolute / Relative	Baseline value	Baseline Year	Target Year	Scope	Progress in 2025	KPIs
3.8 billion to new Sustainable Financings increasing target by 2027	Euro 3.8 billion	Absolute	N/A	2025	2027	Banking sector activity, Downstream Alpha Bank S.A.(Greece) AB Cyprus	Euro 2.1 billion (2,128.4 million)	New financing volumes (in Euro million)
Within the total Sustainable Financings, achieve at least Euro 2.6 billion to Renewable Energy Systems by 2026 (Target under previous business plan)	Euro 2.6 billion	Absolute	N/A	2024	2026	Banking sector activity, Downstream Alpha Bank S.A.(Greece), AB Cyprus	Euro 0.77 billion (769.35 million)	New financing volumes (in Euro million)
Zero financing to new investments in thermal coal mining, upstream oil exploration or coal-fired electricity generation	0 million	Absolute	Euro 0 million	2023	Ongoing	Banking sector activity, Downstream, Alpha Bank S.A.(Greece)	Euro 0 million	New financing volumes (in Euro million)
Financed emissions targets: Power Generation	132 kgCO ₂ eq / MWh	Relative	223 kgCO ₂ eq / MWh	2022	2030	Banking sector activity, Downstream, Alpha Bank S.A.(Greece)	142 kgCO ₂ eq / MWh (-36.4% compared to baseline value)	physical intensity metric (kgCO ₂ eq / MWh)
Financed emissions targets: Oil and Gas	74 Indexed tCO ₂ e of 2022 = 100 tCO ₂ eq	Absolute	100 Indexed tCO ₂ eq of 2022 = 100 tCO ₂ e	2022	2030	Banking sector activity, Downstream, Alpha Bank S.A.(Greece)	104.3 Indexed tCO ₂ eq of 2022 = 100 tCO ₂ eq (4.3% compared to baseline value)	absolute emissions metric (Indexed tCO ₂ e of 2022 = 100)
Financed emissions targets: Cement	584 kgCO ₂ eq / t Cementitious product - intensity	Relative	687 kgCO ₂ eq / t Cementitious product - intensity	2022	2030	Banking sector activity, Downstream, Alpha Bank S.A.(Greece)	623 kgCO ₂ eq / t Cementitious product – intensity (-9.4% compared to baseline value)	physical intensity metric (kgCO ₂ eq / t Cementitious product – intensity)
Financed emissions targets: Iron and Steel	Intensity of portfolio to remain below the reference pathway	Relative	540 kgCO ₂ eq / t Steel - intensity of portfolio	2022	2030	Banking sector activity, Downstream, Alpha Bank S.A.(Greece)	390 kgCO ₂ eq / t Steel - intensity of portfolio (-27.8% compared to baseline value)	physical intensity metric (kgCO ₂ eq / t Steel - intensity of portfolio)

Total reduction target for Scope 3 emissions has not been disclosed as a cumulative figure, as financed emission targets have only been set for the specific four sectors listed on "Table 36".

Target setting process

As highlighted in [SBM-2] Interests and views of stakeholders, multiple stakeholder input has been taken into consideration in shaping each of Targets set by the Group. In response to these expectations, Alpha Bank Group has taken concrete steps to deliver on its climate ambitions. It is noted that there are no changes in targets and corresponding metrics to report.

Financed Emissions Targets are aligned with the Paris agreement and the UN Sustainable Development Goals and are based on conclusive scientific evidence. Specifically, with reference to the selected NZBA carbon-intensive sectors the Group has deployed science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE) scenario as its benchmark pathway. Worth mentioning that the baseline measurement relied on the GHG emissions of its borrowers or investee companies and followed the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the PCAF. It is noted that the GHG emission targets have not been externally assured. Additional information on the climate analysis is provided in [IRO-1] Description of the process to identify and assess material impacts, risks and opportunities and the [E1-1] "Transition Plan for Climate Change mitigation".

The GHG emission reduction targets represent gross targets, meaning that GHG removals, carbon credits or avoided emissions are not taken into account as a means of achieving the GHG emission reduction targets.

Due to the level of data availability, GHG emission in 2022 were set as baseline, regarding the Bank's portfolio related emissions. Another reason was that the Bank improved in 2022 the coverage and data quality of its financed emissions.

The Group has not set GHG emission reduction targets for the year 2030 regarding its own operations. However, is in the process of developing targets regarding Scope 1,2 for the mid-term (2026-2030) and long-term time horizon (>2030). Additionally, the Bank has set though GHG emission reduction targets for 2025 as disclosed in the table below:

Table 37 GHG emission reduction targets related to own operations

Target description	Target level	Absolute / Relative	Baseline value	Baseline Year	Target Year	Scope	Progress in 2025	KPIs
Reduction of Scope 1 and 2 GHG emissions by 20% until 2025, comparing to 2022	N/A	Absolute	1,473	2022	2025	Own operations Alpha Bank S.A.(Greece)	4,400	Scope 1 GHG Emissions (tn CO ₂ eq.)
	N/A	Absolute	18,419	2022	2025		7,117	Scope 2 GHG Emissions Location-based (tn CO ₂ eq.)
	15,914	Absolute	19,892	2022	2025		11,517(-42% compared to baseline value)	Scope 1 and 2

Risk Appetite Framework

The Group has already incorporated in its Risk Appetite Framework (RAF) a set of quantitative indicators and qualitative commitments regarding climate risks. In terms of quantitative indicators, the Group has defined several C&E indicators designed to improve the sustainability of the portfolio and mitigate potential exposure to risk, and that are incorporated in Risk Appetite Framework as supporting elements. Additionally, limits have been established in part of the existing C&E indicators. The indicators cover the area of business planning and green financing, collateral vulnerability to physical and transition risk, financial activity vulnerability to physical risk and sustainable investing. The Group monitors its Risk Inventory to provide a comprehensive overview of the enhancements and progress achieved in climate-related risks in the Bank's Risk Registry. More specifically, the following Key Risk Indicators with thresholds are included in the Risk Appetite Framework (RAF), considering the materiality assessment outcomes as well as the target-setting exercise and sector-specific commitments.

Table 38 the Risk Appetite Framework (RAF) indicators

	Risk Category	Perimeter	RAF Indicator
Transition Risk	Credit Risk	Alpha Bank S.A.	Exposures to sectors considered more sensitive to transition risk
	Credit Risk	Alpha Bank S.A.	New originations to sectors considered more sensitive to transition risk
	Credit Risk	Alpha Bank S.A.	Exposures of Mortgage Portfolio with EPC label >= D
	Credit Risk	Alpha Bank S.A.	New Originations in Mortgage Portfolio with EPC label <= D
Physical Risk	Credit Risk	Alpha Bank S.A.	Exposures sensitive to impact from climate change physical events, specific sectors
	Credit Risk	Alpha Bank S.A.	Real Estate Exposures sensitive to impact from climate change physical events
Transition Risk	Business and Strategic	Alpha Bank S.A.	Net interest income from sectors considered more sensitive to transition risk
Transition Risk	Market Risk	Alpha Bank S.A.	Bank's ESG-related investment assets (such as Green Bonds) (in Euro million). / Total Face Value of Bonds in AC, FVOCI and FVPL (non-TRD) portfolios classified as Sustainable according to Bloomberg data
Physical Risk, Social Risk, Governance Risk	Operational Risk	Alpha Bank Services and Holdings S.A. Group	ESG Risk Losses
Environmental Risk, Social Risk, Governance Risk	Reputational Risk	Alpha Bank Services and Holdings S.A. Group	ESG Rating
Transition Risk	Business and Strategic	Alpha Bank S.A.	Physical intensity of new and existing clients in the Power sector, kgCO ₂ e/MWh
Transition Risk	Business and Strategic	Alpha Bank S.A.	Physical intensity of new and existing clients in the Cement sector, kgCO ₂ e/t cement
Transition Risk	Business and Strategic	Alpha Bank S.A.	Physical intensity of new and existing clients in the Iron and Steel sector, kgCO ₂ e/t steel
Transition Risk	Business and Strategic	Alpha Bank S.A.	Oil and Gas refining drawn exposure, EUR million
Transition Risk	Business and Strategic	Alpha Bank S.A.	Change in % of exposure with 1.5°C aligned climate targets for each priority sector

[E1-5] Energy consumption and mix

The Group recognizes that energy consumption for own operations is generating emissions that are directly contributing to climate change and therefore need to be mitigated. It is also recognized that achieving the net zero target means that the Group will need to minimize energy

consumption by implementing soft and hard measures. The Group focuses on the rational use of energy; the energy conservation by applying relevant measures; and the use of high energy efficacy buildings' equipment and cars. Moreover, where feasible the Group addresses any residual emissions through Certifications of Origins or the procurement of energy from renewable energy sources. Since 2024 the Energy Management System of Alpha Bank is certified against ISO 50001:2018, while its Environmental Management systems is verified from an accredited external body against EMAS (Eco-Management and Audit Scheme)³⁰. The Group is using the following consumption metrics to track and assess effectiveness towards reducing operational emissions.

Table 39 Energy Consumption and mix

Energy consumption and mix	2024	2025
(1) Fuel consumption from coal and coal products (MWh)	0	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	5,442	18,760
(3) Fuel consumption from natural gas (MWh)	5,448	7,683
(4) Fuel consumption from other fossil sources (MWh)	2.78	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	11,328	30,522
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	22,220	56,966
Share of fossil sources in total energy consumption (%)	33.0%	61.27%
(7) Consumption from nuclear sources (MWh)	2,194	776
Share of consumption from nuclear sources in total energy consumption (%)	3.3%	0.83%
(8) Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	4	590
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	42,903	34,645
(10) The consumption of self-generated non-fuel renewable energy (MWh)	-	-
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	42,907	35,235
Share of renewable sources in total energy consumption (%)	63.7%	37.90%
Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)	67,321	92,977

In 2025, Alpha Bank activated a pilot small-scale flat roof PV system at one branch in Athens, Greece, which generated 15.28 MWh of electricity. In 2026, the Bank expects to activate 10 additional small-scale flat roof PV systems. The Group will further explore opportunities to expand PV installations, focusing on reducing both the overall emissions balance and operational costs.

Energy related calculations and methodologies

Almost all data collected for Alpha Bank Group refers to the period of January to September/October 2025. Consumption for 12-month period was derived for all data as following:

- The annual electricity consumption was derived from the actual bills received. For the period that no actual was available, data from previous corresponding period were used.
- For Alpha Bank London Ltd, electricity consumption has been estimated proportionally to its surface area from actual data.

Alpha Bank S.A. has an annual contract for purchasing electricity for its own operating premises (e.g. branches, office buildings, warehouses, ATMs) and hence has purchased Guarantees of Origin for the total electricity consumption of Alpha Bank S.A. and number of subsidiaries operating to these premises – buildings. Additionally, Alpha Bank London Ltd and Acarta Construct SRL have received Certification of Origins from renewable energy sources for their total electricity consumed in 2025.

Energy intensity

The high climate impact sector used to calculate the energy intensity figure is L68 (Real Estate activities). The cumulative energy consumption from the aforementioned entities is 42,208 MWh. The revenue associated with real estate operations is Euro 18.4 million and is included in the Group's financial statements by referring to the following lines: Income from leasing of investment properties; Income from services relating to investment properties; Other income – Rental income from properties other than investment properties.

Therefore, the energy intensity associated with activities in high climate impact sectors is **0.00229MWh/Euro net revenue**. The relevant values for 2024 are: the cumulative energy consumption is 29,939 MWh, the revenue is Euro 12.3 million and the energy intensity is 0.00243MWh/Euro. It is noted that the energy intensity for prior reporting year has been restated due to methodological amendments.

The above metrics have not been validated by an external body.

³⁰ https://green-forum.ec.europa.eu/green-business/emas_en

[E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions

The measurement, continuous monitoring, and effective reporting of carbon emissions is a key priority for the Group and constitutes a critical and objective means for assessing its performance and effectiveness against its climate commitments. By the time of reporting, 2025 Gross Scopes 1, 2, 3 and Total GHG emissions have not been validated by an external body.

Table 40 Gross Scopes 1, 2, 3 and Total GHG emissions

Gross Emissions	2024	2025
Scope 1		
Gross Scope 1 GHG emissions (in metric tons of CO ₂ eq)	3,252	6,913
Share of Scope 1 GHG emissions from regulated emission trading schemes (%)	No emissions from regulated emission trading schemes	No emissions from regulated emission trading schemes
Scope 2		
Gross Scope 2 GHG location-based emissions (in metric tons of CO ₂ eq)	27,963	18,030
Gross Scope 2 GHG market-based emissions (in metric tons of CO ₂ eq)	19,702	10,527
Share of contractual instruments used for sale and purchase of energy bundled with attributes about energy generation in relation to Scope 2 GHG emissions (%)	Only certifications of Origins are foreseen	Only certifications of Origins are foreseen
Share of contractual instruments used for sale and purchase of unbundled energy attribute claims in relation to Scope 2 GHG emissions (%)	Only certifications of Origins are foreseen	Only certifications of Origins are foreseen
Scope 3		
Gross Scope 3 GHG emissions for each significant category (in metric tons of CO ₂ eq)- (Investments)	26,464,149	24,156,058
Share of emissions calculated using primary data obtained from suppliers or other value chain partners (i.e. obligors) (%)	32.9%	12.8%
Totals		
Total GHG emissions with location-based Scope 2 (in metric tons of CO ₂ eq)	26,560,666	24,255,539
Total GHG emissions with market-based Scope 2 (in metric tons of CO ₂ eq)	26,552,405	24,248,036

Table 41 Gross GHG Emissions

Emissions category	Gross emissions (tCO ₂ eq)	
	2024	2025
Scope 1 emissions	3,252	6,913
Stationary combustion (in metric tons of CO ₂ eq)	1,307	2,404
Mobile combustion (in metric tons of CO ₂ eq)	1,342	4,142
Fugitive emissions (in metric tons of CO ₂ eq)	604	367
Scope 2 emissions location-based	27,963	18,030
Scope 2 emissions market-based	19,702	10,527
Total Scope 1 + 2 emissions (Scope 2 location-based)	31,215	24,944
Total Scope 1 + 2 emissions (Scope 2 market-based)	22,954	17,440
Scope 3 emissions (excluding category 15)	65,302	74,538
Purchased goods and services	9,453	16,224
Capital goods	-	1,059
Fuels and energy related activities	2,097	5,263
Upstream transportation and distribution	343	351
Downstream transportation and distribution	5	5
Waste generation	39	95
Business travel	542	220
Employee commuting	3,338	3,819
Downstream leased assets	49,486	47,502
Investments	26,464,149	24,156,058
Scope 1, Scope 2 (location-based) and Scope 3 (excl. category 15) emissions	96,543	99,481
Scope 3 emissions (including category 15)	26,529,451	24,230,596

As shown, in the table above, the most significant category of Scope 3 GHG emissions (accounting for 99.7% of total Scope 3 emissions), based on the Magnitude of the estimated GHG emissions is cat.15 Investments (Financed emissions).

The Group acknowledges that with the increase in demands for full carbon footprint measurements from its Customers in the coming years, the absolute values (absolute values in tCO₂eq) of financed emissions may be materially affected in the coming years as well.

GHG emissions calculation and methodologies used

There are no significant changes compared to the previous year regarding the definition of what is considered upstream and downstream value chain. However, changes in the reported Scope 1, 2 GHG emissions compared to previous year (compared to "2024 Sustainability Statement", are attributed to the fact that certain subsidiaries were sold in 2025 (please refer to the Section: Assets Held for sale of the Financial Statements).

Scope 1, 2 GHG emissions calculation and methodologies used

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.

- 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).
- Refrigerants: emissions are attributed to the refrigerants' losses of 2024.

Scope 3 GHG emissions calculation and methodologies used

Two specific approaches were used to calculate direct and indirect emissions:

- Activity-Data Based Approach: Emissions were calculated using the activity data related to the service or product (e.g. quantities, transport work, energy consumption), and
- Spend-Based Approach: Emissions were derived from the economic value of the service or product, correlating with the costs incurred by the entity. This uses Input-Output tables for (EU-27), allocating national GHG emissions to economic sectors based on economic flows.

List of GHG emissions included in the inventory and exclusions and reporting boundaries

The Group is currently at advanced state of a more detailed measurement of its Scope 3 financed emissions across asset classes and sectors, following the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the PCAF. The PCAF builds upon the GHG protocol guidance to calculate Scope 3, category 15 (see Table 41 Scope 3 Categories), emissions to provide asset class specific calculation approaches with guidance on financial or operational control approaches, attribution factors, emissions factors and data sourcing hierarchies.

For the following categories of Scope 3, an explanation of calculation methods for estimating the GHG emissions is provided:

Category 1: Purchased goods and services

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). For the Bank and its subsidiaries, indirect emissions are calculated using either: i) **Activity-based approach** – using the carbon emission factors and physical quantities of the goods, or ii) **Spend-based approach** – applying environmental emission factors for the relevant economic sector, based on total Scope 1, 2, and 3 emissions per € of turnover, as well as the Bank's/subsidiary's related expenses. Carbon emission factors primarily come from the *UK Government GHG Conversion Factors for Company Reporting* (DEFRA & BEIS, full set for advanced users) and other relevant sources, such as industry associations (e.g., European Printing Ink Association – EuPIA). If primary data on product or goods quantities (e.g., paper purchases in kg, water consumption in m³) are not available, emissions are estimated using the associated expenditure recorded in the balance sheet.

Category 2: Capital goods

In this category are included the purchase of goods with a long useful life, which are used for the production of products or services. In the case of the Bank and its subsidiaries, this category includes, based on the balance sheet ("Other expenses"), capital expenditures for equipment, machinery, or infrastructure.

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

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. To calculate indirect emissions, carbon footprint conversion factors are applied, along with the physical quantities of energy products consumed. Specifically, for all fuels except electricity, the carbon footprint conversion factors (from well-to-tank) are taken from the "UK Government GHG Conversion Factors for Company Reporting" (full set for advanced users), developed by the UK Department for Environment, Food and Rural Affairs (DEFRA) and the Department for Business, Energy, and Industrial Strategy (BIS). For electricity, a separate carbon footprint conversion factor per kWh is used, based on data from the Carbon Data Intelligence database, which contains both national and European datasets. For the subcategory "TD losses", which corresponds to emissions from losses in the electricity transmission and distribution network, the emission factor used was based on data from Carbon Footprint Ltd. For the subcategory "WTT losses" that corresponds to electricity production, the emission factor used was based on data from Carbon Footprint Ltd. It is noted that for companies which have an active contract with an electricity provider, taking provision for providing Guarantees of Origins from renewable energy sources, "WTT losses" has not been calculated.

Fuels and electricity quantities used to calculate emissions are provided through bills or invoices.

Category 4: Upstream transportation and distribution

This category accounts for emissions arising from the transportation and handling of goods to and from the facilities of the entity concerned through vehicle fleets owned by external suppliers. In the case of the Bank, this category includes emissions from the transportation of goods purchased from suppliers where transportation costs were not incorporated into the sales prices of the products, the transportation of materials to and from the Bank's warehouses carried out by partner companies, as well as the transportation of items resulting from mergers of departments and branches. This category is not typically encountered among the activities of the Bank's subsidiaries.

Category 5: Waste generated in operations

The methodology used for the emissions calculation is based on spend-based method and average-data method. Scope 3 emissions from waste generated in operations include solid wastes produced by Employees and sent to landfill, as well as recycled materials. Activity data for solid wastes produced in Group's premises are calculated based on specific assumptions (e.g. by using the indicator of solid wastes produced per employee in the tertiary sector provided by Eurostat and taking into account the number of Employees who were exempted from teleworking. Furthermore, for the recycled materials the expenses made for their transportation have been used as activity data, which has been derived from invoices. DEFRA emission factors per type of material wasted and treated are also used to calculate a weighted emission factor for solid wastes on the basis of a typical composition of the produced mixture (based on an EPA's study).

Category 6: Business Travel

The methodology used for the emissions calculation is based on actual data. 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. All relevant information is provided by the collaborating travel agencies. Defra 2025 emission factors have been applied.

Category 7: Employee commuting

This category concerns emissions arising from Employees' commuting to and from the Bank using various modes of transport. For the Bank, 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 Bank and provided to Employees are excluded, as they are accounted for under Scope 1. Scope 3 emissions are calculated using an activity-based approach. Specifically, total annual transport work is calculated per travel mode and multiplied by DEFRA & BEIS conversion factors for all means of transport, except for public transport, for which national emission factors based on OASA and STASY data are applied. The calculation also takes into account the avoided transport work resulting from the implementation of teleworking among the Group's Employees.

Category 8: Upstream leased assets

This category does not apply to Alpha Bank because emissions from the operation of leased office buildings are included under scopes 1 and 2.

Category 9: Downstream transportation and distribution

Category 9 includes indirect greenhouse gas (GHG) emissions (Scope 3) arising from the transportation and distribution of products after the point of sale, where such transportation is not performed or directly controlled by the organization. It relates to emissions from the dispatch of correspondence to various geographical regions in Greece (Attica, the rest of mainland Greece, and the islands), calculated based on activity data and transportation parameters (mode of transport and distance). The Bank classifies emissions from the dispatch of correspondence under Category 1.

Category 10: Processing of sold products

The Group, as a financial service provider, does not sell products, only services that do not need processing. As a result, emissions in this category are not relevant.

Category 11: Use of sold products

The Group offers only services to its clients and does not sell products that lead to emissions when used. Therefore, use of the sold products does not have an impact and does not represent position in the Group's carbon footprint.

Category 12: End of life treatment of sold products

The Group offers only services to its clients and does not sell products that lead to emissions when disposed. The end-of-life treatment of sold products does not represent a significant position in the Group's carbon footprint.

Category 13: Downstream leased assets

This category includes, analyzes, and estimates Scope 3 emissions arising from the operation of assets owned by the company (acting as lessor) and leased to third parties during the reporting year, which are not already included in Scope 1 or Scope 2. Emissions from the leased assets (e.g., real estate, equipment, etc.) are considered. For the relevant calculations, a spend-based approach is applied, using environmental emission factors corresponding to the economic factors of the various subcategories of loans and investments.

Category 14: Franchises

This category is not relevant as the Group has no Franchises.

Category 15: Investments (Financed Emissions)

In order to align its portfolio with the Paris Agreement climate objectives, the Group is carrying out a full measurement of its financed emissions, covering investment and lending products of its corporate portfolio across all the sectors it finances, based on the GHG emissions of its borrowers or investee companies. To measure its financed emissions, the Bank follows the Global Greenhouse Gas Accounting and Reporting Standard for the Financial Industry developed by the PCAF (version Nov. 2021). PCAF builds upon the GHG Protocol Corporate Value Chain (Scope 3) emissions – Investments (Category 15), to provide asset class specific calculation approaches. In this context, the asset class coverage includes Listed and Unlisted Equity, Corporate Bonds, Corporate Loans, Commercial Real Estate (CRE), Mortgages, Motor Vehicle loans, Sovereign Debt and Project Finance. For the purposes of the financed emissions measurement, the counterparty NACE sector allocation was identified and GHG financed emissions calculated for Scope 1, Scope 2 and Scope 3 emissions (in tons of CO₂ equivalent), depending on availability of information. Financed emissions have been measured by using primary data % (e.g., reported emissions) for the 12.8% of the portfolio (in terms of financed emissions), whereas for the remainder of the portfolio (i.e., 87.2 %), financed emissions have been estimated by using proxy data (e.g., EEIO). To the extent GHG emissions, activity or financial data were not available on behalf of the counterparties for 2024, the measurement for the financed emissions was based on data for 2023. Bank exposure to each counterparty corresponded to end of 2025. The Group's category 15 emissions include the emissions of all the Banks' subsidiaries, JVs, and associates. Given that the Bank has no operational control over JVs and associates, Scopes 1, 2 and 3 of these entities are included in the Group's carbon footprint under Scope 3 category 15, as these entities are considered investees, following the PCAF methodology

GHG emissions intensity

Table 42 GHG emissions intensity (total GHG emissions per net revenue)

2025 GHG emissions intensity (total GHG emissions per net revenue (tn CO ₂ e/Euro net revenue).	
Location -based	Market-based
2025	2025
0.011	0.011

For FY24 GHG intensity was 0.012 for both location-based and market-based.

Table 43 Net Revenue Amounts for GHG intensity (in Euro)

2025 Net Revenue Amounts (in Euro)	
Net revenue used to calculate GHG intensity (in Euro) ³¹	2,184,362,000

[E1-9] Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

Anticipated Financial Effect

For information regarding the anticipated financial effects from material Physical and Transition risks, please refer to SBM-3.

Real Estate Assets Energy Efficiency

The following tables illustrate the gross carrying amount of loans collateralized by commercial & residential immovable property per energy efficiency class (actual) and energy efficiency consumption (estimated & actual) accordingly, at Group level.

Table 44 Gross carrying amount of loans collateralized by commercial & residential immovable property per Actual EPC

Level of energy efficiency (EPC label of collateral) ³²	Total gross carrying amount (in Euro million) ³³
A	371
B	205
C	372
D	246
E	90
F	41
G	92

Table 451 Gross carrying amount of loans collateralized by commercial & residential immovable property per Energy Efficiency Consumption (Estimated and Actual)

Level of energy efficiency (EP score in kWh/m ²) ³⁴	Total gross carrying amount (in Euro million)
0; <= 100	1,101
> 100; <= 200	4,239
> 200; <= 300	2,237
> 300; <= 400	1,716
> 400; <= 500	346
> 500	1,315

ESRS E4 – BIODIVERSITY AND ECOSYSTEMS

[E4-1] Transition plan and consideration of biodiversity and ecosystems in strategy and business model

Resilience Analysis

Scope & Methodology

The Group has performed a resilience analysis to assess biodiversity and ecosystem risks within its portfolio, as described under [E4.IRO-1] "Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities". Regarding nature risks and in alignment with its materiality assessment the Bank has run multiple long-term nature scenarios for credit risk. The methodology uses the GLOBIO model to assess the dependency component of the Bank's counterparties (outside-in) and estimates counterparties' land usage reduction costs for the impact component (inside-out).

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

³¹Total Income from banking and investment property management as included in the financial statements.

³² Source: Pillar III Disclosures

³³ Perimeter: Sum of collateralized loans commercial immovable property and of residential immovable property, Actual EPC, Group Perimeter

³⁴ Source: Pillar III Disclosures

The impact component is estimated by leveraging Land usage intensity based on the SBTN 2030/2050 target under two scenarios i.e. 'Baseline' and a 'Stressed' scenarios'. The 'Baseline scenario' reflects the most likely macroeconomic trajectory under current policies and prevailing market conditions, assuming no major shocks or structural breaks, based on the 'NGFS NDC scenario'. While the 'Stressed scenario' represents the future pathway associated with the highest environmental transition risk costs based on the 'NGFS Delayed transition scenario'. 2025 is considered the starting year for the reduction of absolute land footprint.

Results

The results of the materiality assessment performed are illustrated under [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business.

Stakeholder Involvement

Alpha Bank Group proactively engages with all stakeholders to address biodiversity and ecosystem preservation, aligning its approach with supervisory expectations, regulatory requirements, and evolving best practices, including the development of metrics, targets, and goals. Biodiversity and ecosystems preservation and restoration is considered an emerging topic in the agenda of the Bank's Clients with more prominent impacts recognized in the long-term time-horizon. Regarding shareholder feedback, no specific biodiversity considerations have been received to date. The Group's approach in this area is primarily guided by legal and regulatory frameworks and its commitment to long-term environmental stewardship.

In addition, for the purposes of the Double Materiality Assessment the Group leveraged its existing stakeholder engagement output (i.e. existing employee surveys, investor and client and market feedback, etc.) to identify potentially additional priority topics coming from its stakeholders. For further information on the Group's overall stakeholder engagement process and involvement please refer to [SBM-2] Interests and views of stakeholders.

[E4.SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

The Group has not identified any actual and potential impacts on biodiversity and ecosystems either on their own operational sites or sites under their operational control, nor they have specified any activities negatively affecting biodiversity sensitive areas and affect threatened species. Specifically, there are no material negative impacts regarding land degradation, desertification or soil sealing and their portfolios of investment activities have all the required environmental terms and conditions. However, biodiversity has been defined as material only in relation to the Group's downstream value chain and the overall portfolio of investments.

[E4-2] Policies related to biodiversity and ecosystems

Key Environmental and Biodiversity Policies

The Group recognizes that biodiversity loss and ecosystem degradation arising from economic activities may have social impact. Therefore, nature-related considerations have been embedded into its policies to indirectly avoid and minimize any negative effects on local communities. The Group adopts a proactive approach to the management of ESG risks, with particular emphasis placed on risks arising from climate and environmental change, which is already a key component of its Risk Management. Thus, it has set a series of key policies to manage material sustainability matters such as the Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending and the Credit Policy Manual Wholesale Banking & Credit Policy Manual Small Business. For further details about these policies as well as the monitoring process please refer to [E1-2] Policies related to climate change mitigation and adaptation.

To further mitigate its impact on biodiversity, the Group maintains an exclusion list to determine which activities are prohibited from being financed. Specifically, the Bank prohibits financing towards:

- Activities prohibited by host country legislation or international conventions relating to the protection of biodiversity resources or cultural heritage.
- Drift net fishing in the marine environment using nets in excess of 2.5 km in length.
- Conversion of natural forests into plantation.
- Wholesale and retail trade of thermal coal.
- Any activity involving significant degradation, conversion or destruction of the sites included in the Natura map

The Group's exclusion list under the Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending Policy to allocate zero financing to targeted activities harming species diversity, habitats and waterbodies pertains to the downstream scope of its value chain. The established commitments apply to all the Group's operations, in every country where it operates.

In 2025, Alpha Bank strengthened its contribution to biodiversity and ecosystem protection through the establishment of its Green Bond Framework, which directs financing towards activities with measurable environmental benefits. The Framework incorporates stringent eligibility criteria that require financed assets to comply with high environmental standards, including IFC Performance Standards and relevant EU legislation, thereby supporting projects that minimize ecological impacts and promote nature-positive outcomes. Through its "taxonomy-aware" design, the Framework seeks, to the extent possible, to align with the EU Taxonomy environmental objectives — including climate change mitigation, climate change adaptation, the transition to a circular economy, pollution prevention and the protection and restoration of biodiversity and ecosystems. By integrating biodiversity considerations into its due-diligence processes, sectoral risk assessments and project selection methodology, the Bank allocates financial resources in a way that reinforces sustainable land use, enhances environmental resilience and supports long-term ecosystem preservation.

Implementation of biodiversity-related policies

In the context of ESG and Climate Risk Governance, Alpha Bank Group has implemented a comprehensive structure, addressing relevant decision making and implementation at all levels. Further to that in E1 includes all third-party standards or initiatives the Group commits to regarding the policy implementation. More details for this structure please refer to [E1-2] Policies related to climate change mitigation and adaptation.

Stakeholder engagement for policy setting and implementation

Stakeholders' engagement plays an important role in introducing new policies. As mentioned above, no specific biodiversity considerations have been received to date by Shareholders. The Group, in response to Regulators' expectations, implemented Climate Risk Management, ESG criteria in all lending and investment decisions, and Risk and Capital Strategy incorporating ESG criteria. Customer feedback also influenced the development of the Sustainable Finance Framework, Transition plans for clients, and ESG-related products and services.

Therefore, there are relevant policies that are available on the ESG and Sustainability section of the Alpha Bank S.A. [website](#) in both Greek and English languages to address the different stakeholder groups:

- Environmental Management System
- Sustainable Finance Framework and External Review
- Green Bond Framework and Second Party Opinion

These policies are actively shared with affected stakeholders through direct communications and employee ESG awareness programs. Specifically, all Employees have access to the policies through ABID on Intranet – internal Alpha Bank website. For stakeholders implementing policies, including investors, the Group ensures access through regular updates, sustainability reporting, and dedicated investor engagements. These methods include participation in conferences, briefings, and the publication of detailed frameworks, such as the SFF and the Climate-Related, Environmental, Social, and Governance Risk Management Policy, which outline the bank's commitments and operational integration of ESG standards.

Relation of Policies with Biodiversity and Ecosystems matters

The Group acknowledges that its current biodiversity and ecosystems-related policies are still under development to fully address the specific subject matters outlined in the Datapoint. However, it is committed to progressively integrating these aspects into its operational and financing frameworks. Below is the status and alignment of policies with the subject matters.

a) Contribution to direct impact drivers on biodiversity loss:

- i. Climate Change: The Group's policies address climate change indirectly through its focus on decarbonization and support for renewable energy and energy-efficient projects, but these measures do not currently target biodiversity impacts directly.
- ii. Land-Use Change: While land-use assessments are part of the ESG risk review for projects, the policies do not comprehensively address land artificialization, freshwater-use change, or sea-use change impacts. These gaps are recognized and planned for future iterations of the policies.
- iii. Direct Exploitation: The Group's exclusion list explicitly prohibits financing activities such as deforestation and overfishing, but further integration of biodiversity-specific exploitation metrics into the due diligence process is still under development.
- iv. Invasive Alien Species: This is not explicitly addressed in current policies but could be included in future updates as part of the Group's evolving biodiversity strategy.
- v. Pollution: Policies currently address pollution risks, particularly in industrial projects, through ESG due diligence, but direct links to biodiversity impacts are not yet systematically incorporated.

b) Impacts on the State of Species:

The Group does not currently have detailed mechanisms to assess impacts on species population sizes or extinction risks. Biodiversity considerations are indirectly addressed by excluding funding for activities in protected areas, but further development of species-specific impact monitoring is required.

c) Impacts on the Extent and Condition of Ecosystems:

Ecosystem impacts, including land degradation and soil sealing, are partially addressed through ESG risk reviews and exclusion of certain activities. However, a comprehensive ecosystem health monitoring framework is not yet in place.

d) Impacts and Dependencies on Ecosystem Services:

Dependencies on ecosystem services, such as carbon sequestration and water provision, are considered in project evaluations where relevant, but these are not yet systematically linked to biodiversity impacts across the portfolio.

The Group applies, maintains, and updates the exclusion list to determine specific activities, which are not allowed to be financed. The criteria for exclusion span across various environmental and social matters. The exclusion list is part of the Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending which incorporates activities related to biodiversity and ecosystems.

In addition, following the ESG risk categorization at the obligor/project/lending transaction level and depending on the outcome (described in detail in the relevant Credit Policy Manuals), an ESG Due Diligence is carried out based on specific evaluation criteria, defined as Environmental and Social Requirements, which reflect those of EBRD. One of the ESG evaluation criteria describes potential risks and impacts on biodiversity conservation and sustainable management of living natural resources. All obligors/projects of the Group are required to manage the ESG performance stemming from their business activity to this domain. When the outcome of the ESG assessment is non-sustainable Medium or High Risk financing and the request under consideration concerns a dedicated purpose investment nature new financing e.g. project finance (infrastructure, energy, etc.), construction / expansion / purchase of real estate including industrial premises, hotel and tourism units, a due diligence is carried out on the basis of which, if required, a corrective action plan is compiled which should be implemented in a specific timeframe by the client.

In addition to all the policies described above, the Group 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, its 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 with ISO14001- is 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 and assesses financed projects on the basis of environmental and social risks.

Alpha Bank, through its Environmental Management System (EMS), indirectly addresses the impacts related to biodiversity and ecosystems, recognizing their importance for its business operation and model. Although there is no specific reference on biodiversity and ecosystems as separate entities, the EMS incorporates procedures for assessing and managing environmental and social risks that touch upon natural systems and the challenges they face.

Material Dependencies: The Group recognizes its dependence on material resources derived from ecosystems. Through the EMS, it identifies and assesses the environmental aspects of its activities that interact with natural ecosystems, such as energy and water use, emissions, and

resource management. The emphasis on efficient resource use directly correlates the recognition that the sustainability of business activities is inextricably linked to the health of natural systems.

Physical Risks: The EMS includes the assessment of environmental impacts and risks arising from extreme weather events or other natural disasters (physical risks). The Group examines the impact of these phenomena on its operations and business model and takes measures to minimize them.

Transition Risks: By integrating non-financial criteria into its credit assessments, the Group proactively addresses the risks of transitioning to a more sustainable economy. By evaluating financed projects based on environmental and social standards, the Group reduces its exposure to businesses or sectors that may be negatively affected by regulatory changes, reputational issues, or economic challenges related to biodiversity loss or ecosystem degradation.

Opportunities: The Group recognizes the opportunities arising from promoting sustainability. It encourages green financing and offers products that help its Customers improve their environmental performance. In this way, The Group seeks to contribute to the growth of sustainable investments and services, while also contributing to ecosystem protection.

Sustainable Land and Agriculture Practices

In agriculture involving animals, Group prohibits financing activities such as force-feeding ducks and geese, fur factory farming, and any other activities deemed illegal under national or international laws or subject to phase-out bans. To mitigate specific sectoral risks—such as managed grazing, prevention of overgrazing, large-scale livestock farming, wastewater management, waste management, air emissions, animal feed, disease control, responsible use of antibiotics, and ensuring animal welfare—the Group conducts Environmental and Social risk due diligence through qualified personnel in accordance with required legislation. As of December 2025, agriculture represents only a small portion of the Group's current loan portfolio.

Sustainable Sea and Ocean Practices

Furthermore, the Group prohibits financing drift net fishing activities using nets longer than 2.5 km to mitigate risks in fisheries and aquaculture. To address other sector-specific risks—including fish types, bycatch, organic waste management, petroleum management, wastewater and effluents, air emissions, solid waste management, plant-based feeds from sustainable agriculture, cultivation of native species in bag nets or closed-wall sea-pens, cultivation of non-native species in land-based tanks, risk prevention for local wild populations, stocking densities to minimize disease outbreaks, net loss prevention in fish protein yield, water management, discharges and effluents, soil erosion and sedimentation, and the use of fertilizers and chemicals—the Bank conducts Environmental and Social due diligence through technically qualified personnel in accordance with required legislation.

Deforestation Practices

Finally, to prevent environmental and social risks associated with forestry projects, the Group Credit Policy prohibits financing commercial logging operations in primary tropical moist forests, and the production or trade of wood or other forestry products unless sourced from sustainably managed forests.

To address sector-specific risks such as water management, responsible use of fertilizers and pesticides, alternatives to chemical inputs, hazardous materials management, soil erosion, fire management, reforestation with native species, and promoting multi-age and multi-species forests over monocultures, the Group conducts environmental and social risk due diligence through qualified personnel to verify compliance with legislation. As of December 2025, forestry constitutes only a small portion of its loan portfolio.

[E4-3] Actions and resources related to biodiversity and ecosystems

Biodiversity and Ecosystem related Actions

To remain compliant with its exclusion list, the Group retains a commitment to allocate zero finance to targeted activities harming species' diversity, habitats and waterbodies. This action was achieved for the reporting year as no new financing volumes were allocated to any exclusionary categories. This expects to remain unchanged as the Alpha Bank commits to its target in the future and is expected to continue over the short-, medium, and long-term horizons.

The Group's aim for zero financing towards targeted activities harming species diversity, habitats and waterbodies, pertains to its downstream value chain and applies to all Group's operations, in every country where it operates and affects individuals, corporates and SMEs. This commitment took effect in 2023 and the target has been achieved for 2024 and 2025.

Additionally, the implementation of this commitment contributes directly to Group's broader sustainability objectives, particularly aligning with SDG 15 "Life on Land." It supports the Group's strategy to minimize its environmental footprint and safeguard biodiversity by financing only those activities that meet strict environmental criteria as outlined in its Climate-Related and ESG Risk Management policies.

Regarding geographies and stakeholder groups, this commitment applies comprehensively across all countries of operation, primarily affecting individuals, SMEs, and corporates in the Group's downstream value chain. While the commitment has been implemented globally, a significant focus remains on the Greek market, given the regional impact of activities on local biodiversity and ecosystems.

Reforestation enablement through private banking products

Further to that, starting in 2021 and continuing through 2026, Alpha Bank has also set an additional action to collaborate with Reforest Action and subsequent promotion of impact investing to private banking Customers. Since 2021 as part of the collaboration with **Reforest'Action**, a global actor in reforestation and agroforestry, more than 69,921 trees have been financed for planting, of which nearly 9,135 were financed in 2025. The reforestation projects have been implemented in critical areas across Greece, including the Arona forest in Katerini, Thessaloniki forest, Pierian Mountains forest, and Kastanolongos forest in Southern Evia. This effort has resulted in the storage of 1,370 tons of CO₂ and the creation of 27,405 natural shelters for wild animals according to the certificates the Group has received for the completion of each initiative.

Regarding the operational and upstream value chain segments, the Group has not identified any material impacts related to biodiversity and ecosystems.

The Group confirms that its own operational model, primarily centered on financial services, does not inherently or directly generate issues requiring remediation actions. However, in cases where harm has occurred due to external circumstances, such as natural disasters, Alpha Bank Group has historically supported affected communities through financial assistance and social programs.

In 2025, Alpha Bank mobilized 74 Employees from the Risk Control Business Area to support a volunteer initiative in the Aesthetic Forest of Kaisariani, in collaboration with the Philodassiki Society of Athens. The team contributed to the restoration of an eroded forest road in the Analipsi area, using natural materials to stabilize the pathway and improve access for firefighting vehicles and visitors. This action supported the preservation and resilience of a protected forest ecosystem and reflects the Bank's commitment to biodiversity enhancement and community-based environmental stewardship.

Case studies: Biodiversity-related and bio-product certified companies financed through Alpha Bank and InvestEU

In 2025, Alpha Bank supported a series of enterprises whose products and operations are certified under recognized European environmental and organic standards, thereby indirectly contributing to biodiversity protection and sustainable agricultural practices. Through the InvestEU Sustainability facility, the Bank provided general-purpose financing to five companies whose eligibility was based on verified environmental criteria. One financed company qualified on the basis of holding an EU Ecolabel for liquid dishwashing detergents, demonstrating compliance with stringent requirements on reduced toxicity, biodegradability, water protection and overall lower environmental impact.

Four additional financed companies demonstrated eligibility through valid organic production certifications issued under Regulation (EU) 2018/848 and listed on the EU TRACES platform. Their certified product ranges include unprocessed and processed organic agricultural goods—such as plant-based foods, beverages, fruit derivatives, herbs, and organic convenience products—produced with methods that restrict synthetic inputs, safeguard soil and water quality, and promote the conservation of agricultural biodiversity.

While the InvestEU Sustainability loans are general-purpose in nature, their allocation to certified organic and eco-labelled companies supports the continued operation and potential expansion of business activities with lower environmental burdens. By directing resources to enterprises adhering to EU organic and environmental compliance schemes, Alpha Bank contributes—albeit indirectly—to the conservation of agricultural biodiversity, the protection of ecosystems, and the scaling-up of sustainable production models within the Greek market. As such, while the nature of the Group's services minimizes direct instances of material harm necessitating remedy, its frameworks, initiatives and lending activities ensure that any identified impacts are effectively addressed in alignment with best practices and stakeholder expectations.

Resources for implementation of actions

It is important to mention that for the implementation of its action plan the Group does not require significant operational expenditures (OpEx) and/or capital expenditures (CapEx). Thus, no significant current or future financial and other resources have been allocated to the implementation of the action plan.

Worth noting that no biodiversity offsets have been used in the actions.

[E4-4] Targets related to biodiversity and ecosystems

Alpha Bank Group has identified through its Materiality Analysis the potential negative impacts on biodiversity and ecosystems through its financial products/services. As a result, the Group is committed to zero financing to targeted activities harming species diversity, habitats and waterbodies. This represents an ongoing target that serves to mitigate any material impacts the Group has on biodiversity and ecosystems through the provision of its financial products and services.

The Group ensures it will not finance transactions that impose environmental or social threat, through the incorporation of the "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending" in the existing Credit Risk Management Framework and the Group's Credit Policy.

This target was implemented in 2023, is absolute, with no permissible thresholds, and continues to be in effect from fiscal year 2023 onwards. Compliance to the Group's expanded exclusion list is tracked through regular monitoring of financing activities and the established credit risk management processes.

The Group's commitment to maintaining zero financing is an ongoing objective, evaluated annually. Consequently, the baseline value is anticipated to consistently remain at zero each year.

The Group's target relating to biodiversity and ecosystems serves to mitigate its downstream material impacts and is applicable everywhere (i.e., in each country) the Group has its operations. The initial focus for the Group's sustainable lending targets is its largest entity, Alpha Bank S.A., with the related policies having been expanded across the Group.

Target setting process

The Group's target applies to its downstream value chain. The Group sets its sustainable lending targets for the purpose of aligning its portfolio with the Paris Agreement objectives and is in the process to develop more targets on material sustainability matters by actively leveraging its Materiality Analysis and SFF to identify areas of priority and impact. As part of its membership in the UN Environment Program Finance Initiative (UNEP FI), the Group applies best practices to assess risks and opportunities in its financing activities, particularly related to climate and biodiversity impacts. Furthermore, through its participation in the United Nations Global Compact (UNGC), the Group ensures its sustainability targets address broader social and environmental considerations.

The targets under development also align with Greece's Recovery and Resilience Plan and other relevant EU and national policies. The methodologies incorporate both quantitative metrics and qualitative indicators, ensuring progress is measurable, traceable, and aligned with the Bank's commitment to sustainable development. Alpha Bank remains committed to maintaining transparency through regular updates in its Sustainability Report and other disclosures.

Stakeholder Involvement in Target Setting

As per the stakeholder engagement process described in [SBM-2] *Interests and views of stakeholders*, forms an essential input to the Group's strategic planning, including target setting. By actively participating in initiatives like the UNEP FI and its working groups, the bank ensures that its goals reflect broad societal priorities and address key sustainability challenges.

Target Progress

The Group's zero financing target for activities with an adverse impact on species diversity, habitats and waterbodies is an absolute target which is measured through two KPIs: 1) new financing volumes in Euro million (Zero volume) and 2) Operational sites owned, leased, managed in or adjacent to protected areas and areas of high biodiversity value outside protected areas. The target was achieved with no new financing volumes announced for either metric category.

Target Alignment with international and national policies and legislations

At this stage, the Bank's biodiversity-related target has not yet been informed by the Kunming–Montreal Global Biodiversity Framework or the EU Biodiversity Strategy for 2030. However, the Bank's target contributes towards nature conservation by not financing activities with high

biodiversity impact. Alpha Bank Group leverages the framework of Greece's National Recovery and Resilience Plan (NRRP), to support projects classified under the green transition pillar, which allocate significant resources to biodiversity protection. Through the Bank's participation in the Recovery and Resilience Facility (RRF) co-financing, the Group can allocate financing to projects aimed at urban regeneration, protection of biodiversity, and enhancements in environmental infrastructure, including investments in Civil Protection Centers. These activities contribute to the preservation and sustainable management of ecosystems while fostering the Group's broader sustainability objectives. .

Targets reflected in Value Chain

The Group recognizes the critical importance of biodiversity in its downstream value chain. Through its downstream value chain assessment, the Group has identified key biodiversity-related risks and opportunities, including dependencies on ecosystem services and the impacts of financed projects on habitats and ecosystems. The Group's activities in sectors such as real estate, tourism, and infrastructure are analyzed using tools like UNEP FI's Portfolio Impact Analysis to identify and manage biodiversity impacts.

The Group has not used biodiversity offsets as part of its target-setting and their target pertains to avoidance on the mitigation hierarchy.

Target effectiveness, ambitions and progress

Alpha Bank Group tracks the effectiveness of its policies and targets in relation to material sustainability-related impacts, risks, and opportunities. This is implemented through:

1. structured approach:
 - implementation of policies and frameworks
 - annual report for Principles for Responsible Banking and corresponding assessment
 - qualitative and quantitative indicators that are aligned with international standards such as the EU Taxonomy, and Alpha Bank Group's SFF.
2. mechanisms, not limited to:
 - Policy Effectiveness Tracking: Regular reviews of environmental, social, and governance (ESG) risks and integration into credit assessment processes to ensure that clients meet sustainability thresholds.
 - Defined Levels of Ambition: Commitment to achieving net-zero greenhouse gas emissions by 2050, operationalized through interim science-based reductions and sustainable financing expectations.
 - Qualitative and Quantitative Indicators: Metrics such as exposure to transition-sensitive sectors, greenhouse gas emissions metrics and biodiversity impacts indicators to evaluate progress and manage risks.
 - Baseline Assessments: Reference points for progress measurement, such as emissions intensity benchmarks and sectoral sustainability profiles.

The Group implements a process of ESG risk categorization and due diligence during credit approvals. The governance structure, both at the Board and Executive level ensures oversight and accountability at all levels. The Group's sustainability strategy is integrated into operational policies and stakeholder engagement efforts.

[E4-6] Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities

Anticipated financial effect of material biodiversity and ecosystems-related risks & opportunities

The results of the materiality assessment performed are illustrated under [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business.

ESRS E5 - RESOURCE USE AND CIRCULAR ECONOMY

[E5-1] Policies related to resource use and circular economy

Key Environmental and resource Use Policies

The Alpha Bank Group adopts a proactive approach to the management of ESG risks, with particular emphasis placed on risks arising from climate and environmental change, which is already a key component of its Risk Management. Thus, the Group has set a series of key policies to manage material sustainability matters such as the Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending. For further details about these policies as well as the monitoring process please refer to [E1-2] Policies related to climate change mitigation and adaptation.

The Group's exclusion list pertains to the downstream scope of its value chain. The established commitments apply to all the Group's operations, in every country where it operates.

Implementation of resource use-related Policies

In the context of ESG and Climate Risk Governance, Alpha Bank Group has implemented a comprehensive structure, addressing relevant decision making and implementation at all levels. For more details on this structure, you may refer to [E1-2] Policies related to climate change mitigation and adaptation.

All third-party standards or initiatives the Group commits to regarding the policy implementation are listed also in E1 as referred above.

Stakeholder Involvement in Policies

In accordance with the established Environmental Policy, the Group maintains ongoing dialogue with shareholders, clients, business partners, and government bodies on sustainability matters. It consistently publishes reports detailing the outcomes of its environmental initiatives.

For more information on relevant stakeholder involvement in policies and how the aforementioned policies are made available to stakeholders, please refer to [E4-2] Policies related to biodiversity and ecosystems.

In its financing activities, the Group actively promotes circular economy practices among its clients by integrating environmental and social criteria into credit assessments. Projects focusing on recycling, waste reduction, and the use of recycled materials are prioritized in the Group's SFF, which aligns with the EU Taxonomy for environmentally sustainable activities.

Additionally, through the financial services, the Group encourages clients to transition away from reliance on virgin resources by adopting circular economy principles as ESG criteria are embedded throughout the financing process to ensure alignment with sustainability objectives at every stage of the credit lifecycle.

To strengthen these efforts, the Group has established robust monitoring mechanisms, overseen by the Corporate Governance, Sustainability, and Nominations Committee, to assess and track the environmental impact of financed projects.

The Group's approach to sustainable sourcing and the use of renewable resources is firmly integrated into its business practices and aligned with international sustainability standards, including the EU Taxonomy for environmentally sustainable activities and its ISO 14001-certified Environmental Management System (EMS).

In its financing activities and broader economic contributions, the Group prioritizes funding for projects and businesses that advance the use of renewable resources and sustainable practices. Financing is directed towards industries such as renewable energy, green buildings, and sustainable agriculture according to the SFF.

[E5-2] Actions and resources related to resource use and circular economy

Resource Use and Circular Economy key actions

The Group has a negative impact to Resource Security (which affects the development of a Circular Economy) through the Group's products/services and business relationships.

As a result, the Group has developed a list of green and social activities that are eligible for sustainable financing which has been implemented for 2025 and will continue to be applied in the future. These activities include five distinct themes: Energy Efficiency, Renewable Energy, Sustainable Transport, Resource Efficiency and Pollution Control, and Green Buildings. Thus, the Group has committed to (re)finance:

- Processes and infrastructure that facilitate recycling. Examples: waste management companies which incorporate recycling and sustainable waste management practices.
- New technology to facilitate maximum use of waste. Examples: separation of materials or energy efficient recycling technology.
- Treatment of bio-waste through anaerobic digestion in dedicated plants with the resulting production and utilization of biogas and digestate.
- Treatment of bio-waste through composting (aerobic digestion) in dedicated facilities with the resulting production and utilization of compost.
- Companies/projects that substitute virgin raw materials with secondary (recycled) materials originating from materials and resources recovery.
- Companies/projects that increase the capacity utilization of a product or asset during its useful life through sharing business models. Sharing is circular when it optimizes the utilization of the product or asset.
- Repair activities and activities that facilitate reduction in material use. Examples: renting electric appliances instead of buying or community-based equipment sharing, etc.

Alpha Bank Group is implementing sustainability into its operations and financing activities according to its SFF and in alignment with global sustainability goals, including the Paris Agreement, the EU Green Deal, and the United Nations Sustainable Development Goals (SDGs).

The Group provides funding for projects that promote recycling, composting, and innovative waste-to-energy solutions, including the production of biogas and secondary materials with an established goal of achieving Euro 3.8 billion in sustainable disbursements by 2027.

Regarding geographies and stakeholder groups, actions applicability please refer to the relevant section in [E4-3] Actions and resources related to biodiversity and ecosystems.

To support remediation for communities impacted by material environmental harms, the Group has financed projects aimed at improving waste management infrastructure in regions with historically inadequate waste processing systems. The Epirus Region and Peloponnese Region PPP projects exemplify this commitment, directly reducing pollution, minimizing harmful environmental impacts, and improving public health outcomes. These efforts address the systemic harm caused by improper waste management, ensuring compliance with international environmental standards while benefiting local communities.

The Epirus plant, operational since 2019, ensures at least 17,000 tonnes of recyclable materials are recovered annually, contributing to national recycling targets. The plant generates 10,800 kilowatt-hours of green energy every year, enough to power 3,000 households, while preventing the release of 12,000 tons of carbon dioxide into the atmosphere. Additionally, it produces 25,000 tonnes of compost annually, supporting sustainable agricultural practices and reducing reliance on chemical fertilizers.

The Peloponnese plant, which has been completed in 2025, prevents regional landfill waste, at least 65% of biodegradable materials are utilized, 60,000 tons of liquid waste are diverted from landfills, and green energy is generated to serve the needs of 6,000 households, while avoiding release of 24,000 tons of carbon dioxide into the atmosphere.

Resources for implementation of actions

Alpha Bank Group acknowledges the importance of allocating appropriate financial and other resources to effectively implement its action plans. The Group incurs operating (OpEx) and capital expenditures (CapEx) in connection with initiatives aimed at supporting circular economy from its business activities and its own operations. However they are not presented in this statement as they are not considered significant.

[E5-3] Targets related to resource use and circular economy

Resource Use and Circularity Targets

The Group has identified through its Materiality Analysis the potential negative impacts on circularity (resources and waste) through its financial products/services. In order to promote the reduction of waste generation and promotion of the principles of the circular economy in alignment with SDG 12 "Responsible Consumption and Production" the Group monitors the financing provided in alignment with the Bank's SFF Green pillar - Resource efficiency and pollution control theme which targets loans for recycling and reuse and circular economy.

Alpha Bank sets an overall target for new sustainable financings of EURO 3.8 billion for 2025-2027 which includes dedicated purpose financing to Companies/projects that substitute virgin raw materials with secondary (recycled) materials originating from materials and resources recovery, Companies/projects that increase the capacity utilization of a product or asset during its useful life through sharing business models and Repair activities and activities that facilitate reduction in material use. However, no specific target for circular-focused disbursements has been set.

In addition, the Bank measures and monitors the financing eligible and aligned to the EU Taxonomy objective for the transition to a circular economy, in accordance with Article 8 of the EU Taxonomy.

The Group's target applies to its downstream value chain and is applicable everywhere (i.e., in each country) that there are operations. The initial focus for the Group's sustainable lending targets is its largest entity, Alpha Bank S.A., with the targets having been expanded across the Group for 2025.

In accordance with the waste management hierarchy, the Bank's target is positioned mainly at the "avoid" stage, as its primary objective is to prevent the generation of waste at source, by contributing to the elimination of the use of virgin materials and to the promotion of the prolonged use of products through its portfolio. Moreover, it shall be stated that the target is not mandatory.

Targets Assumptions, Methodologies, Scenarios, Data Collection and Alignment with International Policies

The Bank is in the process of developing more targets on material sustainability matters for the organization and is actively leveraging its Materiality Analysis and SFF to identify areas of priority and impact. The finalization will consider both local and international sustainability contexts.

To ensure the robustness of its existing target of Euro 3.8 billion towards new Sustainable Financings including circularity-focused projects by 2027, Alpha Bank utilizes methodologies and frameworks provided by the organizations and initiatives it participates in or supports. As a signatory of the Net-Zero Banking Alliance (NZBA), the Bank is aligning its long-term objectives with the net-zero pathways, using science-based scenarios to measure and track emissions reductions. Through the UN Principles for Responsible Banking (PRB), Alpha Bank has integrated the SDGs and Paris Agreement objectives into its business model.

Further, Alpha Bank adheres to the Green Bond Principles (2021) and Green Loan Principles (2021) to classify and track sustainable financing activities, ensuring that these meet globally recognized sustainability standards. As part of its membership in the UN Environment Program Finance Initiative (UNEP FI), the Bank applies best practices to assess risks and opportunities in its financing activities, particularly related to circular economy and resource (re)use.

To enhance transparency and align with international policy goals, the Group incorporates guidance from the TCFD in its reporting and integrates climate-related risks into its decision-making processes. Furthermore, through its participation in the United Nations Global Compact (UNGC), the Group ensures its sustainability targets address broader social and environmental considerations.

The targets under development will also align with Greece's Recovery and Resilience Plan and other relevant EU and national policies. The methodologies will incorporate both quantitative metrics (e.g., total amount allocated to sustainable financing, total financing specifically to renewable energy projects, percentage reduction in financing activities that negatively impact the environment) and qualitative indicators (e.g., governance improvements, programs initiated to educate stakeholders, awards and recognitions received), ensuring progress is measurable, traceable, and aligned with the Group's commitment to sustainable development.

Further engagement to diverse stakeholders, including regulators, Customers, and community representatives takes place through structured dialogues and collaborative platforms, with the most recent example of materiality assessment. More details on the stakeholders engagement process please refer to the relevant section in [SBM-2] *Interests and views of stakeholders*. By actively participating in initiatives like the UNEP-FI, the Group ensures that its goals reflect broad societal priorities and address key sustainability challenges.

While more targets are included, Group remains committed to maintaining transparency through regular updates in its Sustainability Report and other disclosures.

Progress against targets

Alpha Bank has a commitment of EURO 3.8 billion towards new Sustainable Disbursements including circularity-focused projects, according to the 2025-2027 business plan.

The metric for circularity-focused projects is absolute, with no significant assumptions behind it. It is based on the activities incorporating circular economy principles in alignment with Alpha Bank's Sustainable Finance Framework and SDG 12. Disbursements for circularity-focused projects amounted to **Euro 6.6 million** for 2025.

The European Recovery and Resilience Facility (EU RRF) plays a critical role in Alpha Bank's sustainability strategy. RRF loans are aligned with Greece's Recovery and Resilience Plan, financing projects that enhance resource efficiency, promote circular economy principles, and accelerate the green energy transition. While compliance with RRF requirements is mandatory, Alpha Bank voluntarily extends these principles to its broader lending portfolio, further supporting the green transition of SMEs and other key sectors.

The Group's broader sustainability strategy integrates the Paris Agreement and the European Circular Economy Action Plan.

Targets Applicability

The Group acknowledges the importance of improving disclosures for its subsidiaries and entities in other countries. For entities or subsidiaries not explicitly covered in the present Sustainability Statement, the Group reaffirms that efforts are underway to extend these frameworks and assessments. Reasons for this stem from varying stages of implementation of standardized materiality assessments and data collection processes across regions such as local regulatory requirements, operational structures, and resource availability

[E5-6] Anticipated financial effects from material resource use and circular economy-related risks and opportunities

Anticipated Financial effect of circular economy-related risks & opportunities

The results of the materiality assessment performed are illustrated under [SBM-3] *Material impacts, risks and opportunities and their interaction with strategy and business*.

SOCIAL INFORMATION

ESRS S1 - OWN WORKFORCE

Alpha Bank Group is dedicated to advancing responsible business practices that foster an ethical working environment for its workforce. The Group has integrated sustainability into its core operations, acknowledging that respect for human rights is fundamental to long-term value creation. In alignment with international frameworks and taking into consideration the Stakeholders' considerations, the Group continuously adapts to meet evolving standards and best market practices, please refer to [SBM-2] *"Interests and views of stakeholders in relationship with strategy and business model"* for further details.

[S1.SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Regarding material impacts, risks, and opportunities, all Employees in Group's own workforce who could be materially impacted by business activities are included within the scope of disclosures. The Employees are directly employed by the Group's Subsidiaries, and include permanent and temporary Employees, as well as trainees or part-time Employees in some subsidiaries. For more information, please refer to "Connection of material impacts, risks and opportunities with strategy and business model" section above.

Equal treatment and opportunities for all

Alpha Bank Group is committed to maintaining a fair and equal working environment that upholds human dignity, ensures non-discrimination, and promotes equal opportunities for all Employees, regardless of age, gender, disability, or sexual orientation, actively fostering a culture of inclusion, mutual respect, and shared responsibility in advancing diversity and equitable treatment across its workforce.

The Group has integrated equal treatment as a core principle within its governance and operational frameworks, through the adoption of appropriate policies, the promotion of ethical standards as well as by adhering to all legal requirements, to maintain and support an ethical and meritocratic working environment. Through its Code of Conduct and Ethics explicitly safeguards transparency, integrity, and equal treatment across all internal and external relationships, including Employees, suppliers, and stakeholders. Its Diversity Policy demonstrates its commitment to inclusive practices and merit-based selection, particularly at the Board level. These initiatives are, also, supported by the Group's adherence to the Hellenic Corporate Governance Code, which reinforces ethical conduct and non-discrimination. Alpha Bank, also, ensures that all Employees have access to appropriate **communication channels** to express concerns or report issues, in alignment with the Group's whistleblowing procedures and ethical standards. By embedding these values into its strategy and business model, Alpha Bank proactively manages material risks and opportunities related to workforce equity, fostering a fair and respectful working environment that enhances Employee engagement and organizational resilience.

The Double Materiality Assessment identified "Staffing and training issues" as the only material risk related to Alpha Bank's own workforce. No material opportunities were identified within this category, the assessment also highlighted positive impacts associated with the Group's workforce practices.

The Group recognizes that emerging technologies and accelerated digitalization present both new prospects and potential risks for workforce adaptability which is applicable to all Employees. In particular, the Group acknowledges that insufficient, delayed, or uneven access to training and skills development may pose a risk of skill obsolescence, reduced confidence and engagement, and psychosocial strain (e.g., stress or "technology fatigue") that could adversely affect employee well-being and productivity. To proactively mitigate these risks, Alpha Bank ensures equitable access to tailored learning paths for Employees of all ages, backgrounds, and skill levels and monitors completion and impact through defined KPIs. As part of this approach, the Bank has introduced AI Awareness sessions to demystify new technologies, promote responsible and secure use of AI, and support Employees in adapting to evolving tools and processes, while mitigating health and safety related risks from the use of emerging technologies. By investing in inclusive, data-informed development programs, combined with manager check-ins and employee feedback loops, the Group aims to ensure that technological progress enhances productivity and innovation while safeguarding engagement, inclusion and overall well-being.

Although no negative material impacts on its Employees were identified, the Group recognizes that the continuously growing demand for upskilling and the inherent challenges in the implementation of Diversity, Equality and Inclusion principals can inadvertently result in discriminatory practices, especially in fast-paced sectors where organizations are expected to fully adapt in rapidly changing conditions. To protect its workforce, Alpha Bank Group is committed to proactively engage with its Employees to discover potential incidents of discrimination early and ensure that such cases are stand-alone incidents which are not indicative of the Group's values and practices. In terms of equal treatment amongst the workforce, no specific category of Employees is considered to be at greater risk.

Some of the Policies applicable to the Group's workforce, that help ensure positive impacts, in the context of equal treatment for all staff are:

- Code of Conduct & Ethics
- Remuneration Policy
- Diversity Policy
- Career Framework

Moreover, indicative activities and initiatives that contribute to the Group's commitment to positive impacts in terms of equality are:

- Diversity and Inclusion programs, initiatives, and trainings to promote gender equality, provide support to underrepresented groups, and ensure equal opportunities for all Employees with the ultimate goal of creating a more supportive and inclusive work environment that values Employee satisfaction and promotes organizational as well as individual performance.
- Multiple programs designed to support Employees in various aspects of their lives, including initiatives that promote physical and mental health, resources that encourage family engagement and flexible work arrangements, to ensure a healthy and well-balanced workforce.

Working Conditions

Alpha Bank Group upholds high standards of working conditions, ensuring a fair, safe, and inclusive environment that supports Employee well-being, professional development, and equal opportunity across all roles and functions, which is also highlighted through the positive impacts that have been identified under the Double Materiality Assessment "Secure employment", "Social dialogue" and "Freedom of association".

The Group fully complies with all applicable European and national legislation and regulatory requirements concerning working conditions and consistently applies international best practices across its entire workforce. To ensure the highest working conditions for its workforce, Alpha Bank Group:

- Implements various policies and procedures to eliminate health related risks and promote work-life balance, promoting job security, through strategic workforce planning for all Employees, especially those impacted by potential restructurings.
- Ensures that high performance is rewarded through a well-structured remuneration policy and specifically, by its variable remuneration framework, which consists of carefully planned measurable targets.
- Conducts annual performance reviews and provides feedback to all Employees regarding their performance.
- Offers continuous learning opportunities, providing access to professional development courses, and supporting career advancement through mentorship programs and through learning and development tools for all Employees (e.g., Udemy) to help them seamlessly adapt to modern work practices and evolving job roles.

- Establishes regular communication channels between management and Employees, creating forums for discussion, and involving Employees in decision-making processes (e.g., talk to us, Alpha Way Communities of Change, Townhalls, new Intranet etc.).
- Conducts annual Employee satisfaction surveys with high participation rates to monitor the Employees' pulse on issues related to working conditions.
- Provides various benefits to its Employees, such as health care coverage, teleworking options, initiatives related to Employee well-being with focus on both physical and mental health etc.
- Supports the formation of Employee unions, ensuring the right of Employees to collective bargaining.

Alpha Bank Group's operations are primarily concentrated in the European Union, where stringent regulations and oversight mechanisms are in place to prevent cases of child labor, forced labor and compulsory labor, hence why the Group has not identified any types of operations or geographical areas with the aforementioned risks. The Group's implemented robust policies and practices have been designed to address and mitigate individual incidents, with prompt and effective responses, ensuring that no specific category of Employees is at greater risk in terms of working conditions and no particular activities that could lead to a greater risk for individual with specific characteristics have been identified at Group level. Furthermore, our net zero transition plan ensures that no negative impacts are expected on our Employees.

Health and Safety

Alpha Bank Group recognizes Health, Safety and Wellbeing to have an important aspect of its workforce. Thus, a Strategy on Health, Safety and Wellbeing has been approved, structured around the following three pillars, with launches and implementation of initiatives and actions around them:

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

Recognizing that resilience and preparedness for unexpected or adverse situations are crucial for safeguarding the health and safety of its workforce, Alpha Bank Group:

- updates emergency and evacuation plans when required by changes in conditions, regulations or other requirements and events.
- establishes procedures to ensure that suppliers and third parties comply with those high standards, through technical assessments, consultations and HSE audits
- provides on-site training on first aid
- organizes on-site 'stop smoking' clinics to support Employees in improving their health and overall quality of life.

[S1-1] Policies related to own workforce

Alpha Bank Group has established and implemented policies to address material impacts, risks, and opportunities for its own workforce, ensuring coverage of all Employees, in alignment with the Minimum Disclosure Requirements on Policies (MDR-P) as outlined in ESRS 2. To ensure that all Group policies are effectively designed, approved, and executed through appropriate governance structures and procedures, and that they remain aligned with the Group's strategic objectives and the interests of its stakeholders, dedicated processes have been put in place.

Alpha Bank Group upholds a strong commitment to safeguarding human rights and promoting fairness across its operations. The Group actively cultivates a workplace culture that values individual expression, equal opportunity, and inclusive practices, guided by its internal frameworks on Diversity, Equity, and Inclusion and its overarching human rights principles. All employment-related policies and procedures are shaped by a firm respect for human rights, ensuring that equity and diversity are not only protected but also embraced throughout the organization. Alpha Bank reinforces this commitment through structured initiatives and governance mechanisms, as well as continuous engagement with its workforce through numerous initiatives and trainings regarding career and leadership development opportunities, regular surveys and feedback mechanisms, flexible work options and health and well-being programs.

In alignment with internationally recognized standards such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, the Group integrates human rights considerations into its strategic and operational decision-making, aiming to prevent violations and foster a responsible and respectful working environment in its own workforce and its business partnerships. Several mechanisms, including trainings, are in place to monitor compliance with the aforementioned standards and frameworks, and they are referenced in detail in the Grievance or Complaints Handling Mechanisms Related to Employee Matters section of the S1- Own workforce. The Group also adheres to sectoral labor agreements in Greece and other countries where it operates, ensuring compliance with national and international labor standards and legal requirements. In extremely rare cases where human rights violations are identified in the Group's operations, remedial actions are immediately imposed to not only correct the specific violation but to also reinforce its identification system and overall ethical practices and standards.

Forced Labor, Compulsory Labor, Child Labor

Alpha Bank Group is dedicated to fostering a safe, healthy, and equitable working environment where all Employees are treated with dignity and respect. In alignment with national and European legislation, as well as the Group's core values and principles, any practices involving forced, compulsory, or child labor are strictly prohibited across all operations.

To uphold these standards, Alpha Bank conducts comprehensive due diligence and background checks on both Employees and business partners, ensuring alignment with its ethical commitments and safeguarding its operations from any involvement in such practices. These measures reflect the Group's unwavering commitment to human rights and responsible business conduct.

Elimination of discrimination, Harassment prevention, promotion of equal opportunities, Diversity & Inclusion

In relation to human rights, Alpha Bank Group has a wide variety of policies in place to safeguard its operations and foster a safe and fair working environment. The Group is dedicated to preventing, mitigating, and addressing discrimination, violence, and harassment, including gender-based and sexual harassment, and domestic violence and takes appropriate measures or makes reasonable adjustments to its working conditions to support potentially affected Employees. Moreover, it informs and sensitizes its Employees through various means, including printed and electronic materials and trainings, ensuring that they are all the policies and procedures regarding the prevention of discrimination and harassment in the workplace.

In 2025 the Group provided practical guidance, based on the Code of Conduct and Ethics, to all Employees to enhance its strategy against all forms of discrimination, harassment, or misconduct against not only colleagues but also Customers, suppliers or contractors promoting the Group's values and commitment to provide a safe working environment.

To reinforce its strategic commitments, the Group applies the following policies:

Corporate Responsibility Policy

Policy Scope: *Entire workforce*

Policy Implementation Oversight at the highest organizational level: *Chief Executive Officer (CEO)*

This Policy is grounded in internationally recognized human rights frameworks, including the ILO Core Labor Conventions, the Universal Declaration of Human Rights (UDHR) and the Organisation for Economic Co-operation and Development (OECD) Guidelines on Responsible Business Conduct.

It affirms Alpha Bank Group's commitment to respecting the rights of its workforce by explicitly prohibiting child, forced, and compulsory labor. The Policy also upholds the rights to freedom of association and collective bargaining, in accordance with both national and international standards.

The main objectives of the Policy are to:

- Promote fair, inclusive, and respectful working conditions, defend human rights and provide opportunities for employee development, health, and safety.
- Support society by prioritizing initiatives in culture, education, health, and environmental protection.
- Incorporate environmental, social, and governance (ESG) criteria into financing and product development, actively contributing to environmental protection and resource conservation.
- Ensure credibility, consistency, and efficiency in banking services while continuously improving products and services to meet Customer needs responsibly.

This Policy promotes workforce diversity, fair remuneration, and continuous Employee development, while ensuring a strong focus on occupational health and safety and work-life balance. These principles are consistently applied across all Group entities, both in Greece and internationally. The oversight of the Policy is managed by the Communications and Corporate Affairs Business Area and it is uploaded to the Group's Intranet, where it remains available for all Employees. The policy has been updated in 2025 and is due for Executive level approval in H1 2026.

Diversity Policy

Policy Scope: *Members of the Board of Directors, Senior Management and Employees*

Policy Implementation Oversight at the highest organizational level: *Chief of Corporate Center and General Counsel and Chief Human Resources Officer (CHRO)*

The Diversity Policy is applicable in the selection process for the Board of Directors' Members as well as for the appointment of Alpha Bank's Senior Management and Employees and has been designed according to the legislative and regulatory frameworks currently in force, including the Joint ESMA/EBA "Guidelines on the assessment of the suitability of members of the management body and key function holders", as well as embracing European best practices in corporate governance.

The main objectives of the Policy are to:

- Support and promote diversity on the Board of Directors and Employees.
- Engage a broad set of qualities and competences in the recruitment process, to achieve a variety of views and experiences and to facilitate independent opinions and sound decision-making within the Board of Directors.
- Aim at an appropriate representation of all genders within the Board of Directors.
- Ensure that the principle of equal opportunities is respected when selecting Members of the Board of Directors.
- Ensure equal opportunities and treatment for Employees of different genders.

Through this Policy, the Group affirms its commitment to respecting, protecting, and promoting the diversity of all Employees. Alpha Bank Group is dedicated to fostering an inclusive working environment that is free from any form of discrimination, including but not limited to discrimination based on gender, age, nationality, marital status, sexual orientation, genetic characteristics, disability, race, color, religious or political beliefs, ethnic or social origin, citizenship, or any other protected characteristic.

The monitoring process for the Diversity Policy consists of oversight and evaluation by the Corporate Governance, Sustainability and Nominations Committee regularly, which is responsible for assessing the implementation of the Policy, reviewing gender representation and overall diversity at the Board of Directors, Senior Management, and Employee levels within Alpha Bank S.A.

As part of the annual evaluation of the Board's effectiveness, the Committee analyzes its composition, considering diversity in skills, experience, and representation. If diversity objectives are not met, the Committee investigates the underlying reasons and recommends corrective actions to ensure compliance with the principles of equal opportunity and inclusion. Additionally, the Policy is periodically reassessed against diversity benchmarking results published by competent authorities such as the EBA ensuring its alignment with regulatory requirements and industry best practices.

The key elements of the Diversity Policy are included in the Corporate Governance Statement that is uploaded in Alpha Bank's website, where it remains available for all Employees.

Career Framework

Policy Scope: *Entire workforce*

Policy Implementation Oversight at the highest organizational level: *Chief Human Resources Officer (CHRO)*

Alpha Bank Group is committed to providing structured growth opportunities, enhancing organizational effectiveness, and establishing itself as a preferred employer. To support these objectives, the Career Framework Policy establishes a comprehensive structure to define, evaluate, and manage roles within the Group, ensuring clarity, fairness, and alignment with strategic objectives. It categorizes roles based on job titles, career levels, and job families, creating a consistent framework for role assessment and career development.

The basic principles governing the Policy are:

- **Transparency:** The steps, rules and definitions followed to define the characteristics of each job role, as well as their approval process, are published internally within the Group.
- **Consistency:** Job roles from different functional areas but with the same level of contribution to the Bank's goals are managed similarly, based on specific evaluation criteria of importance.
- **Validity:** The relative importance of each job role for the operation of the Organization is determined objectively and with fair judgment, based on the job description, impact indicators on the Organization, and required skills
- **Flexibility:** The Career Framework Policy is adapted to changes in the Bank's business models.

Prior to the launch of the Career Framework, HR engaged in a series of consultations with Business Area Directors to finalize role descriptions and employee allocations to the new roles, incorporating feedback on an individual basis. Additionally, presentation of the Career Framework was delivered to the Workers' Representatives to ensure alignment and facilitate smooth implementation.

The Career framework provides a foundation for managing employee career development within an organization, it supports the alignment of HR processes to the organization's goals and objectives and helps to build a motivated and engaged workforce. Specifically, this Policy can help:

a) the organization benefit by:

- Becoming more competitive, by providing a job architecture, established in many companies, that is considered an important employer selection factor
- Clearly defining different roles and their corresponding level of responsibility, as well as defining value adding hierarchical levels, thus supporting career development programs
- Providing a solid building block for rewards programs, linking them to the role in the organization

b) the Employees benefit by:

- Minimizing subjectivity and enabling rational, consistent, and transparent decisions about roles
- Allowing them to see where they fit within the organization.
- Helping them understand their relative position within the organization.
- Empowering them to navigate their own career paths.
- Providing the ability to manage their own development plans.
- Unlocking multiple opportunities across the business.

The Policy integrates seamlessly with core human resources systems, including talent management, compensation, and workforce planning. It supports dual career paths, enabling Employees to advance either through managerial roles or as individual contributors, based on their expertise and aspirations. Role evaluations are conducted objectively, focusing on responsibilities, required competencies, and their impact on the organization, ensuring a transparent and equitable approach.

The Policy is reviewed periodically to ensure that the framework remains aligned with market standards, GRI Standards and organizational needs and is uploaded to the Group's Intranet, where it remains available for all Employees. The Policy applies to all Employees of the Bank and the Group Companies, except for any specific requirements and adjustments to individual issues. These exceptions must be approved by the Executive Committee, adhere to the local, supervisory, and legislative provisions of the countries where the Group operates.

In 2025, Alpha Bank reaffirmed its commitment to career progression and talent development through the design of a **structured career pathing framework**. This initiative provides Employees with clearly defined career trajectories, outlining required skills, experiences, and development opportunities. By integrating this framework with key HR systems and policies, Alpha Bank has fostered a holistic approach to internal mobility, enabling structured development, succession planning, and career progression.

Linking Policies with Actions related to Diversity

Along with the abovementioned Policies, since 2022 the Group has adopted and throughout the years enhanced a modern framework against violence and harassment at the workplace and since 2023, the Bank developed its DE&I Strategy, consisting of five DE&I focus pillars:

- **Gender Diversity:** A framework of interventions has been developed to promote equal opportunities in professional development, performance evaluation, and rewards, with a strong focus on women's personal growth. The program "A.W.A.R.E." (Alpha Women, Authentic, Resilient, Empowered), is the starting point for female empowerment. It has implemented a comprehensive framework over the past years to promote gender equality and personal development for women. Key empowerment initiatives include the Group's mentoring and educational programs as Trading Alpha Brains (TAB), PosiDives, SheForHe, Bankers and Daughters. The last two programs were not implemented in 2025.
- **Generational Diversity:** The Group offers students hands-on experience through short- and long-term internships and provides young professionals with full-time roles via fixed-term contracts.. The Group also runs two Accelerator Programs in Retail and Wholesale, supporting over 200 young professionals in their career development. Additionally, the Young Enthusiasts Society (YES) fosters a vibrant community for Employees under the age of 30, encouraging engagement, skill-building, and collaboration across departments.
- **Health Equity:** The Group promotes health equity by offering disability-related leave, reduced working hours, and financial assistance, including support for child health issues. Employees and their families have access to comprehensive health and life insurance plans, outpatient coverage, and savings plans. Additional benefits for parents include childbirth allowances, day-care support, and flexible working arrangements. On-site medical care is provided by two physicians with fully equipped dispensaries. To further support well-being, the Wellbeing Employee community designs initiatives focused on mental health, work-life balance, financial wellness, and physical health.
- **Financial Inclusion:** Financial equity is one of the cornerstones for the professional development of Alpha Bank's Employees. Financial equity aims to create more informed citizens who make wiser financial decisions and thus become responsible consumers & better bank Customers for the benefit of the bank and the economy overall.
- **LGBTQ+ inclusion:** Among numerous trainings in matters related to inclusion, the Group has also launched a large-scale awareness program for people managers focused on identifying and preventing unconscious bias, reinforcing a culture of fairness, dignity, and support.

Code of Conduct and Ethics

Policy Scope: Entire workforce and business partners

Policy Implementation Oversight at the highest organizational level: Chief Compliance Officer (CCO)

Alpha Bank Group has introduced a Code of Conduct and Ethics, approved by the Board of Directors through the Corporate Governance Sustainability and Nominations Committee, which describes the Group's commitments and rules of conduct applicable to the interactions between its Executives, Employees, transacting parties and shareholders. The Group attaches great importance to matters of ethics and transparency and has in place clear rules regarding the protection of personal data, the prevention of bribery and conflicts of interest, as presented also through Double Materiality Assessment, see section [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model.

The Code's main objectives are to:

- Inform all Employees about Alpha Bank's values and specific procedures, measures and practices they must follow to ensure a healthy working environment as well as legal and regulatory compliance throughout the Group,
- uphold ethical business conduct, regulatory compliance, and corporate transparency across all Group operations, establishing the foundation for integrity, accountability, and responsible corporate governance and ensuring alignment with the Group's values and regulatory obligations. It is directly linked to the material impacts, risks, and opportunities identified through the Group's double materiality assessment (e.g. ethical conduct, fair treatment, secure employment, social dialogue, and non-discrimination).
- Promote all five Diversity, Equity and Inclusion pillars in the workforce and avoid all types of discrimination, harassment or inappropriate behavior between all Employees, and
- support a corporate culture, where Employees are protected, empowered, and encouraged to uphold ethical standards.

The process for monitoring its adherence includes structured compliance frameworks, periodic internal audits, oversight by the Corporate Governance Sustainability and Nominations Committee, and dedicated training programs. Additionally, whistleblowing mechanisms and grievance procedures enable Employees to report unethical behavior or Code violations.

The Code of Conduct and Ethics supports Alpha Bank Group's sustainability commitments by aligning with internationally recognized third-party standards, including the UN Global Compact principles, the OECD Guidelines for Multinational Enterprises, and the Global Reporting Initiative (GRI) Standards. These frameworks guide the Group's approach to ethical business conduct, human rights, fair treatment, anti-corruption, and responsible corporate governance, and underpin the relevant disclosures under the European Sustainability Reporting Standards (ESRS).

The Code of Conduct and Ethics is uploaded to the Group's Intranet, where it remains available for all Employees.

Violence and Harassment Prevention Policy

Policy Scope: Entire workforce

Policy Implementation Oversight at the highest organizational level: Chief Human Resources Officer (CHRO)

The Group has a zero-tolerance approach to any form of harassment, including sexual harassment and domestic violence that could potentially affect the workplace environment. The Violence and Harassment Prevention Policy sets the framework for preventing as well as addressing workplace discrimination, violence, and harassment, ensuring a respectful and dignified environment. The Policy is applicable to all Employees, contractors, interns, as well as all related stakeholders and has been designed and implemented according to Greek Law 4808/2021, which ratified the ILO Conventions No. 190 and No. 187 and transposed the Directive (EU) 2019/1158 of the European Parliament and of the Council. The Violence and Harassment Prevention Policy is uploaded to the Group's Intranet, where it remains available for all Employees.

It establishes clear mechanisms for reporting, investigating, and taking appropriate actions to resolve incidents confidentially and impartially. Reports of workplace violence, harassment, or discrimination are assessed through a structured process that ensures fairness, objectivity, and protection of all parties involved. The Evaluation Committee for Reports and Complaints is responsible for reviewing all submitted cases and determining appropriate actions, with strict adherence to confidentiality principles and non-retaliation safeguards.

Support and protection for victims are prioritized, and the Group commits to raising awareness through training and resources to prevent future occurrences. Any form of retaliation or malicious reporting is strictly prohibited, ensuring a safe reporting system and compliance with legal obligations. The Policy explicitly covers discrimination based on gender, race, color, ethnic or social origin, genetic characteristics, language, religion or beliefs, political opinions, disability or health status, age, or sexual orientation.

The monitoring process for the Violence and Harassment Prevention Policy is structured in such a way to ensure its continuous implementation and effectiveness. The Corporate Governance, Sustainability, and Nominations Committee is responsible for overseeing the enforcement of the policy, ensuring that incidents are managed in a manner consistent with legal and regulatory requirements.

Additionally, awareness and training programs are regularly conducted to reinforce the Group's zero-tolerance approach and to educate Employees, contractors, and stakeholders on identifying and preventing workplace violence and harassment. Periodic internal reviews and audits ensure compliance with the policy, while benchmarking against industry best practices and legal standards provide a framework for continuous improvement. Any corrective actions required due to identified policy breaches or gaps are implemented to enhance workplace safety and maintain a respectful and inclusive environment. The Violence and Harassment Prevention Policy is aligned with internationally recognized third-party standards and frameworks for responsible business conduct and human rights. In particular, it reflects the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and relevant Global Reporting Initiative (GRI) Standards. Through this alignment, Alpha Bank reinforces its commitment to providing a safe, respectful, and inclusive working environment, and supports transparent and comparable disclosures on workplace practices in line with international sustainability reporting standards.

Remuneration Policy for Employees

Policy Scope: Entire workforce

Policy Implementation Oversight at the highest organizational level: Chief Financial Officer (CFO)

The Remuneration Policy of Alpha Bank and the Companies of the Group establishes a structured framework for Employee compensation, ensuring compliance with Greek laws, European Banking Authority (EBA) guidelines on sound remuneration policies under Directive 2013/36/EU, and financial best practices.

The Policy aims to attract and retain skilled Employees, encourage long-term sustainable performance, and align Employee remuneration with strategic objectives and the group's risk management framework. This Policy is gender neutral, promotes equal pay for equal work, supports diversity and inclusion and balances the fixed and variable components of remuneration, where the fixed component includes the base salary and specific benefits and the variable component consists of performance-based bonuses.

This Policy also includes risk management mechanisms, such as malus and clawback provisions, prevents excessive risk-taking and ensures accountability. Moreover, ensures that performance evaluation is based on a mix of financial, non-financial, and risk-adjusted criteria, ensuring that remuneration decisions support long-term corporate stability.

The remuneration governance model aims at ensuring clarity and reliability in decision-making processes related to remuneration. The HR function is responsible for the design and annual review of the Policy to ensure alignment with regulatory changes and market trends, while the competent Control Functions review the implementation of the Policy, provide input regarding matters pertaining to its risk and compliance aspects, as well as opinions where needed. The principles, structure and governance of this Policy are overseen by the Remuneration Committee, as well as the Board of Directors. An independent review is carried out, at least annually, by the Internal Audit function to assess the design, implementation and effects of this Policy.

Within this structured and comprehensive remuneration policy, Alpha Bank ensures sustainable growth while safeguarding the interests of its Employees, shareholders and stakeholders. The key elements of the Remuneration policy of Alpha Bank and the other Companies of the Banking Group are uploaded to the Group's Intranet, where they remain available for all Employees.

Occupational Health and Safety Policy

Policy Scope: *Entire workforce*

Policy Implementation Oversight at the highest organizational level: *Health and Safety Board*

The Occupational Health and Safety Policy, uploaded to the Group's Intranet where it remains available for all Employees, establishes the framework for managing health and safety across the Group. Its purpose is to implement best practices and procedures, enhance performance, ensure compliance with institutional and regulatory requirements, and safeguard the health, safety and well-being of its Employees.

The Policy incorporates the Occupational Health and Safety Statement Policy Statement outlining the commitments and principles that guide its implementation. It defines the scope and framework designed to meet these commitments, including compliance with regulatory and other requirements, consultation processes etc.

Additionally, the Policy describes the procedures and processes that support the Health and Safety Management System, such as risk assessment, incident investigation, training and change management. In an annual basis, internal audits are scheduled by internal and external bodies in order to ensure the policy's requirements implementation and identify potential nonconformities and potential improvements.

Moreover, Alpha Bank Group implements, monitors, and continuously improves its Health and Safety Management System certified by an accredited body in accordance with ISO 45001 standards. This system includes policies and procedures aimed at preventing workplace accidents and promoting Employee well-being.

Connection between Policies and IROs

The abovementioned Alpha Bank Group's internal policies are directly linked to the material Impacts, Risks, and Opportunities (IROs) identified through the relevant assessment. Each policy supports one or more workforce-related topics. Specifically, the Corporate Responsibility Policy is primarily linked to Workforce Equality and Justice, while the Code of Conduct and Ethics supports the material impact of Contribution to Livelihood as well as Workforce Equality and Justice. The Remuneration Policy relates to the material impact on Workforce Livelihood, whereas the Violence and Harassment Prevention Policy and the Diversity Policy directly support the impact area of Workforce Equality and Justice. Additionally, the Career Framework Policy is connected to the material impact of training and skills development, including associated staffing and training risks, and the Occupational Health and Safety Policy underpins the material impact related to workforce health and safety.

[S1-2] Processes for engaging with own workers and workers' representatives about impacts

Alpha Bank Group has established various comprehensive processes and initiatives for engaging with its workforce and workers' representatives to address actual and potential risks and impacts. These processes are part of the entire Group's ongoing due-diligence efforts to ensure that Employees' feedback, as key internal stakeholders, informs its decisions and activities effectively.

The Chief Human Resources Officer (CHRO) ensures that engagement efforts are happening throughout the year and that the relevant result and feedback is communicated to the Group's leadership as well as the entire workforce, along with remedial actions. Engagement with workers' representatives is pursued through regular in-person meetings, complemented by more frequent telephone communications. In 2025, a total of thirteen (13) in-person meetings were held. Indicatively, engagement is pursued through:

Communication and Feedback

- Human Resources Outreach:** The Human Resources (HR) function is primarily responsible for ensuring that all Employees are approached and heard and that the feedback acquired by this outreach will be incorporated and will inform the Group's approach. This responsibility for two-way communication is led by the Chief Human Resources Officer (CHRO), who, along with the HR directors and Managers, plays a pivotal role in ensuring Employee engagement. The CHRO and the HR leadership team regularly convene to discuss and address various Employee matters and concerns raised, to develop and implement new policies and strategies within the Alpha Bank Group and align the Group's business targets with the latest needs and expectations of its workforce. Moreover, the Group has established the role of HR Business Partners, who serve as the first point of contact for Employees of all business units and branches, supported further by on-site visits for interpersonal communication and open discussions.
- Employee Feedback Channels:** Alpha Bank Group maintains open lines of communication with its Employees to continuously gather data, input and feedback, with particular attention to Employees included in vulnerable groups, helping to identify specific issues and

areas for improvement. Indicatively, internal campaigns, tools such as the Speak-Up Line and internal Communities, provide Employees with accessible platforms to voice concerns and share input. Moreover, Employee engagement surveys, frequent feedback sessions, and annual 360° performance reviews help monitor the effectiveness of implemented policies and strategies, making necessary adjustments and ensuring continuous improvement.

- **Targeted programs and initiatives:** The Group implements targeted programs and initiatives to gain valuable insight in the perspectives of more vulnerable or underrepresented groups, such as women and people with disabilities within its workforce, to further support their needs. The Diversity and Inclusion Program specifically addresses the needs and challenges faced by the aforementioned employee groups, to enhance the support provided.

Labor Agreements and Employee Representation

The Group respects and fully complies with the Employees' right to unionize and take part in collective bargaining discussions and agreements, by engaging with worker representatives to discuss and negotiate on matters affecting the workforce.

- **Special Corporate Collective Labor Agreement:** The Top Management team of Alpha Bank Group Personnel Union jointly concluded a Special Corporate Collective Labor Agreement, which also further reinforced policies that prevent, address and eliminate violent and harassing behaviors in the workplace. A Sectoral Collective Labor Agreement (CLA) covers the entire banking sector, while Corporate Collective Labor Agreements (CCLA) cover all permanent Employees of the Alpha Bank Group.
- **Engagement with Unions:** The Alpha Bank Group Employees Association closely collaborates with HR, with monthly meeting discussions for topics related to Employee welfare, workplace policies, and other relevant issues. This collaboration and mutual engagement effort provides a structured platform for open dialogue and ensures that Employee voices are heard and considered in decision-making processes.

Employee Engagement Survey

The Group implements a systematic, structured, biennial Employee engagement survey designed to capture Employees' perceptions of the working environment, leadership, communication, and organizational culture. The survey forms an integral part of the Group's broader commitment to responsible people management and continuous improvement.

The 2024/25 survey was conducted from December 2024 to January 2025 and recorded an 84% response rate, with 5,334 Employees participating across the Group including 2,880 qualitative comments. Results were communicated to management and Employees, and all people managers received detailed reporting for their teams along with guidance on developing targeting action plans to foster open dialogue and address areas for improvement.

Due to a significant organizational restructuring in Greece, it was determined that conducting an earlier iteration of the Employee engagement survey in 2025 would not provide valid and comparable results. Consequently, a single survey iteration was conducted, which began on December 15th 2025 and will be concluded in 15th January 2026, the final results of which will be included in next year's statement.

Communications with own workforce for engagement in health and safety issues

Alpha Bank Group prioritizes consultation and active engagement with Employees on health and safety matters. To achieve this, the Group has implemented multiple communication channels and initiatives that allow Employees to raise concerns, share ideas and suggestions, identify risks, participate in self-assessments and provide feedback on health and safety perceptions.

Key surveys and initiatives in 2025 include:

- **"Stop Smoking" Survey:** Designed to assess interest in quitting smoking and offer participation in on-site "Stop Smoking" clinics.
- **Wellbeing Questionnaire:** Establishing a baseline for Employees' self-assessed wellbeing index.
- **Wellbeing Index Integration:** Added to the Employee satisfaction survey for continuous monitoring

Communication Channels:

- A **dedicated mailbox** where Employees might suggest ideas, raise concerns and provide feedback on health and safety matters
- A specific category within Success Factors for communication related to **health and safety**

Additional engagement methods:

- Encouraging Employee participation in events organized under health and wellbeing campaigns
- Regular meetings with the Employees' Health and Safety Board

Adherence to human and labour rights

Alpha Bank Group has established a transparent and equitable remuneration framework that ensures compliance with labor regulations, including minimum wage, working hours, and leave, while promoting gender neutrality, equal pay for equal work, and merit-based career advancement, in alignment with national labour market standards. As mentioned in above (S1-SBM3), Alpha Bank Group operations are primarily concentrated in the European Union, where stringent regulations and oversight mechanisms are in place to prevent cases of child labor, forced labor, compulsory labor and human trafficking. The Group is committed to safeguard human rights through adherence to all applicable national and European laws, as well as protecting the rights of Employees as established under national and EU law and the ILO conventions.

Group Communities linked to material impacts

To promote collaboration and networking, Alpha Bank Group facilitated the establishment of the "Communities of Change" in 2021, which are Employee groups based on shared interests or characteristics. These communities encourage learning from diverse experiences, sharing best practices, building cross-functional alliances, and enhancing the Employee value proposition. They provide safe, supportive spaces for Employees to connect, grow professionally, and foster cultural awareness.

These communities are closely aligned with the Group's strategic workforce priorities and play a vital role in fostering shared goals and collective growth. Specifically:

- **Alpha Ithacans** (related to Diversity and Inclusion): Formed in July 2021, the Alpha Ithacans Community brings together a total of 102 Employees who have been repatriated through their employment at Alpha Bank since 2019. Its mission is to exchange knowledge,

best practices, and diverse experiences to drive change and improve effectiveness across the Bank. The community also supports Alpha Bank's "Future Ithacans" initiative, encouraging Greeks abroad to consider returning and joining the organization, with outreach events held in cities like London, New York, Amsterdam, and Düsseldorf.

- **Agile Bankers** (related to Diversity and Inclusion): Established in February 2021, the Agile Bankers Community includes approximately 170 members focused on cultivating an agile mindset across Alpha Bank. Through regular meetups, workshops, and participation in the Agile Academy (ACE), the community promotes leadership engagement, expands agile squads, and fosters continuous learning to support the Bank's transformation goals.
- **Datah01cs** (related to Diversity and Inclusion and Working Conditions): Launched in April 2024, the Datah01cs Community supports Alpha Bank's digital transformation by enhancing data literacy among Employees. With 376 members from various business areas, the community offers a collaborative space for sharing ideas, learning tools, solving case studies, and developing leadership through peer training. It empowers both novice and experienced data users to grow their skills and contribute to innovation, while simultaneously raising data and AI awareness across the Bank.
- **Young Enthusiasts' Society (YES)** (related to Diversity and Inclusion and Working Conditions): Founded in March 2024, YES is a vibrant community of over 450 young Employees under the age of 29. It aims to empower early-career professionals by offering tailored training, career development coaching, and a collaborative environment. Through networking, educational programs, and cross-departmental initiatives, YES helps young talent thrive and actively shape the Bank's culture and future.
- **Wellbeing Community** (related to Wellbeing): Launched in November 2024, the Wellbeing Community is dedicated to promoting holistic wellness across Alpha Bank. With its 141 members, it provides Employees with resources and activities focused on mental health, emotional balance, physical wellbeing, and resilience. Through workshops and open discussions, the community fosters a supportive culture where wellbeing is an integral part of everyday work life.

Additional Communities of Change are being designed and will be launched in 2026, to further strengthen cross-functional collaboration, peer learning, and meaningful connections across the Group around the pillars of Diversity and Inclusion, and Wellbeing.

[S1-3] Processes to remediate negative impacts and channels for own workers to raise concerns

As per the previous section [S1-2], Alpha Bank Group provides multiple accessible channels for its entire workforce to raise concerns and maintain an open line of communication to ensure that all Employees are heard and feedback is further leveraged for tailor-made action plans to address potential shortcomings.

Cases related to human rights are primarily handled by HR Business Partners (HRBPs), who act as direct liaisons with Employees and are specialized in understanding the unique needs and challenges of Employees within their specific business units. In an effort to make the communication process more accessible, Employees can schedule meetings via the "Talk2Us" app or the "AskHR" app and report irregularities through the internal "SpeakUp" and Whistleblowing mechanisms, managed by HR Operations and Regulatory Compliance respectively, while all labor disputes are resolved in line with the Bank's Personnel Regulation.

Employees are always encouraged to report incidents of discrimination and harassment, either in writing (signed or anonymously) or via telephone, email or through the dedicated "SpeakUp" mechanism. All reports are treated with the utmost confidentiality, care and discretion, with fair, timely, thorough, and objective investigations of reported incidents being conducted by the designated bodies, overseen by the "Assessment Committee for reports or complaints related to discrimination, violence and harassment incidents". The Group has also reserved the authority to take necessary measures and impose appropriate sanctions on any individual exhibiting discriminatory or harassing behavior.

Grievance or Complaints Handling Mechanisms Related to Employee Matters

Alpha Bank remains committed to maintaining transparent and effective grievance or complaints handling mechanisms to address all Employee concerns promptly and fairly. The currently implemented approach includes multiple channels through which Employees can raise their grievances, including anonymous reporting options to protect their privacy and encourage openness.

The grievance handling process is designed to be transparent, impartial, and efficient. It involves the following key steps:

1. **Submission:** Employees can submit their grievances through various channels, including an online portal, email, or dedicated hotline.
2. **Acknowledgment:** Upon receipt, an acknowledgment message is sent to the Employee, confirming that their concern has been received and will be addressed.
3. **Investigation:** A thorough investigation is conducted by the designated team to gather all relevant information and ensure an unbiased review of the concern.
4. **Resolution:** Based on the findings of the investigation, appropriate actions are designed and enforced to resolve the issue. The approach may include different measures or even a combination of measures, such as mediation, corrective measures, or disciplinary actions if necessary.
5. **Feedback:** The outcome of the investigation and resolution process is communicated to the Employee, along with the actions taken to address their concern. Where applicable, employee satisfaction feedback is reviewed in order to determine how to improve the resolution process and address ongoing concerns more adequately, thereby improving overall satisfaction in using the channels.

Alpha Bank Group ensures that all Employees are aware of their right to use the grievance mechanism and raise their concerns without fear of retaliation. Regular training sessions and communication campaigns are conducted to promote awareness and understanding of the grievance process and address potential questions Employees may have.

Employee Communication and Support

The Group has implemented various processes to support and mandate the availability of communication channels to all Employees, which are crucial for maintaining transparency, addressing concerns, and fostering a positive work environment. Indicatively:

- Relevant Policies and instructions on how to use the channels are available at the Group's **Intranet**, where every Employee can easily access them. The Intranet serves as a centralized repository for all policy documents, ensuring that Employees have immediate access to the latest versions, including detailed guidelines on how to report concerns, the procedures for handling reports, and the support available. This way it is ensured that all Employees are well-informed about the processes in place to address their concerns and needs.

- Through the Intranet, every Employee can contact the Human Resources Business Area to discuss work-related concerns, as well as matters related to health, safety, and wellbeing, via specially designed channels such as SpeakUp and Talk2us. In these channels, each concern is carefully reviewed, and the Employee is kept informed about the status of their request. Where applicable follow-ups are conducted to ensure that issues are addressed appropriately.
- The **Violence and Harassment Prevention Policy** explicitly prohibits any form of retaliation against Employees who report concerns and also outlines the procedures for reporting incidents, investigating complaints, and taking appropriate actions to resolve issues. More specifically, it designates a specific individual responsible for receiving all relevant reports and the processes to ensure the prevention of related future occurrences.
- The **Whistleblowing Policy** aims to promote transparency and integrity within the organization by encouraging not only Employees, but also Customers, and suppliers to report any incidents of fraud, corruption, coercion, or other violations of the Bank's policies and procedures. This Policy ensures that reports can be made in good faith and with reasonable belief that an offense has been or may be committed. It also safeguards the anonymity of whistleblowers and outlines the procedures for investigating and addressing reported incidents. Alpha Bank monitors the effectiveness of its reporting and whistleblowing mechanisms, including indications related to Employee confidence in these channels, in order to ensure their continued relevance and reliability.

Health and Safety Mechanisms in place for Employees to voice their concerns

The Group actively promotes Employee engagement and open communication as essential for improving procedures, implementing meaningful interventions and organizing impactful initiatives. To facilitate this:

- A **dedicated Health and Safety mailbox** has been established and communicated through via the Intranet, enabling Employees to raise concerns, report risks, and share suggestions on health and safety.
- The Employees Health and Safety Board, widely recognized within the organization, consists of members elected by Alpha Bank Employees. Before each meeting, the Board invites Employees to submit concerns for inclusion in the agenda.
- A **Health and Safety category** within the SuccessFactors app provides an additional channel for Employees to voice issues and access relevant resources.

[S1-4] Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Alpha Bank Group carefully considers any potential impact on its workforce and has implemented a wide range of measures to ensure their safety, well-being, and professional development, including proactive risk mitigation strategies, continuous monitoring of working conditions, and the promotion of a supportive and inclusive work environment.

Key actions for own workforce

Equal treatment and opportunities for all

Alpha Bank Group invests in continuous training and professional development opportunities of its workforce to ensure that Employees are equipped with the necessary skills and knowledge to implement the newest processes and systems. The impact and effectiveness of these programs are evaluated through the assessment of participation rates, performance metrics, feedback questionnaires as well as their actual influence on employee performance and career progression.

In collaboration with external organizations that specialize in supporting women and people with disabilities, Alpha Bank Group is actively utilizing their expertise to create a more inclusive and supportive work environment.

Throughout the reporting year, the implementation of key policy objectives was supported by actions that contributed to the Group's targets through impactful programs, initiatives and partnerships. The following initiatives were available for all Employees of the Group, or to specific categories of Employees as well as junior professionals or university students, depending on the programs' scope and objectives, as described below:

Trainings

- The **"Unconscious Bias" Training**, introduced initially to Managers and Directors is a cornerstone of Group's strategy to prevent discrimination and promote diversity. It helps Employees recognize and understand unconscious biases that may influence their decisions and interactions and equips them with practical tools to mitigate these biases and foster an environment of fairness and respect. The program also strengthens the Employees' understanding on the Group's non-discrimination policies, ensuring alignment with organizational values. The training is delivered on an ongoing basis, through interactive workshops, case studies, and real-life scenarios that encourage meaningful dialogue and reflection.
- **Code of Conduct Training:** Approximately 90% of Alpha Bank Employees have completed the mandatory **Code of Conduct** training programme. Delivered to all Employees on an ongoing basis, the programme supports the Bank's efforts to prevent and address any form of discrimination, harassment, or misconduct. It sets clear expectations regarding professional behaviour towards colleagues, Customers, suppliers, and contractors, thereby promoting the Group's values and its commitment to ensuring a safe, respectful, and inclusive working environment.

Leadership Development Programs

- The Group's leadership development initiatives play a critical role in strengthening an inclusive, high-performance culture and supporting long-term organizational transformation. These programs, including the **"Leading for Impact"** initiative equip leaders with the skills required to model and promote for inclusive behaviors, navigate complexity, collaborate across boundaries and drive sustainable change. Leaders are trained to recognize and address bias in workplace dynamics and decision-making processes, take corrective actions where needed, and foster teams where Employees feel safe to express themselves without fear of unfair treatment. **"Leading for Impact"** further aligns senior leaders with the Bank's renewed Purpose, reinforcing coherence between

leadership behaviours, organisational values and strategic direction, and serving as the foundation of a continuous, multi-year leadership development framework.

Mentoring programs

- **TAB Mentoring Program:** Building on the inaugural cycle in 2021, the second cycle began in 2024 and runs through 2026. Thirteen mentors (at Director level) are paired with twenty-six mentees from frontline and central services, participating in eight mentorship sessions followed by project development." This program strengthens leadership capabilities and professional networks, reaffirming Alpha Bank's commitment to gender equality and career development.
- **The "Economy Class" program,** took place for a second consecutive year and was addressed to female Employees of the Bank. It was conducted in collaboration with the NGO "WHEN", aiming to strengthen the financial resilience and confidence of the participants through Financial Coaching. In 2025, the initiative offered four personalized sessions to 20 selected participants. For more information the financial literacy programs undertaken by Alpha Bank please refer to "Entity-Specific Information" in the Sustainability Statement.
- **The "PosiDives" program** was a key initiative within the Bank's DE&I strategy, exclusively addressed to female Employees. Designed to empower women in managerial positions, the program fosters positive thinking, strengthens support networks, and cultivates a collaborative culture. The inaugural 2024 cycle of PosiDives included 110 senior women Managers, Experts, and Branch Managers, who were actively engaged in professional growth and leadership development for a multiple month-period. Conducted in collaboration with an external partner, this included training sessions, inspiring talks from influential speakers, and interactive Q&A sessions to encourage open discussions and shared learning. Notably, 68% of participants rated the overall value of the program at 9 or 10, and the program achieved an impressive average participation rate of 70%.
- **"PosiTribes" program:** Introduced in November 2025, PosiTribes expands empowerment to over 100 men and women, focusing on leadership skills, positive mindset, resilience. Building on the success of PosiDives, this new ongoing program continues the mission of empowering Employees by enhancing leadership skills and fostering a positive mindset throughout the organization. The program includes 4 training sessions and 2 inspirational talks over 5 months, aiming to create a movement of positivity across Alpha Bank.

Acceleration programs

- Alpha Bank has integrated "**Acceleration Programs**" into its Talent Acquisition Strategy to attract young talent across various Lines of Business. These ongoing programs are designed for individuals with little to no prior work experience, incorporating transparent and highly reliable skills assessment methodologies to unlock candidates' potential. All successful participants begin their journey with a six-month probation period, which transitions into permanent employment upon consistent performance. In 2024 over 200 young professionals participated in Retail and Wholesale accelerator programs. In 2025 the number of young professionals is 218 for Retail, Wholesale, and CRO.

Internships

- Alpha Bank offers internships to both university graduates and undergraduate students, with durations ranging from 1 to 12 months, tailored to individual needs, skills and area of interest. This ongoing initiative often serves as a pathway to future employment, depending on organizational requirements. In 2024, 119 young professionals were benefited out of which 100 individuals were under 30. By the end of 2025, the total number of active internships reached 115 individuals while the total number of hires up to 30 years old was 102 individuals. In addition to this, the Summer Internship Cycle in 2025 involved 29 students from the second year of their studies, representing both Greek and international universities, with 11 participants coming from foreign institutions.

Building Connections with Universities

- The Group actively supports and participates in career events organized by universities to bridge the gap between the corporate environment and students' career development. Additionally, Alpha Bank hosts "Business Days" annually, inviting students and graduates to engage directly with industry leaders. Alpha Bank's "Business Days" have welcomed many participants for three consecutive years. These events provide a valuable platform for participants to meet business leaders, gain insights into banking operations, learn about work methodologies, and explore critical experiences that can shape their future careers.

To further enhance the effectiveness of its Policies, the Group has undertaken several key actions amongst which:

- **Training and Development:** Continuous training and development programs to enhance Employee skills and career growth.
- **Employee Engagement:** Regular Employee engagement surveys to gather feedback and improve workplace conditions.
- **Diversity Initiatives:** Programs' launches to increase the representation of diverse groups within the workforce.
- **Leadership Development:** Establishing programs to cultivate future leaders within the organization.

Working Conditions

To support Employee physical and mental well-being, as well as to provide support for their family needs, the Group has established provisions regarding:

- extra days of leave in cases of people with disabilities or family members with disabilities for Employees considered caregivers
- extra days of leave or reduced working hours for parental support (parent-teacher meetings etc.)
- extra days of leave in cases of hospitalization of family members, undergoing assisted reproduction processes, or mourning
- financial assistance in certain cases, and extension of said financial support in cases of child health issues or disabilities
- monthly welfare benefit for Employees and pensioners who are blind or suffer from kidney failure
- additional leave days for Employees attending undergraduate or masters programs
- free psychological support sessions and annual health check-ups
- the on-site presence of three health physicians
- childbirth allowance or specific cash benefits for Employees' children (e.g., Christmas gift cards or gift cards at the beginning of the school period) as well as daycare benefits

All provisions and benefits mentioned above have been adopted, based on international best practices and according to Group strategic decisions, to enhance the working conditions and improve the well-being of all Employees. The implementation of these provisions is ongoing, according to Group strategic plan and decisions, and are available to all Employees of the Group, based on their needs and family status, and relevant information on specific requirements can be accessed in the Group's Intranet, under the corresponding section.

Moreover, in collaboration with Generali Hellas Insurance, the Group provides the following programs to its permanent Employees, including their family members, in Greece:

- Health and Life Insurance Plan
- Outpatient Insurance Plan

Health and Safety

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

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

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

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

- A 24/7 psychological support hotline, aiming to improve response to mental health issues
- Increased free one-to-one sessions with psychotherapists
- An annual mental health campaign
- Workshops, videos, podcasts and other digital resources covering topics such as empowerment, psychological first aid, the importance of sleep and nutrition for mental health, parenting burnout, digital detox and more, to improve resilience and strength
- Training sessions and workshops on stress management, resilience, and other essential soft skills
- Regular internal audits and inspections of buildings and infrastructure, to ensure a safe and risk-free workplace environment
- Environmental and health & safety assessments, including air and water quality, noise levels, lighting, and thermal comfort
- Pilot wellness programs at selected locations (e.g., Pilates sessions, equipped gyms with trainers), boosting physical and mental health
- Workshops and training on ergonomics, the impact of sedentary lifestyles, and practical tools to improve workspace ergonomics, aiming at preventing work related injuries
- On-site first aid training, to strengthen resilience
- 'Stop Smoking' clinics to support Employees, to improve the lives and health of Employees

The above initiatives are implemented on an ongoing basis, according to Group are available to all Employees of the Group strategic plan and decisions, and related information or invitations are uploaded in the Group's Intranet, where all Employees have access.

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

- "Parents' month": In June/July 2025, to celebrate Global Parents' Day (June 1st), Alpha Bank Group introduced "Parents' Month", a series of 10 webinars led by expert speakers. These sessions covered topics such as parenting challenges and practical tips, emotional connection and safety, balancing roles as a professional, individual, and parent and Mental health topics (e.g., menopause, coping with internal pressure). The program attracted 2,553 total attendances with sessions providing valuable insights to support both professional and personal growth, as well as reinforcing Employee wellbeing.
- "Do Good People" App: In 2025, Alpha Bank successfully rolled out the "Do Good People" mobile application to all Employees. This initiative stems from Alpha Bank's collaboration with Do Good People, S.L., a Spanish company and one of the winners of FinQuest 2022 (3rd prize). Their innovative platform enables organizations to actively engage their workforce in sustainability through simple, impactful daily actions. The "Do Good People" app offers an interactive experience that encourages Employees to adopt sustainable habits via engaging "Sustainability Challenges." Through the app, participants:
 - Complete actions aligned with Alpha Bank's ESG goals.
 - Share photos and experiences on the Bank's internal "Wall."
 - Track both individual and team ESG impact in real time.
 - Contribute to the UN Sustainable Development Goals (SDGs) through everyday choices.

Beyond action, the app fosters awareness about sustainability, promoting a sense of community, recognition, and fulfilment, while generating long-term sustainable habits.

Effectiveness of actions for own workforce

The Group adopts a structured and holistic approach to monitoring and evaluating the effectiveness of its initiatives in generating positive outcomes for its workforce. This includes tracking factors such as participation rates in programs, employee satisfaction levels, and overall engagement, ensuring that initiatives deliver meaningful impact. Insights gathered through these measures allow for timely adjustments and continuous improvement where needed.

The Group places strong emphasis on Employee training and engagement, implementing comprehensive programs that address key areas such as regulatory compliance, anti-money laundering, and occupational health and safety. Engagement levels are regularly assessed through structured Employee surveys, with the insights gained informing the continuous improvement of relevant policies and practices. Through these

measures, Alpha Bank Group ensures that its initiatives effectively contribute to positive outcomes for both its workforce and broader stakeholder community.

Current and planned actions for mitigating material risks and effectiveness of these actions

Alpha Bank Group has implemented a comprehensive set of actions to mitigate material risks related to its workforce and specifically areas of Employee training and development. These actions have been designed to enhance workforce resilience, support business continuity, and uphold ethical standards across all operations of the Group.

Mitigation Actions

- **Continuous Learning & Development:** Ongoing training initiatives, designed to strengthen Employee skills and adaptability, facilitating a smooth transition into a digital era.
- **Leadership Pipeline Development:** Structured processes to identify and prepare future leaders, ensuring long-term business continuity.
- **Workplace Health & Safety:** Targeted programs to promote a safe working environment and support both the physical and mental health of Employees.
- **Diversity & Inclusion Education:** Training programs addressed to all Employees to highlight the significance of diversity in the workplace and support the prevention of workplace discrimination.
- **Performance Alignment:** Employee performance alignment with organizational goals through a digital platform integrated with Alpha Performance Dialogue (APD), with the use of scorecards to define objectives and reward achievements via bonuses and incentives.

Effectiveness Measurement

To assess the effectiveness of these actions, the Group employs both qualitative and quantitative tools, focusing on areas where these practices are expected to generate positive impacts. Key Performance Indicators (KPIs) include:

- **Employee Turnover Rates:** Used to identify retention challenges and evaluate the success of talent management strategies.
- **Employee Satisfaction Surveys:** Conducted regularly to measure engagement and satisfaction levels.
- **Training Completion Rates:** Monitored to ensure participation and effectiveness of learning programs.
- **Health & Safety Incident Reports:** Tracked to evaluate the safety of the working environment.
- **Workforce Demographics:** Analyzed to assess progress toward diversity and inclusion goals.
- **Inclusion Surveys:** Used to understand Employee perceptions of inclusivity within the organization.
- **Cost-Benefit Analysis:** Evaluates the financial impact of HR initiatives on organizational performance.

Data Privacy and Ethical Practices

The Group is committed to ensure that its operations do not cause or contribute to material negative impacts on its workforce, particularly in areas such as procurement, sales, and data use. Specific measures to prevent such impacts include:

- **GDPR Compliance:** Strict adherence to data protection regulations ensuring that Employee data is collected, processed, and used transparently and ethically.
- **Responsible Procurement:** The Bank performs thorough due-diligence and engages only with suppliers and service providers who meet rigorous data privacy standards and respect its core values.
- **Fair Sales Practices:** Sales activities are designed carefully to ensure that Employees are not pressured to achieve unattainable goals and that Employee and Customer data remain protected.
- **Secure Data Use:** Internal processes ensure responsible handling of Employee data, with clear consent and robust security protocols.

Cases of tensions between mitigating material negative impacts

In cases where tensions arise between mitigating risks and material negative impacts as well as other business pressures (e.g. privacy risks), the Group maintains a balanced and principled approach, prioritizing the protection of its workforce and its Customers or wider stakeholders (e.g. Employee data protection). This approach includes thorough and regular risk assessments and active engagement with Employees and their representatives to co-develop solutions that are tailored to the Group's needs.

Continuous Improvement

The Group's commitment to continuous improvement is reflected in its systematic review and enhancement of internal policies and practices, ensuring ongoing alignment with evolving privacy regulations and recognized best practices. To reinforce this commitment, the Group invests in targeted training and awareness initiatives that cultivate a culture of accountability and ethical conduct, empowering Employees to understand their rights and the safeguards in place to protect them. Transparency and accountability are foundational to these efforts, supported by robust governance mechanisms and proactive risk management.

Alpha Bank Group demonstrates its dedication to maintaining a secure, equitable, and supportive working environment that prioritizes Employee trust, safety, and well-being and acknowledges the pivotal role of Employee awareness and capability development in effectively managing material sustainability impacts and as such, continuous training remains a strategic priority. These programs are designed to empower Employees across all levels with the knowledge and skills needed to identify, understand, and address material impacts, focusing on environmental stewardship, human rights, ethical business conduct, and regulatory compliance.

In addition, specialized training is provided to Employees in critical roles, enabling them to apply best practices and innovative approaches within their areas of responsibility. By investing in targeted learning initiatives and cultivating a culture of continuous improvement, Alpha Bank Group reinforces its commitment to sustainability, transparency, and stakeholder accountability. This integrated approach not only strengthens risk mitigation and opportunity capture but also contributes to long-term value creation for the organization and its stakeholders.

Resource Allocation

In managing material impacts, the Group has allocated significant resources to ensure that all potential risks are addressed in a structured, efficient, and responsible manner. This includes a comprehensive framework supported by financial investments, specialized personnel, and ongoing capacity-building programs designed to strengthen organizational expertise and resilience.

The Group has established dedicated teams and governance committees tasked with the identification, evaluation, and management of material sustainability-related impacts. These units are equipped with the appropriate tools, systems, and resources to monitor performance, implement remedial measures, and foster continuous improvement. Financial resources are strategically allocated to support key initiatives, including sustainability programs, technological advancements, and collaborations with external experts and organizations, thereby enhancing the Group's capacity to manage sustainability impacts effectively.

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

Alpha Bank Group has developed and included the following targets in its business plan, incorporating input from all internal stakeholders. These targets are carefully monitored to assess the effectiveness of implemented measures and practices and provide quantitative information on the Bank's progress in areas of key significance:

Table 46 Target tied to own workforce

Target description	Target level	Absolute / Relative	Baseline value	Baseline year	Target Year	Scope	2025
Maintain >40% of womens' representation in managerial positions	>40%	Relative	40%	2022	2027	Own operations	43%
Increase Youth employment by 20%	20%	Relative	20%	2020	2027	Own operations	53%

Target: Maintain >40% of women's representation in managerial positions

Alpha Bank Group is committed to maintaining a minimum of 40% representation of women in managerial positions, reflecting its dedication to fostering an inclusive and equitable workplace. This target underscores its strategic focus on gender diversity as a driver of innovation, balanced decision-making, and organizational resilience. Ensuring strong female representation in leadership roles not only promotes fairness and equal opportunity but also enhances the Group's ability to respond effectively to the diverse needs of its stakeholders. By embedding this target into its broader human capital and sustainability strategy, Alpha Bank Group reinforces its commitment to cultivating a culture of meritocracy, empowerment, and long-term value creation.

Target: Increase Youth employment by 20%

The Group aims to increase youth employment by 20%, reflecting its commitment to empowering the next generation of professionals and contributing to broader social and economic development. This target supports its strategic focus on talent renewal, innovation, and long-term workforce sustainability. By actively creating opportunities for young individuals, Alpha Bank fosters fresh perspectives, enhances organizational agility, and strengthens its capacity to adapt to evolving market dynamics. Moreover, this initiative aligns with the Group's broader ESG objectives, promoting inclusive growth, reducing unemployment among younger demographics, and reinforcing its role as a responsible corporate citizen.

Both targets are currently monitored, and the relevant progress is presented annually. The overall target setting process included engagement and consultations with various internal stakeholders. Although workforce representatives were not specifically included in the setting process of the targets mentioned above, Employee feedback from other sources (e.g. internal surveys) was considered and the relevant annual progress is available to all Employees. The Group remains committed to promoting and improving its practices related to material sustainability topics.

Specifically:

- **Tracking Effectiveness:** robust processes are in place to monitor and assess the effectiveness of all targets. These processes include regular internal reviews, stakeholder engagement, and data-driven assessments to ensure that Group's actions align with its objectives.
- **Ambition Level:** the Group has established a clear qualitative level of ambition that serves as a guiding framework for its efforts, with measurable targets in developmental stage.
- **Progress Measurement:** the Group utilizes a combination of qualitative and quantitative indicators, carefully selected to reflect the specific context and nature of the material impacts the Group addresses. Additionally, a baseline period is defined to measure progress consistently.

The Group has also acknowledged material impacts and risks related to "Contribution to Livelihood of own workforce", "Training and skills development", "Staffing and training issues", "Contribution to health and safety of own workforce", however, no specific targets have been established yet for these. The Group remains fully committed to promoting and improving practices related to these material sustainability topics.

[S1-6] Characteristics of Alpha Bank Group Employees

The workforce of Alpha Bank Group comprises a diverse group of Employees, reflecting a broad range of demographic and professional characteristics. As of December 31, 2025, the total number of Employees stands at 6,992 encompassing various categories based on age, gender, and employment type. The Group is committed to employ individuals across all age groups, ensuring a balanced mix of experience and fresh perspectives. Gender representation is monitored to promote inclusivity and equal opportunity, while employment contracts include both permanent and fixed-term arrangements, tailored to operational needs and strategic priorities. This structured and inclusive approach to workforce composition supports the Group's commitment to diversity, equity, and organizational resilience.

All data related to headcount are presented as of 31.12.2025 without including potential fluctuations throughout the year. During the reporting period Employees of non-guaranteed hours, part-time Employees, as well as Employees of genders other than the ones presented were not included in the workforce. All metrics are absolute numbers without significant assumptions or methodologies behind them and have not been assured by an external third party.

Employees categories are defined as follows:

- Permanent Employees: individuals with employment contracts without a predefined end date.
- Temporary Employees: individuals hired for a specific period or project, under fixed-term contracts.

Table 47 Total Employee head count by contract type and gender

Headcount	Female	Male	Total	Female	Male	Total
Reporting Year	2024			2025		
Total number of Employees	3,470	2,755	6,225	3,906	3,086	6,992
Number permanent Employees	3,370	2,664	6,034	3,756	2,953	6,709
Number of temporary Employees	100	91	191	150	133	283

The total number of employees by headcount, and breakdown by gender and by country for countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees, can be found in the financial statements, on 'staff costs' note 10.

Table 48 Total Employee headcount in countries where the undertaking has at least 50 Employees representing at least 10% of its total number of Employees.

Reporting Year	2024 ³⁵	2025
Country	Greece	
Number of Employees (Headcount)	5,700	6,068 ³⁶
Country	Cyprus	
Number of Employees (Headcount)	N/A	815 ³⁷

Table 49 Number of Employees who left the Group and turnover rate³⁸

Reporting Year	2024	2025
Number of Employees who left the Group	748	565
Employee turnover rate (%)	12	8.1

[S1-8] Collective bargaining coverage and social dialogue

Alpha Bank Group recognizes the fundamental importance of collective bargaining and social dialogue in fostering a fair, inclusive, and transparent working environment, which serve as essential pillars for promoting constructive engagement between the organization and its Employees, ensuring that workforce-related decisions reflect shared interests and mutual respect. Through active participation in collective agreements and open dialogue with Employee representatives, the Group supports the protection of labor rights, enhances workplace relations, and contributes to long-term organizational stability and Employee well-being.

As of December 31, 2025, the majority of Alpha Bank Employees are covered by at least one of the applicable collective bargaining agreements (i.e. national collective bargaining agreement, sectoral collective bargaining agreement and company-level collective bargaining agreement), with the Alpha Bank S.A. Employees' Association serving as the primary platform for Employee representation. In 2025 thirteen (13) meetings convened with both management team and union representatives present. Although the Group does not have specific agreements for representation of Employees by the European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council, their rights and input are represented and facilitated through the Alpha Bank S.A. Employees' Association. Alpha Bank Group Employees outside the EEA, specifically in the United Kingdom, are not covered by collective bargaining agreements.

The following metrics are absolute numbers without significant assumptions or methodologies behind them and have not been assured by an external third party.

Table 50 Employees who are covered by collective bargaining agreements and social dialogue

Type of coverage	Collective Bargaining Coverage		Social Dialogue	
Coverage rate	Employees – EEA (for countries with >50 employees representing >10% of total employees)		Workplace representation (EEA only) (for countries with >50 employees representing >10% total employees)	
Year	2024 ³⁹	2025 ³⁹	2024 ³⁹	2025 ³⁹
80 – 100%	Greece (100%)	Greece (100%), Cyprus (97%)	Greece (100%)	Greece (100%), Cyprus (100%)

Table 51 Share of total Employees who are covered by collective bargaining agreements

Type of coverage	2024	2025
Percentage of total Employees who are covered by collective bargaining agreements (%)	98%	98%

³⁵ In 2024, Greece alone accounted for 10% of the total workforce, while Cyprus was considered non-significant.

³⁶ The above number consists of 2,685 male and 3,383 female Employees.

³⁷ The above number consists of 339 males and 476 female Employees.

³⁸ The Employee turnover rate (%) has been compiled with data on Employees who left the Group voluntarily and non-voluntarily, including dismissals, resignations, voluntary separation schemes, fixed-term contract terminations, deaths in service, sabbatical leaves and other. In the turnover rate calculation, the total Employee head count as of 31.12.2025 was used as the denominator.

³⁹ As of 31.12.2024 only Greece satisfied the requirement of 50 employees representing more than 10% of the Group's total employees, while as of 31.12.2025 this is also applicable for Cyprus.

[S1-9] Diversity metrics

The Group is committed to promoting gender diversity and equal representation across all levels of the organization, including top management. The table below presents the gender distribution in both absolute numbers and percentages, offering a transparent view of the current composition of leadership roles.

Monitoring gender representation at the highest levels of decision-making is a key component of the Group's broader diversity and inclusion strategy, aimed at fostering balanced leadership, enhancing organizational performance, and ensuring that diverse perspectives are reflected in strategic planning and governance.

The following metrics are absolute numbers without significant assumptions or methodologies behind them and have not been assured by an external third party.

Moreover, top Management includes all members of the Senior Leadership Team (SLT) defined as individuals with executive responsibilities, responsible and accountable to the management body for the day-to-day management of the institution, including Key Function Holders (KFHs). The following roles are included in the Senior Leadership Team:

- CEO
- Chiefs who are members of the Executive Committee (Chiefs-ExCo)
- Chiefs who are part of the SLT but not members of the Executive Committee (Chiefs Non-ExCo)

Table 52 Gender distribution in number and percentage at top management level

Gender distribution in number and percentage at top management level ⁴⁰	2024 (#)	2024 (%)	2025 (#)	2025 (%)
Female	14	20%	18	24%
Male	56	80%	57	76%

Alpha Bank Group monitors the age composition of its workforce as part of its commitment to diversity, inclusion, and strategic workforce planning. The following table presents the distribution of Employees across three age groups: under 30, between 30 and 50, and over 50 years old. This breakdown provides insights into generational representation within the organization, supporting efforts to balance experience with innovation, tailor development initiatives, and ensure long-term organizational sustainability.

The following metrics are absolute numbers without significant assumptions or methodologies behind them and have not been assured by an external third party.

Table 53 Distribution of Employees by age group

Distribution of Employees by age group	2024 (#)	2025 (#)
< 30 years old	479	667
30 to 50 years old	4,178	4,463
> 50 years old	1,568	1,862

[S1-11] Social protection

The entire workforce of Alpha Bank Group is covered by social protection provisions, as mandated by the applicable national legal framework, enhanced by group-wide provisions in place which are in place to support Employees and their families. Indicatively, Alpha Bank Group has established policies and practices to ensure **extra days of leave or financial assistance** in cases of:

- Employees with disabilities, caregivers or parents,
- sickness, maternity and paternity leave, Employees undergoing assisted reproduction

Moreover, in collaboration with Generali Hellas Insurance, the Group provides a **Health and Life Insurance plan** and an **Outpatient Insurance plan** to its permanent Employees, including their family members, in Greece.

Lastly, alongside public benefits regarding retirement, the Group has also established:

- **Voluntary Separation Schemes (VSS)** which offer paid leave and severance packages for voluntary departures, ensuring financial stability during transitions.

An Occupational Pension Fund Program (IORP – Institutions for Occupational Retirement Provision) that secures retirement benefits through joint contributions as percentage of salary from Employees and Employer, with vesting period determined by age and enrolment years.

[S1-13] Training and skills development metrics

Employee training and development are central pillars of Alpha Bank Group's strategic priorities, reflecting the Group's commitment to fostering professional growth, enhancing skills, and ensuring long-term employability. Through targeted upskilling and reskilling initiatives, Employees are equipped to adapt to evolving industry demands and contribute meaningfully to the organization's success. All training programs are systematically monitored to track participation and evaluate their effectiveness, ensuring continuous improvement and alignment with business objectives.

Complementing these efforts, annual performance reviews are conducted to assess individual performance and contributions, provide constructive feedback, and support career progression. These evaluations play a key role in identifying development opportunities and reinforcing a culture of accountability and excellence across the organization.

The following metrics are absolute numbers without significant assumptions or methodologies behind them and have not been assured by an external third party.

⁴⁰ The top management level above refers only to Executive and Senior Management.

Table 54 Percentage of Employees that participated in regular performance and career development reviews by gender (%)

Gender	Females		Males	
	2024	2025	2024	2025
Reporting Year				
Percentage of employees that participated in regular performance and career development reviews ⁴¹ (%)	91%	91%	90%	89%

Table 55 Average number of training hours per employee by gender

Gender	Female		Male	
	2024	2025	2024	2025
Reporting Year				
Average number of training hours per employee (#) ⁴²	35.2	43.8	32.0	41.3

[S1-14] Health and safety metrics

All data related to the percentage of people covered by a Health and Safety Management System are based to a headcount as of 31.12.2025, without including potential fluctuations throughout the year. Health and Safety incident data are based on actual data from 1.1.2025 until 31.12.2025. The following metrics are absolute numbers without significant assumptions or methodologies behind them and have not been assured by an external third party.

Table 56 Health and Safety Metrics

Reporting Year	2024 ⁴³	2025
Percentage of own workforce who are covered by health and safety management system (%)	N/A	97%
Number of fatalities in own workforce as a result of work-related injuries and work-related ill-health (#)	N/A	0
Number of recordable work-related accidents within own workforce ⁴⁴ (#)	N/A	17
Rate of recordable work-related accidents within own workforce	N/A	1.59
Number of cases of recordable work-related ill health with regard to employees (#)	N/A	0
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health (#)	N/A	54

[S1-17] Incidents, complaints, and severe human rights impacts

Alpha Bank Group is committed to upholding the highest standards of ethical conduct and human rights across all areas of its operations. As part of this commitment, the Group actively monitors and addresses incidents, complaints, and any severe human rights impacts that may arise.

To reflect the Group's dedication to transparency, stakeholder engagement, and the protection of fundamental rights the following data represents the total number of related incidents as well as the total amount of fines, penalties and compensation for damages as a result of the incidents and complaints disclosed.

The following metrics are absolute numbers without significant assumptions or methodologies behind them and have not been assured by an external third party.

Table 57 Total number of incidents of discrimination, including harassment reported in the reporting period

Reporting Year	2024	2025
Total number of incidents of discrimination, including harassment reported in the reporting period (#)	1	0
Number of complaints filed through channels for Employees to raise concerns (including grievance mechanisms) (#)	2	0
Number of complaints filed to National Contact Points for OECD Multinational Enterprises (#)	0	0
Number of severe human rights issues and incidents(#)	0	0
Total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above	0	0

ESRS S4 - CONSUMERS AND END-USERS

[S4.SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model in relation to consumers

Customers constitute a key stakeholder group for Alpha Bank given their central role in the Group's business model and value creation. Detailed information is disclosed under [SBM-2] "Interests and views of stakeholders" in chapter ESRS 2. The scope of the disclosure under ESRS 2 includes all relevant products and services, as well as all consumers and end-users who may be materially impacted through the Group's operations, value chain, or business relationships.

The Group does not engage in the sale of products and services that are inherently harmful to individuals. Due to the nature of its operations, the Group handles sensitive personal information, therefore there is an inherent risk of data breaches or misuse of personal information. Furthermore, consumers depend on precise information concerning financial products and services, including loan terms, interest rates, and fees. The Group offers its services and products to all consumers and end-users, without any form of discrimination and with respect to their

⁴¹ The percentage is calculated as the number of Employees that participated in regular performance and career development reviews divided by the total headcount of Employees.

⁴² Average number of training hours per Employee by gender has been calculated as the number of training hours per Employee and by gender throughout the year, divided by the total headcount of Employees by gender as of 31.12.2025.

⁴³ Health and Safety metrics were not reported in 2024 and thus there is no available data.

⁴⁴ Number includes 2 work related injuries, 9 pathological incidents and 6 commuting to and from work incidents.

freedom of expression. Therefore, all product-related information is transparent and readily accessible to prevent potential misuse or misunderstanding of its products and services.

The types of consumers who are likely to be materially impacted by the Group's products/services and business relationships are:

- Individuals (i.e. private Customers),
- Corporate and
- SME Customers.

Individuals are people who use the Group's products/services for personal needs, such as savings accounts, mortgages, and credit cards. Corporate Customers are large businesses that have more complex needs, such as loans for operations, expansion, cash flow management, and investments. SME Customers are small and medium-sized enterprises that require banking services to support their operations and growth, including business loans.

Customers may include certain groups that could be particularly susceptible to negative impacts resulting from marketing and sales strategies or privacy-related incidents, such as young and senior individuals and other financially vulnerable individuals (e.g., low-income borrowers). The Group proactively takes steps to avoid material negative impacts on its Customers through initiatives, processes and targeted products and services that are currently in place e.g. education loans, targeted credit products to other vulnerable groups, and others. For details on how impacts, risks, and opportunities for consumers relate to the Group's strategy and business model, please refer to [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model.

Activities resulting in positive impacts on Customers

Alpha Bank is dedicated to ensuring equal access and seamless physical and digital access to its products and services, thereby enhancing the inclusion and financial wellbeing of its Customers. The Group's activities provide comprehensive and inclusive access to financial services through a range of high-quality financial products and services. These span across corporate and retail banking, financial services, investment banking and brokerage services, insurance services, real estate management, hotel services in Greece, Cyprus, United Kingdom, Luxembourg, Romania, Bulgaria, Serbia, Ireland. Continuous improvements are made to enhance the Group's services and products, ensuring ease of access for Customers. More information about the business sectors, products and services of the Group is included in the Board of Directors' Management Report within the Annual Report.

The positive impacts on Customers derive from the Group's portfolio of products and services, which facilitate improved access to key sectors, including Finance and Housing. Moreover, a broader socio-economic positive impact is created on Customers and broader society through the Group's products, services and business relationships, contributing to Healthy Economies.

In Greece, Alpha Bank S.A., which represents the largest share of the Group's operations, offers a diverse range of products and services for individual, corporate and SME Customers. These include:

Products and Services Supporting Retail Customers' Access to Housing and Finance

Affordable Housing solutions

- **Alpha Residence:** a housing loan allowing Customers to purchase a home with the option to secure the loan against any property, with a built-in flexibility in adjusting payment terms based on changes in income.
- **Alpha First Home:** a housing loan targeting first-time buyers between ages 18 to 50, providing financing for up to 90% of the property's value.
- **Alpha Residence Renovation:** a renovation loan available for home improvement projects, which can be secured with or without a property mortgage.
- **Exoikonomo 2023:** a program funded by the Recovery and Resilience Fund to enhance the energy efficiency of homes by at least three energy categories, achieving over 30% primary energy savings. Additionally, the investment includes specific incentives to support low-income and vulnerable households, offering an increased grant rate and a dedicated budget of Euro 178 million.
- **Exoikonomo – Anakainizo gia Neous ("Exoikonomo" Component):** a program supported by the Recovery and Resilience Fund aimed at promoting national and EU energy policies for energy conservation specifically designed to cater for young people needs. Particular attention is given to supporting low-income and vulnerable households, with an increased grant rate and a dedicated budget of €40 million.
- **Reward Program for Consistent Mortgage Borrowers:** introduced in response to the financial strain on households caused by consecutive interest rate hikes due to Central Bank's monetary policies. This program, available for 12 months, aims to support borrowers who consistently meet their repayment obligations by reducing interest rates on variable rate mortgages and to protect borrowers from potential future increases in benchmark rates.

In 2025, Alpha Bank launched four additional programs to address the housing affordability challenges and provide further access to Housing and Finance for Customers in Greece:

- **Exoikonomo 2025:** a program supported by the Recovery and Resilience Fund aimed at advancing national and EU energy policies for energy conservation. The program focuses on improving the energy efficiency of households, achieving over 30% primary energy savings for each home, through an upgrade of at least three energy categories. The investment includes specific incentives to support families with disabled members, those affected by the Thessaly floods (including the earthquake victims in the municipality of Damasi, Municipality of Tyrnavos), earthquake victims in Arkalochori and Samos, families with three dependent children, and vulnerable households, both through increased grant rates and a dedicated budget.
- **"Exoikonomo – Anakainizo gia Neous" Program ("Anakainizo" Component):** a grant program that is a complementary extension of the "Exoikonomo gia Neous" Component expanding its scope beyond energy efficiency upgrades to include additional renovation works that improve the functionality and aesthetics of homes undergoing energy refurbishment. It primarily targets young people up to 39 years old.
- **My Home II** which is a co-financed housing loan designed for first-time homebuyers aged 25 to 50. This program aims to support low-income individuals and those without the financial means to purchase their own primary residence through low-interest mortgage offerings.

- **Upgrade My Home** which is a co-financed loan program aiming to provide incentives to individuals for energy improvements to their existing residences.

Accessibility to Finance

- **Alpha Cash Collateral:** an option to allow Customers to secure a loan without liquidating assets, providing financial flexibility while maintaining investment portfolios.
- **myAlpha Quick Loan:** e-banking personal loans of up to Euro 3,000 to cover unexpected costs and routine spending with a fast and paperless process.
- **Alpha "Metron Ariston":** secured and unsecured personal loans with competitive interest rates and flexible repayment schedules.
- **Alpha Green Solutions – Electric Car/Bicycle and Consumer Loan for the home:** consumer loans especially designed to finance the purchase of electric vehicles or the improvement of the energy efficiency of homes, with favorable fixed interest rates.
- **Alpha Education Consumer Loan:** loans for educational purposes with favorable fixed interest rates.
- **Alpha All in 1:** offering consolidation of outstanding credit card and consumer loan balances into a single, simplified loan program with lower monthly payments.
- **Alpha Epipleon – Overdraft Program:** providing access to additional funds conveniently and affordably through Customers' payroll accounts, as needed.
- **Car Financing and Consumer Goods Loans:** through a wide network of car dealers and retailers, Alpha offers consumer loans for the purchase of cars, motorcycles and consumer goods, with competitive fixed interest rates.
- **myAlpha Benefit:** 3 packages aiming to cut down monthly transaction expenses for Customers. MyAlpha Benefit base, myAlpha Benefit Advanced and myAlpha Benefit Premium.
- **Alpha Residence:** housing loan offered to permanent residents in Cyprus for the purchase, construction, completion or renovation of a property. For financed properties with an Energy Performance Certificate (EPC) of category A, or if renovated properties that achieve EPC category B+ or higher following renovation, the borrower receives a discounted interest rate.
- **Alpha Car:** a car loan offered to individuals for the financing of a new or used car. For new eco-friendly vehicles, i.e. hybrid vehicles, twin-propulsion vehicles and vehicles with carbon dioxide emissions of less than or equal to (\leq) 75g CO₂/km, a discount on the interest rate is offered.
- **Bonus Charity program:** For the 17th consecutive year, the "Bonus Charity" program enabled customers to support a non-profit organization of their choice by redeeming Bonus points. The Bank supplemented the value of the redeemed points, donating more than double their worth to the participating institutions, supporting people in need and certified environmental organizations. In 2025, a total of 975 charity transactions were completed, resulting in donations of Euro 29,880. The 39 organizations currently participating in the Program are listed on the Bank's [website](#).

Products and services that support Corporate and SME Customers' access to Finance, and contribute to the development of Healthy Economies

The Group's products and services addressed to corporate and SME Customers include lending, leasing, real estate and factoring activities aiming at enhancing their access to finance, house their operations and grow. The Group also supports through its products and services sectors that are inherently positively associated with access to Housing and Finance and insurance activities, reinsurance and pension funding, except compulsory social security. Through Alpha Bank S.A. other initiatives targeting corporate and SME Customers include:

- **Financing solutions for Businesses** (e.g., InvestEU co-funding program) and Large Corporate Customers including Letters of Guarantee, Letters of Credit, and lending to the Division' Customers by the Group Companies in Greece and abroad (excluding Customer lending through the Subsidiaries Alpha Leasing S.A. and ABC Factors S.A.).
- **Alpha Bank Gold Business:** a service dedicated to delivering top-tier consulting services to its Gold Business Customers. This commitment extends beyond identifying optimal financial solutions to include the development and implementation of new business development standards.
- **High-value investment projects** in the Greek Hospitality Sector through bonds and loans.
- **myAlpha Business Benefit Advanced:** Introduction of a new transaction package tailored for professionals operating in the Airbnb market.
- **myAlpha Web for Business:** In 2025, several enhancements were introduced to strengthen functionality and improve the overall digital banking experience for corporate clients. These include the deployment of dedicated login page segmentation for individuals and businesses, the integration of Ultimate Beneficiary details within IRIS e-commerce payments, and the extension of corporate card transaction history to 18 months. Additional upgrades include the adjustment of daily purchase limits for corporate prepaid cards, the public rollout of the eLG (electronic Letter of Guarantee) service, and the introduction of Verification of Payee (VoP) to improve payment accuracy. Furthermore, the FX conversion transaction limit via Web FX was increased from USD 300,000 to USD 500,000, offering greater flexibility for high-value transactions. myAlpha Web for Business users can also issue certificates to certified auditors, supporting streamlined financial verification processes.
- **Support Female entrepreneurship:** In 2025, the percentage of female Owners of Individual Businesses which were included in the Segment of Small Businesses (Alpha Bank S.A. portfolio) out of total owners of individual businesses was 33.8%.

Alpha Bank supporting SMEs

- **EIF Sustainability Portfolio Guarantee Product:** A guarantee instrument that supports investments contributing to the green transition of SMEs and Small Mid-Caps, while also providing financing for the working capital needs of "green" enterprises, with an 80% guarantee per financing facility.
- **EIF Innovation & Digitalization Portfolio Guarantee Product:** A guarantee instrument that supports investments in innovation and digital transformation, enhancing access to finance for SMEs, Small Mid-Caps, and R&D-intensive beneficiaries. It also provides financing for the working capital needs for the "Digitalization" of businesses, offering an 80% guarantee per financing facility.
- **HDB Just Transition Co-Financing Loans Fund:** A co-financing instrument offering working capital and investment loans, with 50% of the principal provided interest-free by HDB. The program also provides an additional 3% interest rate subsidy for the first three (3) years of the loan. The Just Transition Development (JTD) Fund is a strategic initiative of the Greek government designed to address the economic and social impacts of de-lignitization in regions dependent on lignite activities. A key pillar of the Fund is the financial

support of SME activities operating in the Just Transition Development Regions (Western Macedonia and specific areas of the Peloponnese), as these businesses are essential drivers of economic growth and job creation. The regions supported by the JTD Fund, designated as Just Transition Areas, include:

- Region of Western Macedonia (Regional Units of Kozani, Kastoria, Florina, Grevena)
- Municipalities of Tripoli, Megalopolis, Gortynia, and Oichalia in the Region of Peloponnese
- Islands with a population of up to 3,100 inhabitants in the Regions of North Aegean, South Aegean, or Crete
- **HDB Just Transition Guarantee Fund:** A guarantee instrument offering investment loans, with 80% guarantee per financing. The program also provides an additional 3% interest rate subsidy for the first two (2) years of the loan.
- **HDB Natural Disasters Recovery Microloans Fund:** A co-financing instrument offering working capital loans, with 75% of the principal provided interest-free by HDB. The program also provides grant for covering costs for mentoring services up to €900 per beneficiary. The Natural Disasters Recovery Microloan Fund constitutes a strategic initiative of the Hellenic Government, aiming to address the economic and social consequences in regions affected by natural disasters. It should be emphasized that all Micro and Small Enterprises operating in the affected areas are eligible for financing, irrespective of whether they have suffered direct material damages from extreme natural phenomena. This provision is based on the premise that, as a broader consequence of natural disasters, the normal course of business activity in the region has been disrupted. The Fund will provide support to enterprises operating in the Region of Thessaly (Regional Units of Larissa, Magnesia, Trikala, and Karditsa).
- **HDB Green Co-Financing Loans – Business Growth Fund:** A co-financing instrument that provided investment loans supporting the green transition of SMEs, with 40% of the principal offered interest-free by HDB. The program also included an additional 3% interest rate subsidy for the first two (2) years of the loan. The Program's availability period ran until 30.06.2025.
- **HDB Innovation Guarantee Fund:** offers financing under favorable conditions, supported by an 80% guarantee. Additionally, there is an option to subsidize up to 20% of the capital if the debtor meets specific innovation and ESG (Environmental, Social, and Governance) criteria within three years of the initial loan disbursement. The Program's availability period run until 31.12.2025.
- **Recovery and Resilience Fund, Greece 2.0:** providing comprehensive Banking Advisory services for the co-financing of SMEs, aimed at implementing investment plans that include sustainability-promoting interventions.
- **Training and support workshops program:** This is a strategic initiative offers targeted training and technical support, featuring a series of workshops delivered across Greece, with a particular focus on SME Customers. The program is designed to support businesses with the implementation of their investment projects and transformation plans, leveraging Alpha Bank's development programs and financing solutions. In addition to the Customer workshops, which focus on business development and provide practical guidance and thorough analysis of real case studies, the training program includes specialized workshops addressed to the Bank's network. These internal sessions aim to strengthen collective knowledge regarding financing solutions for SMEs, facilitate the sharing of best practices and technical expertise, strengthen skills and gain an in-depth understanding of the financing solutions that Alpha Bank offers to businesses.
- **Ecosystem of Partnerships:** a comprehensive suite of services is offered across all green entrepreneurship sectors, encompassing sustainable investments, including specialist advisors, suppliers, and photovoltaic station construction contractors.
- **Equal support for businesses:** collaboration with the Hellenic Development Bank (HDB) and the European Investment Fund (EIF) to offer favorable financing options for start-ups. In addition, Alpha Bank supports female entrepreneurship through its partnership with the EIF, which has facilitated microcredit for micro-enterprises, including numerous women-owned sole proprietorships, through the "Employment and Social Innovation (EaSI) Microfinance Guarantee Facility".
- **Alpha Smart Hospitality:** a service promoting sustainable development by providing financial resources to support the targeted growth of Greek entrepreneurship. This approach involves methodical, substantial, and integrated planning within a sustainability framework, considering available resources, goals, and emerging trends.
- **Alpha Photovoltaic:** a green financing solution for small businesses and farmers investing in photovoltaic systems up to 1MW in Greece. This supports Greece's growing renewable energy market, with lower technology costs and simplified licensing. Aligned with Alpha Bank's sustainability commitments, the loan promotes sustainable development by offering competitive pricing and fostering green entrepreneurship. This product helps investors capitalize on the growth of solar energy, reduce carbon emissions, and contribute to Greece's energy transition.
- **Alpha Sustainable Photovoltaic:** a financing solution to support the construction of 400 kW photovoltaic power stations in Crete and Peloponnese, exclusively for investors recommended by Alpha Bank's Central Partners. The product provides tailored financing packages under the State Aid Free Invest EU Sustainability Guarantee Facility, backed by an 80% guarantee, resulting in competitive pricing. It includes Bridge Financing for Wholesale Banking and features specialized collateral requirements to offer favorable terms. This solution aims to drive the growth of renewable energy projects while meeting sustainability objectives.
- **Alpha Pre-Schooling Social Loan:** a tailored working capital financing product designed to address short-term liquidity challenges faced by private childcare providers (nurseries and kindergartens) in Greece. The product helps bridge cash flow gaps caused by delayed government voucher payments at the start of the school year. Vouchers, issued by the Greek government under approved social programs, are assigned by parents to childcare centers and can then be further pledged to the Bank as collateral to unlock much-needed liquidity.
- Moreover, **Alpha Bank Cyprus** offers a similar suite of Sustainable business loans for green and social purposes, that meet the Sustainable Finance Framework criteria. Green purposes include energy efficiency, green buildings, renewable energy, and sustainable transport. Social purposes include access to essential services such as health and education.

Solutions addressed to Private Banking Customers

Alpha Bank ensures full transparency of sustainability-related information for all investment products (when available) distributed through its channels. The Bank provides the standardized ESG disclosures and integrate sustainability considerations into product selection, advisory processes, and Customer engagement. Activities include prioritizing SFDR and EU Taxonomy-aligned products, training advisors on ESG integration, and providing necessary educational activities to enhance Customer understanding of sustainability impacts.

Private banking Customers have also access to another product with positive environmental impact through the Bank's collaboration with 'Reforest' Action', for which more details can be found on [E4-3] Actions and resources related to biodiversity and ecosystems. By embedding

sustainability into its distribution strategy, the Bank mitigates regulatory and reputational risks while leveraging opportunities to strengthen trust, differentiate competitively, and contribute to the EU's climate-neutral objectives.

Progress is measured through key performance indicators such as the percentage of products with ESG disclosures, SFDR and taxonomy alignment rates. 68% of the Mutual Funds (MFs) offered through Alpha Bank's distribution channels in Greece promote environmental or social characteristics (SFDR Article 8) and 5% of the MFs have a sustainable investment objective (SFDR Article 9). Among these Article 8 and Article 9 products, 53% proceed to sustainable investments. Additionally, the majority (~68%) of all MFs consider ESG Principal Adverse Impacts (PAIs), while around 2% of the MFs are aligned with the EU Taxonomy. Over 50% of products within the Discretionary Portfolio Management service either have sustainable characteristics (SFDR Art 8), sustainable objectives (SFDR Art 9) or promoting responsible investment strategies that are more resilient to long-term risks, thereby reinforcing client trust in Alpha Bank.

Products managed by Alpha Asset Management M.F.M.C.

In 2025, Alpha Asset Management M.F.M.C. reclassified four additional Mutual Funds from Article 6 to Article 8 under the Sustainable Finance Disclosure Regulation (SFDR). As a result, assets promoting environmental and social characteristics increased significantly, from Euro 313 million at the end of 2024 to Euro 1.5 billion at the end of 2025, underscoring the Company's strong commitment to ESG integration.

Digital solutions to enhance the accessibility of products and services to Customers

Innovation and digitalization demand a modernized branch network for the banking services, robust digital platforms and web services, and the provision of widespread, inclusive access to financial services. Key imperatives of Alpha Bank's digital strategy are the continuous improvement in product and service quality, a modern and responsible approach to the Customers' banking needs as well as the Bank's uninterrupted operation. Through digital initiatives such as e-banking and digital card wallets, the Group makes it easier and more secure for all Customers to access its services and products. Among others, the solutions offered are:

- **Digital Cards & Wallets:** The cards enrolled in wallets (Apple Pay, Google Pay, Garmin Pay, Xiaomi Pay) and e-commerce platforms, which Alpha Bank was the first to offer to its Customers, maintained in 2025 the positive trend with the number of active digitized cards (tokens) exceeding 9.6 million. The digital card offering makes it easier and more secure for Customers to use their cards to make payments.
- **Account Opening & Onboarding (Individuals & Professionals):**
 - The ability to open a current account and obtain business e-Banking credentials through myAlpha Web for individuals is available to the public. Individual Customers who have e-banking passwords were given the opportunity to start their professional cooperation with the Bank, as Sole Proprietorships (including freelancers), through myAlpha Web Individuals.
 - Retail Onboarding via myAlpha Mobile: The redesign of the process for starting a banking relationship through myAlpha Mobile was made available to Individuals who wish to open their first account with the Bank. The process is carried out entirely through a mobile phone, without document submission, using eGov-KYC verification and video-call identification with a Bank representative. In just a few minutes, the Customer obtains an account, a debit card, and e-Banking access, fully covering their banking needs.
 - Ability to open a privileged account: private Customers who have e-Banking and wish to open a privileged account to be served with their daily transactions can obtain it either through myAlpha Web or through myAlpha Mobile without visiting a branch.
- **Digital Payments & IRIS (QR generator):** offering for freelancers and sole proprietorships, and optional 'mobile search' during the Activation/Modification of the IRIS Payments service.
- **Digital Lending & Certifications:**
 - Online mortgage pre-approval: The option to obtain a financial pre-approval for a mortgage loan online was launched through myAlpha Web for Individuals, without submitting physical documents or visiting a branch.
 - Online issuance of certificates: While the service that facilitates online requests for the issuance of specific Certificates for bills and loans is offered since 2023, during the reporting year the offering includes the issuance of 2 additional certificates: letters of guarantee and certificate for certified auditors.
- **Smart Service & Self-Service:**
 - MAD Hybrid Self-initiation: This new feature enabled Customers to initiate requests through their e-Banking subscription by completing a form and signing digitally, saving time and simplifying the process.
 - In June of 2025, a new user role was introduced in myAlpha Web for Business, titled "myAlpha Documents Signatory". This role enables authorized individuals, whether internal or external to the company, to gain targeted access to the "Documents" section for the purpose of digitally signing documents exchanged between the Bank and the business. This new capability enhances corporate process workflows while strengthening transparency and security in the Bank-business relationship.
- **Appointments & Remote Service:**
 - myAlpha Rendez-vous: the service enables Customers to book appointments and receive assistance via video call, phone call, or in person at a branch. The Remote Customer Collaboration System (RCCS) includes the "myAlpha Rendez-vous" (available since 2022) and the appointment booking widget within the e-Banking environment (myAlpha WEB Personal and Business and myAlpha Mobile Personal) (available since 2025). Since launch, these channels have generated more than 1,190,000 appointments (individuals and legal entities), with over 80% completed and only 20% cancelled either by the customer or the Bank. Additionally, approximately 150,000 appointments have been registered through the Outbound Application tool, used by the Bank's Customer Service Department and Branches to assist customers who cannot book independently or do not have an email address.
- **Digital Support & Inclusion:**
 - e-Banking for Individuals Chatbot: The digital assistant, available through myAlpha Web and myAlpha Mobile, supports Customers 24/7 with immediate guidance. By making information accessible at any time, it promotes digital inclusion and empowers users of all ages and abilities to navigate banking services with confidence.

- e-Banking Walkthrough: Customer training and continuous support contribute to a complete digital banking experience and fostering valuable relationships. In this context, the e-Banking Walkthrough initiative continued in 2025, during which specialized staff train Customers daily via personalized video-call sessions on how to use e-Banking and stay safe during digital transactions, improving both accessibility and overall experience with our digital services.
- **Paperless Banking & Automation:** The provision of e-Statements: automated information on card transactions, accounts, loans, and POS so that Customers who have e-Banking receive the relevant information online
- **Security & Authentication (Business):**
 - Since March 2025, the “myAlpha Code service” is offered free of charge to myAlpha Web for Business users, following the elimination of the annual fee of Euro 12 per user. Activation of the service is now mandatory for all new Business e-Banking users. For existing users without an active subscription, activation is carried out through their servicing branch.
 - At the same time, the use of the “myAlpha Code” hardware token has been discontinued. Six-digit authentication codes are now delivered exclusively via Viber, with SMS provided as an alternative channel. The seamless integration of the service into myAlpha Web for Business, at no additional cost, ensures enhanced security and streamlined access for corporate clients to all transactions requiring strong Customer authentication.

Inclusive access to products and services

The Group enhances access to its financial services for all consumers, including persons with disabilities and vulnerable groups, through the ongoing modernization of its physical facilities and digital channels. In more detail these include:

- **Deaf & Hard-of-Hearing Customers- Access to Remote Banking Hub & Physical Branches:**
 - Customers can indicate the option “I have a hearing impairment” when scheduling an appointment via alpha.gr or through Alpha Bank’s secure e-Banking platform. They are then served remotely via video call by trained Remote Hub agents, using communication methods tailored to their needs, either through written chat or with the participation of a certified Greek Sign Language interpreter employed by the Bank.
 - In addition, the digital platform “myAlpha Documents” enables the secure electronic exchange and signing of documents, allowing customers to complete requests efficiently without requiring a physical branch visit.
 - Where necessary, Remote Hub agents coordinate follow-up appointments at a physical branch, ensuring smooth service continuity across channels.
 - Alongside its remote service model through the Retail Remote Banking Hub, Alpha Bank provides accessible in-branch banking solutions for Deaf and Hard of Hearing customers across its physical network.
 - Customers may visit a branch accompanied by a sign language interpreter of their choice. Alternatively, they may use the myIRIS mobile application, which offers free, on-demand remote sign language interpretation services provided by the National Foundation for the Deaf, enabling effective communication with branch staff. When required, written communication is also used to support service delivery.
- **Customers with Visual Disabilities:**
 - Deployment of more than 300 audio-guided ATMs with tactile keypads and audio cues that provide full audio navigation via headphones for safe, independent transactions, where Customer information is not displayed on the screen during transactions for security.
 - Screen-reader compatibility implemented for mobile notifications.
 - WCAG -aligned colour contrast and typography across alpha.gr, MyAlpha Web, MyAlpha Mobile.
 - Digital wallet support (Apple/Google Wallet) enabling secure, screen-reader–assisted transactions, with upcoming support for ATM withdrawals via mobile devices
 - Accessible video media with subtitles available on Alpha.gr.
 - All Bank documents available in Braille, with a processing time of 7 calendar days.
 - Assistance provided without the need for witnesses.
- **Customers with Increased Mobility & Accessibility needs and senior citizens:**
 - Fully remote digital onboarding process.
 - One-to-one educational video sessions provided by the dedicated “e-Banking walkthrough” team.
 - Modernized facilities of Branches that are accessible to all.
 - Accessible and ergonomic ATM height/placement standards applied across the network.
 - Remote digital service channels (chat, Remote Customer Collaboration System , web) reducing need for physical travel.
 - Digital signing and acceptance of documents (MAD) for frictionless operations.
- **Customers with Cognitive or Learning Difficulties:**
 - Simplified content across MyAlpha Web and Mobile supports easier comprehension and reduces cognitive load.
 - Guided chatbot interactions designed with plain language and step-by-step assistance to support task completion.

The websites are available in both English and Greek, and this bilingual approach extends to the Customer Service Call Centre. Customers visiting the Branches can also receive assistance in English, and an English-language interface option is available at the Bank’s ATMs. The Branch Network and ATMs form the cornerstone of traditional banking services, and as such, they have been given heightened attention to ensure that all Customers can access financial services equitably in all countries and regions that the Group operates.

Looking ahead, Alpha Bank has initiated a coordinated accessibility program to ensure that its retail-facing digital channels, including the mobile application and web banking, achieve accessibility compliance, aligned with WCAG 2.2 AA and the EU Accessibility Act.

During the first half of 2026, the new retail mobile application and the core retail web banking flows are targeted to achieve accessibility compliance, with full retail web accessibility targeted by the second half of the year. Accessibility requirements will be embedded as a standard practice to ensure that all newly launched retail digital services remain compliant by design. The programme includes the delivery of accessible digital documents (PDFs and statements) and enhancements to video call interactions with Customers, including support for live transcription and sign language interpreter participation upon request, particularly within digital onboarding and identification flows within

Looking forward, Alpha Bank is launching a coordinated programme to achieve full accessibility compliance across all digital channels, aligned with WCAG 2.2 AA and the EU Accessibility Act. Key priorities include enabling full screen-reader navigation across MyAlpha Web and Mobile for both retail and business Customers, delivering accessible PDF documents, enhancing accessible product information, and redesigning onboarding flows to support interpreter participation in eKYC video identification where needed. These improvements ensure that all new digital projects—onboarding, product acquisition, everyday transactions, and service interactions—are designed from the outset to be fully accessible and inclusive for every Customer.

Through the offering of these products/services, the Group and its subsidiaries deliver material positive impacts on its Customers. It is noted that no negative material impacts that escalate into widespread or systemic harm against consumers/end-users widespread or systemic impact to consumers and end-users have been identified in the Double Materiality Assessment for the Group's business activities and relationships. The Group's Sustainable Finance Framework targets specific groups of Customers such as socioeconomically disadvantaged population living in rural areas or isolated islands with limited or inadequate basic infrastructure, undereducated, long-term unemployed and working population vulnerable to losing their job due to the energy transition. Additionally, it focuses on elderly, youth, and other vulnerable groups, including persons with disabilities, or those in need of medical attention. Please refer to the Policies section in [E1-2] and the Alpha Bank website for additional information related to the Sustainable Finance Framework.

Material risks and opportunities related to Customers

Material risks and opportunities for the Group generally derive from impacts, dependencies, or other factors, such as exposure to climate hazards or changes in regulation that address systemic risks. Dependencies arise from a reliance on consumers, such as that relating to reputational damage. Other factors refer to systemic factors; for instance, regulatory changes in the financial services sector.

From a risk perspective, in the context of the Double Materiality Assessment performed in 2025, the Group concluded that regarding consumers and end-users, "Privacy", "Access to (quality) information" and "Responsible marketing practices" risks are considered material in the short-, medium- and long-term (from an inherent risk perspective). These risks relate to disclosure and data protection issues, unsuitable promotion practices, fiduciary breaches, disputes over advisory activity, product suitability issues or inadequate disclosure of product terms and they typically stem from the potential failure of internal processes and control mechanisms established to ensure data protection, responsible marketing, and access to quality information.

While such risks may also indirectly affect the Group's clients, their root causes and potential impacts are primarily linked to the Group's operational practices and governance framework. They are mainly connected with external factors, including evolving regulatory requirements (e.g., related to GDPR), industry standards, and societal expectations, which can undermine trust and reputation and potentially result in significant financial losses.

It is noted that, risks related to privacy, access to high-quality information, and responsible marketing practices are not specific to any particular group of customers. Based on the Double Materiality Assessment process no material opportunities have been identified related to the consumers and end-users.

[S4-1] Policies related to Customers

Material impacts on Wholesale and Retail Customers relate to Access to Finance and Housing, Healthy Economies, and risks relate to Privacy and Access to (Quality) Information, Responsible Marketing Practices. Therefore, impacts and risks are being managed by the Group with a comprehensive set of policies, including:

Alpha Bank Group's Non-Financial Risks Management Policy

The Policy defines the main components of Non-Financial Risks Management framework. Indicative examples of risks covered in the policy are among others: legal risk, operational risk, ESG risk and reputational risk. The policy also outlines the principles, definitions, governance structure and risk management practices adopted by the Group for effectively managing its Non-Financial Risk exposures.

The policy is applied at Group level in order to manage and mitigate non-financial risks effectively at a consolidated basis. Certain policy adjustments may be required at Group level, in accordance with local regulatory requirements, to ensure compliance. Accountability for the implementation and oversight of the Non-Financial Risk Policy is assigned to Alpha Bank's governance bodies. The Policy is communicated internally and made accessible to all Employees through the Group's intranet, thereby ensuring transparency.

Sustainable Finance Framework (SFF)

The SFF lays out the criteria to characterize specific loans as sustainable, including themes that contribute to the access to Finance and Healthy Economies, Housing (i.e. access to credit and financing and affordable social housing). The process for monitoring the implementation of the SFF includes a robust governance model as well as its integration into the Bank's existing credit approval process. The SFF relates to banking and lending activities provided to individual, corporate and SME Customers. The scope of the SFF encompasses a variety of ESG lending solutions in the Bank's Wholesale and Retail banking portfolios. Additional credit products may be considered following an assessment of certain eligibility criteria. The related activities under the SFF focus on dedicated-purpose financing (Green/Social loans and RRF loans), general purpose financing (Business Mix and Sustainability-linked loans). Access to credit and financing and contribution to Healthy Economies targets females, rural populations focusing on agricultural production and agricultural value chains, excluded and/ or marginalized populations, and economically disadvantaged groups through SME lending in emerging markets and Microfinance lending. Affordable social housing focuses on the financing of construction, renovation and maintenance of houses destroyed or damaged by natural disasters, as well as the provision of adequate, safe, and affordable housing for women, low-income, and underserved populations. For further details on the key objectives of the SFF, the integration of stakeholders' views in establishing the SFF, and the online availability of SFF to affected Customers and Employees, please refer to [IRO-1] Description of the process to identify and assess material impacts, risks and opportunities and [E1-2] Policies related to climate change mitigation and adaptation.

Group Cybersecurity and Information Security Framework

The Group Cybersecurity and Information Security Framework sets out the Cybersecurity and Information Security principles, policies, procedures, methodologies, technical security standards and guidelines for the management of Cybersecurity and Information Security risks,

ensuring compliance with legal and regulatory framework and leading industry standards and best practices, while supporting the intent and the direction of the Cybersecurity and Information Security Strategy.

It addresses the identified risk of "Disclosure and data protection issues" under the Double Materiality Assessment. The Framework relates to all the Group's activities, products and services and applies to all countries where the Group operates and to all Business Areas of the Bank and Group subsidiaries. In addition, the Bank and Group subsidiaries also ensure that third-party service providers comply with the Group Cybersecurity and Information Security Framework, where applicable, as well as other applicable ICT security standards.

The Framework is reviewed at least annually to meet the increased requirements arising from the relative regulatory framework (such as NIS Directive, EU Cybersecurity Act, GDPR, EBA Guidelines on Cloud Services, EBA ICT Risk Guidelines, DORA, etc.), the operational and technological environment as well as the applicable international standards and best practices. The Cybersecurity and Information Security Business Area operates under Management Systems certified according to ISO standards, including ISO 22301 (Business Continuity), ISO 27001 (Information Security), ISO 27017 (Information Security Controls for Cloud Services) and ISO 27018 (Protection of Personally Identifiable Information on Public Clouds), ISO 27701 (Privacy Information Management). The Business Area also leads the SWIFT CSP assessment and PCI DSS recertification processes for the Bank.

The Group Cybersecurity and Information Security Framework is available to all Employees through the Group's Intranet.

Electronic Fraud Management Policy

Systematic and effective actions to minimize electronic fraud incidents involving e-Banking and Card digital services are a standard practice to ensure operational continuity, corporate reputation, and reduce financial and/or legal risks.

The Electronic Fraud Management Policy of Alpha Bank S.A.45 defines the structure and the operating principles for the prevention, timely detection, and effective management of fraud incidents via e-Banking and Card Services with the aim of reducing them and continuously improving the infrastructure, organization, and procedures for the effective combating of electronic fraud.

As a Financial Institution the Policy aligns with the requirements of the European regulatory framework, such as PSD2 and the EBA guidelines, as well as with international payment security standards. Its purpose is to clearly define the principles, responsibilities, and methods for preventing, detecting, and responding to suspicious activities. Potentially effected stakeholders can be informed through material that exists on the Alpha Bank S.A. website (for individuals and business). More details are included in the Electronic Fraud Management Initiatives section.

The creation and configuration of the rules for the Anti-Fraud systems are guided by its Business Strategy and the electronic fraud patterns that are being identified through the daily analysis of fraud incidents. Additionally, the Fraud Alerts Management Team, which is a crucial part of the Electronic Fraud Management Unit, is committed to operating on a 24-hour basis to ensure that the bank is always prepared to respond promptly to any fraud incidents. In an environment where threats evolve daily, the policy serves as a stable point of reference, enabling the Bank to stay one step ahead of emerging risks and to react quickly and effectively to any fraud incident.

Group Personal Data Protection Policy

The Group Personal Data Protection Policy aims to define the rules governing the organizational and technical measures for the effective management and protection of personal data while ensuring the privacy of the data subjects (i.e. Natural Persons and Sole proprietorships). Moreover, the policy seeks to enhance Customer confidence and preserve the Group's reputation as well as its competitive presence in the market. The scope of the policy applies to all Group subsidiaries and their respective Business Units, all Employees, and all third parties that in any way process personal data on behalf of the Group subsidiaries, as data processors. The Group Personal Data Protection Policy is binding for Group subsidiaries that operate in countries where GDPR is applicable and process personal data. The detailed policy is accessible to all Employees on intranet, while the relevant Notice on the Processing of personal Data, is constantly available to the Customers on Alpha Bank's website. The Policy has been developed to be in compliance with the General Data Protection Regulation (GDPR) and as such, has a strict set of procedures inter alia it adheres to:

1. Privacy by Design and by Default
2. Record of Processing Activities
3. Data Protection Impact Assessment
4. Data Subjects Rights Management
5. Personal Data Breach Management

The "Privacy by Design and by Default" procedure ensures personal data protection throughout the entire lifecycle of a project, product, or system, from initial development to operation and withdrawal. It applies to all projects involving organizational redesign or IT systems where personal data is processed, either by the Bank or third parties. This procedure aligns with the Group Cybersecurity and Information Security Framework and supports the procurement, development, and maintenance of information systems.

The "Record of Processing Activities" procedure documents all personal data processing activities within business areas in a central Record of Processing Activities (RoPA). Its purpose is to ensure the RoPA is consistently updated with the information required under Article 30 of the GDPR through regular or ad hoc reviews.

The Data Protection Impact Assessment is conducted when personal data processing may pose a high risk to the rights and freedoms of individuals. Its purpose is to identify such high-risk activities and manage them by developing action plans with technical and organizational measures to mitigate the risks. The "Data Subject Rights Management" procedure ensures that data subjects' requests are received, assessed, and processed effectively within the required timeframe. It relies on the cooperation and coordination of all involved business units and third-party data processors. The "Personal Data Breach Management" procedure ensures compliance with obligations to protect personal data by

⁴⁵ It is noted that Alpha Bank Cyprus is also aligned with the requirements of the European regulatory framework, such as PSD2 and the EBA guidelines

identifying, managing, and responding to breaches promptly. It includes notifying the Supervisory Authority and affected individuals, when necessary, in accordance with applicable legal requirements.

The Group Data Protection Policy is applicable since 2018, as well as other procedures that cover various obligations stemming from GDPR. To monitor this policy, KPIs are determined and generated on a regular basis and are subject to periodical review to confirm the effectiveness of the measures implemented and performance of the data protection program. No severe human rights issues and incidents connected to consumers and/or end-users have been reported.

Group Outsourcing Policy

This Policy sets specific evaluation criteria for Outsourcing third party service providers, aiming to minimize potential risks for the Group and its Customers. The Policy applies to all subsidiaries of the Group in Greece and abroad, and relates to outsourcing activities, on the basis of Executive Committee Act No 178, as issued by the Bank of Greece (Session 178/2.10.2020), and the relevant guidelines of the European Banking Authority (EBA Guidelines on outsourcing arrangements EBA/GL/2019/02). The policy covers Outsourcing service providers that may be deployed regarding the offering of services to Customers and end-users, and does not apply to all third-party service providers, as per BoG Act 178/5/2.10.2020. In addition, the Policy addresses the "Privacy" and "Access to Products and Services" in line with Double Materiality Assessment performed by the Group.

Monitoring of the Outsourcing Policy is conducted on an ongoing and risk-based basis and includes, indicatively, the periodic review of key risk indicators (KRIs), service performance indicators (KPIs), compliance assessments, incident reports, material changes, and findings arising from internal audits or supervisory reviews. The ICT Third-Party Risk and Outsourcing Committee is responsible for supervising implementation of the Outsourcing Strategy and receives regular reporting from the competent units and monitors adherence to regulatory requirements, contractual obligations, service levels, and exit strategies, with particular focus on Critical or Important Outsourcing Arrangements. Any material deviations, breaches, or emerging risks are promptly escalated to the BoD together with proposed remediation actions and timelines for resolution. An annual comprehensive review of the Outsourcing Policy and its effectiveness is also performed, the results of which are reported to the BoD.

All Business Areas and relevant subsidiaries as well as management bodies involved in the outsourcing lifecycle must comply with the Outsourcing Policy (of which the Outsourcing Strategy is an integral part) and the relevant Procedures. The Policy is made available internally on the Group's intranet page.

Other information on policies related to Customers

Alpha Bank complies fully with all rules and guidelines established by the Communication Control Council, including the [Greek Code of Advertising and Communication](#), however no specific policy is currently in place regarding responsible marketing practices and access to quality information. Alpha Bank's existing processes ensure that Customers are protected through responsible marketing practices and access to high-quality, transparent information. These established mechanisms adequately address the relevant material sustainability matters related to consumer needs, and therefore no additional policies have been deemed necessary at this time. Applicable regulations are reviewed regularly to maintain alignment of the processes in place. Instructions from the Communications Committee and the Regulatory Compliance Business Area are being followed on the promotional and advertising material of products and services in order to ensure compliance with a variety of regulatory texts such as MiFID II, BoG Governor's Act 2501/2002, PSDII, aiming at the full, transparent, timely and non-misleading information of existing and potential Customers. Explicit and sufficient information, regarding offered services and products is provided to all Customers regardless of the distribution channels. These processes evidence that at Alpha Bank, transparency in promoting its services throughout the business relationship with Customers is of the utmost importance.

In addition, aspects related to these matters, are integrated in the Code of Conduct and Ethics and the Corporate Responsibility Policy.

Particularly, for ensuring adequate controls against the generation of misleading financial information, as well as corruption, antitrust violations, abusive contractual terms, insider dealing, conflicts of interest, money laundering, bribery and, towards its Customers, the Group has set a Code of Conduct and Ethics. Regarding Customers, the Group ensures through the Code of Conduct and Ethics:

- The protection of Customer information confidentiality.
- The protection of personal data through secure and appropriate management thereof.
- The provision of explicit information regarding offered services and products, regardless of the distribution channels.
- The transparency in promoting its services throughout the relationship.
- The diligent resolution of complaints and measuring of Customer satisfaction.
- The protection of the Customers' legitimate interests.
- The establishment of the appropriate organizational structure, policies and procedures for the avoidance of conflict-of-interest situations.

Furthermore, through the Corporate Responsibility Policy, the Group prioritizes credibility, consistency, and efficiency in its banking services. As in accordance with the Code of Conduct and Ethics and the principles of Corporate Governance, the Bank adheres to principles of best banking and business practices. More specifically, the principles of integrity and honesty, impartiality and independence, confidentiality and discretion with the aim to provide full, accurate, and truthful information to stakeholders.

More information on the Code of Conduct and Ethics is provided in [G1-1] Business conduct policies and corporate culture of the Sustainability Statement, as well as on the Group's website. The Corporate Responsibility Policy is described further on [S1-1] Policies related to own workforce and the Corporate Governance Statement within the Annual Report 2025.

Through engaging with its key stakeholders, Alpha Bank S.A. has identified 3 areas that their Customers are prioritizing: 1) access to finance, 2) data privacy, and 3) sustainable financing. Taking into consideration the interests of its Customers, the Bank has responded through setting the SFF, as well as implementing transition plans for its Customers, developing ESG-related products and services, ecosystem of ESG partners, and internal risks and controls.

Significant changes in policies related to Customers in 2025

In 2025 the **Complaints Management Policy** was strengthened to enhance transparency, efficiency, and regulatory compliance in line with Bank of Greece directives. The update reflects:

- a) regulatory and supervisory requirements,
- b) organizational and operational restructuring, and
- c) the integration of corporate responsibility and ESG principles.

Key improvements include:

- A structured categorization process based on product, issue type, and applicable regulatory framework.
- A defined prioritization mechanism reflecting risk, complexity, and potential impact on the Bank.
- Clearly established response timelines, including internal targets for business areas (1–5 calendar days) and an overall resolution timeframe of 10–15 calendar days, ensuring timely and consistent handling.
- A formal escalation framework for delayed or complex cases.
- Strengthened monitoring, reporting, and accountability mechanisms supporting transparency, continuous improvement, and Customer trust.

The revised Policy ensures effective and lawful complaint handling, establishes a Central Complaints Management Team (CCMT) with clear stakeholder roles, and promotes a unified, Customer-centric approach across all service channels. Monitoring, escalation mechanisms, and root cause analysis support accountability and continuous service improvement.

Oversight of policies

Overall, the Board of Directors and its Committees are responsible for the approval of the policies and oversee their implementation. More specifically:

- **Alpha Bank Group's Non-Financial Risks Management Policy:** The Non-Financial Risks and Internal Control Committee is responsible for reviewing the Policy at least on an annual basis, while any updates to the Policy are endorsed by the Risk Management Committee prior to final approval by the Board of Directors, which retains ultimate accountability.
- **Sustainable Finance Framework (SFF):** The Group Sustainability Committee oversees the implementation of the SFF and reports to the BoD.
- **Group Cybersecurity and Information Security Framework:** The Group Chief Information Security Officer is responsible for managing the day-to-day operational execution of this policy and manages the multilayered security infrastructures and mechanisms for the protection of the services provided. Finally, it is mentioned that the Group's Cybersecurity and Information Security Strategic Plan is monitored regularly and reported to the Non-Financial Risks and Internal Control Committee Executive Committee, and the BoD.
- **Group Personal Data Protection Policy:** The Group's Data Protection Officer as well as the DPOs in the Group Companies are responsible for the control and continuous monitoring of compliance and proper implementation of this policy.
- **Group Outsourcing Policy:** The ICT Third-Party Risk and Outsourcing Committee is responsible for supervising implementation of the Outsourcing Strategy. It ensures that the BoD is duly and regularly informed on issues related to the overall implementation and monitoring of the Outsourcing Strategy and Policy. All Business Areas of the Group as well as management bodies involved in the outsourcing lifecycle must comply with the Outsourcing Policy (of which the Outsourcing Strategy is an integral part) and the relevant Procedures.
- **Electronic Fraud Management Policy:** The Electronic Fraud Management Business Area is responsible for the oversight and operational management of both e-Banking and Card Services Anti-Fraud systems, which feature a rule creation and customization environment.

Adhering to principles for the protection of Human rights

The Group demonstrates its commitment and its general approach for respecting the human rights of consumers and/or end-users through adhering to the following principles:

- As signatory of the United Nations Global Compact (UNGC), Alpha Bank operates in respect with "Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights"; and "Principle 2: make sure that they are not complicit in human rights abuses."
- Through the UNEP FI, the Group has committed to the 6 Principles for Responsible Banking (PRB) including "Principle 3: Clients and Customers: "We will work responsibly with our clients and our Customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations."

It is noted that no standalone human rights policy is in place.

General approach for Customer engagement and measures to provide or enable remedy for human rights impacts

The Group continuously seeks to engage effectively with its Customers by establishing meaningful, two-way communication, building trust and creating value. Through Customer engagement, the Group identifies and understands its Customer needs and expectations, continuously improves the offering of products and services as well as updates and enhance its policies, mechanisms and processes to maintain trust and build long-term relationships with its Customers.

The Group has a general approach for providing and enabling remedy for human rights impact, through the establishment of both proactive and reactive measures. The protection of the legal interests and human rights of its Customers is outlined in the Bank's Code of Conduct and Ethics. In addition, the Group collaborates with its stakeholders (such as NGOs, and others) for facilitating effective remediation. It has also established mechanisms and channels available to its consumers, that enable them to raise their concerns. Corrective actions are immediately taken to mitigate potential risks for the affected Customers. Additionally, the Group undertakes actions to further improve and strengthen existing technical and organizational measures to prevent the recurrence of such incidents. Please refer to [S4-3] "Processes to remediate negative impacts and channels for consumers and end-users to raise concerns" for more information regarding the channels in place.

Also you may refer to section [S1-1] for references on the alignment of the Corporate Responsibility Policy with internationally recognized guidelines, principles and initiatives on sustainable development.

It is worth mentioning that no incidents of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve consumers and end-users have been recorded and reported in the Group's downstream value chain. For more information on how the Group monitors compliance with policies, please refer to [G1-1] Business conduct policies and corporate culture as well as to [S1-1] Policies related to own workforce.

[S4-2] Processes for engaging with consumers and end-users about impacts

The Group's stakeholder engagement approach is founded on the principles of transparency, inclusivity, and accountability, ensuring that its sustainability efforts align with stakeholder expectations and values.

The Alpha Bank Group aims to maintain ongoing dialogue and collaboration with these stakeholders to understand and address their expectations, needs, concerns, and requests as much as possible. Recognizing the diversity among its stakeholders, the Bank has developed tailored engagement and communication strategies to meet the unique needs and preferences of its consumers and end-users.

Alpha Bank prioritizes delivering an exceptional customer experience throughout the entire service cycle and the delivery of high-quality products and services. The Digital Sales and Customer Experience Business Areas alongside the Customer Service Business Area are supporting the efforts to achieve these goals. Systematic collection of customer feedback and analysis of customer insights are integral part of these efforts. Flagship initiatives promoting the customer-centric culture for Alpha Bank S.A., the largest subsidiary of the Group, are enabled by the "Voice of Customer" program. This includes, a series of surveys addressed to both Wholesale and Retail Customers measuring a number of indices such as

- the Net Promoter Score (NPS) – measures the degree of recommendation of the bank based on overall relationship or specific experiences across channels, products, or Customer journeys,
- the Customer Satisfaction (CSAT) - measures how satisfied a Customer is with their overall cooperation with the bank or specific area of the business,
- the Customer Effort Score (CES) - measures a Customer's level of effort while interacting with the brand or specific touchpoints, products, and services.

Moreover, in 2025, Alpha Bank, launched the "close-the-loop" initiative, which involves monthly calls for individual Customers to deepen feedback while addressing specific pain point by offering real-time support where possible.

In addition, Alpha Bank Cyprus was the first bank in Cyprus to introduce the "Customer Advocate" as an enabler to the "Voice of Customer". The Corporate Governance and Customer Advocacy Business Area ensures the fair handling of Customer complaints and monitors the implementation of corrective actions. In alignment with the above, the relevant Customer Complaints Management Policy has been revised including reporting to the CEO and subsequently to the Board of Directors cases where the Bank's response is deemed unfair.

The Group is dedicated to frequent engagement with its stakeholders, providing them with transparent and material information.

Furthermore, Relationship Managers collect and communicate Customer feedback. Communication with all stakeholder groups is conducted on an annual, bi-annual, quarterly, and ad hoc basis, and detailed information is available under [SBM-2] "Interests and views of stakeholders".

Effectiveness of the Customer engagement

The effectiveness of the engagement with consumers and/or end-users is evidenced by identifying specific matters through workshops, surveys with specific Customers, and feedback received through the existing channels for consumers to raise concerns and integrating their expectations and needs in informing and initiating new initiatives, products and services. Alpha Bank has designed a Customer Experience program comprising horizontal initiatives and IT investments designed to address identified customer pain points. The three-year implementation roadmap aims to improve service consistency, accessibility, and customer satisfaction, reinforcing responsible banking practices and long-term stakeholder value. It is mentioned that currently there is no specific process in place for engaging and for gaining insight into the perspectives with consumers and/or end-users who may be particularly vulnerable to impacts and/or marginalized consumer groups is in place. The general approach for consumer engagement applies to all consumers of the Group's products and services. Please refer to [GOV-1] The role of the administrative, management and supervisory bodies to see the relevant responsibilities on the organizational structure.

Operational responsibility for ensuring the accomplishment of engagement and outcomes

For Retail Customers, operational responsibility for day-to-day engagement and the integration of key insights into products and services resides with the Chief Retail Client Strategies Officer. The primary objective is to ensure Customer satisfaction and deliver high-quality products and services. To achieve this, the Business Area actively gathers input through Customer surveys, relationship managers, and by analyzing data from the Bank's digital platforms to understand consumer behavior and preferences. The insights gathered from these engagement activities are leveraged to inform Alpha Bank's policies, practices, and product development, ensuring that Customer expectations and concerns are addressed effectively. For Wholesale Customers, Relationship Managers (RMs) collect and transmit feedback to the Wholesale Business Development Area, with Chief Wholesale Banking maintaining the operational responsibility.

[S4-3] Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

It is noted that no negative material impacts on Customers have been identified through the Double Materiality Assessment conducted in 2025. However, in the event of negative impacts to its Customers, the Bank has established specific mechanisms and processes for contributing to the remedy of them.

Any actions that might have caused to the Customers, may be reported through the Whistleblowing mechanism, available on the website. The Whistleblowing Policy ensures that anonymity of the Whistleblower that utilizes the mechanism, will be properly protected in order to avoid any possible negative consequences, such as threats or attempts of retaliation, or discrimination or any other form of unfair treatment. Submitted reports are communicated only to predefined persons, the number of which is narrowed to those responsible for carrying the investigation and are entitled to act in discretion and confidentiality. By respecting the above would also result in protecting the identity of the reported persons. Please see the [G1-1] Business conduct policies and corporate culture.

In addition, through the "Notification on the Processing of Personal Data", where GDPR is applicable, Customers are informed on how their personal data is processed by Alpha Bank or third parties on its behalf and on how to exercise their rights as per the GDPR. It also entails the purpose, sources, recipients, storage duration, and contact information regarding the Data Controller and Data Protection Officer.

The "Notification on the Processing of Personal Data" is available on Alpha Bank's website. The respective "Notification" is also available on each of the Group subsidiaries' website. Furthermore, special privacy notices are provided to Natural Persons whenever necessary.

Furthermore, a Support Centre has been established to address Customer grievances. Under this mechanism, the Bank has a Customer Service Call Centre, Merchants Customer Service Call Centre, and direct lines for different business units/subsidiaries. The main call center directs to Alpha Bank S.A. with individual contact numbers listed for the Group's services at Alpha Real Estate S.A., Generali, Alpha Leasing, AlphaTrade, and Alpha Mutual Funds. Complaints are managed by the Customer Service Business Area at Alpha Bank. It tracks and monitors issues raised and addressed through a Contact Form on the Bank's website and listed contact numbers. The Bank aims to revert to Customer issues with a clear and substantiated reply in accordance with the applicable Regulatory and Legal provision. The Bank has established and maintains an updated Complaints Management Procedure, ensuring the lawful, effective, and transparent handling of complaints in full compliance with the applicable regulatory framework. Upon receiving a complaint, the Customer Service Business Area undergoes a 4-step process:

1. Acknowledgement of receipt of the case
2. Investigation with cooperation of the competent Business Areas of the Bank
3. Resolution of the issue
4. Customer response

If the Customer disagrees with the proposed resolution or reply, they are provided with the option to decline the proposed resolution. In that event, the consumer may revert to the Hellenic Financial Ombudsman (the contact information of which is provided on the Group's website). All the above information is provided on the Bank's website, including the expected wait time and answers to Frequently Asked Questions. Customers are updated throughout the process using the contact details they provided (by SMS, phone number, or letter).

These processes have been implemented by the Bank without the participation of third-party mechanisms.

The above processes refer to channels provided to Customers for raising their concerns, not only for the Bank's activities, but as well for any activities provided to them from the Bank with cooperation of business partners (i.e. suppliers and other external parties). Currently, no particular assessment takes place for the effectiveness of the mechanisms and channels that the Group utilizes for its consumers to raise their concerns.

2025 Complaints: Alpha Bank S.A. monitors and tracks the number of complaints submitted, independently of their nature. The number of complaints received from consumers and/or end-users during 2025 were 19,242. Customer usage of these channels as a means of providing feedback demonstrates that Customers feel empowered to raise concerns and trust the mechanisms for resolution disclosed above. Please also refer to section [G1-1] Business conduct policies and corporate culture and section [G1-3] Prevention and detection of corruption and bribery on how Customers become aware of and trust the processes as a way to raise their concerns.

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

As described in [S4-2] "Processes for engaging with consumers and end-users about impacts" and [S4-3] "Processes to remediate negative impacts and channels for consumers and end-users to raise concerns" the Group has not recognized any material negative impacts on consumers and/or end-users through its business activities. As a signatory to the Principles for Responsible Banking, Alpha Bank has adopted the UNEP-FI Commitment for Financial Health and Inclusion since 2019 and is acting through its business activities to foster healthy social paradigms and objectives. Thus, the implementation of the following actions contributes to the achievement of corresponding policy objectives and, where applicable relevant targets.

Among the key actions that the Group performs to increase the positive impacts created to its Customers are reflected through its Sustainable Finance Framework (SFF) and refer to:

- The development of Green and Sustainable financial products such as products for SME lending in emerging markets, Microfinance lending, Financing of construction, renovation and maintenance of houses destroyed or damaged by natural disasters.
- The integration of sustainability criteria into credit and loan approvals.

The products are targeted especially to affected stakeholder groups, such as Female, Rural populations focusing on agricultural production and value chains, Excluded and/or marginalized populations, financially, disadvantaged groups as referenced also in [S4-1] "Policies related to Customers", whereas under section [S4.SBM-3] "Material impacts, risks and opportunities and their interaction with strategy and business model in relation to consumers" a detailed reference to the relevant financing products and services is provided. In addition, the SFF does not currently set a defined time horizon regarding the number of products aligned to it, but it has a long-term view and has a Group application.

Identified risks through the Double Materiality Assessment pertain the topics of Privacy, Access to Quality Information and Responsible Marketing Practices. The Group ensures that these risks are mitigated through key actions which are supported by robust internal control mechanisms, processes that ensure ethical marketing communications, transparency, honesty, and compliance with regulatory standards. These processes ensure that for every advertising project, a communication plan assessment is performed by the competent Business Areas and, if required, by the Legal Services or the Regulatory Compliance Business Areas, to ensure objectivity when providing information.

Advertisements include all necessary details to inform the public, as described in previous reference under "Other information on policies related to Customers". Hence these actions ensure that there is no negative ramification for Customers due to manipulation or misinformation as the above processes serve to mitigate such outcome. When space or time constraints prevent full disclosure (such as in TV or radio spots), Alpha Bank provides its [website](#) for more information. These practices apply in Greece for Alpha Bank S.A., but similar practices are also established in other areas where the Group operates. Thus, Alpha Bank complies with the regulatory framework in force regarding transparency in providing information to contractual parties, precontractual information, advertising as well as the terms of contracts with its Customers.

The above actions do not have a defined time horizon for completion, but govern continuously the Group's operations. Regarding the progress of the actions, regular monitoring takes place to ensure that no incidents of non-compliance with regulatory framework and marketing practices have been occurred. Through the implementation of the above controls and processes, the Group also mitigates the risk to consumers regarding Access to Quality Information through a review by the related Divisions prior to releasing information to consumers.

Through continuous training programs for Employees, the Group prevents any potential negative indirect impact on Customers, or realization of risk that concern Privacy-related incidents. Trainings to mitigate the risk of privacy include the Cybersecurity Awareness Program, Cybersecurity and Information Security training modules, and the electronic Fraud training program. These trainings improve the internal capacity building to enhance service quality and delivery, leading to increased Customer satisfaction. Trainings are performed on an annual basis.

GDPR training

Moreover, data protection training sessions are conducted throughout the year for all new Employees. During 2025, the following sessions took place:

- Control and Risk Culture: boosting awareness in data protection with specialized training sessions to appr. 420 Bank's Branch Network Employees.
- Data Protection Institutional Framework: training session with the participation of approximately 170 Group Employees in Greece that covered various data protection issues such as Artificial Intelligence, emerging regulatory obligations (e.g. DORA, NIS II) and third-party assessment.

Data protection training sessions take place in Group Companies in Greece, and Cyprus, where GDPR is applicable.

The above actions are ongoing and thus, there is no timeframe of completion. The progress of these actions is regularly monitored to ensure that no severe incidents of non-compliance with regulatory framework will take place. For this reason, to support the implementation of the above, human resources are utilized and expected to continue to be utilized in the future time horizon such as through employee training and consulting services to empower Employees' knowledge and skills for sustainable projects, and utilization of technological solutions, such as digital tools.

Furthermore, it should be mentioned that the existing processes reassure not only that no material financial effects will affect the Bank but also that no material negative impacts will be created to its Customers.

Cybersecurity training

Regarding the identification and reaction to Cybersecurity and Information Security risks, Employee awareness and training is a critical and continuous activity. In addition to the program for new employee induction to Group Cybersecurity and Information Security Framework principles, a sophisticated Cybersecurity Awareness Program is being structured at the beginning of each year and supported by an e-learning platform. During 2025, the annual Cyber Awareness Program was completed successfully, with new Cybersecurity and Information Security training modules introduced and successfully completed by 5,287 Employees at Group level. The main training objectives, the appropriate training strategy as well as the initial planning of the trainings are determined at this stage. Training content is updated regularly to maintain its relevancy and is adjusted to each role, within the Bank to achieve the necessary growth and development. The training program is reviewed during the year and may be modified according to new needs that may arise. The training plan includes specialized training and certifications for Managerial/Administration and Technical functions in Greece, and the other countries where the Group operates.

Other Cybersecurity and Information Security Initiatives

The Cybersecurity and Information Security initiatives consider international standards and frameworks and are aligned with the Non-Financial Risks Management Policy. The Cybersecurity and Information Security Business Area directly supports Business Areas and Group subsidiaries in conducting Information Classification and Cybersecurity and Information Security Risk Assessments (CISRA) for applications that support critical business processes including cloud-based applications, as well as conducting the coordination and monitoring of the execution of improvements and remediation of deviations. Continuous and real time identification of Cybersecurity vulnerabilities for critical systems is performed via the deployment and configuration of dedicated software on the corresponding infrastructure.

The Alpha Bank Computer Security Incident Response Team (AB CSIRT) is certified as a full member of the global Forum of Incident Response and Security Teams (FIRST) and the Financial Services Information Sharing and Analysis Centre (FS-ISAC) and cooperates with the National CSIRT and the National Cybersecurity Authority to ensure continuous information exchange and response to cyber threats. During 2025, the

AB CSIRT dedicated significant time and effort towards fostering growth across various and critical Threat Management domains. The Cyber Threat Intelligence Framework has been formalized and included within the Group Cybersecurity and Information Security Framework.

The Cybersecurity and Information Security Business Area manages the multilayered security infrastructures and mechanisms for the protection of the services provided (defense in depth). In 2025, replacements, upgrades and major improvements of critical Cybersecurity infrastructures were performed and a major project for Network Security Redesign has been initiated.

Electronic Fraud training

In addition, Alpha Bank runs a dedicated annual electronic Fraud training program, which is supervised by Electronic Fraud Management Unit, to ensure Employees remain fully aware of the latest fraud trends, digital scams, and emerging attack methods. By keeping Employees informed and alert, the Bank enables them to quickly recognize red flags, guide Customers with confidence, and step in before suspicious activity turns into actual loss. Training is delivered through an easy-to-use e-learning platform and is updated frequently so that Employees always work with current, practical information. In 2025 the program was completed successfully by 3,023 Employees of Alpha Bank S.A. Each module focuses on real scenarios and common fraud patterns, helping staff respond more effectively in their daily interactions. By strengthening Employee awareness, the Bank enhances its overall fraud-prevention capability, protects Customers more proactively, and reinforces trust across all services. The program is reviewed throughout the year and enriched whenever new threats or operational needs arise. In 2025 the Bank supporting the importance of electronic fraud training to its Employees, has created a dedicated slot during the "Alpha First" Induction Programs, where all new Employees receive structured training on fraud awareness. We introduced the most common types of electronic fraud to protect not only the Bank Customers, but also themselves.

Other Electronic Fraud Management Initiatives

Electronic Fraud Management has introduced additional measures to protect Alpha Bank's Customers. Through myAlpha Web, retail Customers are given the opportunity to temporarily lock their e-Banking subscription if they suspect interception or leakage of their passwords or detect suspicious activity in their e-Banking. Changes were also made to the myAlpha Code guidelines to provide a more secure experience; the registration of the 6-digit code is now requested in all transactions to third parties in subscriptions with the service activated as well as during login. Access is blocked upon incorrect myAlpha Code entries via SMS OTP (one-time password). Also, the text messages are now clearer and more explanatory.

Thus, the Bank continues to invest in enhancing Customer awareness and empowering them to recognize and respond to warning signs of electronic fraud. The ongoing development of internal anti-fraud controls and system safeguards is critical for Alpha Bank, hence a series of educational videos are being available on both the Bank's [website](#) and [YouTube channel](#). These resources present practical, real-life scenarios to help Customers better understand common fraud techniques and how to avoid them. Customer security remains one of the Bank's highest priorities, and we are committed to providing the tools, information, and protections necessary to ensure their ongoing safety. On the other hand, twice a year electronic fraud awareness updates are sent not only to our retail but also to our wholesale customers.

Please refer to [GOV-5] Risk management and internal controls over sustainability reporting for more information on the Group's approach to risk management.

Resources for managing material impacts

For managing the impacts, the Group utilizes several human resources across its Business Areas and Group subsidiaries, including: the Retail and Wholesale Banking Business Areas, the Digital Sales and Customer Experience, the Customer Service, the Marketing and Public Relations Business Areas, the Group Data Protection Office, the Cybersecurity and Information Security Business Area, the Non-Financial Risks Control, and the Central Procurement Management and Outsourcing among others monitor impacts on the Group's Customers and end users.

Due to the nature of the Group's business activities, no significant operational (OpEx) and/or capital expenditures (CapEx) that relate to the implementation of its actions towards the achievement of its actions have been specifically attributed.

Actions to enable and provide remedy

No negative material impact on consumers and end-users has been identified. Nevertheless, the Group has established a comprehensive framework of policies, procedures and operational mechanisms designed to prevent, mitigate and, where necessary, enable remedy for potential adverse impacts on consumers. This framework encompasses the design of consumer-centric products that respond to customer needs, a robust Risk Management for credit assessment and the prevention of fraudulent activities, the implementation of ethical business practices, and the transparency of information. In addition, the Group fosters a culture of corporate responsibility among its employees, supporting behaviors and decision-making that uphold consumer protection and enable the prompt handling and remediation of any issues that may arise. Please refer to [S4-1] "General approach for Customer engagement and measures to provide or enable remedy for human rights impacts" for additional information.

Other Customer-related initiatives

- **“Green City” collaboration:** In 2025, in collaboration with the largest recycling program in Greece, Alpha Bank S.A. supported Customers of the Bonus app with e-coupons for enhancing their accessibility to goods, while promoting recycling. By recycling household waste at specific Mobile Green Points, Customers earn “Green City” coins, which they can convert into Bonus points through the Bonus app. In 2025, Bonus Customers have responded with great interest and have proceeded into 6,839 conversions of green city coins into 17,097,502 Bonus points. The collaboration between Bonus and “Green City”, actively supports recycling since it offers an extra benefit to Bonus Customers to recycle on a regular basis. More information can be found by visiting the website.
- **“myAlpha Documents” service:** In 2025, more than 10,000 requests from individuals and businesses were handled remotely by the Alpha Bank’s Branch Network and Central Services through the “myAlpha Documents” electronic document exchange platform. The use of the service has saved more than 200,000 pages of documents that have been distributed digitally. Through myAlpha Documents, customers are able to manage a wide range of banking requests, upload supporting documentation, and sign documents online, without visiting a branch.
- **Innovation and Entrepreneurship Support:** Part of its long-term commitment to sustainable growth and digital transformation, Alpha Bank continues to invest in initiatives that foster innovation, strengthen the start-up ecosystem, and accelerate the development of new technological solutions. Through strategic programs, partnerships, and open-innovation activities, the Group actively supports entrepreneurship and contributes to the evolution of the financial sector, enhancing the access to Finance for Consumers.
- **FinQuest by Alpha Bank – Driving Innovation in Financial Services:** The Bank’s International Innovation Competition was held for the fourth consecutive year in 2025 and has now become a well-established mechanism for strengthening ties with the domestic and international FinTech and start-up ecosystem. The purpose of FinQuest is to accelerate digital innovation in the banking sector by fostering collaboration with FinTechs and technology start-ups. The objectives of FinQuest by Alpha Bank 2025 included:
 - **Identifying AI-powered banking solutions:** Attracting pioneering ideas that address real challenges or create new opportunities in the financial sector.
 - **Exploring commercial adoption:** Leveraging start-up proposals to enhance products and services, improve internal processes, or support entry into new markets.
 - **Strengthening start-up entrepreneurship:** Supporting the growth and visibility of innovative early-stage companies.
 - **Deepening engagement within the FinTech ecosystem:** Expanding the Bank’s role and influence in the innovation community.
 - **Cultivating an internal culture of innovation:** Encouraging creativity, experimentation, and continuous learning across the organization.

The competition’s final event and winner selection took place in November 2025 as part of **Alpha Bank’s Innovation Day**, which was a live-streamed open event, serving as a strategic platform for Alpha Bank to communicate its vision and leadership in the era of Artificial Intelligence.

- **Accelerating Pilot Programs with Start-ups:** In parallel with its flagship innovation events, Alpha Bank continues to enhance its ability to rapidly design and implement pilot programs with innovative start-ups. By adopting agile methodologies and streamlined processes, the Bank ensures that promising ideas can be tested quickly and effectively, accelerating the transition from concept to real-world application. This approach supports the growth of early-stage and scale up companies while enabling the Bank to continuously integrate emerging technologies into its operations.
- **Support Female entrepreneurship:** In support of female entrepreneurship, Alpha Bank completed the "Alpha Females for VentureGarden" program in collaboration with Anatolia College, for the second consecutive year. The programme directly relates to consumers of Alpha Bank’s services, as it targets current and aspiring female entrepreneurs who operate or intend to operate small businesses and may become or already are Customers of the Bank. The programme enhances participants’ financial literacy, business planning capability and access to financing tools, thereby supporting their ability to establish, grow and sustainably finance their enterprises. With the inclusion of structured entrepreneurial training, delivered through five themed workshops in Athens and Thessaloniki, the programme is addressing areas such as business strategy, digital marketing, financing instruments and financial management. In this context, the initiative contributes positively to financial inclusion and access to finance for women entrepreneurs.

Through these initiatives, Alpha Bank reaffirms its role as a catalyst for innovation and entrepreneurship. By empowering start-ups, fostering collaboration, and embracing new technologies, the Bank contributes to a more sustainable, competitive, and future-ready financial ecosystem.

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

Regarding its material positive impacts to Access to products and services, and Contribution to Healthy Economies, Alpha Bank’s Strategic Targets are aligned with SFF and enhance the positive contribution to consumers and end-users. The targets included below are specifically related to consumers and end-users and as such, pertain to the downstream value chain. Progress against targets is monitored through specific Key Performance Indicators (KPIs), as presented in the following table. Targets have been set at Group level (where no reference exists in the table below), the largest Group entity Alpha Bank S.A. has reported progress and where relevant other Group entities will progressively adopt them.

Table 58 Targets relating to consumers and end-users

Target description	Target level	Absolute/ Relative	Baseline value	Baseline Year ⁴⁶	Target Year	Scope	Progress in 2025	KPIs
Increase access to people with mobility limitations to 85% of our Branches	85% of Branches	Absolute	80%	2023	2025	Downstream, Alpha Bank S.A., Alpha Bank Cyprus	87% ⁴⁷	Percentage of Branches accessible (fitted with a ramp or easily accessible) by people with disabilities (%)
Safeguard internal risk controls that protect the Customers' data	N/A	Absolute	3	N/A	Ongoing	Downstream, Alpha Bank S.A.	6	Personal Data breach incidents (number of incidents notified to Personal Data Protection Authorities)
Achieve ca. Euro 900 million of Retail Sustainable Loans, including loans to Small Businesses ⁴⁸	Euro 900 million	Absolute	N/A	2025	2027	Downstream, Alpha Bank S.A., Alpha Bank Cyprus	328.4	Total amount Euro million
Launch new sustainability-based mortgage and consumer loan products and credit cards.	N/A	Relative	2 products (Exoikonomo, Ecolytiq)	2023	Ongoing	Downstream, Alpha Bank S.A. (Greece)	5 (My Home II, Upgrade my Home, Kotsovolos Green Loans, New Exoikonomo Cycles: Exoikonomo 2025 & Exoikonomo – Anakainizo gia Neous)	Number of products launched
Support financial inclusion through educational programs addressed to teachers, students, women and people over 55.	N/A	Relative	4 (Alphabet of Economics, Circular Economy in Action, Economy lessons, e-economy for all)	2023	Ongoing	Downstream, Alpha Bank S.A. (Greece)	4	Number of CSR programs implemented for the financial inclusion addressed to teachers, students, women and people over 55.
Limited financing to activities that can affect health and well being, including gambling, production or trade in tobacco and alcoholic beverages	5%	Absolute	N/A	2017	Ongoing	Downstream, Alpha Bank S.A. (Greece), Alpha Bank Cyprus, Alpha Bank London	1.42%	KRI- Financing provided to gambling, tobacco and alcoholic beverages as % of total loan portfolio

Please note that these metrics are absolute numbers and as such, there are no significant assumptions or methodologies behind them. It is noted that the metrics described have not been assured by an external third party. Regarding the relative targets in the above table, the methodologies used are indicated by the KPIs detailed in the relevant column. No other methodologies or assumptions were used.

It is noted that no interim targets or milestones have been set. The methodology for setting the targets includes the review of best practices, peer benchmarking and understanding of the Group business model, utilizing also input from the Group's stakeholders, such as investors, and clients, for detailed reference on stakeholders' engagement regarding target setting please refer to [SBM-2] Interests and views of stakeholders. Furthermore, targets have been set with the aim of aligning the Group business model and strategy with the contribution to the UN Sustainable Development Goals. For setting the targets no critical assumptions were made.

In addition to the above, the Group has also the target **increase digital sales by 30%**. In 2025 the following were achieved:

- Digital sales 30.6%
- ~37% of cards were issued digitally in the like for like category
- families using myAlpha Vibe increased to > 7,000, and
- 3 out of 4 consumer loans were granted through digital channels.

⁴⁶ Baseline year is the same with base year.

⁴⁷ Alpha Bank S.A. 85% accessible (209 out of the 245) branches, Alpha Bank Cyprus: 100% accessible (25 out of 25) branches.

⁴⁸ According to the 2025-2027 business plan.

It is noted that currently, the setting of targets, the tracking of the performance against targets and the improvement of targets set, is conducted with the involvement of internal stakeholders, and not with the participation or engagement of Customers. However, the Group continuously seeks the engagement of Customers, for setting its policies, and respond to their needs, and will enhance further the integration of their views into its decision-making and strategic actions.

It is noted that regarding Responsible Marketing Practices and Access to Quality Information, no specific measurable outcome-oriented target has been set. Regarding these sustainability matters minimum safeguards apply. The overarching goal of the Group is not to cause or contribute to significant harm of Customers through either its own operations or its business relationships. The Group will consider in the upcoming years to review its strategic approach and enhance its performance with more outcome-oriented targets, where applicable. Please refer to the [S4-Consumers and End Users] "Other information on policies related to Customer" and "Processes to remediate negative impacts and channels for consumers and end-users".

Entity-Specific Information

The effectiveness is monitored through specific Key Performance Indicators, that have been established from the Group as follows:

Access to (quality) information

Access to (quality) information has been identified as a material risk pertaining to the Group's downstream value chain. This pertains to potentially unsuitable promotion practices (CR), fiduciary breaches (miscellaneous, CR), disputes over advisory activity, and product suitability issues / inadequate disclosures of product terms (CR).

Table 59 Number of incidents of non-compliance concerning product and service information and labelling

Alpha Bank Group	2024	2025
Number of incidents of non-compliance concerning product and service information and labelling ^{49,50}	0	0

This metric was calculated based on incidents of non-compliance with regulations resulting in a fine, penalty, or warning, and incidents of non-compliance with voluntary codes. This metric excludes any incidents of non-compliance in which the Group was determined not to be at fault as well as any incidents of non-compliance that relate to events in periods prior to the reporting period, if applicable.

Responsible marketing practices

The Group has identified Responsible Marketing Practices as a material inherent risk pertaining to its downstream value chain through its products/services and business relationships with Customers. This is due to product suitability issues/inadequate disclosure of product terms (CR), unsuitable promotion practices (CR), and miscellaneous fiduciary breaches.

Table 60 Incidents of non-compliance concerning marketing communications

Alpha Bank Group	2024	2025
Incidents of non-compliance concerning marketing communications ^{50,51}	0	0

This metric was calculated based on incidents of non-compliance with regulations resulting in a fine, penalty, or warning, and incidents of non-compliance with voluntary codes. This metric excludes any incidents of non-compliance in which the Group was determined not to be at fault as well as any incidents of non-compliance that relate to events in periods prior to the reporting period, if applicable. It is noted that the metrics described have not been assured by an external third party.

Personal Data Protection

In 2025, the following personal data breach incidents were identified and reported. For these incidents corrective actions have been immediately implemented in order to mitigate potential risks for the affected data subjects. Moreover, the Group Entities proceeded to actions to further improve and strengthen the existing technical and organizational measures in order to avoid the recurrence of such incidents.

⁴⁹ GRI Standards, Disclosure 417-2

⁵⁰ It is noted that the data has not been externally verified.

⁵¹ GRI Standards, Disclosure 417-3

Table 61 Metrics to safeguard internal risk controls that protect Customers data

Alpha Bank Group	2024	2025
Personal Data breach incidents (number of incidents notified to Personal Data Protection Authorities) ⁵²	6	6

The assessment of all incidents is performed according to internal procedures and based on the provisions of Art.33 of GDPR and the relevant guidelines issued by the European Data Protection Board. No significant assumptions have been made. It is noted that the metrics described have not been assured by an external third party.

Access to products and services

IQonomy is a corporate social responsibility initiative designed to strengthen financial literacy and advocate for a circular economy, with the overarching objective of tackling financial exclusion and fostering sustainable growth. It targets social groups identified by the OECD as particularly susceptible to financial literacy challenges. IQonomy is fully aligned with the Greek national strategy for financial literacy launched by the OECD and overseen by the Greek Ministry of Economy and Finance. The program aims to instill fundamental financial knowledge and skills in students at all educational levels, empower women, and educate individuals aged 55 and above on navigating the digital landscape of transactions. Comprised of four specialized programs:

- Alphabet of Economics
- Circular Economy in Action
- Economy Class
- e-economy for all

These initiatives are carried out in partnership with Civil Society Organizations.

Table 62 FN-CB240a.4 Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved Customers

Alpha Bank Group	2024	2025
Alphabet of Economics	593 teachers and 6,693 students	599 teachers and 5,766 students
Economy Class	383 women Employees, Customers, general public ⁵³	169 general public ⁵⁴
e-economy for all	195 participants	101 participants
Circular Economy in action	235 teachers and 16,166 students	260 teachers and 17,712 students

The metrics described on "Table 62", refer to absolute numbers of participants and as such, there are no significant methodologies behind them. These, refer to 2025 as year of implementation. The scope of financial literacy is enabled by four programs covered under the IQonomy initiative, through which students, teachers, women, and people over 55 can apply. All participants are considered as direct beneficiaries, which the common practice for CR Programs. A Social Impact Assessment & Social Return on Investment Report (SIA/SROI) is conducted by a third-party consultant and external body on behalf of Alpha Bank on annual basis for each program. In more detail:

Alphabet of Economics:

- Runs in collaboration with the non profit organisation ActionAid Hellas.
- The program runs during school year, is addressed to school teachers and students and is approved by the Institute of Educational Policy (IEP).
- Educational method: train the trainer seminars for school teachers. In-class workshop for students aged 10-15 years old.
- An open call takes place before the beginning of each cycle and teachers can apply to participate to training seminars for free.
- The program is monitored through a report sent by ActionAid and shared with Alpha Bank upon the completion of school year.
- The SROI for the 2024 implementation (carried out during 2025) was: for every Euro 1 invested in the program, at least Euro 7.35 of value is returned to society.

Economy Class:

- Runs in collaboration with NGO WHEN.
- Addressed to women 18+ from all over Greece.
- Training method: monthly on-one seminars. Runs during a period of 9 months.
- An open call takes place before the beginning of each cycle and women can apply to participate to training seminars for free.
- Monitored through two reports per year (a midterm and a final report) sent by WHEN and shared with Alpha Bank upon the completion of each evaluation phase.
- The SROI for the 2024 implementation (carried out during 2025) was: for every Euro 1 invested in the program, at least Euro 12.83 of value is returned to society.

⁵² GRI Standards, Disclosure 418-1(b)

⁵³ The total number for 2024 includes 122 women Employees, 86 women Customers and 175 women from general public through the collaboration with Women On Top Organization.

⁵⁴ The total number for 2025 includes 169 women from general public through the collaboration with WHEN Organization.

e-economy for all:

- Runs in collaboration with NGO People Behind.
- Addressed to people 55+.
- Training method: physical or on-line seminars.
- NGO approach Municipalities that are interested to host the program and the seminars take place at the municipality's Community Center for Seniors (ΚΑΠΗ).
- Monitored through two reports per year (a midterm and a final report) sent by People Behind and shared with Alpha Bank upon the completion of each evaluation phase.
- The SROI for the 2024 implementation (carried out during 2025) was: for every Euro 1 invested in the program, at least Euro 7.41 of value is returned to society

Circular Economy in action:

- Runs in collaboration with NGO SciCo (Science Communication).
- Runs during school year (2 cycles per year), is addressed to school teachers and students and is approved by the Institute of Educational Policy (ΙΕΠ). Educational method: train the trainer seminars (online and physical) for school teachers and in-class workshop for students 12-17 years old.
- An open call takes place before the beginning of each cycle and teachers can apply to participate to training seminars for free.
- Monitored through a report sent by SciCo which is shared to Alpha Bank upon the completion of each cycle.
- The SROI for the 2024 implementation (carried out during 2025) was: for every Euro 1 invested in the program, at least Euro 8.94 of value is returned to society.

Table 63 Metrics for Access to Finance and Housing

Alpha Bank Group	2024	2025
Disbursements of retail sustainable loans and consumer green loans for housing purposes ⁵⁵	Euro 39.1 million	Euro 305.2 million
Number of voice-directed ATMs for visually impaired people	299 of 1,193 (~25%)	300 of 1,199 (~25%) ⁵⁶

The type of loans mentioned are aligned with Group's Sustainable Finance Framework, in which sustainable criteria are clearly defined. It is noted that the metrics described have not been assured by an external third party.

Please note that these metrics are absolute numbers and as such, there are no significant assumptions or methodologies behind them. It is noted that the metrics described have not been assured by an external third party.

CONTRIBUTION TO HEALTHY ECONOMIES

By providing tailored financing solutions such as business loans, credit lines, and trade finance, the Group enables economic growth and contribute to Healthy economies. More information about how the Group business model and strategy as well as the management of impacts contribute to Healthy Economies can be found in the sections under ESRS S4 "Consumers and end-users" chapter. The following metrics relate to new financing volumes achieved in 2025, hence reflect the Group's actions towards the implementation of its target to reach Euro 3.8 billion by 2027.

Table 64 New financing volumes to Retail Green and Social Loans, and Loans to small businesses

Alpha Bank Group	2024	2025
Disbursements of Retail Green and Social Loans and Sustainable Loans to small businesses ⁵⁷ (total amount in Euro million)	Euro 67.5 million	Euro 328.4 million

It is noted that these metrics are absolute numbers and as such, there are no significant assumptions behind them. The type of loans mentioned are aligned with Group's Sustainable Finance Framework, in which sustainable criteria are clearly defined. It is noted that the metrics described have not been assured by an external third party.

⁵⁵ Retail sustainable loans related to co-financed loans under state incentives programs such as, "EXOIKONOMO" and other social loans (e.g. education). Consumer green loans for housing purposes and Mortgage Sustainable Loans (with EPC certificate's grade A or higher for new properties and B+ or higher for properties renovation).

⁵⁶ As of 31.12.25, most of Alpha Bank's ATMs (>1,100) in Greece have had hardware sockets to support the voice guidance service. However, the Bank has implemented this service in 300 ATMs as it has a total of 300 licenses for this software. The following factors were taken into account in the selection of ATMs:

- coverage of as many counties as possible
- central points with high transaction volumes
- proposals of the Panhellenic Association of the Blind (high traffic points, e.g. near/opposite clubs)

The number of ATMs providing this service will increase with the approval of the purchase of additional software licenses.

⁵⁷ Retail Green and Social Loans related to retail sustainable loans, consumer green loans for housing purposes and sustainable loans to small businesses, such as EU RRF loans and other EU co-financed loans.

Table 65 A maximum cap of 5% on specific financing activities

Alpha Bank Group	2024	2025
Financing provided to gambling, tobacco and alcoholic beverages as % of total loan portfolio ⁵⁸	N/A	1.42%

GOVERNANCE

ESRS G1 - BUSINESS CONDUCT

[G1-1] Business conduct policies and corporate culture

Alpha Bank Group is committed to conducting business according to applicable laws, rules, regulations, and the highest ethical standards. This commitment is an essential element of the responsibility it bears towards its Customers, Shareholders, and other Stakeholders for the protection of the reputation and long-term success of its business. The Group adopts a zero-tolerance approach towards illegal or other actions which might negatively affect its reputation and credibility. These commitments are crucial pre-conditions for the maintenance of a robust corporate culture which contributes to the highest standards of conduct with business issues.

Alpha Bank S.A. adheres to effective Corporate Governance, which pursues on an ongoing basis. Thus the Bank and its Group subsidiaries consider the requirements of the institutional framework, the best practices at international and at European level, the interests of its Shareholders as well as the expectations of its Stakeholders and the society.

Following a resolution of the Board of Directors and with reference to article 17 of Law 4706/2020, Alpha Bank S.A. adopted the Hellenic Corporate Governance Code of the Hellenic Corporate Governance Council (the "Code"). The Alpha Bank S.A. adheres to the Code which is available on its [website](#).

The Board of Directors (BoD) is responsible for the management of Alpha Bank S.A.'s affairs, including the oversight of all matters related to business conduct. The BoD holds the ultimate and overall responsibility for Alpha Bank S.A. and defines, oversees, and is accountable for the implementation of governance arrangements that ensure the effective and prudent management of the Bank. In this context, the BoD:

- ensures the integrity of the accounting and financial reporting systems, including the adequacy of financial and operational controls and compliance with applicable laws and relevant standards,
- oversees the Bank's disclosure framework and the effectiveness of communication processes,
- provides comprehensive oversight of senior management and monitors their performance in line with the Bank's strategic objectives.

Furthermore, the BoD retains the ultimate responsibility for all business conduct issues relevant to Alpha Bank S.A., including the prevention of bribery and corruption, as well as the ongoing evaluation, reinforcement, and development of a robust corporate culture. Information on the role of the administrative, management and supervisory bodies and their expertise on business conduct matters is disclosed under [ESRS 2] "Board of Directors relevant experience". Please also refer to the Corporate Governance Statement of the Annual Report for further details on the BoD responsibilities and composition.

Fostering a Strong Corporate Culture

Alpha Bank Group's Corporate Culture has been shaped by its positive contribution to the Economy and Society over the past 140 years. Known for the strong financial expertise and stability, the Group maintains a corporate culture that leverages its Purpose and Values as a compass and is supported by a robust set of policies disclosed in the following "Policies" section, which covers key areas of business conduct topics that are material to Alpha Bank S.A. and central to its operational effectiveness.

Policies

All policies, procedures, and controls safeguard the prudent management of non-compliance risk with the applicable regulatory framework, as well as the alignment of corporate culture with a robust business conduct framework⁵⁹. The Group's existing policies are structured to address the risks identified through the Double Materiality Assessment.

This framework includes the Code of Conduct and Ethics, the Whistleblowing Policy, the Anti-bribery and Corruption Policy, the Anti-Money Laundering and Counter-Terrorism Financing Policy, and the Policy on the Prevention of Conflicts of Interests. Additionally, fundamental Codes and Policies and Compliance Regulations applied by Alpha Bank Group are provided in the Governance section of Alpha Bank's website. The BoD is accountable for these policies, while the Compliance Business Area functions as the owner and is responsible for responding to any concerns or questions from staff, as well as for monitoring their proper implementation through internal controls which cover all functions, such as:

- second-line monitoring performed by the Compliance Business Area on adherence to regulatory and internal requirements,
- thematic compliance reviews and targeted monitoring activities based on identified risk areas,
- ongoing AML/CFT surveillance and transaction monitoring,
- monitoring of Policy implementation and identification of areas for enhancement,
- periodic reporting by the Compliance Function to Senior Management and the relevant Board Committee, and

⁵⁸ Funding rule on specific activities as per the Group's Exclusion List. The numerator of the KRI is the sum of outstanding balances recorded under both on-balance-sheet and off-balance-sheet for the following activities: production or trade of alcoholic beverages (excluding beer and wine) tobacco, gambling, casinos, and equivalent enterprises (betting platforms and stores) as of the respective reference date. The denominator of the KRI is the amount of the gross loans as of the respective reference date. It is noted that the metrics described have not been assured by an external third party.

⁵⁹ The Compliance Business Area, in conjunction with other Areas of the Bank, is responsible for managing the risk of non-compliance with the applicable regulatory framework, in its role as a second line of defense and as part of the Internal Control System. In particular, it identifies, assesses and manages the risk to which the Bank may become exposed in connection with the applicable regulatory framework.

- follow-up of corrective actions arising from internal control findings to ensure timely implementation.

These Policies are addressed to all Employees of the Group, as well as to all Stakeholders related with it. They are designed to complement the Personnel Regulation, Policies and Procedures of the Bank, which refer to the general duties of all Employees. Policies are in line with the applicable national and European regulatory framework, the principles of the UN Global Compact and best practices within the European Union. There is also alignment with the United Nations Convention Against Corruption Principles. Although the Group has not yet formally endorsed the Convention, Alpha Bank is in the process of evaluating the steps required for formal alignment and endorsement. The Bank plans to finalize its assessment and establish a formal action plan and timeline for implementation, ensuring full consistency with the Convention's requirements.

The following policies are made available to all potentially affected Stakeholders who may wish to use them and/or implement them through the intranet (for internal stakeholders) and the public [website](#) (for external stakeholders), with a corresponding circular uploaded in the event of a new or updated Policy.

The Group has not yet set specific targets related to anti-corruption and anti-bribery, aside from the metrics provided and trainings covered per, as the enforcement of the policies described ensure compliance with a strong corporate culture and values.

Nonetheless, the Group has ensured to take all necessary actions needed to address the policy-objectives:

- Wide access of the relevant policies to all internal and external stakeholders
- Availability of appropriate channels for the handling of internal and external Whistleblowing reports
- Regular trainings covering the scope of the policies comprising sound business conduct

Code of Conduct and Ethics

The [Code of Conduct and Ethics](#) outlines the principles that Alpha Bank Group stands for, aiming to provide Personnel with ample guidance on conducting business in an ethical manner. The Code applies to all persons linked with Alpha Bank and its Subsidiaries through an employment contract and Board Members as well as individuals or legal entities connected to the Group or Group companies through a formal agreement e.g., contractors, consultants etc. The Code is aligned with key international standards and voluntary initiatives to which the Group has committed to, including the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

The Code of Conduct and Ethics, continues to reflect comprehensive Group policies, clear expectations for ethical behavior, a strong risk management culture, and compliance with regulatory and legislative framework. More information can be found in [S1-1] Policies related to own workforce.

The Group conducts internal audits to monitor compliance with the regulatory framework and has put in place specialized control and reporting systems, working closely with the competent Regulatory Authorities to combat money laundering and financial crime.

In order to ensure compliance with the Policies, the Compliance Function conducts periodic monitoring and control exercises, enabling the Bank to identify business conduct irregularities and breaches. Depending on the severity of the incidents identified through this periodic monitoring and control, the Audit Committee will be informed.

As at-risk functions the Group has defined those that interact directly with Customers, both natural persons and legal entities; those that operate as part of the Alpha Bank Branch Network fall mostly under this category. Indicative examples of at-risk functions include:

Retail and Business Banking Relationship Managers, Corporate and Commercial Banking Customer Service Officers, Branch Customer Service Officers, Front-office Tellers, SME and Corporate Lending Officers, and other roles with direct Customer engagement or decision-making authority related to Customer onboarding, credit evaluation, transactions, and financial product distribution.

[G1-3] Prevention and detection of corruption and bribery

Whistleblowing Framework

A robust Whistleblowing Framework has been in place for several years, enabling Employees, Customers and Suppliers, or other Stakeholders who become aware of serious irregularities, omissions, or offences, to report them in a reliable and confidential manner. The Whistleblowing Framework is the main monitoring and reporting mechanism available to both internal and external stakeholders to report potential incidents and allegations as those relate to the entirety of the Policies described herein (i.e. the Policy on the Prevention of Conflicts of Interest, the Code of Conduct and Ethics, Anti-money Laundering, Counter-Terrorist Financing, and the Anti-Bribery and Corruption Policy). The Bank has set a Whistleblowing Policy which complies with the requirements of the regulatory framework, as stipulated in the provisions of Bank of Greece Executive Committee's Act 243/2025, as well as of Directive (EU) 2019/1937 of the European Parliament and of the Council on "the protection of persons who report breaches of Union law".

The Policy constitutes a means of ensuring the integrity, internal governance, and reputation of the Bank. It contributes to the identification of risks and to the adoption of the appropriate corrective measures, including but not limited to, enhancing the Internal Control System, detecting in advance incidents of fraud or other serious offenses, applying the appropriate measures to liable parties and, when required, notifying the competent Authorities, as the case may be.

Ensuring an environment of trust and safety for their Employees, Customers and Suppliers, the Bank encourages reporting in good faith of illegal acts or serious offenses, which come to their attention.

An inviolable principle of the Policy is to protect anonymity and confidentiality of the personal data of Whistleblowers and, in case they are Employees of the Bank, to safeguard that their professional evaluations are and will be performed impartially.

The whistleblowing procedure aims at strengthening transparency, which encourages the reporting of incidents that give rise to violations of the Procedures and Policies of the Bank as well as the reporting of incidents of fraud, corruption, coercion, or other violations.

The Bank has set reporting channels which are available and easily accessible to all Personnel, Customers, Suppliers, and other Stakeholders. Reports can either be submitted via phone, through which a 24/7 hotline is also available, or via a dedicated e-mail or by post, directly to the Chief of Compliance. The reports can be submitted on an anonymous or eponymous basis. In all cases, the identity and anonymity of the whistleblower is protected. The Whistleblowing Policy explicitly protects whistleblowers against retaliation, in line with Directive (EU) 2019/1937 and Law 4990/2022. Protection includes safeguarding identity, confidentiality, and ensuring that no adverse treatment, discrimination or unfair evaluation occurs as a result of reporting as referenced in section [S4-3], which provides further detail on non-retaliation safeguards.

All reports are submitted from Regulatory Compliance to the Whistleblowing Committee, and, upon request of the Whistleblower, the report may also be submitted, by means of a physical meeting, with a member and the secretary of the Committee. The Members of the Committee

are the Chief of Compliance, Internal Audit, Legal and HR – as such, separate from the chain of management involved in the specific matter. The Members designated to assess whistleblowing reports are senior Officers belonging to the Bank's second- and third-line control functions, each already subject to continuous regulatory and professional training requirements in their respective areas. Their role in the Whistleblowing Committee requires familiarity with the applicable national legislation transposing Directive (EU) 2019/1937, the Bank's Whistleblowing Policy, confidentiality obligations, and non-retaliation safeguards whilst training on these elements is incorporated into the broader compliance and governance training frameworks that apply to all senior control-function Officers. When a report is submitted to the Whistleblowing Committee, a series of actions are undertaken to ensure it is treated appropriately. The Whistleblowing Committee carefully examines the report's content to determine the existence of irregularities, omissions, or offenses. In the case where those are present, the Committee will then refer the report for further investigation to the Internal Audit Business Area or for any further necessary actions to the competent Unit(s) of the Group Alpha Bank S.A., if required. Once these procedures are complete, the findings are referred to the Whistleblowing Committee which will determine whether the issue has been resolved satisfactorily and if there is need for further investigation and referral of identified violations to the Management of the Bank.

The Chair of the Committee submits, on a quarterly basis, an activity report, to inform the Audit Committee of the reports received and handled during the reported period and is always informed of any significant events on a timely basis. In addition to the follow-up procedures set out under Directive (EU) 2019/1937, Alpha Bank applies additional internal procedures for the handling of business conduct incidents. Specifically, cases may be referred for independent investigation to the Internal Audit Division, escalated for disciplinary handling to HR Operations, or submitted for decision to the Executive Committee or the Board of Directors depending on the seniority of the person concerned. The Whistleblowing Committee also assesses cases originating from Regulatory Authorities and may handle matters outside the formal scope of the Policy where independent handling is required. Such cases may be initiated, inter alia, through the complaints' management process, following requests of the Regulatory Authorities or through the grievances of Customers, Suppliers and Employees via various communication channels. Furthermore, the Committee conducts annual reviews of the Policy, proposing amendments where necessary.

Under the responsibility of the Regulatory Compliance Business Area, the Whistleblowing Policy shall be communicated to Employees and posted on the Bank's website in a separate, easily identifiable and accessible section available to potentially affected Stakeholders. Information shall include the procedures applicable for reporting a case, and the way the Bank may request the Whistleblower to clarify elements of the report, or to provide additional information, the timeframe for providing feedback and the type and content of such feedback, as well as the nature of the follow-up over the reports.

In line with its firm and unwavering position against corruption, bribery and fraud, Alpha Bank S.A. has issued a Group Anti Bribery and Corruption Policy and established relevant control mechanisms in order to mitigate the relevant risks.

Anti-bribery and Corruption Policy

As per previous mention, Alpha Bank has developed an Anti-bribery and Corruption Policy which applies to the entire Group. The Policy is addressed to the Members of the BoD and its subsidiaries (including those of Special Purpose Vehicles), to Chief Executive Committee Members, Directors, Employees of the Group Alpha Bank S.A., and other stakeholders such as suppliers of goods and/or services that transact with the Group, Alpha Bank S.A., Public and Government Officials, Advisers, and Customers. The Policy is easily accessible to all internal and external stakeholders through Alpha Bank S.A.'s website.

The Group's Anti-Bribery and Corruption Policy (hereinafter the "Policy") is in compliance with the applicable national regulatory framework, the EU best practices and the 10 principles of the UN Global Compact. The provisions of this Policy are supplementary to any applicable laws in force. This Policy is complementary to the following Policies and Procedures of the Bank and the Group:

- Code of Conduct and Ethics
- Personnel Regulation
- Anti-money Laundering and Combating the Financing of Terrorism (AML/CFT) Policy
- Policy on the Prevention of Conflict of Interests
- Policy on Related Parties Transactions
- Whistleblowing Policy and Procedures

The Group applies a zero-tolerance approach towards bribery and corruption. To this end, it is strictly forbidden to offer, promise or accept benefits or other privileges in general, to any person, directly or indirectly through a third party, for the purpose of (i.e., in return for):

- coercion to act in breach of a lawful duty,
- coercion to abuse their position,
- obtaining an improper advantage, contract, or other privilege.

Zero tolerance towards bribery and corruption is demonstrated throughout the corporate conduct and training provided to all Employees, irrespective of their hierarchical level.

The Group Employees, in addition to the above, are strictly prohibited from receiving any payment, inducement of any kind or service or benefits of any nature that could compromise their professional judgment, taking action, in order to circumvent controls in place to prevent bribery, accepting facilitating payments in order to prioritize a Customer's request, providing, accepting or promising, directly or indirectly, any benefit or advantage to/from a Public or Government Official, seeking to advance personal or Group interest.

Services, hospitality, entertainment, and other types of offers are considered as gifts and are not acceptable, according to the Policy. Exceptionally, gifts of small value may be accepted, to the extent that they are offered within the context of social occasions and traditions.

Group Employees shall report any breaches or suspected breaches of the Policy that come to their attention to the Regulatory Compliance Business Area by using the means provided in the Whistleblowing Policy and Procedures.

Also, all Employees notify the Regulatory Compliance Business Area for any gift offered to them, to obtain approval for their acceptance.

The Compliance Function monitors all gifts and, upon assessment, provides guidance to the recipient for the acceptance, decline or appropriate disposal of the gift.

When selecting and subsequently collaborating with Third Parties (e.g. providers, consultants, suppliers, etc.), Alpha Bank takes all necessary measures to ensure that any new business relationship is based on the principles of business ethics.

The Group has established dedicated reporting channels such as a direct telephone line, dedicated e-mail, and postal address to which breaches of Anti-Bribery and Anti-Corruption Policy provisions can be addressed, which refer to instances to address allegations or incidents of corruption and bribery. These channels operate exclusively for receiving reports and are available 24 hours a day, seven days a week for all Personnel, Customers and Third Parties.

The Regulatory Compliance Business Area shall review all requests submitted during a calendar year and report the conclusions to the Board of Directors through the Audit Committee.

Through continued developments in Alpha Bank's business ethics practices such as those disclosed above, Alpha Bank has been upgraded by MSCI to AA from a previous A rating making Alpha Bank on par with its global peers.

Policy on the Prevention of Conflicts of Interests

The Policy on the Prevention of Conflict of Interests applies to the Group Companies in Greece and abroad, notwithstanding ad-hoc policies applying to one or more Group companies as a result of additional requirements imposed by the relevant national regulatory framework.

In particular, the Policy aims to:

- Prevent cases of conflict of interests, which may prove detrimental to the interests of Customers or potential Customers when providing banking and/or investment services.
- Enforce procedures to manage cases of conflict of interests, which may include organizational and administrative measures for handling such cases and safeguarding Customers' interests.
- Establish control mechanisms, which allow an overall assessment of the efficiency of the conflict of interests' prevention framework as well as of the Bank's level of adherence to the respective framework.

The Policy applies to a clearly defined set of internal and external Stakeholders, including Bank Employees at all hierarchy levels, Members of the Board and external service providers within outsourcing arrangements. It is made available to all covered Employees through internal governance channels and forms part of the mandatory policy framework that Employees must comply with.

New Employees are also informed during onboarding and are required to submit disclosures related to external interests or affiliations. When recruiting new Employees, Alpha Bank takes into account any existing business, financial and other interests in accordance with the provisions of the Policy on the Prevention of Conflict of Interests

The Policy covers conflict of interests cases, either potential or confirmed. The Bank's Employees may seek advice from the Compliance Division, in terms of assessing a potential conflict of interests' case, as well as providing instructions on the appropriate remediation measures.

The policy adheres to the requirements of the regulatory framework, as stipulated among others in the relevant Law on sociétés anonymes, on Corporate Governance Law, MiFID II, the Executive Committee Act 243/7.7.2025 of the BoG, as well as the Group's Code of Conduct.

The monitoring of the Policy is performed through the Internal Control System, which establishes:

- the organizational structure, segregation of duties, dual control, and controlled information access,
- risk management processes to identify and assess risks related to activities, processes and systems,
- the periodic evaluation of the adequacy and effectiveness of internal control mechanisms, and
- the independent roles of the Risk Management, Regulatory Compliance and Internal Audit Business Areas.

In addition, the Policy outlines the procedures followed by the Regulatory Compliance for evaluating and managing reported conflicts of interest, including documentation, investigation steps, corrective measures, escalation to Senior Management or the Audit Committee, and maintaining a Conflict of Interest Register to ensure continuous monitoring and proper implementation of the Policy.

Policy on Related Parties Transactions

The Policy covers a set of principles and internal procedures aimed at mitigating the "conflict of Interest" risk, in cases where the "personal or private interests" of the "Related Parties" may be in conflict with the interests of the Bank. This Policy applies to the entire Group. For Banks and Branches headquartered abroad, the stipulations of this Policy may be adjusted accordingly, in cases where the local regulatory and legal provisions prevail over the requirements of this Policy. Such differences must be communicated to the Bank's Regulatory Compliance Division. Group Companies may respectively adjust the limits of the transactions under examination, based on their size and on the type of their activities, after submitting a relevant proposal to the Bank's Compliance Division and obtaining the necessary approvals. The Policy is under review in order to incorporate the Executive Committee Act 243/7.7.2025 of the BoG.

The monitoring of the Policy is carried out by the Regulatory Compliance Business Area, which maintains the register of Related Parties, reviews transactions classified under the Policy to ensure they meet regulatory requirements and performs continuous oversight through system-based monitoring. Findings and all related-party transactions are reported semi-annually to the Audit Committee and the Board of Directors, ensuring systematic supervision and escalation where needed.

The Policy is implemented in accordance with the external regulatory and supervisory framework explicitly referenced in it, including Law 4548/2018 on corporate governance and related parties, Law 4261/2014, Executive Committee Act 243/7.7.2025, the Group Code of Conduct and Ethics, IFRS (including IAS 24 Related Party Disclosures) and EBA Guidelines on internal governance.

In defining the Policy, the Bank considers the interests of its key stakeholders. This is reflected in safeguards ensuring equal treatment of shareholders, arm's-length execution of transactions, and the prevention of preferential or abusive practices involving Related Parties, thereby protecting the Bank's financial integrity as well as the interests of minority shareholders and Customers.

The Regulatory Compliance monitors on an on-going basis the Related Parties transactions and apply appropriate control, in order to identify any deviations in the application of the Policy, or any transactions which entail significant Conflict of Interest risk.

More specifically, the Business Area reviews Related Parties transactions which have been concluded in order to verify conformity to the principles and the processes applied with those stipulated under the Policy. In case indications of non-conformity with the provisions stipulated in the Policy arise, the corresponding transactions are communicated to the Audit Committee, including any remediation actions considered necessary.

Business Areas, including the Regulatory Compliance, credit functions, and supervisory bodies such as the Audit Committee and the Board receive the Policy and its updates through formal internal communication channels. In addition, individuals identified as Related Parties are

informed of their obligations through mandatory declarations and periodic updates, ensuring they understand the requirements necessary for the implementation of the Policy.

Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT)

Money Laundering/ Terrorist Financing (AML/CFT) Risk is the potential for a financial institution to be exploited for money laundering or terrorist financing purposes. It involves identifying, assessing, and managing the likelihood that the institution's products, services, Customers, or operations could be exploited for illegal financial transactions. The key components in assessing AML Risk include Customer risk, geographic risk, product risk and channel risk.

ML/TF Risk forms an integral part of the ABG's broader Compliance Risk framework, and it requires robust systems to assess, detect, report, and mitigate risks, aligning with international standards and regulatory requirements.

The AML/CFT Business Area develops and implements the evaluation framework for managing money laundering (ML) and terrorist financing (TF) risks within the Bank.

Key responsibilities include:

- AML/CFT Policy Development & Implementation
- Monitoring & Transaction Surveillance
- Suspicious Activity Reports
- Training & Awareness
- Collaboration & Reporting

Alpha Bank has no relevant targets related to the aforementioned policies, however there are several actions that the Group undertakes and tracks the effectiveness of its policies.

Actions

In 2025, the Group has performed several actions related to the "Contribution to Transparency and the Rule of Law" Impact and the AML/CFT Risk recognized within the Double Materiality Assessment. The AML/CFT actions in particular focused on the following priorities:

KYC / Customer Due Diligence Improvements

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

The comprehensive KYC/CDD improvements are designed to streamline certification and verification processes, reduce risks, and ensure compliance across all client categories. This approach will contribute to more efficient Customer onboarding, better data quality, and enhanced risk mitigation, while aligning with regulatory requirements. In addition, the updates will continue by 2026.

Transaction Monitoring & Suspicious Transactions Reporting Management

- Prioritization of alerts based on risk profiles,
- enhancing the accuracy and timeliness of suspicious activity detection.

The expected outcome for these actions is faster detection of potential suspicious activities and more efficient STR filing.

IT Systems & Data Analytics Enhancements

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

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

Governance, Control, and Assurance:

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

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

Updated AML BWRA Methodology

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

GAP Analysis for New EU AML Regulatory Package:

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

The analysis and initial action plans are expected to be completed by Q2 2026.

Trainings

Business Conduct Trainings

All new Employees are made explicitly aware of Alpha Bank's key internal Policies upon joining and are required to review them as part of their onboarding process. Physical trainings are delivered by the Compliance Function to all new hires, irrespective of hierarchical level, covering Compliance Culture, the Code of Conduct and Ethics, the Whistleblowing Policy, Conflict of Interest management, and Anti-Bribery and Corruption principles. These sessions enhance awareness of reporting channels for irregularities, omissions, offences, and Policy breaches.

Further to the above, all Bank and Subsidiaries Employees participate in mandatory E-Learning training programs relating to Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT), the Code of Conduct and Ethics, the Anti-Bribery and Corruption Policy and the Whistleblowing Policy. These trainings are conducted on an annual basis. Through the e-learnings, Employees have access to digital material, interactive content, and comprehension questions designed to reinforce understanding and ensure full assimilation of regulatory and internal requirements. The successful completion of these mandatory trainings was incorporated into the KPIs designed for the Business Units balanced scorecards. Although no standalone Training Policy exists, however, relevant provisions are included within existing Policy documents.

Regarding Conflict of Interest, the Compliance Function performs regular training to enhance Employees' awareness of all the risks that may arise from potential Conflict of Interests situations, as well as to ensure comprehension of responsibilities attached to Employees. Physical trainings are conducted for all new hires/on boardings to raise the awareness for conflict-of-interest cases and Policy breaches through the dedicated reporting channels. Additional training (E-Learning) is being designed covering the Policy and will be addressed to all Bank and Greek subsidiaries Employees.

In relation to AML/CFT, the Bank and the Group Companies provide training programs, including web training to its Employees, while a specialized training is delivered to the AML/CFT-related Business Area, as well as of the Money Laundering Reporting Officer and their deputy. The training programs that are provided to the Employees include:

- Briefing Officers on the legislation and their obligations arising from the applicable provisions and the procedures adopted by the Bank or the Group company, including those relating to issues such as the identification and verification of the Customers' identities, keeping records and internal reporting.
- The appropriate adjustment of the implementation time, duration and content of training programs, depending on the category and job of Personnel.
- The repetition, at regular intervals, of training programs in order to ensure the knowledge of Personnel regarding their duties and obligations and their update on all new developments.

The AML/CFT Compliance Officer is responsible for the design and implementation of Anti-Money laundering and terrorist financing training of Employees.

During 2025, 4,226 employees across Alpha Bank and Greek Subsidiaries successfully completed the mandatory 2-hour "AML awareness" E-learning which was launched in December 2023. It shall be noted that the aforementioned training was reviewed and updated according to the changes in the AML/CFT Regulation and will be assigned to all Bank and Greek Subsidiaries Employees in 2026.

Also, 248 Bank Employees attended the "AML, Control and Risk Management" training, a tailor-made program for Branch network.

The updated Code of Conduct and Ethics continues to embed comprehensive Group Policies, ethical expectations, a strong risk management culture, and adherence to the regulatory framework. The related training program is mandatory for all Personnel, and the Board of Directors participated in a presentation of the updated Policy. During 2025, the relevant training was attended by 5,616 Bank and Greek Subsidiaries Employees. Additional information is available in section [S1-1] Policies related to own workforce.

Lastly, during June 2025, launched the "Whistleblowing Policy and Procedures" e-learning. As of 31.12.2025, 3,943 Bank and Subsidiaries Employees completed the course.

Anti-Bribery and Corruption (ABC) Trainings

A key component of the implementation of the Anti-Bribery and Corruption framework is the delivery of dedicated training programs. These include both e-learning modules and physical sessions led by the Compliance Function.

In 2025, the Bank developed and implemented the Anti-bribery and Corruption e-learning program, which is mandatory for all existing Bank and Greek subsidiaries Employees across all organizational levels. Furthermore, every new hire, upon on boarding, is required to successfully complete the e-learning as well as the comprehension questionnaire which is included. In order to reinforce the training framework, the successful completion of this mandatory training was incorporated into the KPIs designed for the Business Units balanced scorecards.

Physical trainings are conducted for all new Employees to raise the awareness for the respective Policy, as well as the Code of Conduct and Ethics.

Various topics were covered such as defining bribery and corruption, the provisions of Alpha Bank Group's Policy and the obligations arise for Group Personnel, issues regarding gifts and hospitality, interaction with public officials, the use of Corporate Cards, channels for reporting irregularities and breaches of the Policy as well as the Group's corporate culture towards bribery and corruption.

In terms of overall scope during the reporting year, Employees participated in ABC-related trainings, including:

- 657 managers,
- 59 administrative, management and supervisory body members, and
- 3,856 other Employees.

Training delivery consisted of 1 hour of in-class instruction, across a total of 11 training sessions and approximately 7 hours (in total) of computer-based learning. Topics addressed included definitions of corruption, policy requirements, and procedures for suspicion and detection.

There are no significant methodologies and significant assumptions behind the above metrics related to training.

[G1-4] Incidents of corruption and bribery

In 2025 Alpha Bank's mechanisms recorded an internal fraud incident which led to the dismissal of two (2) Employees. Alpha Bank has not faced any convictions or fines for violation of anti-corruption and anti-bribery laws.

Appendix

Table 66 ESRS 2 General - Index table

Disclosure Requirement and related datapoint
GENERAL INFORMATION
[BP-1] General basis for preparation of sustainability statements
[BP-2] Disclosures in relation to specific circumstances
[GOV-1] The role of the administrative, management and supervisory bodies
[GOV-2] Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
[GOV-3] Integration of sustainability-related performance in incentive schemes
[GOV-4] Statement on due diligence
[GOV-5] Risk management and internal controls over sustainability reporting
[SBM-1] Strategy, business model and value chain
[SBM-2] Interests and views of stakeholders
[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
[IRO-1] Description of the process to identify and assess material impacts, risks and opportunities
[IRO-2] Disclosure Requirements in ESRS covered by the undertaking's sustainability statement
ENVIRONMENTAL INFORMATION
Disclosures pursuant to Article 8 of Regulation 2020/852 ("EU Taxonomy Regulation")
ESRS E1 CLIMATE CHANGE
[E1-1] Transition plan for climate change mitigation
[E1.SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
[E1-2] Policies related to climate change mitigation and adaptation
[E1-3] Actions and resources in relation to climate change policies
[E1-4] Targets related to climate change mitigation and adaptation
[E1-5] Energy consumption and mix
[E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions
[E1-7] GHG removals and GHG mitigation projects financed through carbon credits- N/A
[E1-8] Internal carbon pricing- N/A
[E1-9] Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
ESRS E4 BIODIVERSITY AND ECOSYSTEMS
[E4.SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
[E4-1] Transition plan and consideration of biodiversity and ecosystems in strategy and business model
[E4-2] Policies related to biodiversity and ecosystems
[E4-3] Actions and resources related to biodiversity and ecosystems
[E4-4] Targets related to biodiversity and ecosystems
[E4-5] Impact metrics related to biodiversity and ecosystems change- N/A
[E4-6] Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities
ESRS E5- RESOURCE USE AND CIRCULAR ECONOMY
[E5-1] Policies related to resource use and circular economy
[E5-2] Actions and resources related to resource use and circular economy
[E5-3] Targets related to resource use and circular economy
[E5-4] Resource inflows- N/A
[E5-5] Resource outflows- N/A
[E5-6] Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities
ESRS S1 OWN OPERATIONS
[S1.SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
[S1-1] Policies related to own workforce
[S1-2] Processes for engaging with own workforce and workers' representatives about impacts
[S1-3] Processes to remediate negative impacts and channels for own workforce to raise concerns
[S1-4] Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
[S1-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
[S1-6] Characteristics of Alpha Bank Group Employees
[S1-7] Characteristics of non-Employees in the undertaking's own workforce- N/A
[S1-8] Collective bargaining coverage and social dialogue
[S1-9] Diversity metrics
[S1-10] Adequate wages- N/A
[S1-11] Social protection
[S1-12] Persons with disabilities- N/A
[S1-13] Training and skills development metrics
[S1-14] Health and safety metrics
[S1-15] Work-life balance metrics- N/A
[S1-16] Remuneration metrics (pay gap and total remuneration)- N/A
[S1-17] Incidents, complaints and severe human rights impacts
ESRS S4 CONSUMERS AND END USERS
[S4.SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
[S4-1] Policies related to Customers
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[S4-3] Processes to remediate negative impacts and channels for consumers and end-users to raise concerns
[S4-4] Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
[S4-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
Entity-Specific Information

Contribution to Healthy Economies
[G1-1] Business conduct policies and corporate culture
[G1-2] Management of relationships with suppliers- N/A
[G1-3] Prevention and detection of corruption and bribery
[G1-4] Incidents of corruption or bribery
[G1-5] Political influence and lobbying activities- N/A
[G1-6] Payment practices- N/A

List of Abbreviations

AML/CFT: Anti-Money Laundering and Combating the Financing of Terrorism
BoD: Board of Directors
C&E: Climate and Environment
CGSNC: The Corporate Governance, Sustainability and Nominations Committee
CSR: Corporate Social Responsibility
CSRD: Corporate Sustainability Reporting Directive
DE&I: Diversity, Equity and Inclusion
DMA: Double Materiality Assessment
EBA: European Banking Authority
ESRS: European Reporting Sustainability Standards
GRI: Global Reporting Initiative
IEA: International Energy Agency
NGO: Non-Governmental Organization
NZBA: Net Zero Banking Alliance
PCAF: Partnership for Carbon Accounting Financials
RAF: Risk Appetite Framework
RCSA: Risk and Control Self-Assessment
SASB: Sustainability Accounting Standards Board
SFF: Sustainable Finance Framework
TCFD: Task Force on Climate-related Financial Disclosures
UNEP FI: United Nations Environment Program Finance Initiative
N/A: Not Applicable