



2026 PARTICIPANT

Our company is committed to upholding the Ten Principles of the **United Nations Global Compact**. Please refer to our **Communication on Progress**.



ALPHA BANK

2026

COMMUNICATION ON PROGRESS (CoP) QUESTIONNAIRE

The present document constitutes the Communication on Progress Questionnaire with FY25 information which is available on the Participants section of the following website:
<https://unglobalcompact.org/what-is-gc/participants/164519-Alpha-Bank-S-A->



COMMUNICATION ON PROGRESS
QUESTIONNAIRE

Alpha Bank S.A.

No. of questions
45/45



R2. What is the time period covered by your Communication on Progress? (MM/YYYY - MM/YYYY)

Please share the date range of the reporting period used for the Communication on Progress option you select.^①

01/2025 - 12/2025

R3. (Optional) Please clarify the scope of reporting covered by your Communication on Progress. For example, please describe the operational scope of your CoP, (e.g., corporate office, investments, subsidiaries) as needed.^①

Listed entity

R5. (Optional) Please upload the sustainability report for your company

(Uploaded file cannot exceed 50MB)

SUSTAINABILITY-STATEMENT-FY2025-ALPHA-BANK-ENG.PDF



CEO Statement of Continued Support



CEO Statement of Continued Support

To our stakeholders,

I am pleased to confirm that Alpha Bank S.A. reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

In this annual Communication on Progress, we disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals.

Sincerely yours,

C1. Please complete the following information:

CEO/Highest-level executive name:	Dimitris I. Kazazoglou-Skouras
CEO/Highest-level executive full title:	Head of Sustainability
Company name:	Alpha Bank S.A.

C2. Please confirm:

☐	I am the CEO or highest-level executive.
☒	I have received permission to sign on behalf of the CEO or highest-level executive.

C2.1. If applicable, form completed on behalf of the CEO or highest-level executive by:

Margarita K. Leontopoulou

Success Stories & Future Priorities



S1. (Optional) Within the reporting period, is there an initiative(s), project(s), and/or policy(ies) of which the company is particularly proud? Please focus on examples that demonstrate not only positive societal or environmental impact but also measurable value for the company.

Disclaimer: These initiatives are self-reported and have not been independently verified by the UN Global Compact. By responding to this question, you consent to being contacted by the UN Global Compact regarding these initiatives for potential inclusion as examples in UN Global Compact resources.

This stand-out effort relates to:

(Select all that apply)^①

☒	Governance
☐	Human Rights
☒	Labour
☒	Environment



Anti-Corruption

S1A. Please provide a link and/or provide additional information:

A key achievement was the conversion of the Sustainable Finance Framework from a policy commitment into scaled-up financing activity. In 2025, Alpha Bank reported EUR 2.1bn of new financings classified under the SFF criteria, including EUR 769.35mn of new financings to Renewable Energy Systems. The Bank also reported EUR 3.25bn of corporate loans in green thematic categories and EUR1.1bn of sustainability-linked loans. In retail and small-business banking, sustainable loan disbursements increased significantly, including EUR 302.5mn of retail sustainable and consumer green housing loans, and EUR 328.4mn of retail green, social and sustainable loans to small businesses. These outcomes show that the SFF is supporting the transition to a lower-carbon economy while contributing to loan growth, product development, and client engagement. Alpha Bank also completed its inaugural Green Senior Preferred Bond issuance, raising EUR500mn to support eligible green investments. The transaction attracted demand of more than EUR3bn, demonstrating strong investor confidence in the Bank's sustainability strategy. This is a clear example of sustainability creating business value, by improving access to sustainable capital markets and supporting the Bank's funding profile. Additionally, Alpha Bank advanced its Climate Transition Plan, which supports the alignment of the Bank's portfolio with climate objectives and strengthens climate-risk management. In 2025, the Bank tracked progress against sectoral decarbonization targets in high-emitting sectors, including Power Generation, Cement, Oil & Gas, and Iron & Steel, and maintained zero financing for activities such as thermal coal mining, upstream oil exploration, and coal-fired electricity generation. This initiative helps reduce environmental impact while improving portfolio resilience and limiting exposure to transition-risk sectors. From a governance and anti-corruption perspective, Alpha Bank published its Anti-Bribery and Corruption Framework, further strengthening transparency, ethical conduct, and control mechanisms across the organization. The Framework supports the Bank's zero-tolerance approach to bribery and corruption and reinforces its wider compliance architecture, including policies, training, monitoring, and reporting channels. This creates value for the Bank by reducing conduct and regulatory risk, protecting reputation, and supporting trust among clients, investors, employees, and other stakeholders. Alpha Bank also strengthened the internal conditions needed to deliver these initiatives. Through its ESG governance model and ESG Academy, 60% of Greece's workforce participated in ESG training, more than 74% of retail banking employees completed dedicated ESG lessons, and 260 Wholesale Banking and Wholesale Credit employees received climate-risk training. This supports consistent implementation of ESG criteria in client assessment, credit decision-making, and sustainable finance classification. Together, these initiatives generated measurable environmental, social, and governance outcomes while also creating business value through sustainable lending growth, improved risk and conduct management, stronger client relationships, investor confidence, and enhanced access to sustainable finance markets.

S2. Which of the five issue areas does the company plan to prioritize in the next two years?

(Select all that apply)



Governance



Human Rights

☒	Labour
☒	Environment
☒	Anti-Corruption
☐	None

S2A. (Optional) Please provide additional information:

Over the next two years, Alpha Bank expects to prioritise Environment, supported by Governance, Labour and Anti-Corruption. The main priority is environmental and climate-related: continuing implementation for the Climate Transition Plan, scaling sustainable finance under the EUR3.8 billion 2025-2027 sustainable finance target, delivering the Renewable Energy Systems financing target, supporting client transition and setting targets for the next wave of material carbon-intensive sectors. Governance will remain important through Board and management oversight of ESG strategy, risk management, reporting and target monitoring. Labour-related priorities focus on continued ESG and climate capability-building, employee wellbeing, inclusion and skills development. Anti-corruption priorities focus on continued implementation of the Anti-Bribery and Corruption Framework, mandatory training, reporting channels, and control effectiveness. Together, these priorities are expected to support lower-carbon financing, portfolio resilience, stronger internal execution capacity and ethical business conduct.

Governance



Policies and Responsibilities



G1. Does the board/highest governance body or most senior executive of the company:

(Select all that apply)^①

☒	Issue an annual statement about the relevance of sustainable development to the company

☒	Issue an annual statement that addresses impacts on both people and the environment
☒	Issue an annual statement highlighting a zero tolerance for corruption
☒	Sign off on organizational sustainability targets
☒	Supervise Environmental, Social, and Governance reporting
☒	Regularly review potential risks related to the business model
☐	None of the above

G1A. (Optional) Please provide additional information:

The Board of Directors approves the Bank's annual Sustainability Statement, which is prepared in line with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), as part of its Annual Report. The Board also approves and oversees the implementation of the Company's sustainability strategy, including relevant targets and Key Performance Indicators (KPIs), and supervises ESG reporting and disclosures.

G2. Does the company have a code of conduct in place regarding each of the following sustainability topics?

(Select one answer option per line) ⓘ

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on our employees	Yes, focused on our employees and suppliers	Yes, focused on our employees and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	☐	☐	☐	☐	☒
Labour Rights/Decent Work	☐	☐	☐	☐	☒
Environment	☐	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☐	☒

G2A. (Optional) Please provide additional information:

Alpha Bank has established a comprehensive Code of Conduct and Ethics, supported by a framework of policies that collectively address key sustainability topics, including human rights, labour and employment practices, environmental responsibility and anti-corruption. The Code sets out the Bank's expectations on responsible and ethical conduct, including respect for human rights, equal treatment and non-discrimination, health and safety, responsible environmental behaviour, integrity, avoidance of conflicts of interest, and zero tolerance for bribery and corruption. It applies to employees, Board Members, and persons or entities connected to the Group through formal agreements. The Code is supported by more specialised policies and frameworks, including the Anti-Bribery and Corruption Framework, Whistleblowing Policy, ESG and sustainability policies, and labour-related policies and procedures. Together, these documents guide employees and relevant stakeholders on expected conduct and support responsible business practices across the Bank's operations and relationships.

G3. Has the company appointed an individual or group responsible for each of the following sustainability topics?

(Select one answer option per line) ⓘ

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Human Rights	☐	☐	☐	☐	☒
Labour Rights/Decent Work	☐	☐	☐	☐	☒
Environment	☐	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☐	☒

G3A. (Optional) Please provide additional information:

Alpha Bank has appointed governance bodies and senior-level structures with responsibility for these sustainability topics. Responsibility sits at the highest levels of the organization through Board-level ESG oversight, including the Corporate Governance, Sustainability, and Nominations Committee, and is supported by executives and management-level sustainability, risk, compliance and human resources functions. These structures have direct influence on outcomes through oversight of ESG strategy, policies, reporting, risk management, sustainable finance, employee matters, and business conduct.

G3.1. If yes, does the company also have formal governance structures (e.g., committees or governance bodies) in place to provide strategic oversight and support for these sustainability topics?

(Select one answer option per line) ⓘ

	No formal structure	Yes, with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes (e.g., includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, involves one or more members of senior management)	Yes, with direct influence at the highest level of the company (e.g., full access to relevant information, involves members at highest level of company)
Human Rights	☐	☐	☐	☐	☒
Labour Rights / Decent Work	☐	☐	☐	☐	☒
Environment	☐	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☐	☒

G3.1A (Optional) Please provide additional information:

Alpha Bank has formal governance structures in place to provide strategic oversight and support for sustainability topics, including environmental, social, labour, human rights, and anti-corruption matters. At Board level, the Corporate Governance, Sustainability and Nominations Committee oversees ESG matters and supports the Board in supervising sustainability strategy, ESG risks and opportunities, targets, policies, and reporting. The Bank's ESG governance model is further supported by management-level structures, including the Group Sustainability Committee, as well as relevant functions such as Sustainability, Risk Management,

Compliance, Human Resources, and Internal Audit. These structures have direct influence on outcomes because they support the integration of sustainability into strategy, governance, risk management, credit processes, employee matters, business conduct controls, and external reporting.

Prevention



G4. Does the company have a process to identify, assess and mitigate risks related to the following sustainability topics?

(Select one answer option per line)^①

	No, this is not a current priority	No, but we plan to within the next two years	Yes, conducted by a designated individual or group	Yes, engaging employees across the company	Yes, engaging employees and business partners	Yes, engaging employees, business partners and external stakeholders
Human rights risks	☐	☐	☐	☐	☐	☒
Labour rights risks	☐	☐	☐	☐	☐	☒
Environmental risks	☐	☐	☐	☐	☐	☒
Corruption risks	☐	☐	☐	☐	☐	☒

G4A. (Optional) Please provide additional information:

Alpha Bank has established processes to identify, assess and mitigate sustainability-related risks across its operations, supported by its Board and senior management oversight, and by its risk management and internal control framework. These processes include ESG governance structures, risk management and compliance frameworks, internal controls and due diligence procedures, the Climate Transition Plan, the Code of Conduct and Ethics, the Anti-Bribery and

Corruption Framework, whistleblowing channels, HR policies, health and safety procedures, and supplier-related expectations. Together, these mechanisms help the Bank prevent, detect, escalate and manage sustainability-related risks across its operations and business relationships.

G4.1. As part of the risk identification, assessment and mitigation process, has the company identified business partners and external stakeholders where the risk related to human rights, labour, environment and/or corruption may be particularly severe?

(Select one answer option per line)(i)

	Yes	No
Human rights risks	☐	☒
Labour rights risks	☐	☒
Environmental risks	☒	☐
Corruption risks	☐	☒

G4.1A. (Optional) Please provide additional information:

As part of Alpha Bank's risk identification, assessment and mitigation processes, the Bank identified business relationships where environmental and climate-related risks may be particularly severe, mainly through the Bank's portfolio and sectoral analysis. In particular, the Bank's Climate Transition Plan identifies material carbon-intensive sectors in the financing portfolio, including Power Generation, Oil and Gas, Cement, and Iron and Steel, as requiring enhanced monitoring, decarbonisation targets, and portfolio steering. The Bank also applies exclusion criteria to certain high-impact activities, such as thermal coal mining, upstream oil exploration, and coal-fired electricity generation. For human rights, labour rights, and corruption risks, the Bank maintains relevant policies, controls, due diligence procedures, and reporting channels covering own operations, suppliers, and other business relationships.

G5. Does the company have a due diligence process through which it identifies, prevents, mitigates and accounts for actual and potential negative impacts on sustainability topics?

(Select one answer option per line)(i)

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human rights risks	☐	☐	☐	☐	☒
Labour rights risks	☐	☐	☐	☐	☒
Environmental risks	☐	☐	☐	☐	☒
Corruption risks	☐	☐	☐	☐	☒

G5A. (Optional) Please provide additional information:

Alpha Bank has established due diligence processes to identify, prevent and mitigate sustainability-related risks across its operations and value chain. Human rights and labour-related due diligence covers employees, clients, suppliers and affected communities. Environmental risks are assessed through the Bank’s ESG risk management framework and Double Materiality Assessment in line with CSRD/ESRS, which considers impacts, risks and opportunities across the value chain. Corruption risks are addressed through the Anti-Bribery and Corruption Policy and related controls, which apply to both employees and third parties, ensuring coverage beyond the Bank’s own operations.

G5.1. During the due diligence process, has the company identified those suppliers and/or other business relationships where the risk of adverse impacts on human rights, labour, environment and/or anti-corruption may be particularly severe?

(Select one answer option per line)(i)

	Yes	No
Human rights risks	☐	☒

	Yes	No
Labour rights risks	☐	☒
Environmental risks	☐	☒
Corruption risks	☐	☒

G5.1A. (Optional) Please provide additional information:

Alpha Bank maintains due diligence, risk management and control processes covering own operations, suppliers, clients and other business relationships. These include supplier standards, ESG and credit assessment procedures, anti-bribery and corruption controls, whistleblowing and reporting channels, and climate and environmental risk management processes. These mechanisms support the identification, escalation, and investigation of potential adverse impacts across human rights, labour, environment and anti-corruption topics. Based on the above, the Bank did not identify, through due diligence specifically, suppliers or other business relationships where adverse impacts on human rights, labour rights, environment or anti-corruption were particularly severe. The Bank does, however, identify and monitor higher-risk environmental and climate-related exposures through broader processes, including portfolio analysis, climate-risk assessment and transition planning.

Concerns and Grievance Mechanisms



G6. Does the company have a process(es) through which members of the company's workforce can raise concerns about the company's conduct on sustainability topics?
(Select one answer option per line) ⓘ

	No, this is not a current priority	No, but we plan to within the next two years	Yes, we have an informal process (e.g., through supervisors, others)	Yes, we have a formal process
Human Rights	☐	☐	☐	☒
Labour Rights / Decent Work	☐	☐	☐	☒
Environment	☐	☐	☐	☒
Anti-Corruption	☐	☐	☐	☒

G6A. (Optional) Please provide additional information:

Alpha Bank has established formal processes through which employees can raise concerns related to sustainability topics, including dedicated whistleblowing and grievance mechanisms. These include multiple reporting channels, including confidential and anonymous options, and are supported by policies ensuring the protection of whistleblowers against retaliation. The mechanisms are available to employees across the organization and cover a wide range of issues, including human rights, labour practices, environmental and anti-corruption matters. These mechanisms support early identification, escalation and investigation of concerns, help protect employees who report in good faith, and strengthen accountability, transparency and ethical conduct across the organization.

G6.1. Please provide additional detail regarding the process(es) the company has through which members of the company’s workforce can raise concerns about the company’s conduct.

(Select one answer option per line)(i)

	Yes	No
Is the process communicated to all employees/workers in local languages?	☒	☐
Is the process available to non-employees (e.g., suppliers, consumers, communities, and other	☒	☐

	Yes	No
business relationships)?		
Is the process confidential (e.g., whistleblowing process)?	☒	☐
Are there processes in place to ensure the protection of whistleblowers? (e.g., against retaliation)	☒	☐
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)?	☒	☐
Other (Please provide additional information)	☐	☒

G6.1A. (Optional) Please provide additional information:

Alpha Bank has established formal whistleblowing and grievance mechanisms through which employees and external stakeholders, including suppliers and third parties, can raise concerns related to sustainability topics. These mechanisms include confidential and, where applicable, anonymous reporting channels and are supported by safeguards to ensure the protection of whistleblowers against retaliation. The processes cover issues arising from both the Bank’s operations and its business relationships.

Tracking Action Effectiveness



G7. How does the company track the effectiveness of its actions to manage its potential and actual impacts on the following sustainability topics?
(Select all that apply for each line)

	No actions are systematically tracked	Gathers and assesses feedback from relevant stakeholders	Sets and regularly tracks goals and targets/KPIs	Conducts monitoring and evaluation (e.g. through internal and/or external auditing, impact assessments, grievance mechanisms, and benchmarking)	Incorporates lessons learned into operational policies and procedures
Human Rights	☐	☒	☒	☒	☒
Labour Rights/Decent Work	☐	☒	☒	☒	☒
Environment	☐	☒	☒	☒	☒
Anti-Corruption	☐	☒	☒	☒	☒

G7A. (Optional) Please provide additional information:

Alpha Bank tracks the effectiveness of its actions through a structured ESG performance framework, which includes a combination of stakeholder feedback, the setting and monitoring of targets and KPIs, regular monitoring and evaluation processes, and continuous improvement through the incorporation of lessons learned into policies and procedures. This is complemented by feedback mechanisms, including stakeholder engagement and whistleblowing channels, which enable the Bank to identify potential issues and assess the effectiveness of its controls. The Bank also incorporates lessons learned into its policies, procedures and disclosures, supporting continuous improvement.

G8. Is executive pay linked to performance on one or more of the following sustainability topics?

(Select one answer option per line) ⓘ

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Human Rights	☒	☐	☐
Labour Rights / Decent Work	☐	☐	☒
Environment	☐	☐	☒
Anti-Corruption	☒	☐	☐

G8A. (Optional) Please provide additional information:

Alpha Bank links executive variable remuneration to sustainability-related performance through its remuneration framework, which is based on annual and long-term performance scorecards. These scorecards include KPIs aligned with the Bank’s business strategy, risk management framework and sustainability goals, ensuring that ESG considerations are embedded in executive performance evaluation and incentive structures.

Leadership Composition



G9. Please provide details regarding the company's board/highest governance body. ⓘ

(Please enter only whole numbers rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros. For the categories ‘Male, Female, Other’, ‘Under 30 years old, 30–50 years old, Above 50 years old’, and ‘Executive directors or equivalent, Non-executive directors or equivalent, and Independent non-executive directors or equivalent’, please enter whole numbers only from 0 to 100). The values within these categories must total 100% in order to proceed.)

If your organization does not have board directors, select the options which best represent the members of your equivalent governing body with respect to their involvement in the day-to-day management of your organization.

	Known	Number (Please input a whole number)	Not applicable
Total number of board members (#)	☒	11	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Male (%)	☒	55	☐
Female (%)	☒	45	☐
Other (%)	☒	0	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Under 30 years old (%)	☒	0	☐
30-50 years old (%)	☒	9	☐
Above 50 years old (%)	☒	91	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
From minority or vulnerable groups (%)	☒	0	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Executive directors or equivalent (%)	☒	18	☐

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Non-executive directors or equivalent (%)	☒	9	☐
Independent non-executive directors or equivalent (%)	☒	73	☐

G9A. (Optional) Please provide additional information:

Alpha Bank maintains a Board of Directors with a balanced composition, including executive, non-executive and independent non-executive members, in line with applicable legal and regulatory requirements and corporate governance best practices. The Board’s composition reflects a combination of professional experience, independence, and diversity considerations, including gender diversity, and is subject to regular review.

G10. Within the reporting period, what was the percentage of women in managerial positions?
*(If 'Known' is selected, include the value. Please enter only whole numbers from 0 to 100, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros)*ⁱ

	Known	Percentage of women (%) (Please input a whole number e.g., 50% = 50)	Unknown
Managerial positions	☒	43	☐

G10A. (Optional) Please provide additional information:

Within the reporting period, women represented 43% of managerial positions at Alpha Bank. This reflects the Bank's continued focus on diversity, inclusion and equal opportunities, supporting a broader leadership pipeline, stronger talent retention and more balanced decision-making across the organisation.

G11. What is the gender representation of the company's C-suite or equivalent executive leadership positions?

(Select all that apply for each line)ⁱ

	Women	Men	Other (e.g., non-binary)	Not applicable (e.g., the company does not have this position)	Choose not to disclose
Chief Executive Officer	☐	☒	☐	☐	☐
Chief Financial Officer	☐	☒	☐	☐	☐
Chief Procurement Officer	☐	☐	☐	☒	☐
Chief Technology Officer	☐	☒	☐	☐	☐
Chief Marketing Officer	☐	☐	☐	☒	☐
Chief Operations Officer	☐	☒	☐	☐	☐
Chief Sustainability Officer	☐	☒	☐	☐	☐
Chief Legal Officer/General Counsel	☒	☐	☐	☐	☐
Chief Human Resources Officer	☒	☐	☐	☐	☐
Chief Compliance Officer	☐	☒	☐	☐	☐

	Women	Men	Other (e.g., non-binary)	Not applicable (e.g., the company does not have this position)	Choose not to disclose
Other (Please provide additional information)	☒	☒	☐	☐	☐

G11A. Other (Please provide additional information):

Chief Internal Audit: Woman Chief Retail Client Strategies: Man

Sustainable Finance



G12. Does the company consider sustainability in its financing and investment strategies?

(Select one that applies)(i)

- ☐ Yes, we consider sustainability in our financial planning and decision-making, **but not through a structured approach**
- ☐ Yes, we take a structured approach to considering sustainability **through a sustainability-informed investment or financing strategy, but this does not include specific targets tied to sustainability impact** (e.g., sustainability-linked bonds)
- ☒ Yes, we take a structured approach to considering sustainability in financing and investment **through SDG-aligned investment or SDG-linked financing strategies**, including specific targets tied to sustainability impact (e.g., use-of-proceeds bonds)

☐	No, but we plan to within the next two years
☐	No, this is not a current priority
☐	Choose not to disclose

G12A. (Optional) Please provide additional information:

Alpha Bank takes a structured approach to integrating sustainability into its financing and investment strategies through its Sustainable Finance Framework and Green Bond Framework, which are aligned with international standards such as the Green Bond Principles and the EU Taxonomy.

Data Assurance



G13. Does the company produce sustainability reporting according to:

(Select all that apply)ⁱ

☒	National/local regulation on sustainability
☒	Security exchange regulations
☒	Corporate Sustainability Reporting Directive (CSRD) (formerly known as Non-Financial Reporting Directive of the European Union (NRFD))
☐	Voluntary Sustainability Reporting Standards for non-listed SMEs (VSME)
☒	Global Reporting Initiative (GRI)
☐	Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)

☐	International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
☐	Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
☐	IFRS Sustainability Disclosure Standards (IFRS S1 and S2) (incorporating the Task Force on Climate-related Financial Disclosures (TCFD))
☐	Taskforce on Nature-related Financial Disclosures (TNFD)
☐	Taskforce on Inequality and Social-related Financial Disclosures (TISFD)
☒	CDP (formerly known as Carbon Disclosure Project)
☐	Science-Based Targets initiative (SBTi)
☒	Other voluntary frameworks (Please provide additional information)
☐	No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress

G13A. Other voluntary frameworks (Please provide additional information):

In addition to the above, Alpha Bank reports against voluntary sustainability frameworks and initiatives, including the UNEP FI Principles for Responsible Banking and Pillar 3 disclosures. Alpha Bank's sustainability reporting is based on a combination of mandatory European sustainability reporting requirements and voluntary frameworks that support transparency, comparability, and accountability. Its reporting covers ESG strategy, material impacts, risks and opportunities, sustainable finance, climate-related matters, governance, social issues, and progress against sustainability targets.

G14. Is some or all of the information disclosed in this questionnaire assured by a third-party?
(Select one that applies)(i)

☒	Yes
☐	No

G14A. Yes (Please provide additional information):

Sustainability information disclosed in this questionnaire is subject to third-party assurance, as it is included in Alpha Bank's Sustainability Statement and annual reporting package. Deloitte Certified Public Accountants S.A. provided the Limited Assurance Reports for the Sustainability Report for 2025, prepared in accordance with the International Standard on Assurance Engagements (ISAE) 3000.

Human Rights and Labour

Materiality

HR/L1. Which of the following has the company identified (by way of a formal or informal assessment) as material human rights and labour rights topics connected with its operations and/or value chain?

Note: It is important that participants assess the topics below, especially areas such as digital security, privacy, and data protection through a human rights and labour rights lens rather than an operational risk management lens.

(Select all that apply)(i)

☒	Freedom of association and the right to collective bargaining
☐	Child labour

☐	Forced labour
☒	Non-discrimination and equality (in respect of employment and occupation)
☒	Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)
☐	Wages
☐	Working hours
☒	Mental health and employee wellbeing
☒	Gender equality and women's rights
☐	Children's rights (beyond child labour)
☐	Rights of vulnerable groups (e.g., migrants, refugees, minority communities)
☐	Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)
☐	Just Transition (human rights impacts of climate action and economic transition on workers and communities)
☐	Land rights and rights of Indigenous Peoples
☐	Raw material sourcing (incl. traceability)
☒	Digital security, privacy, and data protection
☐	Freedom of expression and access to information
☒	Product and service end-user rights (incl. safety, accessibility, and potential misuse)
☐	Emerging technologies and responsible adoption of Artificial Intelligence (AI)

☐	Conflict-sensitive due diligence and/or use of security providers
☒	Other human/labour rights topics identified as material
☐	No informal or formal human/labour rights assessment conducted

HR/L1A. Please identify additional current material human rights topics either not on this list or that you believe represent evolving topics:

Other material topics identified: secure employment, social dialogue, training

HR/L1A. (Optional) Please provide additional information:

The actual ESRS topics identified as material by Alpha Bank under the FY25 DMA were the following from the listed options selected: - 'Non-discrimination in respect of employment and occupation' was the sub-sub topic of 'Diversity' which is not limited to gender diversity - 'Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)' and 'Mental health and employee wellbeing' was the sub-sub topic of 'Health and safety' - 'Product and service end-user rights' were the sub-sub topics of 'Access to products and services', 'Access to quality information' and 'Responsible Marketing Practices'

HR/L1.1. In addition to the required labour rights topics (freedom of association and the right to collective bargaining, child labour, forced labour, non-discrimination and equality, a safe and healthy working environment, and wages) and the gender topic (gender equality and women’s rights), which human rights and labour rights topics does the company identify as most material to be reported on when answering questions HR/L2–HR/L5?

(Select all that apply, maximum six)(i)

☐	Working hours
☒	Mental health and employee wellbeing
☐	Children’s rights (beyond child labour)

☐	Rights of vulnerable groups (e.g., migrants, refugees, minority communities)
☐	Right to a clean, healthy and sustainable environment (e.g., pollution of water, air, and land)
☐	Just Transition (human rights impacts of climate action and economic transition on workers and communities)
☐	Land rights and rights of Indigenous Peoples
☐	Raw material sourcing (incl. traceability)
☒	Digital security, privacy, and data protection
☐	Freedom of expression and access to information
☒	Product and service end-user rights (incl. safety, accessibility, and potential misuse)
☐	Emerging technologies and responsible adoption of Artificial Intelligence (AI)
☐	Conflict-sensitive due diligence and/or use of security providers
☐	None

HR/L1.1A. (Optional) Please provide additional information:

Regarding the 'Freedom of expression and access to information' option selected from the list above, the most material for Alpha Bank is the 'access to information'

HR/L2. Does the company have a policy commitment in relation to the following human rights & labour rights topics?

(Select one answer option per line, if 'Yes', include the value)ⁱ

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant human rights and labour rights policy was last reviewed (YYYY)
Freedom of association and the right to collective bargaining	☐	☐	☒	☐	2025
Child labour	☐	☐	☒	☐	2024
Forced labour	☐	☐	☒	☐	2024
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☒	☐	2026
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☒	☐	2024
Wages	☐	☐	☒	☐	2025

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant human rights and labour rights policy was last reviewed (YYYY)
Gender equality and women's rights	☐	☐	☒	☐	2026
Mental health and employee wellbeing	☐	☐	☒	☐	2025
Digital security, privacy, and data protection	☐	☐	☒	☐	2018
Product and service end-user rights (incl. safety, accessibility, and potential misuse)	☐	☐	☒	☐	2025

HR/L2A. (Optional) Please provide additional information:

Alpha Bank's commitments on human rights and labour rights are reflected across several policies, codes and frameworks. These commitments are aligned with recognised international standards and principles, including the UN Global Compact Ten Principles, the ILO Core Labour Conventions, the Universal Declaration of Human Rights, and the OECD Guidelines for Multinational Enterprises. The Bank reports on these commitments, actions and related outcomes through its FY2025 Sustainability Statement, prepared in accordance with the CSRD/ESRS framework, and through other voluntary disclosures. The review year reported for each topic refers to the most relevant policy or framework supporting that commitment, while implementation is supported by the wider set of applicable internal policies, procedures and governance mechanisms. An indicative, non-exhaustive list of relevant policies and frameworks is provided below. All publicly policies are available on Alpha Bank's website and are also referenced, where relevant, in the FY2025 Sustainability Statement. - Code of Conduct and Ethics (2024): <https://www.alpha.gr/-/media/AlphaGr/Files/Group/etairiki-diakybernisi/kodikas-deontologias.pdf> - The Suppliers' Code of Conduct (2022): <https://www.alpha.gr/-/media/AlphaHoldings/Files/etairiki-diakubernisi/suppliers-code-of-conduct.pdf> - Occupational Health and Safety Policy (2025): <https://www.alpha.gr/-/media/AlphaHoldings/pdf-files/politiki-ygeias-kai-asfaleias-stin-ergasia.pdf> - Remuneration Policy of the Members of the BoD (2025):

https://www.alpha.gr/-/media/AlphaGr/Files/Group/etairiki-diakybernisi/Remuneration-Policy-of-the-Members-of-the-BoD_ENG.pdf - Occupational Health and Safety Policy (2025): <https://www.alpha.gr/-/media/AlphaHoldings/pdf-files/politiki-ygeias-kai-asfaleias-stin-ergasia.pdf> - Data Protection Policy (2018): <https://www.alpha.gr/en/retail/Personal-data-protection-m2> - Sustainable Finance Framework (2023): <https://www.alpha.gr/-/media/AlphaHoldings/Files/enimerosi-ependuton/apologismoi-drastiriotion/alpha-bank-sustainable-finance-framework-december-2023.pdf>

HR/L2.1. For each human rights & labour rights policy commitment, is it:

(Select all that apply for each line)ⁱ

	Aligned with international human rights/labour standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's suppliers	Applied to the other stakeholders within the company's value chain (consumers, communities, other business relationships)	Developed involving human rights/labour expertise from inside and/or outside the company	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	☒	☒	☒	☒	☒	☐	☒	☐
Child labour	☒	☒	☒	☒	☒	☐	☒	☐
Forced labour	☒	☒	☒	☒	☒	☐	☒	☐
Non-discrimination and equality (in respect of	☒	☒	☒	☒	☒	☐	☒	☐

employment and occupation)								
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☒	☒	☒	☒	☒	☐	☒	☐
Wages	☒	☒	☒	☒	☒	☐	☒	☐
Gender equality and women's rights	☒	☒	☒	☒	☒	☐	☒	☐
Mental health and employee wellbeing	☒	☒	☒	☒	☒	☐	☒	☐
Digital security, privacy, and data protection	☒	☒	☒	☒	☒	☐	☒	☐
Product and service end-user rights (incl. safety, accessibility, and potential misuse)	☒	☒	☒	☒	☒	☐	☒	☐

HR/L2.1A. (Optional) Please provide additional information:

Alpha Bank's human rights and labour rights commitments are reflected across several policies, codes, frameworks and procedures. These commitments are aligned with recognized international standards and principles, including the UN Global Compact Ten Principles, among others. The commitments are supported by publicly available policies and frameworks, including, on an indicative and non-exhaustive basis, the Code of Conduct and Ethics, the Suppliers' Code of Conduct, the Remuneration Policy for the Members of the Board of Directors, the Occupational Health & Safety Policy, the Corporate Responsibility Policy, the Sectoral Collective Labour Agreement, the Diversity Policy, the Violence and Harassment Prevention Policy, the General Cybersecurity and Information Security Policy, the Group Personal Data Protection Policy etc. Specifically, the Code of Conduct and Ethics is approved at Board level and applied to employees, Board members and persons or entities connected to the Group through formal agreements. Workforce-related commitments apply primarily to Alpha Bank's own operations, while supplier-related commitments are extended through the Suppliers' Code of Conduct, including on work and human rights, child and forced labour, non-discrimination, freedom of association and collective bargaining, fair treatment, wages-related provisions and health and safety. For consumers, communities and other business relationships, Alpha Bank maintains broader responsible business, customer protection, accessibility, equal treatment, privacy, data protection and conduct-related commitments.

HR/L2.2. Does the company’s policy on freedom of association and collective bargaining:

(Select all that apply) ⓘ

☒	Reference the respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of anti-union discrimination
☒	Prohibit any acts of interference in trade unions
☒	Facilitate collective bargaining with the trade union representatives
☒	Provide trade union representatives with the information required for meaningful bargaining in the context of bona fide negotiations
☒	Reference the respect for the right of workers to submit grievances without suffering
☐	We do have a policy on freedom of association or collective bargaining but it does not include any of these details

HR/L2.2A. (Optional) Please provide additional information:

Sectoral Collective Labor Agreement (CLA) cover the entire banking sector, while Corporate Collective Labor Agreements (CCLA) cover all permanent Employees. The Code of Conduct and Ethics is in place to ensure that various labor rights, such as equal pay for equal work, right to freedom of association etc are protected. Alpha Bank has several mechanisms in place to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises, including trainings that align with the aforementioned and grievance mechanisms. For more information please see the S1-1 Policies related to own workforce within the FY 25 Sustainability Statement of the Annual Report.

HR/L2.3. Does the company's policy on wages include:

(Select all that apply)ⁱ

Note: The International Labour Organization (ILO) defines living wage as “the wage level that is necessary to afford a decent standard of living for workers and their families, taking into account the country circumstances and calculated for the work performed during the normal hours of work.” Compliance with minimum wage laws alone does not constitute a living wage commitment unless explicitly aligned with recognised living wage benchmarks.

☒	A commitment to equal pay for work of equal value
☒	A commitment to paying living wages to the company's own employees
☐	A commitment to advancing the payment of living wages across the company's supply chain
☐	A commitment to measuring and monitoring progress toward paying living wages (e.g., through living wage gap analyses)
☐	Time-bound, measurable targets to advance the payment of living wages
☐	We do have a policy on wages, but it does not include any of these details (Please provide additional information)

HR/L2.3A. (Optional) Please provide additional information:

Providing equal opportunities for employment and career advancement to all Employees goes beyond a legal obligation for the Bank, it is a fundamental pillar of its Human Resources Strategy. This principle is embedded in the Bank’s Human Resources management procedures and practices, ensuring consistent implementation across all countries in which the Bank operates. When setting diversity objectives, the Bank considers diversity benchmarking results, published by the competent authorities, the European Banking Authority (EBA) or other leading international bodies and organizations. The Bank applies uniform Remuneration, Benefits and Corporate Expenses Policies that are neutral with respect to personal characteristics such as gender, race, age, religion or other legally protected attributes, while respecting and promoting diversity and fostering an inclusive culture that ensures fairness and equal treatment across all Employee categories. In that context, the Bank offers fair remuneration, based on contracts aligned with national labor market standards, ensuring compliance with applicable regulations on minimum wage, working hours and leave entitlements. The Bank’s and the Group’s remuneration practices fully comply with the applicable legal and regulatory framework, as in force, including Law 4261/2014 [transposing EU Directive 2013/36/EU – Capital Requirements Directive (CRD) IV], Law 4548/2018 and the EBA Guidelines on sound remuneration policies and the Bank of Greece Executive Committee Act 231/15.7.2024. In addition, the Alpha Bank has in place a Sectoral Collective Labor Agreement (CLA) which covers the entire banking sector, while a Corporate Collective Labor Agreement (CCLA) covers all permanent Employees of the Bank. Both agreements define the minimum wage in higher level than the Greek legislation.

Prevention



HR/L3. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following human rights & labour rights topics?

(Select all that apply for each line)ⁱ

No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent/mitigate the risks/ impacts in question	To agree on a way to prevent/ mitigate the risks/ impacts in question	To assess progress in preventing /mitigating the risks/impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question
Freedom of association and the right to collective bargaining	☐	☐	☐	☒	☒

	No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent/mitigate the risks/ impacts in question	To agree on a way to prevent/ mitigate the risks/ impacts in question	To assess progress in preventing /mitigating the risks/impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question
Child labour	☒	☐	☐	☐	☐	☐
Forced labour	☒	☐	☐	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☐	☐	☒	☒
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☒	☐	☐	☒	☒
Wages	☐	☐	☐	☒	☐	☒
Gender equality and women's rights	☐	☐	☐	☐	☒	☒
Mental health and employee wellbeing	☐	☒	☐	☐	☒	☒
Digital security, privacy, and data protection	☐	☒	☐	☐	☒	☐
Product and service end-user rights (incl.	☐	☒	☐	☐	☒	☐

No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent/mitigate the risks/ impacts in question	To agree on a way to prevent/ mitigate the risks/ impacts in question	To assess progress in preventing /mitigating the risks/impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question
safety, accessibility, and potential misuse)					

HR/L3A. (Optional) Please provide additional information:

The Group remains committed to continuously monitoring and assessing its performance across these areas to ensure consistency with its sustainability objectives. It implements a range of policies and initiatives designed to promote an inclusive, supportive, and engaging work environment, while maintaining regular dialogue with employees and other stakeholders to identify areas for improvement and future development. In the event of negative impacts on its Customers, the Bank has established specific mechanisms and processes for contributing remedy, including the Whistleblowing mechanism and a Support Centre to address Customer grievances. Alpha Bank continues to strengthen its approach through the enhancement of its frameworks, processes, and initiatives, reinforcing its commitment to responsible and sustainable business practices.

HR/L4. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select all that apply for each line)(i)

	No action within reporting period	Provided internal training/ capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	☐	☐	☐	☐	☒	☐	☐
Child labour	☒	☐	☐	☐	☐	☐	☐
Forced labour	☒	☐	☐	☐	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☒	☐	☐	☐	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☒	☐	☐	☐	☐	☐
Wages	☐	☐	☐	☐	☒	☐	☐
Gender equality and women's	☐	☒	☒	☐	☒	☐	☐

	No action within reporting period	Provided internal training/ capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
rights							
Mental health and employee wellbeing	☐	☒	☐	☐	☐	☐	☐
Digital security, privacy, and data protection	☐	☒	☐	☐	☐	☐	☐
Product and service end-user rights (incl. safety, accessibility, and potential misuse)	☐	☒	☒	☐	☐	☐	☐

HR/L4A. (Optional) Please provide additional information:

Alpha Bank takes actions to prevent, mitigate and manage actual and potential impacts on human rights and labour rights through a combination of policies, governance mechanisms, employee engagement, training, monitoring, reporting channels and corrective processes. For its own workforce, the Bank's actions include maintaining policies and procedures on ethical conduct, equal treatment, non-discrimination, diversity and inclusion, health and safety, remuneration, training and skills development, employee wellbeing, social dialogue and collective bargaining. The Bank engages with employees and employee representatives through formal and informal channels, including collective labour agreement, employee communication mechanisms and reporting channels. These actions support the prevention and mitigation of risks related to fair treatment, working conditions, freedom of association, employee wellbeing, discrimination, harassment and health and safety. For health and safety, Alpha Bank implements occupational health and safety procedures, monitors relevant indicators, records and assesses incidents, and applies corrective and preventive actions where required. For diversity, equality and gender-related topics, the Bank monitors relevant workforce

indicators, including gender representation in management, and implements actions to support equal opportunities, inclusion and fair treatment. For suppliers, Alpha Bank extends relevant labour and human rights expectations through the Suppliers' Code of Conduct, which covers work and human rights, including child labour, forced labour, freedom of association and collective bargaining, non-discrimination, fair treatment, wage-related provisions and health and safety. Supplier-related expectations support the prevention and mitigation of adverse impacts in the Bank's supply chain. For consumers and end-users, Alpha Bank manages relevant human-rights-related impacts through customer protection, responsible marketing, product suitability, accessibility, privacy, data protection, cybersecurity and complaint-handling mechanisms. These actions support access to quality information, fair treatment of customers, protection of personal data, accessibility of products and services, and responsible provision of financial services. Alpha Bank also maintains whistleblowing and grievance/reporting channels, which support the identification, escalation and investigation of concerns related to misconduct, discrimination, harassment, fraud, corruption, human rights, labour rights or other breaches of responsible business conduct. Lessons from monitoring, engagement, complaints, incidents and internal reviews are used to improve policies, procedures, controls, training and business practices. Actions related to material own workforce and consumer/end-user topics are further described in sections S1-4 and S4-4 of Alpha Bank's FY2025 Sustainability Statement.

HR/L4.1. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select one answer per line)(i)

	No monitoring of progress	Review topics on an ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	☐	☒	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☐	☐	☐	☒	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☐	☐	☒	☐	☐

	No monitoring of progress	Review topics on an ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Wages	☐	☒	☐	☐	☐
Gender equality and women's rights	☐	☐	☐	☒	☐
Mental health and employee wellbeing	☐	☒	☐	☐	☐
Digital security, privacy, and data protection	☐	☐	☐	☒	☐
Product and service end-user rights (incl. safety, accessibility, and potential misuse)	☐	☐	☐	☒	☐

HR/L4.1A. (Optional) Please provide additional information:

For topics where targets have been established and are publicly disclosed, Alpha Bank monitors and reports their progress on annual basis through its Sustainability Statement. All targets are monitored by the Board of Directors. Progress is assessed through workforce KPIs, employee engagement surveys, training completion, gender and youth employment metrics, grievance/complaint channels, privacy/cybersecurity controls and customer-protection monitoring. The Group reviews the topics of 'Freedom of association and the right to collective bargaining', 'Wages' and 'Mental health and employee wellbeing' among other topics through its annual materiality assessment process by leveraging insight from all relevant communication channels and mechanisms available to employees and their representatives. Thus, Alpha Bank remains committed to addressing impacts and risks related to these topics through established policies and actions. For example, regarding 'Freedom of association and the right to collective bargaining' and 'Wages' constructive dialogue and cooperation with employee representatives to discuss and negotiate matters affecting the workforce takes place, while for 'Mental health and employee wellbeing' the Bank implements a Health and Safety Management System according to ISO 45001, which is certified by an accredited body.

HR/L4.1.1. (Optional) For relevant human rights & labour rights topics for which the company sets timebound goals/targets, what targets has the company set? ⓘ

Non-discrimination and equality (in respect of employment and occupation)	Increase employment of young people by 20% by 2025
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	Provision of a safe and Inclusive work environment-ongoing target- ongoing target
Gender equality and women's rights	Maintain 40% representation of women in managerial positions-ongoing target, Support financial inclusion through educational programs addressed to teachers, students and people over 55, women & young entrepreneurs-ongoing target
Digital security, privacy, and data protection	Safeguard internal risk controls that protect the Customers' data- ongoing target

Product and service end-user rights (incl. safety, accessibility, and potential misuse)

1) Increase access for people with mobility limitations to 85% of our Branches by 2025 2) Achieve ca. Euro 900 million of Retail Sustainable Loans, including loans to Small Businesses by 2027 - Launch new sustainability-based mortgage and consumer loan products and credit cards by 2025 - Support financial inclusion through educational programs addressed to teachers, students, women and people over 55- ongoing target - Limited financing to activities that can affect health and well being, including gambling, production or trade in tobacco and alcoholic beverages - ongoing target

HR/L4.1.1A. (Optional) Please provide additional information:

The target-setting process was informed by a review of industry frameworks, market practice and peer benchmarking, and a thorough understanding of the Group’s business model, while also taking into account input received from key stakeholders, including employees, investors and customers. Furthermore, the targets have been designed to support the alignment of the Group’s business model and strategy with its contribution to the United Nations Sustainable Development Goals (SDGs). There are no significant assumptions underpinning the established targets, and no interim milestones have been developed to monitor progress.

Response and Reporting



HR/L5. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following human rights & labour rights topic(s)?

(Select one answer per line)(i)

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Freedom of association and the right to collective bargaining	☒	☐	☐	☐
Child labour	☒	☐	☐	☐
Forced labour	☒	☐	☐	☐
Non-discrimination and equality (in respect of employment and occupation)	☒	☐	☐	☐
Safe and healthy working environment (incl. sexual harassment, violence and abuse at work)	☒	☐	☐	☐
Wages	☒	☐	☐	☐
Gender equality and women's rights	☒	☐	☐	☐
Mental health and employee wellbeing	☒	☐	☐	☐
Digital security, privacy, and data protection	☒	☐	☐	☐
Product and service end-user rights (incl. safety, accessibility, and potential misuse)	☒	☐	☐	☐

HR/L5A. (Optional) Please provide additional information:

Alpha Bank maintains formal engagement, grievance, reporting and complaint-handling mechanisms for employees, employee representatives and customers. These mechanisms support the identification, escalation and remediation of actual or potential adverse impacts related to own workforce and consumers/end-users. Insights from these mechanisms are used to review and improve relevant policies, procedures, training programmes, products and services. In FY2025, Alpha Bank reported zero severe human rights issues, and zero discrimination/harassment incidents. For health and safety, the Bank reported recordable work-related accidents, as further detailed in HR/L7. These incidents are managed through the Bank's occupational health and safety framework, including monitoring, investigation, corrective actions and employee support mechanisms. Actions related to material own workforce and consumer/end-user topics are described in sections S1-4 and S4-4 of Alpha Bank's FY2025 Sustainability Statement. For Digital security, privacy and data protection, Alpha Bank reported 6 personal data breach incidents during the reporting period. These incidents are managed through the Bank's data protection, cybersecurity, incident management and regulatory compliance processes, including assessment, escalation, corrective actions and notification to competent authorities and/or affected individuals, where applicable.

HR/L6. What was the average gender pay gap (comparing jobs of equal value) during the reporting period?ⁱ

(Please enter only whole numbers, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, spaces, or leading zeros)

Guidance for Gender Pay Gap: Companies should calculate the gender pay gap by subtracting the average hourly earnings of male employees by the average gross hourly earnings of female employees, dividing the resulting figure by average gross hourly earnings of male employees. Earnings should be based on jobs of equal value. The result should then be multiplied by 100 to reveal the percentage wage gap between female and male employees. Please refer to the CoP guidebook for additional information on the gender pay gap formula.

	Unknown	Choose to not disclose
Average Gender Pay Gap (%) - (Please input answer as a whole number e.g., 95% = 95)	24	☐

HR/L6A. (Optional) Please provide additional information:

This figure is broadly consistent with the prior reporting year and refers to Alpha Bank S.A for the FY25. The main driver of this unadjusted gap remains the underrepresentation of women in higher managerial positions. Alpha Bank recognizes the importance of continued action to reduce pay disparities and support equal opportunities. The Bank is gradually increasing the share of women in people management positions from middle management level and above. This metric has also been introduced in Senior and Higher management performance KPIs as a part of comprehensive strategies regarding diversity and

inclusivity. Throughout the reporting period, the Bank maintained remuneration and employment practices designed to support fair treatment, equal opportunities and non-discrimination. The Remuneration Policy for Alpha Bank and the other Companies of the Banking Group is gender-neutral, supports equal treatment and promotes an inclusive and diverse workplace. In addition, the applicable Sectoral Collective Labor Agreement (CLA) and the Corporate Collective Labor Agreement (CCLA) define the minimum wage for all Bank employees irrespective of gender.

HR/L7. Within the reporting period, what was the rate of recordable work-related accidents for employees? ⓘ

Guidance for work-related accidents rate: companies should calculate the work-related accidents rate by dividing the total number of work-related accidents in the reporting year by the total number of hours worked by all employees during the same period. The result should then be multiplied by 200,000. Please refer to the CoP guidebook for additional information on the work-related accidents rate formula.

	Unknown	Choose to not disclose
Rate of work-related accidents (Please input a number rounded to two decimal places, e.g., 1.55)	0.32	☐

HR/L7A. (Optional) Please provide additional information:

Alpha Bank reports 17 recordable work-related accidents and a rate of 1.59 in its FY2025 Sustainability Statement, calculated under the CSRD/ESRS methodology, which uses a multiplier of 1,000,000 hours. For the purposes of the UNGC CoP questionnaire, the rate has been converted in accordance with the CoP/VSME formula, which uses a multiplier of 2000,000 hours. Therefore, the equivalent CoP rate is 0.32.

HR/L8. (Optional) Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the human rights and labour principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation. ⓘ

Throughout the reporting year the implementation of key policy objectives was supported by actions that contributed to the Group’s targets with impactful programs, initiatives and partnerships. Indicative actions are provided 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 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, by setting clear expectations regarding professional behavior towards colleagues, Customers, suppliers, and contractors.

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.

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, which is structured around the following three pillars:

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

In addition, 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

Additional Initiatives related to DE&I and Sustainability

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).
- “Do Good People” App: In 2025, Alpha Bank successfully launched the “Do Good People” mobile application for all Employees through its collaboration with Do Good People S.L., a FinQuest 2022 award-winning company. The platform enables organizations to actively engage their workforce in sustainability through simple, impactful daily actions, which contribute to the UN Sustainable Development Goals (SDGs) through everyday choices.

Environment



Commitment



E1. Does the company have a policy commitment in relation to the following environmental topics?

(Select one answer per line, if 'Yes', include the value)ⁱ

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed (YYYY)
Climate change	☐	☐	☒	☐	2023
Water	☐	☐	☒	☐	2024
Oceans	☒	☐	☐	☐	
Nature and biodiversity	☐	☐	☒	☐	2024
Air pollution	☐	☐	☒	☐	2024
Waste management	☐	☐	☒	☐	2024
Circularity	☐	☐	☒	☐	2024

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed (YYYY)
Energy & resource use	☐	☐	☒	☐	2019
Other environmental topic(s) (Please provide additional information)	☒	☐	☐	☐	

E1A. (Optional) Please provide additional information:

The Bank's Environmental Policy is incorporated in its publicly committed Environmental Strategy which contains commitments for climate change, biodiversity, and circularity with specific targets that are monitored quarterly and reported annually. The Bank's Environmental Policy commitments are disclosed in detail within its annual Sustainability Report and Climate-related report. In particular, for its own operations, the Bank has established an Environmental Management Policy since April 2019 that sets the framework for the Group's Environmental Management, aiming at improving its environmental performance, 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. -Sustainable Finance Framework Alpha Bank's Sustainable Finance Framework 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) -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. Links: <https://www.alpha.gr/en/Group/esg-and-sustainability/environment/environmental-management-system> <https://www.alpha.gr/en/Group/esg-and-sustainability/environment/our-environmental-policy>

E1.1. For each environmental policy commitment, is it:

(Select all that apply for each line)ⁱ

	Aligned with international environmental standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's suppliers	Applied to the other stakeholders within the company's value chain (consumers, communities, other business relationships)	Developed involving environmental expertise from inside and/or outside the company	Other (Please provide additional information)
Climate change	☒	☒	☒	☒	☐	☒	☐	☐
Water	☒	☒	☒	☒	☐	☐	☐	☐
Nature and biodiversity	☒	☒	☒	☒	☒	☐	☐	☐
Air pollution	☒	☒	☒	☒	☒	☐	☐	☐
Waste management	☒	☒	☒	☒	☒	☐	☐	☐
Circularity	☒	☒	☒	☒	☐	☐	☐	☐
Energy & resource use	☒	☒	☒	☒	☒	☐	☐	☐

E1.1A. (Optional) Please provide additional information:

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 following policies 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.

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

-ESG in Loan Origination In 2024, the Group enhanced its credit assessment process, 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.

-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 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).

-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.

-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. Moreover, As part of our ongoing commitment to environmental sustainability and responsible sourcing: It is mandatory that all of the Bank's suppliers in the paper sector comply with the standards set by the Forest Stewardship Council (FSC). This is a pass-fail criterion that applies without exception. The FSC is an international, non-profit organization that promotes environmentally appropriate, socially beneficial, and economically viable management of the world's forests. FSC certification ensures that products come from responsibly managed forests that provide environmental, social, and economic benefits. More information can be found at: <https://fsc.org/en>

Accordingly, paper products provided to the Bank (internal A4 printing, operational use and digital statement generation- "e-statements"), must be FSC-certified. It is important to clarify that no paper used in these processes originates from natural forests. This requirement reflects our commitment to sustainable development and supports global efforts to combat deforestation. Our Bank is taking active steps to reduce the impact of the materials we use—starting with the cards we issue to our customers. We've decided that most banking cards supplied to our Bank must now be made from biodegradable or environmentally responsible materials. This is a pass-fail requirement. Cards made from traditional, non-biodegradable plastics (such as standard PVC) will no longer be accepted. Suppliers who cannot meet this standard will not be considered in our procurement

process. Among other things, the Bank evaluates whether Suppliers apply certified environmental management systems in line with international standards such as ISO 14001.

Prevention



E2. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following environmental topics?

(Select all that apply for each line) ⓘ

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information)
Climate change	☐	☒	☒	☒	☒	☒	☐
Water	☐	☒	☐	☐	☐	☐	☐
Oceans	☒	☐	☐	☐	☐	☐	☐
Nature and biodiversity	☐	☒	☒	☒	☒	☒	☐
Air pollution	☒	☐	☐	☐	☐	☐	☐
Waste management	☐	☒	☐	☐	☒	☐	☐

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information)
Circularity	☐	☒	☒	☒	☒	☒	☐
Energy & resource use	☐	☒	☒	☒	☒	☒	☐
Other environmental topic(s)	☒	☐	☐	☐	☐	☐	☐

E2A. (Optional) Please provide additional information:

Alpha Bank is proactively engaging with shareholders and other stakeholders to align its priorities. The Bank’s approach to stakeholder engagement is built on the principles of transparency, inclusivity, and accountability, ensuring that its sustainability efforts align with the expectations and values of its stakeholders. Shareholders are promptly provided with comprehensive information regarding the Sustainability Strategy and progress towards its targets. Additionally, the Bank engages in an annual sustainability roadshow and detailed discussions on its sustainability strategy, its alignment with global standards, and its financial implications. It also hosts interactive one-to-one sessions with investors to collect insights, expectations and refine its approach. Customers: In 2025, Alpha Bank 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. 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. Employees: By fostering a shared understanding of sustainability across all levels of the organization, we ensure that ESG principles are embedded into daily operations and decision-making. This collective commitment strengthens our ability to deliver long-term, responsible growth. To support this engagement, we have introduced several initiatives that are accessible to all employees. Notably, the launch of the ESG Academy in 2023

marked a key milestone in building internal capacity on ESG topics, with a particular emphasis on environmental responsibility. Through structured training, employees gain a deeper understanding of issues such as climate risk, sustainable finance, and emissions reduction. This widespread engagement plays a critical role in advancing the Bank’s transition plan. By equipping employees with the skills and awareness necessary to support our environmental goals, we are accelerating progress toward key targets. Our people act as drivers of change, both within the organization and in their interactions with clients and communities.

Rating Agencies and Indices: The Bank maintains regular and transparent engagement with rating agencies and sustainability indices to provide comprehensive information on its environmental strategy, performance, targets, and governance approach. Through structured disclosures, questionnaires, bilateral meetings, and participation in assessment processes, the Bank communicates progress and receives valuable external feedback on the above-mentioned topics.

Organizations and Initiatives: The Bank actively engages with international sustainability organizations, industry initiatives, and collaborative platforms to strengthen its environmental approach and align with emerging best practices. Through participation in initiatives such as the United Nations Environment Programme Finance Initiative (UNEP FI), the United Nations Global Compact (UNGC), the Hellenic Bank Association (HBA) and other relevant sectoral and ESG-focused networks, the Bank contributes to collective action and knowledge sharing on environmental topics.

E3. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select all that apply)ⁱ

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Climate change	☐	☒	☒	☒	☒	☒	☐
Water	☒	☐	☐	☐	☐	☐	☐
Oceans	☒	☐	☐	☐	☐	☐	☐
Nature and biodiversity	☐	☒	☒	☒	☒	☒	☐

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Air pollution	☒	☐	☐	☐	☐	☐	☐
Waste management	☐	☒	☒	☐	☐	☒	☐
Circularity	☐	☒	☒	☒	☒	☒	☐
Energy & resource use	☐	☒	☒	☒	☒	☒	☐
Other environmental topic(s)	☒	☐	☐	☐	☐	☐	☐

E3A. (Optional) Please provide additional information:

Training: 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. Engagement with Suppliers: The Supplier Code of Conduct (with regard to Labor and Human Rights, Health and Safety, Environmental Responsibility and Integrity-Business Ethics) was issued in 2022. The acceptance of the said code and the compliance with the Corporate Responsibility Policy is a prerequisite for signing contracts and assignments (if the vendor does not apply a similar code). When evaluating the Suppliers’ performance, the Bank assesses whether they have had their management systems certified according to international standards, such as ISO 9001, ISO 45001 and ISO 14001. Supplier Code of Conduct:

<https://www.alpha.gr//media/AlphaHoldings/Files/etairiki-diakubernisi/suppliers-code-of-conduct.pdf> External audit process: 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. Associations, governmental/regulatory bodies: Alpha Bank constantly monitors the regulatory framework landscape at European and national level, in order to be aware of changes thereof and to anticipate and inform its strategic direction. It is an active member of the relevant industry association (Hellenic Bank Association) and the Head of the Governance and Sustainability Division is the representative to the HBA for issues relating to Sustainability. Alpha Bank has established clear guidelines for communicating its environmental commitments during external engagements. These guidelines ensure that its messaging is consistent and aligned with global sustainability frameworks such as the Paris Agreement, and also with its sustainability strategy and environmental goals such as reducing carbon footprint, promoting sustainable finance and achieving net-zero targets. A cross functional team, including sustainability, legal, and communications departments, reviews all proposed engagements. Major engagements with significant environmental implications require approval from senior management. Regular updates are included in its sustainability disclosures ensuring consistency across all external engagements. In 2024, Alpha Bank expressed its positions responding to public consultations, discussions and deliberations through the relevant trade association (Hellenic Bank Association, EBF) on topics such as the development of EU sector-specific standards for sustainability, the development of Voluntary ESRS for SMEs, Pillar III climate risk disclosures, the EBF response to the EBA Guidelines on ESG Risk Management, transition finance, climate scenario analysis, Green Asset Ratio calculation, and the transposition of the CSRD into national legislation. In April 2024, ahead of the fourth meeting of the Intergovernmental Negotiating Committee on Plastic Pollution (INC-4), Alpha, along with 180 financial institutions, signed the Finance Statement on Plastic Pollution calling on governments to negotiate an ambitious treaty to end plastic pollution. The statement was prepared by UNEP FI, the PRI, Finance for Biodiversity Foundation, the Business Coalition for a Global Plastics Treaty, the Dutch Association of Investors for Sustainable Development (VBDO) and CDP.(www.unepfi.org/wordpress/wp-content/uploads/2024/04/Finance-Statement-to-end-Plastic-Pollution-20241125.pdf)

E3.1. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select one answer option per line) ⓘ

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Climate change	☐	☐	☐	☒	☐
Nature and biodiversity	☐	☐	☐	☒	☐

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Waste management	☐	☐	☐	☐	☒
Circularity	☐	☐	☐	☒	☐
Energy & resource use	☐	☐	☐	☒	☐

E3.1A. Other (Please provide additional information):

Waste Management: We monitor and we disclose metrics related to waste management on an annual basis. We have not set targets on this topic.

E3.1A. (Optional) Please provide additional information:

Climate Change: 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). Nature and biodiversity: 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. Circularity: 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. Energy & resource use: Alpha Bank regularly monitors energy consumption at its premises and the corresponding greenhouse gas emissions, in line with the requirements of the Greenhouse Gas Protocol. This regular practice aims at improving the accuracy of the Bank’s performance data and identifying areas for improvement. Thus, the target objective for the Bank is to reduce its Scope 1 and 2 emissions by 20% from its own operations in 2025 compared to 2022.

E3.1.1. (Optional) For relevant environmental topics for which the company sets timebound goals/targets, what targets has the company set?

(Please provide a description of targets, for example, what is the target, absolute vs. intensity, externally verified, on track, etc. Refer to the CoP Guidebook for target examples)ⁱ

Climate change	3.8 billion to new Sustainable Financings increasing target by 2027, Absolute, Externally verified, on track - Financed emissions targets: Power Generation 132 kgCO2eq / MWh, Relative, Externally verified, on track - Financed emissions targets: Oil and Gas 74 Indexed tCO2e of 2022 = 100 tCO2eq, Absolute, Externally verified, on track - Financed emissions targets: Cement 584 kgCO2eq / t Cementitious product - intensity, Relative, Externally verified, on track - Financed emissions targets: Iron and Steel Intensity of portfolio to remain below the reference pathway, Relative, Externally verified, on track
Nature and biodiversity	Zero financing to new investments in thermal coal mining, upstream oil exploration or coal-fired electricity generation, Absolute, Externally verified, on track
Circularity	3.8 billion to new Sustainable Financings increasing target by 2027, Absolute, Externally verified, on track

Energy & resource use

Reduction of Scope 1 and 2 GHG emissions by 20% until 2025, comparing to 2022, Absolute, Externally verified, on track

E3.1.1A. (Optional) Please provide additional information:

Climate Change: 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). Nature and biodiversity: 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. Circularity: 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. Energy & resource use: Alpha Bank regularly monitors energy consumption at its premises and the corresponding greenhouse gas emissions, in line with the requirements of the Greenhouse Gas Protocol. This regular practice aims at improving the accuracy of the Bank's performance data and identifying areas for improvement. Thus, the target objective for the Bank is to reduce its Scope 1 and 2 emissions by 20% from its own operations in 2025 compared to 2022.

E3.1.2. For each environmental topic in which the company sets timebound goals/targets, how is progress against goal/target tracked?
(Select all that apply for each line)(i)

	Progress is not tracked	Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information)
Climate change	☐	☒	☒	☒	☐
Nature and biodiversity	☐	☒	☒	☒	☐
Circularity	☐	☒	☒	☒	☐
Energy & resource use	☐	☒	☒	☒	☐

E3.1.2A. (Optional) Please provide additional information:

All sustainability targets are subject to external verification to ensure transparency, reliability, and alignment with applicable reporting standards and commitments. Progress against these targets is systematically monitored through the ESG Dashboard, a dedicated reporting and performance-tracking tool that provides regular visibility on key sustainability indicators and milestones. The ESG Dashboard is presented on a quarterly basis to the Corporate Governance Sustainability and Nominations Committee, a board-level committee, enabling structured oversight. Moreover, progress on those targets is publicly disclosed annually on our Sustainability Statement and ESG Databook.

E4. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following environmental topics?
(Select one answer option per line)(i)

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Climate change	☐	☐	☒	☐
Water	☒	☐	☐	☐
Oceans	☒	☐	☐	☐
Nature and biodiversity	☐	☐	☒	☐
Air pollution	☒	☐	☐	☐
Waste management	☒	☐	☐	☐
Circularity	☒	☐	☐	☐
Energy & resource use	☐	☐	☒	☐
Other environmental topic(s)	☒	☐	☐	☐

E4A. (Optional) Please provide additional information:

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 though GHG emissions created mainly through the financing activities of sectors that are contributing negatively 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. • 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. Please refer to [E1-3] Actions and resources in relation to climate change policies.

Climate Action



E5. Within the reporting period, did the company measure Scope 1 and/or Scope 2 global greenhouse gas (GHG) emissions?
(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros)

	Known	Measured Total Emissions (tCO2e)	We did not measure our gross emissions (Please provide additional information)
Scope 1 emissions	☒	6913	☐
Scope 2 (market-based) emissions	☒	10527	☐
Scope 2 (location-based) emissions	☒	18030	☐

E6. Within the reporting period, did the company measure Scope 3 global greenhouse gas (GHG) emissions?
(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros) ⓘ

	Known	Measured total emissions (tCO2e)	Yes, partially measured	We did not measure Scope 3 emissions (Please provide additional information)
Scope 3 emissions	☒	24156058	☐	☐

E6.1. Which Scope 3 categories are included in the company’s Scope 3 emissions calculation?

(Select all that apply)ⁱ

☒	Purchased goods and services
☒	Capital goods
☒	Fuel- and energy-related activities
☒	Upstream transportation and distribution
☒	Waste generated in operations
☒	Business travel
☒	Employee commuting
☒	Upstream leased assets
☒	Downstream transportation and distribution
☐	Processing of sold products
☐	Use of sold products
☐	End-of-life treatment of sold products

☒	Downstream leased assets
☐	Franchises
☒	Investments
☐	Other - upstream
☐	Other - downstream

E6.1A. (Optional) Please provide additional information:

Upstream leased assets: This category does not apply to Alpha Bank because emissions from the operation of leased office buildings are included under Scope 1, 2 GHG emissions.

E7. Does the company have a target(s), validated by a third-party, relating to the reduction of greenhouse gas (GHG) emissions?

(Select all that apply for each line. If have target(s), include the baseline year)(i)

	Short term (5-10 years)	Medium term (10-15 years)	Long term (20-30 years)	Baseline year (YYYY)	No targets set
Scope 1 targets validated by a third-party	☒	☐	☐	2022	☐
Scope 2 targets (market-based) validated by a third-party	☐	☐	☐		☒

	Short term (5-10 years)	Medium term (10-15 years)	Long term (20-30 years)	Baseline year (YYYY)	No targets set
Scope 2 targets (location-based) validated by a third-party	☒	☐	☐	2022	☐
Scope 3 targets validated by a third-party	☒	☒	☐	2022	☐
All or some set targets not validated by a third-party	☐	☐	☐		☒

E7A. (Optional) Please provide additional information:

Alpha Bank regularly monitors energy consumption at its premises and the corresponding greenhouse gas emissions, in line with the requirements of the Greenhouse Gas Protocol. This regular practice aims at improving the accuracy of the Bank’s performance data and identifying areas for improvement. Thus, the target objective for the Bank is to reduce its Scope 1 and 2 emissions by 20% from its own operations in 2025 compared to 2022.

E8. Does the company have a climate change adaptation plan?

(Select all that apply)(i)

☒	Yes, and it includes physical risk assessments
☐	Yes, and it includes transition risk assessments
☐	Yes, and it includes a physical climate risk scenario analysis
☐	Yes, and it includes actions to increase adaptation and resilience in the communities in which we operate

☐	No, but we plan to within the next two years
☐	No (Please provide additional information)

E8A. (Optional) Please provide additional information:

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.

Energy/Resource Use



E9. Has the company set targets to phase out fossil fuels?

(Select all that apply) ⓘ

☒	Yes, we have set targets to phase out fossil fuel-based materials
☒	Yes, we have set targets for investment in non-fossil fuel emitting activities
☐	Yes, we have set targets for renewable energy procurement
☐	Yes, we have set targets to end the exploration of fossil fuels, the expansion of existing fossil fuel reserves, the extraction of fossil fuels
☐	Yes, we have set other targets to phase out fossil fuel usage
☐	No, but we plan to within the next two years

☐

No

E9A. (Optional) Please provide additional information:

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.

E10. Does the company have a transition plan containing policies, actions, investments, accountability mechanisms, and targets to limit global warming?

(Select all that apply)①

☒	Yes, it is aligned with science to limit global warming to 1.5°C
☒	Yes, it follows the mitigation hierarchy
☒	Yes, it helps increase direct/indirect investment in renewable energy
☒	Yes, it transitions from fossil fuels to non-emitting energy sources such as renewables
☒	Yes, it improves energy efficiency and substituting disposable materials for reusable materials
☐	Yes, it deploys GHG removal methods
☒	Yes, it describes the impacts on stakeholders, workers and the environment and the actions taken to manage them

☐	Yes, it describes how public policy activities, including lobbying activities, are consistent with the transition plan
☒	Yes, it factors into the organization’s financial planning
☒	Yes, it is embedded in the business strategy
☒	Yes, it is overseen by the highest governance body of the company
☐	No transition plan (Please explain why it does not exist)

E10A. (Optional) Please provide additional information:

Please refer to our Transition Plan ([E1-1] Transition plan for climate change mitigation) pg. 82 of our 2025 Sustainability Statement.

Additional Topic-specific Questions



E11. Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g., based on the most severe actual or potential negative impacts on people and/or the environment)?

(Select all that apply)^①

☒	Climate change
☐	Oceans
☒	Energy & resource use
☐	Waste management

☐	Water
☒	Nature and biodiversity
☐	Air pollution
☒	Circularity
☐	None of the topics have been identified as material by the company

E11A. (Optional) Please provide additional information:

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, 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 though 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.

Additional Topic-specific Questions: Nature and biodiversity



E14. Does the company have an active nature action plan, and what part(s) of your business does it cover?

(Select one that applies)(i)

☒	Yes, it is implemented across the company
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☐	Yes, it is implemented for selected priority locations/products/commodities only (Please provide additional information)
☐	Yes, plan is developed but not yet implemented (Please provide additional information)
☐	Plan development is in progress (Please provide additional information)
☐	No plan yet

E14A. (Optional) Please provide additional information:

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. 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.

Additional Topic-specific Questions: Circularity



E16. Within the reporting period, how has the company implemented circular economy practices?

(Select all that apply) ⓘ

☒	Has a formal circular economy policy or commitment
☐	Has dedicated resources (budget and/or staff) to circular economy initiatives
☒	Has integrated circularity considerations into product or service design
☐	Promotes circular business models
☒	Applies circular economy practices to the company's own operations
☒	Engages and collaborates with suppliers and value chain partners to implement circular economy practices
☒	Applies circular economy practices to waste management
☒	Tracks and/or monitors circularity outcomes (examples include, but are not limited to: percentage of recycled input materials, circular products, or waste diverted from landfill/incineration, etc.) (If applicable, please provide additional information)
☐	Has other circular economy practices not listed above
☐	None – the company has not implemented any circular economy practices in the reporting period

E16A. (Optional) Please describe examples of how circularity outcomes have been tracked and monitored:

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. The Green Bond Framework, introduced in 2025, 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 and pollution prevention and control, in alignment with the Sustainable Finance Framework green theme. 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. Moreover, 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.

E17. (Optional) Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the environment principles, including goals set and any challenges faced and actions taken towards prevention and/or remediation.

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

- 1) 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.
- 2) 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.

- 3) 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. 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. Integrating Sustainability into Asset Management Alpha Asset Management MFMC delivers on its commitment to integrate ESG parameters in investment analysis, decision-making and active ownership practices. In this context, it: > Complies with the SFDR regulation. > Has co-signed the UN initiative on the Principles for Responsible Investment – PRI since 2018. In July 2025 the company submitted its annual assessment report, which included its responsible investment activities. > Has developed an ESG (Environmental, Social and Governance) Policy. > Offers mutual funds with targeted ESG investment strategy that promote sustainability. Adopting and using ESG criteria as a catalyst for value creation is still a priority for Alpha Asset Management MFMC. At the end of 2025, the assets of Alpha Mutual Funds incorporating ESG features stood at €1.5 billion. The company marked a significant increase compared to €313 million at the end of 2024, capturing a 60% market share.

Anti-Corruption

Commitment

AC1. Does the company have an anti-corruption compliance programme?

(Select one that applies) ⓘ

☐

No, this is not a current priority

☐	No, but we plan to within the next two years
☒	Yes

AC1A. (Optional) Please provide additional information:

Alpha Bank has a comprehensive anti-corruption compliance programme, supported by its Anti-Bribery and Corruption Framework. The Framework sets out the Group's zero-tolerance approach to bribery and corruption and applies to Board members, senior executives, employees, third-party goods and service providers, advisers, and customers. The Anti-Bribery and Corruption Policy includes clear prohibitions on offering, promising, giving, requesting, or receiving improper payments or benefits, whether directly or indirectly through third parties. It is also reinforced by complementary policies (e.g. Code of Conduct and Ethics, AML/CFT Policy, Conflict of Interest Policy and Whistleblowing procedures) and is implemented through the Group Compliance function. It is supported by a system of internal controls, procedures and monitoring mechanisms designed to prevent, detect and address bribery and corruption risks. It is further supported by internal procedures, employee awareness measures and training, and regular reviews to ensure that controls remain appropriate to the nature of each Group company's activities. Through this programme, Alpha Bank aims to prevent bribery and corruption risks, strengthen ethical conduct, protect its reputation, and maintain the trust of customers, investors, employees, suppliers, and other stakeholders.

AC1.1. Is the anti-corruption compliance programme:

(Select all that apply) ⓘ

☒	Publicly available
☒	Approved at most senior level of the company
☒	Applied to the company's own operations
☒	Applied to the company's own suppliers
☒	Applied to the other stakeholders within the company's value chain (consumers, communities, other business relationships)

☐

Other (Please provide additional information)

AC1.1A. (Optional) Please provide additional information:

Alpha Bank’s anti-corruption compliance programme is reflected in its Group Anti-Bribery and Corruption Statement, which is publicly disclosed and which outlines the Bank’s principles, governance structure, and high-level commitments. Oversight and approval rest with senior governance bodies, including the Group Audit Committee and the Compliance function, ensuring top-level accountability. The anti-corruption policies, Code of Conduct, and related controls apply across all business units, employees, and operational activities of Alpha Bank. Suppliers are covered through the Suppliers’ Code of Conduct, which includes explicit anti-corruption and ethical-conduct requirements. The Bank’s anti-corruption expectations extend to advisers, intermediaries, customers, and other business partners, as reflected in the ABC Framework, Code of Conduct, and CSR-related policies, which promote integrity and transparency across the broader value chain.

AC1.2. Does the company monitor its anti-corruption compliance programme?

(Select all that apply) ⓘ

☒

Yes, through review on an adhoc basis

☐

Yes, through internal employee self-evaluations

☐

Yes, through automated controls monitoring

☐

Yes, through external independent monitoring

☒

Yes, through other mechanisms (Please provide additional information)

☐

No, we do not monitor the anti-corruption compliance programme (Please provide additional information)

AC1.2A. Yes, through other mechanisms (Please provide additional information):

Alpha Bank has established a robust and continuously monitored framework to identify, prevent, and address bribery, corruption, and conflicts of interest across its operations. The Bank’s Anti-Bribery and Corruption Policy is subject to systematic oversight through a structured set of internal procedures, control mechanisms, and ongoing monitoring activities carried out by the Compliance function, including periodic reviews to verify the effectiveness of controls and ensure alignment with evolving regulatory requirements. The Group’s Audit Committee provides independent governance and oversight of the Policy’s implementation, reinforcing accountability at the highest level. In addition, the Bank maintains formal whistleblowing channels that allow employees and stakeholders to confidentially report suspected misconduct, providing an additional layer of monitoring and early detection. Employees also participate in annual training on anti-corruption practices, money-laundering prevention, and ethical conduct, ensuring that the Bank can continuously assess, strengthen, and monitor its overall compliance programme.

AC2. Does the company have policies and recommendations for employee procedures in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

(Select one that applies) ⓘ

☐	No, and we have no plans to develop any policy/recommendation
☐	No, but we plan to within the next two years
☒	Yes, included within a broader policy or as a standalone policy

AC2A. (Optional) Please provide additional information:

Alpha Bank maintains comprehensive policies and clear recommendations to guide employees whenever they face uncertainty regarding potential bribery, corruption, or conflicts of interest. These are primarily set out in the Group Anti-Bribery and Corruption Policy, the Code of Conduct and Ethics, the Policy on Prevention of Conflict of Interest, and Whistleblowing procedures. The framework includes specific requirements regarding gifts and hospitality (e.g. declaration and approval thresholds), interactions that may give rise to conflicts of interest, the obligation to report concerns through dedicated channels, and expectations for ethical conduct. When in doubt, staff are encouraged to seek advice from the Compliance function or escalate concerns through the Bank’s established whistleblowing channels, which allow for confidential reporting of suspected misconduct. In addition, the Bank’s Policy on “Related Parties” Transactions provides further safeguards by regulating transactions involving individuals or entities that may present heightened conflict-of-interest risks, ensuring transparency and preventing undue influence in dealings with related parties. This policy is part of the Bank’s Internal Governance Regulation and reinforces the broader conflict-of-interest framework. Employees may also escalate concerns confidentially through the Bank’s Whistleblowing Policy, which provides secure channels for

reporting suspected misconduct. Together, these policies ensure that staff have clear, structured procedures and reporting mechanisms for navigating ethically sensitive situations.

AC3. Does the company engage in collective action against corruption?

(Select one that applies) ⓘ

☐	No, this is not a current priority
☐	No, but we plan to in the next two years
☒	Yes (Please provide additional information)

AC3A. Yes (Please provide additional information):

Alpha Bank engages in collective action against corruption through its participation in the UNGC and its commitment to the Ten Principles, including the principle that businesses should work against corruption in all its forms. Through this participation, the Bank contributes to multi-stakeholder dialogue and promotes alignment with international standards, supporting transparency, integrity and responsible business conduct. This complements the Bank’s internal Anti-Bribery and Corruption framework.

Prevention



AC4. Who receives training on anti-corruption and integrity?

(Select all that apply) ⓘ

☒	All employees
☐	

☐	Selected employees (Please provide additional information)
☐	Third-party suppliers, contractors and/or consultants
☐	No training provided

AC4A. (Optional) Please provide additional information:

Alpha Bank provides anti-corruption and integrity-related training to employees through broader ethics and compliance training, including the Code of Conduct and Ethics, Whistleblowing Policy and Procedures, and Anti-Bribery and Corruption-related training. The Group Compliance Training Programme includes E-learning which is mandatory for all employees, while newcomers have live anti-bribery sessions in their induction program. Training covers topics including anti-bribery and corruption, AML/CFT, regulatory compliance and risk culture, and is delivered through both physical and web-based sessions as well as e-learning platforms.

AC4.1. How often is such training provided?

(Select one answer option per line)(i)

	One time only	Every two or more years	Every year	Unknown
All employees	☐	☐	☒	☐

AC4.1A. (Optional) Please provide additional information:

Anti-corruption and integrity-related training is delivered on an ongoing basis through the Group Compliance Training Programme, which includes multiple training sessions and e-learning modules provided to all employees. Training is repeated annually and updated to reflect regulatory developments and internal risk assessments. E-learning is mandatory for all employees, and newcomers have live anti-bribery sessions in their induction program.

AC5. What mechanisms does the company have in place to detect incidents of corruption?

(Select all that apply) ⓘ

☒	Internal reporting channels (e.g., confidential or anonymous speak-up mechanisms)
☒	Whistleblower protection
☒	Internal audits, compliance reviews, or other forms of controls
☒	Third-party due diligence and ongoing monitoring
☒	External reporting channels (e.g., grievance or complaint mechanisms)
☐	External audits or independent reviews
☐	Other (Please provide additional information)
☐	No mechanisms in place to detect incidents of corruption

AC5A. (Optional) Please provide additional information:

Alpha Bank detects potential incidents of corruption through a combination of internal reporting channels, whistleblowing mechanisms, whistleblower protection, internal controls, compliance reviews, and oversight procedures. Its Anti-Bribery and Corruption Framework is supported by procedures designed to prevent and identify bribery and corruption risks, within the Code of Conduct and Ethics and Whistleblowing Policy provide employees and other stakeholders with channels to report concerns, including confidentially or anonymously where applicable. The Bank ensures the protection of whistleblowers against retaliation and maintains strict confidentiality safeguards. Detection is further supported by a framework of internal controls, compliance procedures and regular reviews implemented by the Compliance function, aimed at identifying and addressing corruption-related risks. In addition, external grievance and reporting channels are available to

stakeholders, including suppliers and third parties, enabling them to raise concerns related to potential misconduct. These mechanisms help Alpha Bank detect, escalate and address potential misconduct, strengthen accountability, and reduce legal, regulatory and reputational risk.

Response and Reporting



AC5.1. Within the reporting period, what actions has the company taken to address suspected incidents of corruption?

(Select all that apply)^①

☒	Internal measures (e.g. internal investigation, review by board of directors, review by ethics committee)
☐	External measures (e.g., audit, review, report to and collaborate with authorities)
☐	Other (Please provide additional information)
☐	No actions were taken to address suspected incidents of corruption
☐	No incidents of corruption suspected

AC5.1A. (Optional) Please provide additional information:

Within the reporting period, Alpha Bank addressed suspected misconduct through internal investigation and disciplinary action. Alpha Bank's Whistleblowing Policy supports the reporting and investigation of concerns relating to fraud, corruption, coercion or other violations, while the Anti-Bribery and Corruption Framework provides the basis for prevention, escalation and appropriate response actions. All suspected incidents are reviewed by the Whistleblowing Committee and internal investigation is conducted in cooperation with Internal Audit and Human Resources Divisions. The Bank reported no convictions or fines for violations or anti-corruption and anti-bribery laws during the reporting period.

AC6. (Optional) Briefly describe additional relevant practical actions the company has taken within the reporting period and/or plans to take to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation.ⁱ

During the reporting period, Alpha Bank continued to strengthen its anti-corruption framework through the ongoing implementation and regular review of its Group Anti-Bribery and Corruption Policy and related procedures, and the publication of its Anti-Bribery and Corruption Statement, reinforcing its zero-tolerance approach and expectations for employees, management bodies, suppliers, advisers, customers and other business relationships. The Bank also continued integrity-related training and awareness on the Code of Conduct and Ethics, Whistleblowing Policy and Procedures, and anti-bribery and corruption requirements. It maintained reporting channels, whistleblowing protections, internal controls and investigation procedures to support prevention, detection and remediation. Looking ahead, the Bank aims to continue strengthening awareness, controls, and regular review of its anti-corruption procedures.