

Alpha Services and Holdings S.A
Pillar III Disclosures
Report for December 31, 2024



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Abbreviation	Definition
ALCo	Assets-Liabilities Management Committee
BoD	Board of Directors
BoG	Bank of Greece
Bps	Basis Point
BRRD	Bank Recovery and Resolution Directive
CAR	Capital Adequacy Ratios
CBR	Combined Buffers Requirements
CCF	Credit Conversion Factor
CCP	Code of Civil Procedure
CCR	Counterparty Credit Risk
CCyB	Countercyclical Capital Buffer
CDS	Credit Default Swaps
CET1	Common Equity Tier 1
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CRD	Capital Requirements Directive
CRE	Commercial Real Estate
CRM	Credit Risk Mitigation
CRO	Chief Risk Officer
CRR	Capital Requirements Regulation
CSA	Credit Support Annex
CVA	Credit Valuation Adjustment
DTA	Deferred Tax Assets
EAD	Exposure at Default
EBA	European Banking Authority
ECAI	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected Credit Loss
ELA	Emergency Liquidity Assistance
EU	European Union
FRTB	Fundamental Review of the Trading Book
FTP	Fund Transfer Pricing mechanism
FVTOCI	Fair Value Through Other Comprehensive Income
FVTPL	Fair Value Through Profit or Loss
FX	Foreign Exchange
GDP	Gross Domestic product
GL	Guidelines
GMRA	Global Master Repurchase Agreement
KPI	Key Performance Indicator
KRI	Key Risk Indicator
LAS	Liquidity Adequacy Statements
LCR	Liquidity Coverage Ratio
LGD	Loss given default
LTV	Loan to Value
HDIGF	Hellenic Deposit and Investment Guarantee Fund
IAS	International Accounting Standards
ICAAP	Internal Capital Adequacy Assessment Process
ICS	Internal Control System



Abbreviation	Definition
ILAAP	Internal Liquidity Adequacy Assessment Process
IFRS	International Financial Reporting Standards
IMA	Internal Model Approach
IRB	Internal Ratings Based (approach)
IRRBB	Interest Rate Risk in the Banking Book
ISDA	International Swap and Derivatives Association
IT	Information Technology
MREL	Minimum Requirement for Own Funds and Eligible Liabilities
NCA	National Competent Authorities
NPE	Non-Performing Exposure
NPL	Non-Performing Loan
NRA	National Resolution Authorities
NSFR	Net Stable Funding Ratio
OCR	Overall Capital Requirement
O-SII	Other Systemically Important Institution
OTC	Over the Counter
P2R	Pillar 2 Requirement
PD	Probability of default
POCI	Purchased or Originated Credit Impaired
RAF	Risk Appetite Framework
RAS	Risk Appetite Statement
RAY	Risk Authority
RCSA	Risk Control Self – Assessment
RRE	Residential Real Estate
RemCo	Remuneration Committee
RWA	Risk Weighted Assets
SA	Standardized Approach
SFTs	Securities Financing Transactions
SME	Small & Medium Enterprises
SPPI	Solely Payments of Principle and Interest
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SRM	Single Resolution Mechanism
SRPC	Supervisory and Resolution Projects Committee
SSM	Single Supervisory Mechanism
STA	Standardized Approach
SVaR	Stressed Value at Risk
TAC	Troubled Assets Committee
TC	Total Capital
TSCR	Total SREP Capital Requirements
UTP	Unlikely to Pay
VaR	Value at Risk

1 Introduction

1.1 General Information

Alpha Bank is one of the leading banks of the Greek privately owned banking sector and constitutes a consistent point of reference for over 140 years. The Bank offers a wide range of high-quality financial products and services, including retail banking, SMEs and corporate banking, asset management and private banking, distribution of insurance products, investment banking, brokerage and real estate management.

Alpha Bank, which was founded in 1879 by John F. Kostopoulos, has its headquarters at 40 Stadiou Street, Athens, and is registered in the Register of Companies with number 6066/06/B/86/05. The Bank is subject to the Greek banking law and is supervised by the European Central Bank (ECB) and the Single Supervisory Mechanism (SSM).

On 2.4.2021 the Extraordinary General Meeting of the Shareholders approved the demerger of the société anonyme under the corporate name “Alpha Bank S.A.” by way of hive down of its banking business sector with the incorporation of a new entity.

On 16 April 2021, the demerger of the former Alpha Bank S.A., then authorized to operate as a credit institution (under G.E.MI. number 223701000 and Tax Identification Number 094014249), which has been already renamed to “Alpha Services and Holdings S.A.”, (“Group”) was announced pursuant to the Decision of the Ministry of Development and Investments under protocol no 45089/16.4.2021 by way of hive-down of the banking business sector with the incorporation of a new company, which was licensed to operate as a credit institution under the name “Alpha Bank S.A.” (under G.E.MI. number 159029160000 and Tax Identification Number 996807331) (the “Bank”), in accordance to the provisions of Article 16 of Greek law 2515/1997, as well as Articles 54 paragraph 3, 57 paragraph 3, 59-74 and 140 paragraph 3 of Greek law 4601/2019 and Article 145 of Greek law 4261/2014, as in force (the “Hive Down”). As a consequence of the Hive Down, the Bank substituted Alpha Holdings by operation of Greek law, as universal successor, in all of its assets and liabilities, rights and obligations and in general its legal relationships within the banking business sector.

Following the demerger, “Alpha Services and Holdings S.A.”, is supervised on a consolidated basis and “Alpha Bank S.A” is supervised on a standalone basis by the European Central Bank (ECB) and the Bank of Greece (BoG).

The Group is active in the Greek and international banking market, with presence in Cyprus, the United Kingdom and Luxemburg.

On 13.12.2024 Alpha Services and Holdings S.A announced the initiation of the merger process, by way of which Alpha Bank S.A. shall proceed with a merger by absorption of Alpha Services and Holdings S.A. Upon the completion of the merger, Alpha Bank will retain its license as a credit institution and will succeed by force of law and by way of a universal succession the Company in any and all of its assets and liabilities. Prior to the Merger completion, the shares of Alpha Bank S.A will be listed on the Athens Exchange and its shares will be delivered upon Merger completion to the Shareholders of Alpha Services and Holdings S.A in exchange for their shares in the Company. The December 31, 2023 has been set as the Transformation Balance Sheet date of the Merger.

On 27.2.2025 the Board of Directors of Alpha Bank S.A and the Board of Directors of Alpha Services and Holdings approved and agreed with the publication of the Merger Documents (the Draft Merger Agreement, the BoD Reports, the Transformation Balance Sheet and (without approval) the Independent Auditor's Reports) and amended the Transformation Balance Sheet date to 31.12.2024 compared to 31.12.2023 previously.

2 Pillar III Disclosures Overview

2.1 Background and Structure of Pillar III Disclosures

The Group Pillar III Report is prepared in accordance with disclosure requirements as laid down in Part Eight of the “Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms” (Capital Requirements Regulation, or “CRR”) and the “Directive 2013/36/EU on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms” (Capital Requirements Directive IV, or “CRD IV”).

The present Report is structured under 17 chapters and 6 Appendices. Chapter 2 describes the Pillar III Disclosures background, an overview of regulatory framework and significant developments within 2024 as well as an overview of the Group’s Corporate Governance. The 3rd chapter provides information on the scope of application of the regulatory framework and the relevant differences with accounting scope of consolidation.

Chapters 4 and 5 provide full information on capital and leverage, including quantitative information on Alpha Bank Group capital base and capital requirements.

Chapters 6 - 15 describe the Group’s risk management framework, and provide detailed information on credit risk, counterparty credit risk, exposure to securitization positions, market risk, non-financial risks, IRRBB, liquidity risk, as well as asset encumbrance.

Chapter 16 provides information on Environmental, Social and Governance (ESG) Risks and Chapter 17 make a reference to the Group’s Remuneration Policy.

The appendices include a listing of BoD Committees’ composition and terms of reference, the CVs of the Members of the Board of Directors as well as the difference of scope of consolidation per entity of the Group, the Terms and conditions of Tier 2 Instruments, Analysis of Own funds structure and Group organizational chart.

The purpose of Pillar 3 report is:

- to disclose regulatory information relating to the risk management framework,
- to enhance transparency as well as investors information and market discipline

2.1.1 Disclosures enhancements

On 24 January 2022, EBA published the final draft ITS on Pillar 3 disclosures on Environmental, Social and Governance (ESG) risks, which follows the release of a Consultation Paper (CP) in March 2021. The final draft ITS put forward comparable disclosures to show how climate change may exacerbate other risks within institutions’ balance sheets, how institutions are mitigating those risks, and their ratios, including the GAR, on exposures financing taxonomy-aligned activities, such as those consistent with the Paris agreement goals.

More specifically, the ITS specifies the requirement laid out in Article 449a of CRR for large institutions to disclose prudential information on environmental, social and governance (ESG) risks, including transition and physical risk. The ITS includes:

(i) tables for qualitative disclosures on environmental, social and governance risks;

- (ii) templates with quantitative disclosures on climate change transition risk;
- (iii) a template with quantitative disclosures on climate change physical risk;
- (iv) templates with quantitative information and key performance indicators (KPIs) on climate change mitigating measures, including the Green Asset Ratio (GAR) on Taxonomy-aligned activities according to Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation), extended information on Taxonomy alignment of exposures in the banking book and other mitigating actions. The disclosure of information on the GAR applies from 31.12.2023 while the additional and separate information on the Banking Book Taxonomy Alignment Ratio - BTAR applies from 31.12.2024. However, the population of BTAR is optional.

In the context of the EBA reporting framework release 3.3 on July 2023, new and amended reporting requirements have been included. More specifically, an integration of a subset of Pillar 3 disclosure templates was prepared for the Pilot of the Pillar 3 Data hub project. The scope of the project is to centralize the prudential disclosures and make prudential information readily available through a single electronic access point (on EBA's website), promoting market discipline by facilitating access to Pillar 3 information, and increasing data usability and comparability.

On 11 December 2023, the Council and European Parliament reached an agreement on the European Commission's proposals for the amendment of Regulation (EU) No 575/2013 (CRR) and Directive 2013/36/EU (CRDIV). These legislative acts (collectively known as 'Banking Package'), implement, among others, the final elements of the Basel III framework of 2017 in the EU. The revised CRR (CRR3) starts applying from January 2025, with a transitional period envisaged for certain rules set out therein (e.g. output floor). Member States shall transpose the revised CRDIV (CRD6) in their national laws within 18 months from its entry into force.

On 14 December 2023, EBA published two draft ITS amending Pillar 3 disclosures and supervisory reporting requirements. These consultation papers are a first step in the implementation of the Banking Package (CRR3 and CRD6). In particular, this draft ITS seek to implement the changes related to the output floor, credit risk, including immovable property (IP) losses, capital valuation adjustment (CVA), market risk and leverage ratio. The amendments related to operational risk are not covered by these consultation papers but will be consulted on together with some policy products.

In line with the Roadmap, the EBA will follow a two-step sequential approach to amend both the Pillar 3 disclosures and supervisory reporting ITS, prioritizing, in step 1, those changes necessary to implement and monitor Basel III requirements in the EU. Later in 2024, as part of step 2, the EBA will develop those reporting and disclosure requirements that are not directly linked to Basel III implementation, together with those requirements with an extended implementation timeline.

On 20 February 2024, EBA launched a public consultation on two draft ITS amending Pillar 3 disclosures and supervisory reporting requirements for operational risk. These consultations complement two additional consultation papers on Pillar 3 and supervisory reporting published on 14 December 2023, in line with the roadmap for the implementation of the EU Banking Package. The consultations are part of phase 1 in the implementation of the EU Banking Package and ran until 30 April 2024. These amending ITS implement the new CRR3 reporting, and disclosure requirements linked to the introduction of the revised framework for the calculation of own funds requirements for operational risk.

On 4 March 2024, EBA launched a public consultation on its draft RTS under the CRR3 regarding off-balance sheet items under the standardized approach of credit risk. The exposure values of off-balance exposure depend on the application of certain percentages, which in turn depend on a bucket classification. The CRR3 is set to introduce amendments to update the calibration of applicable percentages, which results in the introduction of an adjusted weighting scheme and an additional bucket, increasing the number of risk buckets from 4 to 5, and the conversion factor possibilities to 10%, 20%, 40%, 50% or 100%. These RTS provide the criteria that institutions shall use to classify off-balance sheet items, unless explicitly specified in Annex 1 of the CRR. Further, they specify the factors that may constrain the institutions' ability to cancel the unconditionally cancellable commitments. These RTS are part phase 1 of the EBA roadmap on the implementation of the EU banking package.

On 9 April 2024, EBA published its final Guidelines on the resubmission of historical data under the EBA reporting framework. The Guidelines provide a common approach to the resubmission of historical data by the financial institutions to the competent and resolution authorities in case of errors, inaccuracies or other changes in the data reported, in accordance with the supervisory and resolution reporting framework developed by the EBA.

The Guidelines set out a general approach for the resubmission of historical data with the aim of limiting the number of historical periods. Financial institutions are expected to resubmit the corrected data for the current reporting date, and historical data for past reference dates, going back at least one calendar year (except for the data with monthly reporting frequency). The Guidelines also clarify the general circumstances under which the resubmission may not be required. The new precision requirement will be applicable as of 1 April 2025.

On 19 June 2024, Regulation (EU) 2024/1623 of the EP and of the Council of 31 May 2024 amending the Capital Requirements Regulation as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor (CRR 3) was published in the Official Journal of the EU.

CRR 3 introduced new and amended disclosure requirements stemming from the latest Basel III Pillar 3 reforms, and a mandate for the EBA to develop IT solutions, including templates and instructions, for the disclosure requirements laid down in the banking regulation. The new ITS implement the CRR 3 prudential disclosures by including new requirements on output floor, credit risk, market risk, CVA risk, operational risk and a transitional disclosure on exposures to crypto-assets. In addition, they aim to provide institutions with a comprehensive integrated set of uniform disclosure formats while promoting market discipline.

On 21 June 2024, EBA published a final draft ITS on public disclosures by institutions that implement the changes in the Pillar 3 disclosure framework introduced by the amending Regulation (EU) 2024/1623 (CRR 3). These ITS will ensure that market participants have sufficient comparable information to assess the risk profiles of institutions and understand compliance with CRR 3 requirements, further promoting market discipline.

On 09.07.2024, EBA published its final draft ITS on supervisory reporting requirements implementing the changes necessary to keep the supervisory reporting framework relevant and meaningful and aligned with the amending CRR 3, which implements the latest Basel III reforms.

These ITS update the EBA supervisory reporting framework by including new or amended CRR3 requirements on the output floor, credit risk, market risk, CVA risk, leverage ratio and on the transitional treatment of exposures to crypto-assets. On operational risk, these ITS include some minimum reporting requirements based on the consultation launched in February 2024, while the more extensive reporting requirements on this topic will be finalized by the end of this year, together with the new framework for the business indicator for operational risk.

On 11 October 2024, EBA launched a consultation on the Pillar 3 data hub, which will centralize prudential disclosures by institutions through a single electronic access point on the EBA website. This project is part of the Banking Package laid down in CRR3 and CRD6. The consultation paper defines the IT solutions and processes that large and other institutions shall follow to publish Pillar 3 information centrally in the EBA data hub. The proposed IT solutions leverage the EBA's past and ongoing work and infrastructures in the area of disclosures and reporting. The Pillar 3 data hub will centralize on the EBA website the Pillar 3 disclosures of all EU institutions, thus allowing users to download data and visualize the Pillar 3 information in a standardized format. The consultation ran until 11 November 2024.

On 14 November 2024, EBA published an Opinion on the amendments proposed by the European Commission to the EBA final draft ITS on public disclosures by institutions and supervisory reporting under the revised CRR3. The EBA acknowledges that the Commission's proposal provides some flexibility compared to the current version of the ITS and accepts it as an intermediate step. The Commission and the EBA will continue to work together to better articulate and further operationalize these ITS.

On 12 February 2025, EBA published its final draft ITS on the Pillar 3 data hub for large and other institutions, which will centralize prudential disclosures by institutions through a single electronic access point on the EBA website. This project is part of the Banking Package laid down in the CRR3 and CRD6.

The ITS detail the IT solutions and processes to be followed by large and other institutions when submitting their respective Pillar 3 disclosures. This includes the IT solutions to be used, the data exchange formats to be considered and the technical validations to be performed by the EBA. The EBA will provide additional detailed information to the submitters of Pillar 3 information in the onboarding communication plan.

The Pillar 3 data hub will kick-in on 30 June 2025. To submit the information to the EBA, institutions will benefit from a transition period for the information with disclosure reference dates from June to December 2025. This will give them enough time to prepare for the new publication process.

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

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

2.1.2 Approval and publication

In accordance with the Group's internal governance framework, a "Pillar III Disclosures Policy" has been developed and implemented aiming to ensure consistent and continuous compliance with the disclosure requirements of the regulatory framework and best practices.

The adopted policy sets the minimum content of public disclosures presented.

The Bank with the aim to apply, at all times, best practices and cover any new regulatory requirements, reviews its disclosure policy when deemed necessary and at least on an annual basis and updates the extent and type of information provided at each disclosure date accordingly.

The Bank publishes the Pillar III report via its website, within the applicable deadlines. The data included in this report may be different than the respective accounting data, mainly due to differences between the regulatory consolidation and the accounting consolidation and/or differences in the definitions used. However, the Group's financial statements, used together with Pillar III disclosures, complement market participants' information and enhance transparency.

The Pillar III disclosures have been prepared in accordance with the Bank's formal policy and internal processes, systems & controls and business units ensure the accuracy of their data submissions. The Supervisory and Resolution Projects Committee (SRPC) attests that the report has been prepared in accordance to the requirements under Article 431 (3) CRR and the respective internal control processes.

The annual and the semi-annual (the more detailed) of the quarterly disclosures, based on the Bank's internal governance, are endorsed by Risk Management Committee (RMC) and approved by the Board of Directors (BoD).

2.2 Supervision and Regulatory Framework

Single Supervisory Mechanism (SSM)

Since November 2014, Alpha Bank has been assessed as "Other Systemically Important Institution" (O-SII) and, as such, is directly supervised by the ECB in accordance with the SSM framework.

The Single Supervisory Mechanism (SSM) refers to the system of banking supervision in Europe and it comprises the ECB and the national supervisory authorities of the participating countries.

The applicable banking regulatory framework in the European Union (EU), the Basel 3 capital framework, is effective from January 1, 2014. It was implemented by the "Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms" (Capital Requirements Regulation, or CRR) published on June 27, 2013, in combination with the "Directive 2013/36/EU on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms" (Capital Requirements Directive IV, or CRD IV) published on June 27, 2013 that has been transposed into the Greek legislative framework by the Law 4261/2014. The framework has been amended by the Regulation (EU) 2019/876 (CRR II) of 20 May 2019 and the Directive (EU) 2019/878 (CRD V) of 20 May 2019. The latter has been transposed into the Greek legislative framework by the Law 4799/2021.

The adoption of the Capital Requirements Regulation (CRR III), applicable from 01.01.2025, introduces a series of significant changes to the regulatory framework established under CRR II, particularly in the context of standardized approaches to credit risk, market risk, operational risk and CVA risk. These modifications aim to enhance the resilience of financial institutions while ensuring greater consistency and comparability across jurisdictions.

The transition from CRR II to CRR III reflects the European Union's commitment to implementing the final Basel III reforms (Basel IV). CRR III aims to:

- Enhance the risk sensitivity of prudential frameworks
- Improve the comparability and transparency of financial institutions' risk profiles
- Promote a more resilient banking system capable of withstanding economic shocks

For the calculation of capital adequacy ratio the provisions of the aforementioned regulatory framework are followed. In addition:

- Besides the 8% capital adequacy limit, limits of 4.5% for CET 1 ratio and 6% for Tier 1 ratio are applied
- Capital buffers over and above the CET1 capital limits are required to be maintained. In particular the Combined Buffer Requirement (CBR) consisting of:
 - Capital conservation buffer (CCB) stands at 2.5%.
 - Capital buffers as provided by the Bank of Greece through its Executive Committee Acts as follows:
 - countercyclical capital buffer (CCyB), equal to “zero percent” (0%) for the year 2024
 - other systemically important institutions (O-SII) buffer, which stands at 1.00% for 2024

It is noted that, under Executive Committee Act 235/1/07.10.2024 the Bank of Greece has decided to set the countercyclical capital buffer rate for Greece at 0.25%, applicable from 1 October 2025. The target rate for the positive neutral rate of the countercyclical capital buffer in Greece stands at 0.5%.

These limits should be met on a consolidated basis.

Supervisory Review and Evaluation Process (SREP)

According to Council Regulation 1024/2013, ECB conducts annually a Supervisory Review and Evaluation Process (SREP) to assess the risk profiles of the institutions under its remit.

This process evaluates the:

- Sustainability and viability of business model
- Adequacy of governance and risk management
- Assessment of risks to capital and
- Assessment of risks to liquidity and funding

Following the assessment, the ECB determines the minimum capital requirements and sets qualitative requirements to each of the banking institutions.

Taking into consideration the 2023 SREP decision, ECB notified Alpha Services and Holdings S.A., that for Q4 2024 it was required to meet the minimum limit for consolidated Overall Capital Requirements (OCR), of at least 14.69%. OCR includes for Q4 2024 the CCB Capital Buffer of 2.5%, the O-SII buffer of 1% and the CCyB of 0.19%, which mainly derives from the contribution of subsidiaries.

The OCR consists of the minimum limit of the total Capital adequacy Ratio (8%), in accordance with art. 92(1) of the CRR, the additional regulatory requirements of Pillar2 (P2R) in accordance with article 16(2) (a) of the Council Regulation EU 1024/2013 (3%), as well as the combined buffers' requirements (e.g. CCB, OSII, CCyB), in accordance with Article 128 (6) of Directive2013/36/ EU. The minimum rate should be kept on an on-going basis, considering the CRR/ CRD Transitional Provisions. On December 2024 Alpha Services and Holdings S.A. received the SREP decision 2024 regarding the Capital Requirements for the year 2025. The additional supervisory requirements for Pillar II (P2R) remains unchanged to 3.0%

Single Resolution Mechanism (SRM)

The Single Resolution Mechanism (SRM) that implements the EU-wide Bank Recovery and Resolution Directive (BRRD – see next paragraph) in the euro area. The Single Resolution Board (SRB) in cooperation with the National Resolution Authorities (NRAs), are responsible for the design of the specific resolution strategy for each institution which, among others, includes the resolution actions that could be executed following adequate preparation.

Recovery and Resolution

The European Bank Recovery and Resolution Directive (2014/59/EU – “BRRD”), which is part of the Single Rulebook, establishes a framework for the recovery and resolution of credit institutions and investment firms. The Directive introduced a set of common rules to deal with banking crises across the EU and the orderly recovery and resolution of financial institutions, with the aim to avoid significant adverse effects on financial stability and to ensure that shareholders and creditors (including unsecured depositors) will share the burden in case of a potential recapitalization and/or liquidation. The Directive was transposed into the Greek legislation with Law 4335/2015.

Among other topics, the Directive requires Member States to ensure that institutions prepare and regularly update a Recovery Plan setting out the measures that may be taken to restore their financial position following a significant deterioration thereof. The recovery plan addresses, amongst other aspects, various types of recovery measures that a credit institution may adopt in order to maintain or restore its financial position following a significant deterioration, a framework of recovery indicators that determines the areas in which such measures could be implemented, as well as a set of hypothetical scenarios of instability affecting either the institution alone or the entire financial system and which are used to assess the feasibility of the recovery measures being considered. The Group develops its Recovery Plan on an annual basis, taking into consideration applicable EU Regulations and Directives, national laws, relevant Regulatory Technical Standards (RTS) and Guidelines published by the European Banking Authority (EBA) as well as reports published by the European Central Bank (ECB) on lessons learnt and best practices.

The BRRD also established the framework to create a Single Resolution Mechanism (SRM), the second pillar of the European Banking Union, which was subsequently developed through Regulation EU 806/2014 (SRMR). Under the SRM, the Single Resolution Board (SRB) in cooperation with the National Resolution Authorities (NRAs) are responsible for the design of the specific resolution strategy for each credit institution which, among others, includes the resolution actions that could be executed following adequate preparation. These authorities also draw up the Resolution Plan for credit institutions, which cooperate by providing the necessary information.

Following a legislative reform in November 2016 (“banking reform package”), the regulatory framework applicable to recovery and resolution topics has been amended, introducing the following updates:

- Regulation (EU) 2019/876 of the European Parliament and of the Council amending the Capital Requirements Regulation as regards the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements (CRR 2). The CRR II has entered into force in 27 June 2019.
- Regulation (EU) 2019/877 of the European Parliament and of the Council amending Regulation (EU) No 806/2014 as regards loss-absorbing and recapitalization capacity for credit institutions and investment firms (known as “SRMR2”), applicable from 28 December 2020.
- Directive (EU) 2019/879 of the European Parliament and of the Council amending Directive 2014/59/EU on loss-absorbing and recapitalization capacity of credit institutions and investment firms (known as “BRRD2”). The Directive is expected to be transposed into Greek law within 2021.
- On January 13, 2022 the EBA published its final Guidelines for institutions and resolution authorities on improving banks’ resolvability. These Guidelines represent a significant step in complementing the EU legal framework in the field of resolution based on international standards and leveraging on EU best practices.

Minimum Requirement for Own Funds and Eligible Liabilities (MREL)

Under the Directive 2014/59 (Bank Recovery and Resolution Directive or (“BRRD”), as amended by Directive 2019/879 (BRRD II), banks in the European Union are required to maintain a Minimum Requirement for own funds and Eligible Liabilities (“MREL”), which ensures sufficient loss-absorbing capacity in resolution. MREL includes a risk and a leverage-based dimension. MREL is therefore expressed as two ratios that both have to be met: (i) as a percentage of Total Risk Exposure Amount (“TREA”), (the “MREL-TREA”); and (ii) as a percentage of the Leverage Ratio Exposure (“LRE”), (the “MREL-LRE”).

Following the decision issued by the Single Resolution Board (SRB) on 20 December 2024, Alpha Bank has received the binding Minimum Requirement of Own Funds and Eligible Liabilities (MREL). According to this decision, Alpha Bank is required, on a consolidated basis, to comply with the following MREL targets as of 30 June 2025:

- 23,57% of the Total Risk Exposure Amount (TREA) (i.e., risk-weighted assets,) and
- 5.91% of the Leverage Ratio Exposure (LRE)

The MREL requirement, when expressed as a percentage of TREA, does not include the Combined Buffer Requirement (CBR), which stands at 3.69%, effective from 1 January 2024. As such, the total capital and MREL resources the Bank must maintain, when including the CBR, amount to 27.26% of TREA.

Alpha Bank is expected to meet these revised requirements primarily through the issuance and maintenance of eligible liabilities and own funds, in accordance with the SRB's resolution planning framework.

Furthermore, the Resolution Authority has decided that Alpha Bank S.A. is not subject to requirement for subordinated MREL. The MREL requirements, including the multi – year transition period, are subject to annual review/approval from SRB.

On December 31, 2024, the Bank's MREL ratio stood at 29.04%, which is well above the interim non-binding target of 22.50% of the Total Risk Exposure Amount (TREA) (effective 01.01.2024 including CBR). The ratio includes the profits of the financial reporting period that ended on December 31, 2024 post a provision for dividend payout.

Other Regulatory Restrictions

Group's significant restrictions regarding the use of assets or the settlement of obligations, are those imposed by the regulatory framework in which foreign subsidiaries, supervised for their capital adequacy and liquidity, mainly operate. In particular, the regulatory authorities request, where appropriate and depending on the nature of the company, the compliance with specific thresholds, as for example the maintenance of a specific level of capital buffers and/or liquid assets, the limitation of the exposure to other Group companies and the compliance with specific ratios.

2.3 Significant Developments

2.3.1 NPE Plan/NPE Initiatives

NPE Plan (Update)

Significant NPE reduction of c. €0.7bn was recorded in 2024, out of which €0.6bn reduction stemmed from the result of NPE from transactions and €0.1bn was due to negative organic formation. The Group's total NPE portfolio as of Q4 2024 amounted to c. €1.5bn with a corresponding NPE ratio below 4%.

In March 2025 the Bank submitted an updated NPE Business Plan covering the period 2025-2027.

Based on that, the NPE ratio for 2025 is estimated at c. 3.7% with further reduction to be achieved in the following years.

One of the key pillars of the Bank's Strategy is the de-risking of its balance sheet, and optimization of capital allocation towards core business activities while also improving its asset quality and normalizing the cost of risk. This targeted NPE reduction will be achieved through Alpha Bank's ongoing organic NPE reduction (i.e. cures, debt forgiveness, collateral based recoveries and other closing procedures) further supplemented by in-organic initiatives scheduled in the planning period. After the successful completion of NPE reduction initiatives, the Bank will be able to achieve significantly improved asset quality levels and reduced cost of risk, at par with other European banks, while maintaining a satisfactory capital position above minimum regulatory capital requirements.

Continuous monitoring of the evolution of NPE stock is performed for any negative developments/deviations in order to be counterbalanced by mitigating actions.

NPE initiatives

One of the key pillars of the Bank's Strategy is the de-risking of its balance sheet, putting capital to work with a view to improve its asset quality and normalize the cost of risk.

Despite the difficulties faced due to the persistence of the COVID-19 pandemic, Alpha Bank achieved the completion of securitization transactions of Euro c. 14.2 billion GBV, of both retail and wholesale NPEs, namely project Galaxy, the largest NPE securitization in Greece and second largest in Europe, and project Cosmos, making use of the Hellenic Asset Protection Scheme for the retained senior tranche, which as of 31.12.2024 amounted to Euro 4.87billion.

Along with the securitization transaction, Alpha Bank also concluded the sale of its servicing platform, supporting Project Galaxy and enhancing business model efficiency. The servicer, new CEPAL, has undertaken the management of the remaining NPEs of Alpha Bank through an exclusivity agreement.

Following the delivery of the Galaxy and Cosmos securitisations, Alpha Bank, proceeded with the implementation of its accelerated NPE deleveraging plan through the following transactions which were successfully completed within Financial Years 2022-2024 as per below:

Completed NPE Transactions:

- Project Orbit – sale of a domestic retail unsecured portfolio of Euro 1.2 billion GBV
- Project Light - sale of a domestic retail unsecured portfolio of Euro 0.2 billion GBV
- Project Shipping – sale of 2 single ticket NPE shipping exposures of Euro 0.1 billion GBV
- Project Sky – sale of a Cypriot NPEs portfolio and related Real Estate properties of Euro 2.3 billion GBV, through the sale of Sky CAC Ltd, a subsidiary of Alpha International Holdings S.A.
- Project Hermes – sale of a mixed pool of secured Non-Performing Loans to Greek Large Corporate Entities and Small-Medium Sized Enterprises of Euro 0.65 billion GBV
- Project Cell - the sale of a Portfolio of Retail Unsecured Non-Performing Loans, of Euro 1.5 billion total outstanding balance

Moreover, NPE Deleveraging Plan entails the completion of the following transactions which have been classified to Held for Sale:

- Project Solar – sale of an SME portfolio of Euro 0.4 billion GBV
- Project Andros – disposal of NPE Leasing portfolio of Euro 0.24 billion GBV, through common demerger of Alpha Leasing
- Project Gaia I and II – Two portfolios of mainly secured Non-Performing Loans, of Euro 1.1 billion GBV
- Single ticket exposures Non-Performing Loans of Large Corporate Entities, of aggregate Euro 0.1 billion GBV

2.3.2 Transactions

During 2024, in line with the Strategic Plan, Alpha Services and Holdings proceed to the following actions:

- ✓ On 5.2.2024, the Bank completed the issuance of a senior preferred bond with a nominal value of Euro 400 million, maturity of 6.25 years, with the option to call at 5.25 years, a nominal interest rate of 5% and a yield of 5.125%.
- ✓ The Bank has initiated the sale of two perimeters of loan exposures and has been working on completing the relevant steps to execute the transactions. The transactions are envisaged to be executed through a securitization structure in accordance with the Greek securitization framework (L.3156/2003) and the Hellenic Assets Protection Scheme (L.4649/2019), as amended and in force. Based on the above, the portfolios have been classified as held for sale. The two perimeters are the following:
 - a perimeter of Euro 0.5 billion mainly comprising of non-performing mortgage exposures (“GAIA I”)
 - a perimeter of Euro 0.6 billion mainly comprised of Small Businesses and mortgage and SMEs non-performing exposures (“GAIA II”)

Additionally, the Bank has initiated the sale of a perimeter of Euro 0.1 billion comprised of Cypriot mainly secured NPE portfolio exposures (“Project ACAC”) and has been working on completing the relevant steps to execute the transaction. The transaction is envisaged to be completed within 2025. Based on the above, the particular portfolio has been classified as held for sale.

- ✓ On 04.06.2024, Alpha Services and Holdings successfully priced a Euro 500 million, Subordinated Tier II bond, with a maturity of 10.25 years, callable in 5.25 years and a yield of 6.125% which attracted high interest from the investor community. The outcome confirms the Bank’s strong position and ability to tap the markets, as well as its execution capacity and commitment to deliver against its plan and targets.
- ✓ On 12.07.2024, Alpha Services and Holdings SA reached a definitive agreement for the sale of 90.1% of Alpha Bank Romania S.A. to UniCredit S.p.A. and subsequent merger of Alpha Bank Romania S.A. into UniCredit Bank S.A.

- ✓ On 03.09.2024 Alpha Services and Holdings S.A. (“Alpha Holdings”) announced that it successfully completed the pricing of its Euro €300 million Fixed Rate Reset Additional Tier 1 Notes (the “AT1 Notes”). The AT1 Notes, which are non-call 6 perpetual notes, are issued with a yield of 7.5%.
- ✓ On 4.11.2024 and further to the announcement dated 07.2024, Alpha Services and Holdings S.A., 100% parent of Alpha Bank S.A., announced that its wholly owned Subsidiary, Alpha International Holdings S.M.S.A. (“AIH”), has completed the sale of 90.1% of Alpha Bank Romania S.A. to UniCredit S.p.A. As per the terms of the transaction, AIH has acquired 9.9% of the share capital of UniCredit Bank S.A. (“UniCredit Romania”). As a subsequent step, Alpha Bank Romania S.A. shall be merged into UniCredit Romania, forming a combined banking entity in which AIH shall hold 9.9%.
- ✓ On 20 December 2024, the Bank's subsidiary, Alpha Group Investments Ltd completed the sale of its 65% participation in Skyline Real Estate S.A. to P&E Investments Real Estate Development and Development Societe Anonyme (“P&E”), an investment company under the control of Dimand S.A., Premia Properties REIC and the European Bank for Reconstruction and Development in the context of the “Skyline” transaction. This transaction includes a portfolio of properties amounting to EUR 0.3 billion.
- ✓ On 27 January 2025, the Group's subsidiary, ALPHA HOLDINGS S.A., entered into a binding agreement for the acquisition of 100% of the shares of FLEXFIN LTD, based in Cyprus, which is the sole shareholder of FlexFin S.A., based in Greece. The completion of the transaction is expected to take place within 2025.
- ✓ On 27 February 2025, Alpha Services and Holdings reached an agreement on the key commercial and legal terms for the acquisition of substantially the whole of the banking assets and liabilities of Astrobank Public Company Ltd. The transaction is expected to be completed within 2025, subject to the finalization of the transaction documentation and to the satisfaction of customary conditions precedent.
- ✓ On 31 March 2025, Alpha Services and Holdings reached an agreement with the founding and other main shareholders of AXIA Ventures Group Ltd (“AXIA”) for the acquisition of the 100% (and in any case not less than 95%) issued share capital of AXIA. The transaction is expected to be completed within 2025, subject to the finalization of the transaction documentation and to the satisfaction of customary conditions precedent.
- ✓ At the end of the financial year 2024, the Bank completed a new synthetic transaction for wholesale loan portfolio, named Eleven.

2.3.3 EU-Wide 2025 Stress test

On July 5, 2024, the European Banking Authority (EBA) published for informal consultation its draft methodology, templates, and guidance for the 2025 EU-wide stress test. This step marks the beginning of the dialogue with the banking industry and builds upon the methodology used in the 2023 exercise, with improvements reflecting new insights and regulatory changes. On January 20, 2025, The EBA launched the 2025 EU-wide stress test and released the macroeconomic scenarios. The EBA expects to publish the results of the exercise at the beginning of August 2025.

The 2025 EU-wide stress test will assess the resilience of the European banking sector in the current uncertain and changing macroeconomic environment under a baseline and adverse scenario during a three-year time horizon, from 2025 to 2027. The adverse scenario is based on a narrative of hypothetical worsening of geopolitical tensions, with large, negative, and persistent trade and confidence shocks having strong adverse effects on private consumption and investments, both domestically and globally. The worsening of economic prospects is associated with a sustained drop in EU GDP by 6.3% cumulatively, in the period 2025-2027. At the end of the horizon, unemployment in the EU is projected to be 6.1 percentage points (ppts) above its baseline level. Inflation shifts upwards to 5.0% and 3.5% respectively in 2025 and 2026, before falling back to 1.9% in 2027. As in the 2023 EU-wide stress test, this year's scenario includes information on the growth of Gross Value Added (GVA) in 16 sectors of economic activity. Such breakdown will help better assess EU banks' performance depending on their business model and sectoral exposures.

Some important changes are introduced, notably the integration of the Capital Requirements Regulation (CRR3) that is implemented on January 1, 2025. It also considers the Commission's announcement to postpone the application date of the fundamental review of the trading book (FRTB). Other enhancements include the centralization of net interest income (NII) projections and advancements in the market risk methodology to increase risk sensitivity. For the purpose of the EU-wide 2025 Stress Test, the Bank is part of an EBA sample of 64 banks – thereof 51 from countries which are members of the Single Supervisory Mechanism (SSM) – covering roughly 75% of total banking sector assets in the EU and Norway. The expanded geographical reach and incorporation of proportionality features aim to boost efficiency while ensuring the relevance and transparency of the results.

2.3.4 Overview of Corporate Governance

The Board of Directors (the "Board") is responsible for the management of Alpha Services and Holdings S.A. (the "Company") affairs and its representation vis-à-vis third parties. Further, it has the ultimate and overall responsibility for the Company and defines, oversees and is accountable for the implementation of the governance arrangements within the Company that ensure effective and prudent management of the Company. The overall Corporate Governance framework is included in the Board of Directors Annual Report as at 31.12.2024.

During 2024, our Company revised the Charters of the Board of Directors and its Committees, which include the Audit Committee, the Risk Management Committee, the Remuneration Committee and the Corporate Governance, Sustainability and Nominations Committee. Additionally, we have updated the Articles of Incorporation.

Moreover, Policies related to corporate governance have been meticulously reviewed and updated to ensure full alignment with the current regulatory framework and the most recent best practices of corporate governance. These Policies include the Suitability and Nomination Policy for the Members of the Board of Directors, the Suitability and Nomination Process for the Members of the Board of Directors, the Induction and Training Policy and Procedure for the Members of the Board of Directors, the Policy and Process for the Succession Planning of Non-Executive and Independent Non-Executive Members of the Board of Directors, the Policy for the Succession Planning of Senior Executives and Key Function Holders, the Remuneration Policy of the Members of the Board of Directors, and the Remuneration Policy for Alpha Services and Holdings and its Group along with its Annexes. Additionally, we have revised the Policy for the Evaluation of Senior Executives and Key Function Holders.

Furthermore, our Company has also revised the Expenses Policy for the Non-Executive Members of the Board of Directors. This Policy was approved by the Board of Directors during the meeting held in January 2025.

Suitability and Nomination Policy for the Members of the Board of Directors

Alpha Services and Holdings S.A. has adopted the Suitability and Nomination Policy for the Members of the Board of Directors (the “Policy”) that sets out the principles and the framework for the selection, appointment, re-appointment and replacement of Members of the Board of Directors as well as the criteria to be used in the assessment.

The Policy is supplemented by the “Suitability and Nomination Process for the Members of the Board of Directors”, which provides for the specific process to be followed, mainly by the Corporate Governance, Sustainability and Nominations Committee (the “CGSNC”), to which accountability is attributed in this Policy.

Additionally, the Policy and Process for the Succession Planning of Non-Executive and Independent Non-Executive Members of the Board of Directors forms an integral part of the Company’s Policy for the Members of the Board of Directors that sets out the framework for the succession planning of the Non-Executive Members and the Independent Non-Executive Members of the Company.

The Policy complies with the legislative and regulatory framework in force, including the relevant Joint ESMA/EBA “Guidelines on the assessment of the suitability of members of the management body and key function holders”, the Bank of Greece Executive Committee Act 224/21.12.2023 and the ECB Guide to fit and proper assessments as well as with European best practices in corporate governance.

The objectives of the Policy are to:

- Set general principles that provide guidance to the CGSNC and its Chair on selecting, vetting and proposing candidates to the Board of Directors as well as on the replacement and renewal of the Members of the Board of Directors.

- Set criteria, including diversity criteria, for the selection and suitability assessment of Board of Directors candidates.
- Set criteria for the assessment of the ongoing individual suitability of the Members of the Board of Directors as well as the collective suitability of the Board of Directors.
- Establish a transparent, effective and time-efficient suitability and nomination process.
- Set out the communication channel with the competent authorities (i.e. Bank of Greece, ECB).
- Set out how the assessment is documented.

The Policy and its implementation are monitored and reviewed annually by the CGSNC, approved by the Board and submitted for approval to the General Meeting of Shareholders. Any amendments thereto are approved by the Board and, in case they are material, they are submitted for approval to the General Meeting of Shareholders. The Policy and every material amendment thereto enters into force from the approval thereof by the General Meeting of Shareholders. Material are the amendments that provide for derogations or significantly change the content of the Suitability and Nomination Policy, in particular as to the applied general principles and criteria.

In preparing, amending or reviewing the Policy, the CGSNC and the Board shall take into account recommendations or findings of other Board Committees and Functions, such as Legal Services, Human Resources, and/or Internal Control Functions. The internal control functions should provide effective input for the review of the Policy in accordance with their roles. Notably, the Compliance should analyze how the Policy affects the Company's compliance with legislation, regulations, internal policies and procedures and should report all identified compliance risks and issues of non-compliance to the Board through the CGSNC.

The CGSNC will propose candidates whom it deems suitable to become Members of the Board according to the criteria set out in the applicable regulatory framework and in this Policy. Suitability is determined in relation to the Policy's criteria for candidates (fit and proper and general suitability) and current composition needs. For the purposes of this Policy, it is defined as the degree to which an individual is deemed to have good repute and to have, individually and collectively with the other Directors/Members, adequate knowledge, skills and experience to perform his/her duties and a clear understanding of the Company's culture, values and overall strategy. Suitability also covers the honesty, integrity and independence of mind of each individual and his/her ability to commit sufficient time to perform his/her duties.

Further to the above, where any Members of the Board do not fulfil the requirements set out, the competent authorities, in the framework of the Single Supervisory Mechanism, shall have the power to remove such Members from the Board. The CGSNC, within the aforementioned context, shall consider the suitability of the Members of the Board on a periodic basis, utilizing Board Review assessments and any other pertinent information available.

In order to be considered as a suitable candidate by the Board and its CGSNC, the prospective nominee must: meet the fit and proper requirements, meet individual and collective suitability requirements, have no systematic conflict of interests with the Company, have no impediments according to the relevant legislation and be able to devote sufficient time to the Board. All nominees must submit a declaration that they meet the relevant requirements.

The Suitability and Nomination Policy for the Members of the Board of Directors is posted on the Company's [website](#).

Board of Directors

On 31.12.2024 the Board of the Company was consisted of twelve Members with the following breakdown:

- Two Executive Members
- Three Non-Executive Members
- Seven Independent Non-Executive Members

The Board of Directors at its meeting of 31.12.2024 and following the resolution dated December 12, 2024, the Board has appointed Mr. D.C. Tsitsiragos, Independent Non-Executive Member, as the new Chair of the Board of Directors, effective as of January 1, 2025. The fit and proper assessment process for this appointment was successfully completed with the Single Supervisory Mechanism (SSM) of the European Central Bank (ECB), prior to the Board's decision, in accordance with all applicable laws and regulations.

It is noted that the departing Chair Mr. V.T. Rapanos served as Chair of the Board of Directors since May 2014. Mr Rapanos contributed significantly to safeguarding and steering the Company's long-term strategy, engaged with the Company's Stakeholders to promote the Company's interests and contributed decisively to the establishment of best corporate governance practices in the Company. He has also served as Chair of the Board of Directors of the Hellenic Bank Association, reinforcing its crucial role and function.

The process to identify suitable candidates to replace Mr. V.T. Rapanos as a Board Member has already commenced, based on recommendations by the Corporate Governance, Sustainability and Nominations Committee.

The Members of the Board of Directors comply with the stipulations of article 83 of Law 4261/2014 on the combination of directorships, as they do not hold more than one of the following combinations of directorships at the same time: (a) One Executive directorship and two Non-Executive directorships; (b) Four Non-Executive directorships, excluding directorships in organizations which do not pursue predominantly commercial objectives (e.g. non-profit, charities). It is noted that directorships held within the same group are regarded as one directorship (see table below in "3. Professional commitments of the Members of the Board of Directors").

Professional commitments of the Members of the Board of Directors	
<i>(Based on the composition of the BoD on 31.12.2024)</i>	
Position	Principal outside activities
Chair (Non-Executive Member)	
Vasileios T. Rapanos	Member of the BoD of the Foundation for Economic and Industrial Research (IOBE)
	Member of the BoD of the Biomedical Research Foundation Academy of Athens (BRFAA)
	Chair of the BoD of the Alpha Bank Cultural Foundation
Executive Members	
Vassilios E. Psaltis	Member of the Institut International d' Études Bancaires (IIEB)
CEO	Member of the BoD and of the Executive Committee of the Hellenic Federation of Enterprises (SEV)
	Member of the BoD of the Hellenic Bank Association
Spyros N. Filaretos	Member of the BoD of Alpha Bank London Ltd
Chief of Growth and Innovation	Chair of the BoD of the Efstathia J. Costopoulos Foundation
	Member of the BoD of the Alpha Bank Cultural Foundation
Non-Executive Members	
Efthimios O. Vidalis	Member of the BoD of Titan Cement Company S.A.
	Member of the BoD of Eurolife FFH Insurance Group Holdings S.A.
	Member of the Board of Directors of SEV - Stegi Ellinikis Viomihantias
Johannes Herman Frederik G. Umbgrove	Member of the Supervisory Board and Chair of the Risk Committee and the Audit Committee of Lloyds Bank GmbH
	Chair of the Supervisory Board and of the Nomination and Remuneration Committee, Member of the Risk and Audit Committee and of the Related Party Transactions Committee of DHB Bank N.V. [former Demir-Halk Bank (Nederland) N.V.]
	Director of the Parel van Baarn Foundation
	Member of the Management Committee of the Aston Martin Owners Club Ltd
Independent Non-Executive Members	
Elli M. Andriopoulou	Chair and Managing Director of the Stavros Niarchos Foundation Cultural Center (SNFCC)
Aspasia F. Palimeri	Member of the BoD of the Foundation for Economic and Industrial Research (IOBE)
Panagiotis I.-K. Papazoglou	Member of the Audit Committee (not BoD Member) of the Helleniq Energy

	Member of the Executive Committee of the Foundation for Economic and Industrial Research (IOBE)
	Vice-Chair of the Citizens' Movement for an Open Society
Dimitris C. Tsitsiragos	Member of the BoD of Titan Cement International
Jean L. Cheval	Member of the BoD and member of the Audit and Risk Committee of EFG-Hermès
	Member of the BoD of Natixis Algérie
	Chairman of the Natixis Foundation for Research and Innovation
Elanor R. Hardwick	Member of the BoD of specialty (re)insurer Axis Capital, Member of the Human Capital and Compensation Committee as well as Chair of the Corporate Governance, Nominating and Social Responsibility Committee
	Member of the BoD of Euroclear SA/NV and Member of the Audit & Compliance Committee and Risk Committee
	External member of the Audit Committee of the University of Cambridge
Diony C. Lebot	Member of the BoD of Ayvens (former ALD Automotive)
	Member of the BoD and Chair of the Audit Committee of EQT AB

Evaluation of the Board of Directors

With the support of the CGSNC, the Board annually assesses its effectiveness and that of its Committees. From time to time and at least once every three years, the Board may appoint external consultants to facilitate a more in-depth review of its effectiveness.

The collective evaluation of the Members of the Board and its Committees, for the year 2024, was supported by an external firm expert in board effectiveness. Individual interviews with all Board Members and selected Executives were conducted, focusing on Strategy, Purpose and Role of the Board, Management and Board Succession, Board Culture, Operating Mechanisms and Board Committees.

The Board Self-Evaluation, carried out through an online questionnaire completed by all Board Members and selected Executives, focused on a variety of topics concerning Strategy, Stakeholders, Board Dynamics, Diversity and Inclusion, Board Composition, Operating Mechanisms, Board Succession, Purpose and Sustainability, Talent Management, Relationship with the Executive Team, Digital Readiness, Disrupt and Challenge, as well as Agility. The survey captured dimensions most relevant for high-performing boards, highlighting collective strengths and development areas of the Board.

Alpha Bank's key strengths included a robust and diverse board composition, an open and collegiate board environment, and improved board operations.

The key recommendations were to revisit the balance and alignment between the Executive and Non-Executive Members, reviewing the approach to Alpha Bank's strategy and spending more time on strategic discussions, as well as revisiting board operations to elevate the quality of board papers and presentations.

- The Individual Evaluation of the Members of the Board of Directors for the year 2024 was conducted by the Chair of the Board of Directors.

Assessment of the Board Members' collective suitability based on the ESMA/EBA Guidelines

Following the recent evaluation of the Board, an in-depth assessment of our collective suitability has been conducted. This assessment focuses on our collective knowledge, skills, and experience, in accordance with the ESMA/EBA Guidelines, with the valued support of the CGSNC.

Each Board Member engaged in this process by completing an Individual Self-Assessment questionnaire, designed around the criteria specified in the ESMA/EBA Guidelines. The Chair of the Board has meticulously reviewed these self-assessments and has compiled the Collective Suitability Matrix, taking into account various critical aspects such as governance, risk management, compliance, audit, management, strategy, decision-making, basic theoretical knowledge, and past experience.

Moreover, recognizing that the EBA Guidelines Matrix is a dynamic tool, new sections have been incorporated to reflect the evolving banking landscape and the needs arising from our Company's Business Plan.

Based on the approved Collective Suitability Matrix, it has been resolved that our Board would greatly benefit from the inclusion of new Members who possess extensive knowledge and experience in the Greek market, ESG, IT and Digital, and who are strategic thinkers.

An overview of the CVs of the Members of the Board is presented in Appendix 2.

Assessment of the Effectiveness of COMPANY's Approach to Corporate Governance

The Board of Directors, in accordance with its obligations under paragraph 1 of Article 4 of Law 4706/2020, assessed the implementation and effectiveness of the Company's Corporate Governance System with a reference date of December 31, 2024. The assessment, conducted with the support of external advisors, PricewaterhouseCoopers S.A., did not reveal any material weaknesses.

Committees of the Board of Directors

The Board has the authority to establish both permanent and ad hoc Committees to support it in discharging its responsibilities effectively. While these Committees primarily serve an advisory role, they may also assume certain delegated authorities as determined by the Board.

Each Committee operates under a dedicated Charter that outlines its composition, tenure, functioning and responsibilities. Currently, there are four Committees at the Board level: the Audit Committee, the Risk Management Committee, the Remuneration Committee, and the Corporate Governance, Sustainability, and Nominations Committee.

Each Committee comprises no fewer than three Members, with the composition proposed to the Board by the Corporate Governance, Sustainability, and Nominations Committee (CGSNC). This proposal takes into account the "Suitability and Nomination Policy for Members of the Board of Directors" as well as relevant legal and regulatory frameworks. It is also important to note that the majority of the Members of each Committee are Independent Non-Executive Members.

The primary focus of these Committees is to oversee policies, practices, and procedures within their respective areas of mandate, as detailed in the Charters of each Committee. They also play a crucial role in preparing draft resolutions for Board approval and submitting relevant briefings, reports, key information, and recommendations to the Board. Furthermore, the Committees report regularly to the Board about their work.

A more detailed analysis of the Committees and Charters as well as description of the Diversity Policy applied to management, administration and supervision bodies is presented in Appendix 1.

3 Accounting and Regulatory consolidation

3.1 Consolidation for financial reporting purposes

The consolidated financial statements include the parent company Alpha Services and Holdings S.A, its subsidiaries, associates and joint ventures. The financial statements of the entities that are used to prepare the consolidated financial statements have been prepared as at 31.12.2024 and the accounting policies applied in their preparation, when necessary, were adjusted to ensure consistency with the Group accounting policies.

Subsidiaries

Subsidiaries are entities controlled by the Group. The Group considers the following factors, in assessing control:

- Power over the investee,
- Exposure or rights to variable returns from its involvement with the investee, and
- Ability to use its power over the investee to affect the amount of the investor's return.

In cases of structured entities where the voting rights relate to administrative tasks only and the relevant activities are directed by means of contractual arrangements (i.e. securitization vehicles or mutual funds), the Group assesses the existence of control based on the following:

- The purpose of the entity and the contractual rights of the parties involved,
- The risks to which the investee was designed to be exposed, the risks it was designed to pass on to the parties involved with the investee and the degree of exposure of the Group to those risks,
- Indication of a special relationship with the entity, which suggests that the Group has more than a passive interest in the investee.

Furthermore, regarding the structured entities that are managed by the Group, the Group assesses if it acts as principal or an agent based on the extent of its decision – making authority over the entity's activities, the rights of third parties and the degree of its exposure to variability of returns due to its involvement with the entity.

The Group, based on the above criteria, controls structured entities established for the securitization of loan portfolios.

Associates

Associates are entities over which the Group has significant influence but not control.

Significant influence is generally presumed to exist when the Group holds, directly or indirectly, more than 20% of the share capital of the company concerned without having control or joint control, unless the ownership of more than 20% does not ensure significant influence, e.g. due to lack of representation of the Group in the company's Board of Directors or due to the Group's non-participation in the policy making process. Additionally, significant influence may exist when less than 20% of the share capital is held, when the Group participates in the process of formulating the company's policies through its participation in its Board of Directors and when, based on the shareholders' agreement, there is the possibility of exercising a veto on significant decisions.

Investments in associates are accounted for by the equity method of accounting consolidation.

Joint Ventures

The Group applies IFRS 11 for the accounting treatment of interests in joint arrangements. All joint arrangements in which the Group participates and has joint control are joint ventures, which are accounted for by using the equity method.

A more detailed description of the financial principles applied for consolidation is mentioned in the Group Annual Financial Reports, whereas a detailed list of all Group subsidiaries, associates and joint ventures, as well as the Group's ownership interest in them is provided in note 44 of the Group Annual Financial Report as of 31.12.2024.

3.2 Consolidation for regulatory purposes

Consolidation for regulatory purposes follows the principles set by the law 4261/2014 and the regulatory framework (CRR 575/2013).

The regulatory consolidation is conducted in accordance with the accounting consolidation, with the exception of the following cases:

- Companies that do not belong to the financial sector are consolidated through the equity method;
- Insurance and reinsurance companies that are not deducted from CET 1 are risk weighted at 250% and
- Significant investments in financial sector entities where participation does not exceed the 10% threshold are not deducted from CET 1 and are risk weighted at 250%.

A full list of Alpha Bank Group's subsidiaries and associates is included in Appendix III.

3.3 Reconciliation between accounting and regulatory consolidation

The following table provides a reconciliation of the consolidated balance sheet as at 31 December 2024 on an accounting basis (as presented on p. 247 of the Group's Annual Report 31 December 2024) to the consolidated balance sheet under the regulatory scope of consolidation.

Template 1a: EU LI1 - Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories as of 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g
	Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items				
			Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
Breakdown by asset classes according to the balance sheet in the published financial statements							
1	Cash and balances with central banks	2,998	2,998	2,998			
2	Due from financial institutions	2,296	2,296	764	1,532		
3	Trading securities	53	53			53	
4	Derivative financial assets	628	628	628			
5	Loans and advances to customers	39,050	39,051	29,029		9,929	93
6	Investment securities	0	0				
	- Measured at fair value through other comprehensive income	1,009	1,009	1,009			
	- Measured at amortised cost	16,420	16,398	15,622		776	
	- Measured at fair value through profit or loss	167	167	157		10	
7	Investments in associates and joint ventures	570	570	570			
8	Investment property	290	290	290			
9	Property, plant and equipment	534	534	534			
10	Goodwill and other intangible assets	438	438	25			412
11	Deferred tax assets	4,815	4,820	3,115			1,705
12	Other assets	808	818	818			
13	Assets classified as held for sale	1,999	839	839			
	Total assets	72,075	70,909	55,770	2,161	10,715	53
Breakdown by liability classes according to the balance sheet in the published financial statements							
1	Due to banks	6,533	6,533			2,770	
2	Derivative financial liabilities	793	794			680	
3	Due to customers	51,032	51,037			113	
4	Debt securities in issue and other borrowed funds	3,208	3,245				
5	Liabilities for current income tax	69	69				
6	Deferred tax liabilities	18	19				
7	Employee defined benefit obligations	24	23				
8	Other liabilities	895	895				
9	Provisions	161	162				
10	Liabilities related to assets classified as held for sale	1,153	1				
	Total liabilities	63,886	62,778			3,563	

Template 1b: EU LI1 - Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories as of 31.12.2023

(Amounts in millions of Euro)

		a	b	c	d	e	f	g
		Carrying values as reported in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items*				
				Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
Breakdown by asset classes according to the balance sheet in the published financial statements								
1	Cash and balances with central banks	4,219	4,219	4,919				
2	Due from banks	1,572	1,460	644	911			
3	Trading securities	33	33	33			33	
4	Derivative financial assets	727	1,819	0	1,819			
5	Loans and advances to customers	36,161	36,425	29,636		9,929		73
6	Investment securities							
	- Measured at fair value through other comprehensive income	1,369	1,369	1,502				
	- Measured at amortised cost	14,490	14,466	14,005		466		
	- Measured at fair value through profit or loss	159	159	412		10		
7	Investments in associates and joint ventures	100	181	181				
8	Investment property	301	301	307				
9	Property, plant and equipment	501	500	551				
10	Goodwill and other intangible assets	467	460	44				427
11	Deferred tax assets	4,978	4,983	3,286				1,700
12	Other assets	945	933	955				
13	Assets classified as held for sale	6,399	5,414	878				
	Total assets	72,421	72,722	57,353	2,730	10,406	33	2,200
Breakdown by liability classes according to the balance sheet in the published financial statements								
1	Due to banks	6,921	7,093		657			
2	Derivative financial liabilities	934	2,004		1,427			
3	Due to customers	48,449	48,465		139			
4	Debt securities in issue and other borrowed funds	2,920	2,959					
5	Liabilities for current income tax and other taxes	4	27					
6	Deferred tax liabilities	25	26					
7	Employee defined benefit obligations	24	24					
8	Other liabilities	919	905					
9	Provisions	120	120					
10	Liabilities related to assets classified as held for sale	4,782	3,819					
	Total liabilities	65,098	65,442		2,223			

* incl. Romania perimeter before classified as HFS

The following table provides a reconciliation between the consolidated regulatory balance sheet to the Exposure at Default (EAD) for items subject to the frameworks for credit risk, CCR, securitization and market risk. The assets' carrying value does not include the amount of the intangible assets.

Template 2a: EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e
		Total	Items subject to			
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	Assets carrying value amount under the scope of regulatory consolidation (as per template LI1)	68,699	55,769	10,715	2,161	54
2	Liabilities carrying value amount under the regulatory scope of consolidation (as per template LI1)	3,563			3,563	
3	Total net amount under the regulatory scope of consolidation	65,136	55,769	10,715	-1,403	54
4	Off-balance-sheet amounts	10,264	1,951			
5	<i>Differences in valuations</i>					
6	<i>Differences due to different netting rules, other than those already included in row 2</i>	3,563			3,563	
7	<i>Differences due to consideration of provisions</i>					
8	<i>Differences due to the use of credit risk mitigation techniques (CRMs)</i>					
9	<i>Differences due to credit conversion factors</i>		57,720		967	
10	<i>Differences due to Securitisation with risk transfer</i>					
11	<i>Other differences</i>					
12	Exposure amounts considered for regulatory purposes					

Template 2b: EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements as of 31.12.2023

(Amounts in millions of Euro)

		a	b	c	d	e
		Total	Items subject to			
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	Assets carrying value amount under the scope of regulatory consolidation (as per template LI1)	70,522	57,353	10,406	2,730	33
2	Liabilities carrying value amount under the regulatory scope of consolidation (as per template LI1)	2,223			2,223	
3	Total net amount under the regulatory scope of consolidation	68,299	57,353	10,406	507	33
4	Off-balance-sheet amounts	10,396	1,402			
5	<i>Differences in valuations</i>					
6	<i>Differences due to different netting rules, other than those already included in row 2</i>	2,223			2,223	
7	<i>Differences due to consideration of provisions</i>					
8	<i>Differences due to the use of credit risk mitigation techniques (CRMs)</i>					
9	<i>Differences due to credit conversion factors</i>					
10	<i>Differences due to Securitisation with risk transfer</i>					
11	<i>Other differences</i>					
12	Exposure amounts considered for regulatory purposes		58,755		708	

4 Capital Management

The Group's Risk and Capital Strategy sets specific risk limits, based on management's risk appetite, as well as thresholds to monitor whether actual risk exposure deviates from the limits set.

The Capital Strategy of the Group commits to maintain sound capital adequacy both from economic and regulatory perspective. It aims at monitoring and adjusting the Group's capital levels, taking into consideration capital markets' demand and supply, in an effort to achieve the optimal balance between the economic and regulatory considerations. The objectives of the Group's capital strategy are to ensure that the Group has sufficient capital buffers to cover the risks of its business, to support its growth strategy, comply with regulatory capital requirements and management targets at all times, and to deliver sustainable value to its shareholders.

The Group remains committed to the implementation of its strategy, re-calibrating its approach in order to reflect changes in the market environment and has consistently delivered on its targets to clean-up its balance sheet. The execution of the NPE Business Plan, submitted to the SSM yearly, remains on track through the active management and reduction of NPEs over the Business Plan period.

Main elements impacting Asset Quality, Capital and Liquidity

- ✓ NPE formation in Greece was flat q/q, as slightly higher inflows were more than offset by stronger curings and repayments. In Q4 2024, the Group's NPE stock was further reduced by €0.2bn q/q to €1.4bn, via the upsizing of a sale perimeter, Project "Gaia", under HAPS-III. As a result, the Group's NPE ratio contracted by a further 80bps q/q to 3.8%.
- ✓ The Group's NPE cash coverage edged higher to 53% at the end of Q4, reflecting the composition of the portfolio that was reclassified to held for sale assets, while total coverage including collateral reached 126%. The Group NPL coverage ratio stood at 85%, while total coverage including collateral reached 154%.
- ✓ The Group's CET 1 Capital base stood at €4.9bn, resulting in a CET1 ratio of 16.5%, or 16.3% post dividend accrual (of 24bps) in the quarter, up by 77bps q/q, including the profit of the financial reporting period that ended on 31 December 2024.
- ✓ The Group's Loan-to Deposit stands at 77%, while the Group's Liquidity Coverage Ratio (LCR) stood at 203% vs. 190% in the previous quarter, far exceeding regulatory thresholds and management targets.
- ✓ As of December 2024, ECB financing stood at €2.6bn in total, with TLTRO fully repaid in Q4. The Bank's blended funding cost stood at 131bps in the quarter, down from 141bps in Q3 2024, mainly attributable to lower wholesale funding costs.

Distribution of profits

Alpha Services and Holdings applied and received on 05.06.2024 the approval for the distribution of Euro 122 million to its shareholders (20% of Group's net profit for financial year 2023). Following the approval of the Annual General Meeting which took place on 24.7.2024 the Bank proceeded with the Distribution to its shareholders.

For the year 2024 and according to its dividend policy the Bank applies a 43% dividend payout ratio on FY2024 reported profits. For the following two years of 2025 and 2026 and in view of the capital accretive Business Plan, the Bank aims to apply a 50% dividend payout ratio. In this context, from 2025 onwards the Bank is committed to accelerate DTC amortization for prudential purposes by voluntarily deducting it from prudential own funds ahead of the scheduled timeline. This action will improve Bank's capital quality and increase its strategic options for capital deployment. The acceleration of DTC will be set equal to 29% of planned dividends.

4.1 Capital Ratios

The Capital Adequacy Ratio is calculated as the result of the Group's regulatory capital (own funds) to its RWAs. Regulatory capital includes Common Equity Tier 1 (CET1) capital (share capital, reserves, and minority interests), additional Tier 1 capital (AT1) (hybrid securities) and Tier 2 capital (subordinated debt). RWAs include the credit risk of the banking book, the market risk of the trading book, the operational risk, the counterparty credit risk (CCR) and credit valuation adjustment (CVA).

As shown in the following table, on 31.12.2024, Group's CET1 stood at €4.9 billion and the total Regulatory Capital at €6.6 billion, while the total RWAs amounted to €30.3 billion resulting in a CET1 ratio of 16.3%, and total Capital Adequacy Ratio of 21.9% mainly due to the Q4 2024 profitability (which includes also a provision for the distribution of a total amount of Euro c.281 million) and the decrease in RWAs by c.1.0bn. The main factor for the decrease in RWAs is the conclusion of Unicorn (deconsolidation of Alpha Bank Romania).

Template 3: Capital Adequacy Ratios (%)*

(Amounts in millions of Euro)

	a	b
	31.12.2024	30.9.2024
Capital Type		
CET1	4.921	4.840
Tier 1 Capital	5.621	5.540
Tier 2 Capital	1.011	993
Total Regulatory Capital for C.A.R. calculation	6.632	6.533
Risk Weighted Assets	30.279	31.247
Capital Ratios		
CET1 Ratio	16.3%	15.5%
Tier 1 Ratio	18.6%	17.7%
Capital Adequacy Ratio (Tier 1 + Tier 2)	21.9%	20.9%

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

Greek law 4302/2014 introduced Article 27A to the Greek Income Tax Code, which was initially replaced by Greek law 4303/2014 and then by Greek law 4340/2015 and was most recently amended by Greek law 4549/2018, 4722/2020 and, most recently, 4831/2021 ("DTA Framework"), to allow, under certain conditions, from 2016 onwards, credit institutions to convert DTAs falling within the scope of such law and arising (a) from the participation in the PSI and the buy-back programme and (b) from the sum of (i) the unamortized part of the crystallized loan losses from write-offs and disposals, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other general losses, with respect to existing amounts up to 30 June 2015, into final and due receivables from the Hellenic Republic ("Tax Credit"). In the case of an accounting loss in a specific year, the Tax Credit will be calculated by multiplying the total amount as per the above of the deferred tax asset by the percentage represented by the accounting losses over net equity before such year's losses as appearing in the annual financial statements of the credit institution, excluding such year's accounting losses.

This legislation allows Greek credit institutions to treat such eligible DTAs as not "relying on future profitability" according to the CRD Directive, and as a result such DTAs are not deducted from Common Equity Tier I capital but rather risk weighted. As of 31 December 2024, the eligible amounts not "relying on future profitability" according to the CRD Directive stood at €2.42 billion.

4.1.1 Key metrics

In the following table EU KM1 key regulatory metrics and ratios are provided as well as related input components as defined by the amended versions of CRR and CRD. They comprise own funds, RWAs, capital ratios, additional requirements based on SREP, capital buffer requirements, leverage ratio, liquidity coverage ratio and net stable funding ratio.

Template 4: EU KM1 - Key metrics template as of 31.12.2024^(*)

(Amounts in millions of Euro)

		a	b	c	d	e
		31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2023
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	4,921	4,840	4,787	4,712	4,639
2	Tier 1 capital	5,621	5,540	5,187	5,112	5,039
3	Total capital	6,632	6,533	6,155	6,112	6,039
	Risk-weighted exposure amounts					
4	Total risk-weighted exposure amount	30,279	31,247	32,387	32,216	32,209
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	16.3%	15.5%	14.8%	14.6%	14.4%
6	Tier 1 ratio (%)	18.6%	17.7%	16.0%	15.9%	15.6%
7	Total capital ratio (%)	21.9%	20.9%	19.0%	19.0%	18.8%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	3.00%	3.00%	3.00%	3.00%	3.00%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.69%	1.69%	1.69%	1.69%	1.69%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	2.25%	2.25%	2.25%	2.25%	2.25%
EU 7d	Total SREP own funds requirements (%)	11.00%	11.00%	11.00%	11.00%	11.00%
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
9	Institution specific countercyclical capital buffer (%)	0.19%	0.26%	0.23%	0.20%	0.19%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer	1.00%	1.00%	1.00%	1.00%	1.00%
11	Combined buffer requirement (%)	3.69%	3.76%	3.73%	3.70%	3.69%
EU 11a	Overall capital requirements (%)	14.69%	14.76%	14.73%	14.70%	14.69%
12	CET1 available after meeting the total SREP own funds requirements (%)	10.07%	9.30%			
	Leverage ratio					
13	Leverage ratio total exposure measure	71,684	74,198	72,637	72,159	71,328
14	Leverage ratio	7.8%	7.5%	7.1%	7.1%	7.1%

		a	b	c	d	e
		31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2023
	Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)					
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%			
EU 14e	Overall leverage ratio requirements (%)	3.00%	3.00%			
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	15,689	15,626	15,672	15,614	
EU 16a	Cash outflows - Total weighted value	9,362	9,444	9,525	9,623	
EU 16b	Cash inflows - Total weighted value	1,179	1,215	1,238	1,189	
16	Total net cash outflows (adjusted value)	8,183	8,230	8,287	8,434	
17	Liquidity coverage ratio (%) (adjusted values) (**)	192 %	190%	189%	185%	
17a	Liquidity coverage ratio (%)	203 %	190 %			
	Net Stable Funding Ratio					
18	Total available stable funding	52,598	54,566			
19	Total required stable funding	42,006	42,124			
20	NSFR ratio (%)	125.2%	129.5%			

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

(**) average figures based on previous monthly data points

4.2 Transitional Arrangements

On December 12, 2017 the EU adopted Regulation No 2395/2017 of the European Parliament and of the Council amending EU Regulation 575/2013, as regards transitional arrangements to mitigate the impact of the introduction of IFRS 9 on regulatory capital and leverage ratios. This Regulation inserted a new article 473a in CRR 575/2013 which introduced a 5-year transitional period during which allowed banks to add to the CET1 ratio the post-tax amount of the difference in provisions that resulted from the transition to the IFRS 9 in relation to the provisions that have been recognized at 31.12.2017 in accordance with IAS 39 ("Static" amount). The weighting factors were set per year at 0.95 in 2018, 0.85 in 2019, 0.7 in 2020, 0.5 in 2021 and 0.25 in 2022.

On June 22, 2020 as a response to the COVID-19 pandemic the EU adopted Regulation No 2020/873 of the European Parliament and of the Council amending Regulations (EU) No 575/2013 and (EU) 2019/876.

The Bank has adopted art 473a of the Regulation (EU) 2020/873. The purpose of the new regulation is to mitigate the negative impact on the regulatory capital of the Bank from the increase in the expected credit loss as a result from the Covid-19 pandemic. This article extends to another two-year period the ability to add-back to the regulatory capital the expected credit losses recognized in 2020 and afterwards relating to performing financial instruments. This transition period is effective until the end of 2024. More specific, the weighting factors were set at 1.00 for the first two years (2020 and 2021), 0.75 in 2022, 0.5 in 2023 and 0.25 in 2024.

The following table shows a comparison of own funds and capital and leverage ratios with and without the application of the transitional arrangements.

Template 5: EU IFRS9-FL - Comparison of own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS*

(Amounts in millions of Euro)

	a	b	c	d	e
	31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2023
Available capital (amounts)					
Common Equity Tier 1 (CET1) capital	4,921	4,840	4,787	4,712	4,639
CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	4,921	4,840	4,787	4,712	4,599
CET1 capital as if the temporary treatment of unrealized gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied					
Tier 1 capital	5,621	5,540	5,187	5,112	5,039
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5,621	5,540	5,187	5,112	4,999
Tier 1 capital as if the temporary treatment of unrealized gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
Total capital	6,632	6,533	6,155	6,112	6,039
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6,632	6,533	6,155	6,112	5,999
Total capital as if the temporary treatment of unrealized gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
Risk-weighted assets (amounts)					
Total Risk-weighted assets	30,279	31,247	32,387	32,216	32,209
Total Risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	30,279	31,247	32,387	32,216	32,209
Capital ratios					
Common Equity Tier 1 ratio (%)	16.3%	15.5%	14.8%	14.6%	14.4%
CET1 ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.3%	15.5%	14.8%	14.6%	14.3%
CET1 ratio (%) as if the temporary treatment of unrealized gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied					

	a	b	c	d	e
	31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2023
Tier 1 ratio (%)	18.6%	17.7%	16.0%	15.9%	15.6%
Tier 1 ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18.6%	17.7%	16.0%	15.9%	15.5%
Tier 1 ratio (%) as if the temporary treatment of unrealized gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
Total ratio (%)	21.9%	20.9%	19.0%	19.0%	18.8%
Total ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	21.9%	20.9%	19.0%	19.0%	18.6%
Total ratio (%) as if the temporary treatment of unrealized gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					
Leverage ratio					
Leverage ratio total exposure measure	71,684	74,198	72,637	72,159	71,328
Leverage ratio	7.8%	7.5%	7.1%	7.1%	7.1%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.8%	7.5%	7.1%	7.1%	7.0%
Leverage ratio as if the temporary treatment of unrealized gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied					

⁽¹⁾ including period profits post a provision for the distribution according to the dividend policy

The analysis of Own funds structure is presented in the following table:

Template 6: Own Funds Structure*

(Amounts in millions of Euro)

	31.12.2024	30.09.2024
Share capital	682	682
Share premium	4,784	4,784
Own Shares	(85)	(75)
Retained Earnings and Other Reserves	1,542	1,491
<i>o/w FVOCI reserves</i>	(3)	(2)
Period results	358	266
Common equity tier 1 capital before regulatory adjustments 1-5	7,282	7,148
1.PVA	(4)	(4)
2.Intangible assets	(412)	(426)
3.DTA amortization	(1,705)	(1,725)
4.Irrevocable payment commitment	(30)	(30)
5.Other Adjustments	(210)	(123)
Total regulatory adjustments to common equity tier 1	(2,360)	(2,308)
Common equity tier 1 capital (CET1) (1)	4,921	4,840
Additional Tier I instruments	700	700
Additional Tier I before regulatory adjustments	700	700
Additional Tier I	700	700
Tier I Capital (CET1 + AT1)	5,621	5,540
Subordinated loan	1,011	993
Tier II capital before regulatory adjustments	1,011	993
Tier II capital	1,011	993
Total Capital (TC = Tier I + Tier II)	6,632	6,533
Total RWA	30,279	31,247
Common equity tier 1 Ratio	16.3%	15.5%
Tier I Ratio	18.6%	17.7%
Capital Adequacy Ratio (Tier I + Tier II)	21.9%	20.9%

⁽¹⁾ including period profits post a provision for the distribution according to the dividend policy

Group's CET1 Ratio includes specific prudential adjustments in accordance with Article 3 of CRR and the expectations of regulatory authorities, including those related to exposures guaranteed by the Greek state. Specifically, for the exposures guaranteed by the Greek state, the Bank made a prudential adjustment of € 73 million as of December 31, 2024, in alignment with the guidelines issued by the ECB to banks at the beginning of 2024. This adjustment is temporary and depends, among other factors, on the progress of payments from the Greek state (based on the new Law 5104/24). The book value of these exposures, recognized in the "Loans and receivables from customers" account, amounted to € 100 million as of December 31, 2024, and, in accordance with ECB guidelines, were classified as non-performing exposures (NPE) and accordingly as Stage 3 loans.

4.3 Reconciliation of regulatory own funds to the balance sheet according to IFRS

The table below highlights the difference in the basis of consolidation for accounting and prudential purposes as it compares the carrying values as reported under IFRS with the carrying values under the scope of the regulatory consolidation. References in the last column of the table provide the mapping of regulatory balance sheet items used to calculate regulatory capital. The reference-columns presented below provides the mapping to the references-columns as presented in the template “EU CC1– Composition of regulatory own funds”.

Template 7a: EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		31.12.2024		
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and balances with central banks	2,998	2,998	
2	Due from financial institutions	2,296	2,296	
3	Trading securities	53	53	
4	Derivative financial assets	628	628	
5	Loans and advances to customers	39,050	39,051	
6	Investment securities			
	- Measured at fair value through other comprehensive income	1,009	1,009	
	- Measured at amortised cost	16,420	16,398	
	- Measured at fair value through profit or loss	167	167	
7	Investments in associates and joint ventures	570	570	(g)
8	Investment property	290	290	
9	Property, plant and equipment	534	534	
10	Goodwill and other intangible assets	438	438	(d)
11	Deferred tax assets	4,815	4,820	(e)
12	Other assets	808	818	
13	Assets classified as held for sale	1,999	839	
14	Total assets	72,075	70,909	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		31.12.2024		
1	Due to banks	6,533	6,533	
2	Derivative financial liabilities	793	794	
3	Due to customers	51,032	51,037	
4	Debt securities in issue and other borrowed funds	3,208	3,245	(f)
5	Liabilities for current income tax	69	69	
6	Deferred tax liabilities	18	19	(h)
7	Employee defined benefit obligations	24	23	
8	Other liabilities	895	895	
9	Provisions	161	162	
10	Liabilities related to assets classified as held for sale	1,153	1	
11	Total liabilities	63,886	62,778	
Equity				
1	Share Capital	682	682	(a)
2	Share premium	4,784	4,784	(a)
3	Other equity instruments	700	700	(h)
5	Reserves	-93	-96	(c)
6	Amounts directly recognized in equity and associated with assets classified as held for sale	-14	-1	
7	Retained earnings	2,175	2,107	(b)
8	Treasury shares	-61	-61	(a)
9	Non-controlling interests	16	16	
	Total equity	8,189	8,131	

Template 7b: EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		30.06.2024		
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and balances with central banks	4,227	4,227	
2	Due from banks	1,730	1,730	
3	Trading securities	73	73	
4	Derivative financial assets	1,894	1,894	
5	Loans and advances to customers	35,824	35,825	
	Reinsurance contract assets	-	-	
6	Investment securities	-	-	
	- Measured at fair value through other comprehensive income	1,299	1,299	
	- Measured at amortized cost	15,705	15,682	
	- Measured at fair value through profit or loss	156	156	
7	Investments in associates and joint ventures	154	233	(g)
8	Investment property	285	285	
9	Property, plant and equipment	493	493	
10	Goodwill and other intangible assets	457	448	(d)
11	Deferred tax assets	4,898	4,903	(e)
12	Other assets	988	981	
13	Assets classified as held for sale	6,554	5,454	
14	Total Assets	74,738	73,684	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Due to banks	7,746	7,746	
2	Derivative financial liabilities	1,962	1,962	
3	Due to customers	48,189	48,210	
4	Insurance contract liabilities	-	-	
5	Debt securities in issue and other borrowed funds	3,396	3,432	(f)
6	Liabilities for current income tax and other taxes	67	67	
7	Deferred tax liabilities	23	22	(h)
8	Employee defined benefit obligations	25	25	

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		30.06.2024		
9	Other liabilities	965	971	
10	Provisions	102	102	
11	Liabilities related to assets classified as held for sale	4,656	3,576	
12	Total liabilities	67,132	66,113	
Equity				
1	Share Capital	682	682	(a)
2	Share premium	4,784	4,784	(a)
3	Other equity instruments	400	400	(h)
4	Special Reserve from Share Capital Decrease	-	-	
5	Reserves	(109)	(112)	(c)
6	Amounts directly recognized in equity and are associated with assets classified as held for sale	(73)	(46)	
7	Retained earnings	1,921	1,862	(b)
8	Treasury shares	(15)	(15)	(a)
9	Non-controlling interests	16	16	
10	Total equity	7,607	7,571	

4.4 Capital requirements under Pillar I

The Group calculates and reports to the designated authorities its capital requirements (Pillar I RWAs) according to the provisions of the CRR and implementing the Technical Standards developed by the EBA on a solo and consolidated basis.

The approaches adopted for the calculation of the capital requirements under Pillar I (advanced or standardized methodologies) are determined by the general policy of the Group in conjunction with factors such as the nature and type of risks the Group undertakes, the level and complexity of the Group's business and other factors such as the degree of readiness of the information and software systems.

Capital Requirements are calculated using the following approaches:

- **Credit Risk:** The Group follows the Standardized Approach (STA). The advanced method is used for the valuation of financial collateral.
- **Operational Risk:** The Group follows the Standardized Approach (STA).
- **Market Risk:** A Value at Risk (VaR) model developed at a bank level for the significant exposures and approved by the Bank of Greece. Additionally, the Bank uses the Standardized approach to calculate Market Risk for the remaining, non-significant exposures.

The following template summarizes RWA and minimum capital requirements by risk type. Minimum capital requirement is calculated at 8% of RWA.

Template 8: EU OV1 – Overview of risk weighted exposure amounts as of 31.12.2024

(Amounts in millions of Euro)

		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		a	b	c
		31.12.2024	30.9.2024 ⁽¹⁾	31.12.2024
1	Credit risk (excluding CCR)	25,255	26,561	2,020
2	Of which the standardised approach	25,255	26,561	2,020
3	Of which the foundation IRB (FIRB) approach			
4	Of which slotting approach			-
EU 4a	Of which equities under the simple riskweighted approach			-
5	Of which the advanced IRB (AIRB) approach	-	-	-
6	Counterparty credit risk - CCR	297	295	24
7	Of which the standardised approach	223	163	18
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	7	6	1
EU 8b	Of which credit valuation adjustment - CVA	43	48	3
9	Of which other CCR	24	77	2
15	Settlement risk			
16	Securitisation exposures in the non-trading book (after the cap)	763	653	61
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	273	252	22
19	Of which SEC-SA approach	489	402	39
EU 19a	Of which 1250%/ deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	328	384	26
21	Of which the standardised approach	54	73	4
22	Of which IMA	274	311	22
EU 22a	Large exposures	-	-	-
23	Operational risk	3,636	3,339	291
EU 23a	Of which basic indicator approach	-	-	-
EU 23b	Of which standardised approach	3,636	3,339	291
EU 23c	Of which advanced measurement approach	-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight) (for information)	1,806	1,736	144
29	Total	30,279	31,232	2,422

⁽¹⁾ period profits are not included

4.5 Capital Buffers

The countercyclical capital buffer (CCyB) is a CRD IV instrument, designed to help counter pro-cyclicality in the financial system. Credit institutions are required to set aside additional CET 1 capital during periods of excessive credit growth. This will help maintain the supply of credit and dampen the downswing of the financial cycle. The main purpose of the CCyB is to increase the banks' resilience in good times to absorb potential losses that could arise in a downturn and to support the continued supply of credit to the real economy. For 2024 Bank of Greece, as National Competent Authority, set the countercyclical buffer at 0%. It is noted that, under Executive Committee Act 235/1/07.10.2024 the Bank of Greece has decided to set the countercyclical capital buffer rate for Greece at 0.25%, applicable from 1 October 2025. The target rate for the positive neutral rate of the countercyclical capital buffer in Greece stands at 0.5%.

The CCyB requirements at year end, are slightly decreased due to the deconsolidation of Alpha Bank Romania.

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



Template 9a: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c		d	e	f	g		h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements			Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)			
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book				Total		
010	Breakdown by country:															
10	Cyprus	1,149					1,149	58					58	723	3%	1.00%
11	United Kingdom	1,133					1,133	58					58	728	3%	2.00%
12	Romania	616					616	32					32	394	2%	1.00%
13	Netherlands	301					301	19					19	232	1%	2.00%
14	Ireland	295					295	20					20	249	1%	1.50%
15	France	294					294	21					21	266	1%	1.00%
16	Deutschland	133					133	8					8	98	1%	0.80%
17	Other	29,044		75	60,032	5,448	94,599	1,401	30	61	1,492	18,651	87%			
18	Total	32,965		75	60,032	5,448	98,519	1,617	30	61	1,707	21,341	100%			



Template 9b: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 30.06.2024

(Amounts in millions of Euro)

	a	b	c		d	e	f	g		h	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements			Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)			
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book				Total		
010	Breakdown by country:														
10	Romania	3,514				3,514	162					162	2,023	9%	1.00%
11	United Kingdom	1,062				1,062	57					57	709	3%	2.00%
12	Cyprus	1,002				1,002	51					51	638	3%	1.00%
13	Netherlands	242				242	16					16	194	1%	2.00%
14	Ireland	213				213	14					14	180	1%	1.50%
15	France	178				178	12					12	150	1%	1.00%
16	Luxemburg	139				139	9					9	113	1%	0.50%
17	other	26,763	78	52,945	4,716	84,502	1,459	37	57	1,553	19,417	83%			
18	Total	33,114	78	52,945	4,716	90,853	1,780	37	57	1,874	23,425	100%			

The following table presents an overview of institution - specific countercyclical exposure and buffer requirements.

Template 10a: EU CCyB2 - Amount of institution-specific countercyclical capital buffer as of 31.12.2024

(Amounts in millions of Euro)

		a
		31.12.2024
1	Total risk exposure amount	30,279
2	Institution specific countercyclical capital buffer rate	0.19%
3	Institution specific countercyclical capital buffer requirement	57.0

The following table presents an overview of institution - specific countercyclical exposure and buffer requirements.

Template 10b: EU CCyB2 - Amount of institution-specific countercyclical capital buffer as of 30.06.2024

(Amounts in millions of Euro)

		a
		30.6.2024
1	Total risk exposure amount	32,387
2	Institution specific countercyclical capital buffer rate	0.23%
3	Institution specific countercyclical capital buffer requirement	75.4

4.6 Internal Capital Adequacy Assessment Process (ICAAP)

The ICAAP process is an integral part of the Internal Control System (ICS) of the Group. It is aligned with the best practices and the general principles and requirements set by the regulatory Framework, including the guidelines provided by SSM and/ or EBA, which allows for:

- The identification, analysis, monitoring and the overall assessment of risks
- The improvement of various systems/ procedures/ policies related to the assessment and management of risks
- The estimation of the necessary level of Internal Capital required for the coverage of all risks and
- Capital planning taking also into consideration the Group's Risk appetite and business/strategic plan in a forward looking assessment

As a process, ICAAP is a constant, ongoing and recurring set of actions / streams that are carried out as part of the day-to-day operation of the Group. The related report is updated at least annually, or at a more frequent basis, whenever there is a change considered material.

The Group identifies the following key components of the ICAAP process:

1. Risk Identification and Materiality Assessment Process, which consists of:
 - a. An annual review of the Risk Inventory comprising of an extensive list of risks within supervisory and Alpha Bank perspective.
 - b. Materiality assessment of the identified risk types, after having carved out the non-relevant to the Group risks, based on quantitative / qualitative criteria.
 - c. A display of all material risks in the Group's Risk Registry, presenting their severity before and after controlling and mitigating actions.
2. Capital Adequacy Assessment, that involves the quantification of internal capital for the risk types that are identified as material. For the determination of the internal capital requirements, the Group uses the Pillar I regulatory capital as a starting point taking also into account additional capital where required by using more sophisticated methodologies and definitions. Internal capital requirements under Pillar II represent more accurately the risk profile of Alpha Bank Group, since it covers a wider range of risks and utilizes more sophisticated and risk sensitive approaches. In addition to the above process which coincides with the calendarization of the annual submission of the ICAAP to the supervisory authorities, Pillar II calculations are performed on a quarterly basis according to supervisory expectations.
3. Capital Planning and Stress Testing, that involves the forward-looking view and assessment of risks, evolution of available capital and capital requirements, under baseline and alternative adverse scenarios, as well as considering a reverse stress scenario.
4. Monitoring and reporting of ICAAP results that involves the on-going and regular monitoring of key ICAAP metrics and relevant reporting to appropriate committees, in line with the ICAAP governance framework.

Considering the multi-year plan on ICAAP and the relevant ECB guidelines in particular, the following overarching principles are defined with respect to the ICAAP setup and implementation by the Group:

- The Board of Directors has the overall responsibility of the ICAAP implementation with a clear and transparent assignment of responsibilities to the Risk Management Committee and Senior Management members.
- ICAAP is an integral part of the management framework of the Bank. The ICAAP is integrated into the business, decision-making and risk management processes of the Group, and is consistent and coherent throughout the Group.
- The ICAAP contributes to the continuity of the Bank by ensuring its capital adequacy from different but complementary perspectives (e.g. the economic perspective and the normative perspective).

- Under the economic perspective, the Group ensures that any risks that may affect its capital position are adequately covered by internal capital in line with its internal capital adequacy concept. Under this perspective, the institution's assessment covers the full universe of risks that may have a material impact on its capital position, taking into account fair value considerations for its current assets, liabilities and risks.
 - The normative perspective is an assessment of the institution's ability to fulfil all of its capital-related regulatory and supervisory requirements and demands, and to cope with other external financial constraints on an ongoing basis. The capital plan is comprised of baseline and adverse scenarios and covers a forward-looking horizon of at least three years. The Group also conducts reverse stress testing, as per regulatory requirements, leveraging on the outcome of the adverse scenario.
 - Both perspectives mutually inform each other and are integrated into all material business activities and decisions.
- ICAAP assumptions and risk quantification methodologies are proportionate, consistent and thoroughly validated.
 - Regular stress testing ensures capital adequacy in adverse circumstances.

4.7 Internal Liquidity Adequacy Assessment Process (ILAAP)

The ILAAP is an integral part of the Group's Internal Control System (ICS) and is aligned with the general principles and requirements set by the relevant Regulatory Framework (2013/36/EU, article 86 and EBA/GL/2016/10, Guidelines on ICAAP and ILAAP information collected for SREP purposes).

Following the aforementioned guidelines, the ILAAP report analyses the following areas:

- Key elements of liquidity risk management and ILAAP Framework: Description of the risk appetite framework for liquidity and funding risks is presented, and its integration with ILAAP. Moreover, a comprehensive description of the Group's policies regarding funds transfers pricing, liquidity stress testing, asset encumbrance and intraday liquidity is provided.
- Alpha Bank's Group Background Overview: The Group's key balance sheet figures and liquidity profile is presented.
- The Group's forward-looking liquidity & funding position under the normative perspective is presented under baseline and adverse scenarios (3-year projection of balance sheet figures and key liquidity risk metrics).
- The Group's forward-looking liquidity & funding position under the economic perspective is presented (liquidity buffer evolution under a short term systemic, idiosyncratic and combined shock)
- Quality assurance and validation of liquidity stress testing
- A statement of the level of appropriateness of the liquidity risk management mechanisms and the results of ILAAP, with comprehensive description of the liquidity and funding risks that the Group faces taking into account the current macro-economic environment as well as country-specific and idiosyncratic factors, are included as part of the Internal Liquidity Adequacy Assessment Process (ILAAP) approved by the Board of Directors.

5 Leverage

The leverage ratio, which is defined as Tier 1 capital divided by total exposure, is a binding requirement with the application of the CRR II package, as of June 2021. The “risk of excessive leverage” means the risk that results from an institution's vulnerability due to leverage or contingent leverage that may require unintended corrective measures to its business plan, including distressed selling of assets which might result in losses or in valuation adjustments to its remaining assets.

The level of the leverage ratio with reference date 31.12.2024 on consolidated basis was 7.84%, according to the transitional definition of Tier 1 capital, exceeding by 2.61x the 3% minimum threshold applied by the competent authorities, implying that the Bank is not taking on excessive leverage risk.

The Bank submits to the regulatory authorities the leverage ratio on a quarterly basis and monitors the level and the factors that affect the ratio.

The table below provides a reconciliation of the total exposure measure with the total assets disclosed in published financial statements.

Template 11a: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures as of 31.12.2024

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	72,075
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(1,167)
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	1,141
9	Adjustment for securities financing transactions (SFTs)	40
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2,384
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(2,790)
13	Total exposure measure	71,684

Template 11b: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures as of 30.06.2024

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	74,738
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(1,055)
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	(468)
9	Adjustment for securities financing transactions (SFTs)	42
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2,245
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(2,866)
13	Total exposure measure	72,637

The following template presents a breakdown of the components of the leverage exposure, the minimum requirements and buffers.

Template 12: EU LR2 - LRCom: Leverage ratio common disclosure as of 31.12.2024

(Amounts in millions of Euro)

		CRR leverage ratio exposures	
		a	b
		31.12.2024	30.06.2024
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	69,238	71,069
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	6	0
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(584)	(692)
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-

		CRR leverage ratio exposures	
		a	b
		31.12.2024	30.06.2024
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(2,208)	(2,225)
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	66,452	68,152
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	1,551	1,327
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	271	172
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original exposure method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	Total derivatives exposures	1,822	1,499
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	985	699
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)		
16	Counterparty credit risk exposure for SFT assets	40	42
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	Total securities financing transaction exposures	1,025	741
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	10,287	10,390
20	(Adjustments for conversion to credit equivalent amounts)	(7,903)	(8,145)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22	Off-balance sheet exposures	2,384	2,245
Excluded exposures			
EU-22a	(Exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-

		CRR leverage ratio exposures	
		a	b
		31.12.2024	30.06.2024
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units): - Promotional loans granted by a public development credit institution - Promotional loans granted by an entity directly set up by the central government, regional governments or local authorities of a Member State - Promotional loans granted by an entity set up by the central government, regional governments or local authorities of a Member State through an intermediate credit institution)	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Total exempted exposures)	-	-
Capital and total exposure measure			
23	Tier 1 capital	5,621	5,187
24	Total exposure measure	71,684	72,637
Leverage ratio			
25	Leverage ratio	7.84%	7.14%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	7.84%	7.14%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	7.84%	7.14%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27	Choice on transitional arrangements for the definition of the capital measure	Transitional	Transitional
Disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	874	696

		CRR leverage ratio exposures	
		a	b
		31.12.2024	30.06.2024
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	985	699
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	71,573	72,634
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	71,573	72,634
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.85%	7.14%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	7.85%	7.14%

Template 13a: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 31.12.2024

(Amounts in millions of Euro)

		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	68,660
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	68,660
EU-4	Covered bonds	39
EU-5	Exposures treated as sovereigns	21,364
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	360
EU-7	Institutions	1,974
EU-8	Secured by mortgages of immovable properties	9,697
EU-9	Retail exposures	3,141
EU-10	Corporate	16,420
EU-11	Exposures in default	874
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	14,792

Template 13b: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 30.06.2024

(Amounts in millions of Euro)

		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	70,377
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	70,377
EU-4	Covered bonds	39
EU-5	Exposures treated as sovereigns	23,290
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	622
EU-7	Institutions	1,849
EU-8	Secured by mortgages of immovable properties	12,736
EU-9	Retail exposures	3,546
EU-10	Corporate	13,344
EU-11	Exposures in default	1,167
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	13,783

Alpha Bank monitors and submits to the regulatory authorities the leverage ratio, as defined in Regulation (EU) No 2015/62 of October 10th, 2014, on a quarterly basis and monitors the level and the factors that affect the ratio.

6 General Information on Risk Management

The Group is fully committed to applying the best practices and achieving the highest standards of corporate governance in every aspect of its business, including risk management.

Risk management is essential to promoting the Group's strategic, business and financial objectives and forms an integral part of the business strategy-setting process, including the business planning process and the risk appetite policy, as it defines the maximum acceptable risk appetite regarding each type of risk.

The key risk categories for Alpha Bank include credit risk, market risk, liquidity risk, reputational risk, counterparty risk, country risk, IRRBB non-financial risks and climate and ESG risk. In order to ensure that the impact of the said risks on the Bank's and the Group's financial results, long-term strategic goals and reputation are minimized, the Group has developed mechanisms and procedures for the timely identification, measurement, monitoring and mitigation of risks as well as for the assessment of their potential impact on the achievement of the objectives set.

The Group's strategy for risk management and risk undertaking, applied in all of the Bank Units' and Group Companies' activities, is strictly aligned with the best international practices, as well as with the current legislation, regulatory guidelines and supervisory expectations, while it evolves continuously through the development of a single risk management culture, which is shared across the Bank and the Group.

6.1 Risk Management Framework and Principles

The Group has established a framework of thorough management of risks, based on best practices and regulatory requirements. This framework, based on the common European legislation and the current system of common banking rules, principles and standards, is improving continuously over time and is applied in the daily conduct of the Group's activities within and across borders, making the corporate governance of the Group effective. The main objective of the Group on risk management is to maintain the high quality internal corporate governance and compliance, within the regulatory and supervisory provisions, in order to ensure confidence in the conduct of its business activities through sound provision of financial services.

The Group Risk Management framework, as a structural part of the Group's corporate and risk governance framework, is based upon the following guiding principles:

- Development of a sound Group risk culture that incorporates risk awareness, risk taking and risk management and control in the decisions of management and employees during the day-to-day activities considering their impact on the risks they assume.
- Definition of the Group's risk appetite framework (RAF), which is articulated via the risk appetite statement (RAS) and establishes the individual and aggregate levels and types of risk that the Bank is willing to assume in advance of and in order to achieve its strategic business activities within its risk capacity.
- Definition of the Group risk policy that is adherent to the RAS and is supported by appropriate control procedures and processes.
- Development of the processes to ensure that all material risks and associated risk concentrations are identified, measured, controlled, mitigated and reported on a timely and comprehensive basis.



- Monitoring of risk limits with alignment with the Group's business goals.
- Transparency promoted through clear communication lines.
- Active role of contributing staff in Risk Management. The staff is equipped with all the necessary skills and means which are necessary for effective Risk Management and understands its roles and responsibilities related to the Group Risk Management Framework.
- Full documentation of all processes related to risk identification, measurement, monitoring, reporting and control/mitigation.
- Providing adequate information to Group's and Business Areas' Management.

6.1.1 Risk Appetite Framework (RAF)

The RAF constitutes a major component in the Bank's overall approach to the risk and capital strategy, including policies, processes, controls and systems through which risk appetite is established, communicated throughout the Bank and monitored. The RAF includes the risk appetite statement (RAS), risk limits and an outline of the roles and responsibilities of those overseeing the implementation and monitoring of the RAF, ensuring the alignment of the Bank's corporate and business strategy, the financial and capital planning and the risk management framework. The Risk Appetite is the core tool for better aligning overall corporate strategy, capital allocation, and risk. The Senior Management of the Bank defines and recommends the Risk Appetite at Group level, taking into consideration the business strategy, business plan, risk management framework culture and internal capital adequacy assessment. At this stage, strategic objectives are translated into risk appetite qualitative statements and risk appetite quantitative measures (Key Risk Indicators-KRIs). The Risk Management Committee reviews and recommends annually to the Board of Directors for approval the Group's RAF and statement, considering also ESG risks, i.e. the risks of any negative financial impact to the Company stemming from the current or prospective impacts of ESG factors on its counterparties, such as climate-related risks and ensuring alignment with the Group's strategic objectives and capital allocation. Overall, Risk Appetite sets out the level of risk that the BoD is willing to take in pursuit of its business objectives.

The effective expression of Risk Appetite aids the Group in running its business by providing guidance on acceptable levels of risk while pursuing strategic objectives, thus providing a significant link in achieving the most efficient balance between risk and return.

Successful implementation of RAF depends upon effective interactions between the Board, Senior Management, CFO and CRO, risk management and operating Business Areas.

6.1.2 Risk Governance Structure

The Group has set a robust internal governance framework, which includes a transparent organizational structure, a management body that is responsible for proper risk management processes and for strong internal control system and ensures that the Group holds sufficient capital to meet both its own funds requirements and its internal capital targets.

The Group, taking into account the nature, the scale and the complexity of its activities, as well as the risk profile, develops a risk management strategy based on the following three lines of defense, which are the key factors for its efficient operation. They provide a clear set of rules and standards to be applied to a cohesive operating model, one that provides a framework for the articulation of accountabilities and responsibilities for managing risk across the Group.

In particular:

- 1st line of defense Units (process owners) have the primary responsibility to own and manage risks associated with day-to-day operational activities.
- 2nd line of defense Units, comprising the areas of Chief Risk Control Officer, the Chief Compliance Officer, the Chief Credit Officer, as well as the Risk Models and Data Validation Business Area. These are independent from each other and from the other lines of defense. These areas report to the Chief Risk Officer, which reports to the Risk Management Committee of the Group. Their function is complementary to conducting banking business of the first line of defense in order to ensure the objectivity in the decision-making process, to measure the effectiveness of these decisions in terms of risk undertaking, to design and execute on the risk control strategy and to comply with the applicable legislative and institutional framework, by monitoring the internal regulations and ethical standards as well as to display and evaluate the total exposure of the Bank and the Group to risk, based on the established guidelines.
- The Internal Audit constitutes the 3rd line of defense. The Internal Audit is an independent function, reporting to the Audit Committee of the Board of Directors, and audits the activities of the Bank and the Group, including the activities of the Risk Management Unit.

The Board of Directors and the Risk Management Committee of the Company, presented in chapter 2.3.4 and in the Appendix I of the Pillar III report, as well as the Management Committees of the Bank have separate and distinct roles in providing the final and ultimate levels of defense, ensuring the effective implementation of the group-wide risk management Framework and policies within the Group.

Executive Committee

In accordance with Law 4548/2018 and the Company's Articles of Incorporation, the Board of Directors has established an Executive Committee.

The Executive Committee acts as a collective corporate body of the Company. The Committee's powers and authorities are determined by way of a CEO act, delegating powers and authorities to the Committee. The Committee is vested, at least, with the following powers and authorities to manage the affairs of the Company and take decisions. The Committee has the right to delegate further all or parts of its vested authority.

The indicative main responsibilities of the Committee include but are not limited to the following:

The Committee:

- Prepares the strategy, the business plan and the annual budget of the Company and the Group, including the strategy on Environmental, Social and Governance (ESG) issues, for submission to and approval by the Board of Directors as well as the annual and interim Financial Statements.

- Decides on and manages the capital allocation to the Business Units.
- Prepares the Internal Capital Adequacy Assessment Process (ICAAP) Report and the Internal Liquidity Adequacy Assessment Process (ILAAP) Report for submission to and approval by the Board of Directors, manages their implementation and reports accordingly to the Board of Directors.
- Monitors the performance of each Business Unit and Subsidiary of the Company versus the Budget and ensures that corrective measures are taken.
- Reviews and approves, in the framework of its authorities, the Policies of the Company and informs the Board of Directors accordingly or submits them, as the case may be, to the latter for approval.
- Discusses issues related to the Group's Purpose and Values, culture and human resources as well as approves and manages any collective program proposed by Human Resources for the Staff (including any bonus schemes, voluntary separation schemes etc.).
- Is responsible for the implementation of (i) the overall risk strategy, including the Company's risk appetite and its risk management framework, (ii) an adequate and effective internal governance and internal control framework that includes a clear organizational structure and well-functioning independent internal risk management, compliance and audit functions of high stature and significant know-how as well as sufficient resources to perform their operations, (iii) an adequate and effective framework for the implementation of the Company's strategy on ESG issues, (iv) the amounts, types and distribution of both internal capital and regulatory capital to adequately cover the risks of the Company, (v) the means for achieving targets for the liquidity management of the Company, (vi) the selection and suitability assessment process for Key Function Holders and (vii) any arrangements aimed at ensuring the integrity of the accounting and financial reporting systems, including financial and operational controls, risk management and compliance with the law and the relevant standards.

Group Risk Management Unit

The Chief Risk Control Officer is responsible for the formulation of the unified Policy and Procedures framework for the management of credit risk as well as market, counterparty, liquidity, interest rate and credit spread in the Banking Book (IRRBB/CSRBB) and non-financial risks at Group level and their relationship with climate and ESG risks in general. The Chief Risk Control Officer supervises the following Business Areas:

- Credit Risk and Enterprise Risk Modelling
 - Credit Control
- Climate, ESG and Enterprise Risk Management
- Non-Financial Risks Control
- Market Risk Control

As of 15.1.2025, the Bank has introduced the role of ICT Risk Control Principal, under the Chief Risk Control Officer, in order to substantially enhance the Bank's Information and Communication Technology (ICT) risk management.

The Chief Credit Officer participates in the formulation of the Bank's and Group's Business Plan and Credit Policy and is responsible for evaluating Wholesale and Retail credit requests within its approval limits or proposing them to the relevant Committees. The Chief Credit Officer supervises the following Business Areas:

- Wholesale Credit
- Retail Credit

The Risk and Credit Business Areas supervised by the Chief Risk Officer are the following:

- I. Chief Risk Control Officer
 - i. Credit Risk and Enterprise Risk Modelling
 - Credit Control
 - ii. Climate, ESG and Enterprise Risk Management
 - iii. Non-Financial Risks Control
 - iv. Market Risk Control
- II. Chief Credit Officer
 - i. Wholesale Credit
 - ii. Retail Credit
- III. Risk Models and Data Validation

6.1.3 Firm-wide Risk Management Framework

The Bank's and the Group's business model and operations are regulated and supervised by the relevant authorities in each of the countries where they conduct business. The European Central Bank (ECB) and the Bank of Greece, as the Greek authority in charge that participates in the Single Supervisory Mechanism (SSM), act as the Bank's and the Group's primary supervisors to monitor their compliance with the Greek and the European banking legislations, with the supervisory regulations as well as with the Basel III (CRR/CRD) framework.

The risk management frameworks of the Group subsidiaries conform in all material respects to the Bank's risk management framework.

Within this firm-wide risk governance and management framework, each Risk and Credit Unit of the International Network adapts its risk management framework and policies to the local regulatory and legal requirements while, at the same time, being coherent with those of the Bank, as established in the risk governance framework.

To this end, dedicated regional Risk and Credit Division Managers of the International Network have been appointed to establish the enterprise risk management coverage and have a direct reporting line into the Group Chief Risk Officer.

The Group Risk Governance ensures its independency from the front office/business Units as depicted in the organisational chart of Alpha Bank, shown in the Appendix VI.

6.1.4 Risk Management Policies

The Group Risk Strategy has a structured and documented Group Risk and Capital Strategy in place that is perceived within the organization as an integrated business model that incorporates all the risk management processes, policies, procedures and methodologies adopted and implemented throughout the institution. The Group Risk Strategy objective is to provide a coherent and structured approach towards identifying, assessing and managing risk. It is based on the Risk Policies and Procedures defined by the Risk Management Committee and approved by the Board of Directors. These Policies and Procedures are applied by all members of the Group, taking into account the local regulatory requirements.

- Risk Policies and Procedures include all central rules of conduct for handling risks and are set out in specific Manuals for each risk. These are reviewed regularly and adapted whenever necessary by the RMU of the Group. The Policies are the following:
 - Market Risk Management Policy
 - Non-Financial Risks Management Policy and
 - Assets-Liability Risk Management Policy
- The guiding principles are effectively communicated to all organizational levels in order to build a uniform understanding of risk management objectives.
- Internal Audit is responsible for providing an independent review of the integrity of the overall risk management processes and ensuring the appropriateness and effectiveness of the controls applied.

In the pursuit of the Group's strategic business goals, the risk management framework and the relevant policies, procedures and systems are reviewed on a regular basis, to ensure that risk management and regulatory risk reporting are always compliant with the relevant regulatory guidelines as well as with the principles of corporate governance.

6.2 Stress Testing

Performing stress tests constitutes a key risk management tool, fully integrated into core risk reporting and capital and liquidity planning at the Bank and Group level, which provides indications of the capital required to absorb losses under the assumption of specific extreme hypothetical scenarios. Stress tests are conducted according to the requirements of the regulatory framework and constitute a fundamental parameter of the Group's Enterprise Risk Management strategy, with the aim of assessing the impact of business decisions on the Group's capital position. Furthermore, the Bank's and the Group's Regulatory Credit Framework and the Credit Risk management framework include the institutional and regulatory requirements related to the effective management of loans in arrears and of Non-Performing Loans, including the new requirements and the definitions set out in the supervisory framework.

7 Credit Risk

7.1 General information

Credit risk arises from the potential failure of borrowers or counterparties to meet all or part of their payment obligations to the Group. The primary objective of the Group's strategy for the credit risk management in order to maximize the risk adjusted return, is the continuous, timely and systematic monitoring of the loan portfolio and the maintenance of the credit exposures within the framework of acceptable overall risk undertaking limits. At the same time, the conduct of daily business within a clearly defined framework of granting credit, supported by specific credit criteria, is ensured. The Group's credit risk management framework is being developed based on a series of credit policies and procedures, as well as systems and models for measuring, monitoring and controlling credit risk. These models are subject to an ongoing review process, in order to ensure full compliance with the current institutional and regulatory framework and their adaptation to the respective economic conditions and to the nature and extent of the Group's business.

The Group credit policies and procedures take into account the prevailing institutional framework set by legislation, regulations, ministerial decrees/decisions, etc. and along with the internally defined and established key risk principles and guidelines, they ensure that credit facilities are granted soundly and managed properly and that promote a unified approach on how business financing should be conducted.

The Credit Risk Appetite expresses the level of credit risk that the Bank is willing to assume in order to achieve the business objectives and the expected risk-adjusted return, as defined by a set of minimum quantitative metrics and qualitative standards.

The Credit Risk Appetite is amongst the key contributors in the business planning process, promoting the appropriate alignment of corporate strategy, capital allocation and risk. Top-down risk appetite serves as the limit for risk-taking for the bottom-up planning from the business functions. Risk Limits and policies are calibrated to the credit risk appetite.

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

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

- Include any updates issued by the regulatory authorities
- Take into consideration the macroeconomic and political environment
- Facilitate the portfolio management and the decision making processes
- Contribute to preventing any potential negative effects in the Bank's and Group's financial results.

With main scope to further strengthen and improve the credit risk management framework, the following actions have been implemented during 2024:

Actions and Programs

- Enhancement of the Environmental, Social and Governance (ESG) risk assessment in the credit approval process, at obligor, transaction and overall level.
- Incorporation of the reputational risk assessment in the credit approval process.
- Update of Credit Policies for Wholesale Banking and Retail Banking (Housing and Consumer Lending, Small Business Banking), taking into account the regulatory guidelines for credit and ESG risk management issues and the Group's business strategy.
- Update of the Group Credit Control Framework in order to ensure compliance with Credit Risk Policies at Bank and Group level.
- Enhancement of credit risk models, where needed, to keep them up-to-date and expand applicability, including but not limited to Climate Risk.
- Update of the Concentration Risk and Credit Threshold Policy regarding the maximum acceptable credit limits for large business groups and the enhancement of the Sector Rating Methodology.
- Gradual digitalization of the credit approval process for Small Business Loans portfolio.
- Update of the Credit Risk Early Warning Policy regarding the classification of the business early warning triggers into Material or Non-Material, the enrichment of business early warning triggers as well as the incorporation of the new term "Operating Risk".
- Update of the Group's Loan Collateral Policy regarding the enrichment of methods of real estate property individual valuations with sustainability and ESG factors.
- Update of the Bank's Policy regarding the Hellenic Recovery and Resilience Facility (RRF) program as regards the maximum tenor of project finance loans.
- Update of the Retail Banking Arrears and Forbearance Policy regarding the addition of new products and changes to the existing Retail Banking debt settlement products.
- Update of the Credit Risk Model Management Policy regarding the review of the overrides/non systemic ratings list of values.

- Formation of a new functional area (Credit Risk Stress Test) which is responsible for the preparation, update and adherence to the methodology regarding the assessment and stress test exercise carried out by Supervisory Bodies or within the context of the Group's annual Internal Capital Adequacy Assessment Process.
- Periodic conduct of stress test exercises as a tool for assessing the impact of various macroeconomic scenarios on business strategy formulation, business decision-taking and the Group's capital position. The stress tests are conducted in accordance with the requirements of the regulatory framework and constitute a key component of the Group's credit risk management strategy.
- Update of the Group Credit Risk Models Validation Framework to align with the recent regulatory guidelines and best practices, including qualitative and quantitative validation of significant increase in credit risk (SICR) criteria.
- Update of the Credit Rating System User's Manual in order to capture the new ESG implementations in Credit Rating Systems (ABRS & Credit Lens).
- Validation of the Credit Risk Models, based on the approved time plan and the principles described in the "Credit Risk Models Validation Framework". Benchmarking key risk indicators with the use of EBA risk dashboard.
- Development of a Risk Data Aggregation and Risk Reporting Validation Framework that provides guidance for the assessment – as a second line of defense – of the accuracy, completeness and consistency of the procedures and controls across the whole range of the Risk Data Aggregation and Risk Reporting and BCBS239 supervisory directives for all types of risk.

7.2 Credit Risk Management Function

The management of credit risk is organized under the supervision of the Group Chief Risk Officer by multiple Business Areas that are mainly responsible for:

- setting the Group-wide credit risk appetite and policies,
- reviewing the approval and follow-up processes in the Business Units,
- facilitating the quarterly process of calculating the impairment of credit exposures and
- monitoring and submitting regulatory and internal reports on the Group's consolidated credit portfolio, including the determination of portfolio limits for specific industries and countries.

Dedicated departments develop credit rating and evaluation models and ensure that they are available for day-to-day credit processing at the Business Units and meet regulatory and institutional requirements. A separate Business Area is responsible for validating the credit risk rating systems and models and has direct reporting line to the Group Chief Risk Officer.

In addition, the Group has appointed Risk and Credit Managers in the countries of operation, who are responsible for ensuring compliance with the local supervisory rules and regulations.

The Credit Risk Committee assesses the adequacy and efficiency of the credit risk management policy and procedures of the Bank and its Group Companies and plans the required corrective actions.

The Committee:

- Discusses and endorses the Group Credit Risk Appetite within the overall Risk Appetite Framework, including credit-granting standards, qualitative statements, quantitative metrics and limits, and escalation thresholds, which is then submitted for approval to the Board of Directors through the Risk Management Committee.
- Is informed, on a regular basis, about the Credit Risk Policies of the countries in which the Group operates, ensuring that they are aligned with the Bank's Credit Risk Appetite.
- Periodically reviews the development of credit risk by sector and by geographic area and concentration risk where the Group operates.
- Overviews the reports of the Risk Management Units submitted to the Board of Directors and the Risk Management Committee.
- Overviews the reports of the Troubled Assets Committee.
- Oversees the progress against annual targets submitted through the Business Plan to the Single Supervisory Mechanism (SSM), in the framework of the management of NPEs and NPLs.
- Without prejudice to the "Delegation Framework of Approval Authorities for changes in Credit Policies" discusses and endorses Group Credit Policies, which are then submitted for approval to the Board of Directors through the Risk Management Committee.
- Is informed of the strategy for the management of arrears, Arrears Manuals and the Group's Arrears Committees, approved by the Troubled Assets Committee. In any case, the Committee may recommend adjustments to the arrears management strategy taking into account the Bank's Business Plan for the reduction of non-performing exposures as well as the current macroeconomic conditions in the Greek economy.
- Discusses and endorses the Group Credit and Arrears Committees Charters, which are then submitted for approval to the Board of Directors through the Risk Management Committee.
- Reviews and approves the Group Credit Risk Policies (e.g. Arrears and Forbearance Policy, Greek State Guarantee Forbearance Policy, Early Warning Policy, Loan Collateral Policy, Environmental and Social Risk Management Policy etc.) as well as the Group Credit Control Framework.
- Discusses and endorses the Concentration Risk and Credit Threshold Policy, the Group Write-Off Policy, the Group Loan Default Classification Policy and the Group Loan Impairment Policy, which are then approved by the Board of Directors through the Risk Management Committee.
- Approves the proposals for accounting write-offs or write down of Loans and Advances.
- Approves the development and update of Credit Risk Models as well as the relevant governance framework for the credit risk models (Credit Risk Model Management Policy, Model Development Standards, Group Credit Risk Model Validation Framework). Additionally, it informs about the validation results of the credit risk measurement models.
- Approves the methodology for calculation of the Expected Credit Loss (ECL methodology)
- Approves the quarterly provisions for Expected Credit Loss and is informed on the amount of all expenses/losses related to credit risk (ECL).
- Is informed of the most important findings resulting from the conduct of credit reviews by the Credit Control. The Committee may request from the competent Business Areas or Group Companies specific timetable of compliance with the relevant recommendations.
- Evaluates the Expected Losses audits, carried out by the Supervisory Authorities of the countries where the Group operates.

- Evaluates important findings from internal/ external auditors concerning the Credit Policy applied and the management of credit risk.
- Reviews the results of stress tests.
- Reviews the results and decides on required actions on issues stemming from external evaluation processes including SREP, SSM Audits and other supervisory issues related to Credit Risk.
- Is informed of and reviews Pillar III disclosures and other issues related to Credit Risk.
- Is informed and reviews the progress of projects related to supervisory guidelines (e.g. new definition of default, provisioning calendar) as well as important projects for the Bank related to Credit Risk.

The Members with voting rights, of the Credit Risk Committee are the following:

- The Chief Executive Officer (Chairman of the Committee)
- The Chief Risk Officer
- The Chief Financial Officer
- The Chief of Wholesale Banking
- The Chief of Retail Banking

For credit risk issues concerning the Countries where the Group operates, the Chief of International Network also participates in the Committee in addition to the above as a regular Member with voting rights.

The following Executives also participate in the Committee, as Members, without voting rights:

- The Chief Risk Control Officer
- The Chief Investment Officer
- The Chief of Performance Management and Reporting
- The Chief of Statutory Reporting and Tax
- The Credit Risk and Enterprise Risk Modelling Director
- The Capital Management and Banking Supervision Director
- The Credit Control Director

Credit approval process

The Group, following best international practices and taking into account the prevailing institutional framework set by legislation, regulations, ministerial decrees/decisions, etc, has designed a robust credit risk framework, where the key principles, the guidelines, the procedures followed and the responsibilities of involved Business Areas and Officers, are clearly defined based on the four eyes principle.

In this context, all credit proposals are prepared by the Product Business Areas, are reviewed by the competent Credit Business Areas and are assessed by the competent Credit Committee based on the total credit exposure, the obligor credit risk rating, the provided collaterals and the Environmental, Social and Governance Risk (ESG) rating at obligor, transaction and overall level.

Wholesale Banking Credit Committees

The Wholesale Credit Committees, mainly review and evaluate credit requests for companies/ group of connected companies of the Wholesale Banking portfolio with performing exposures or/ with Non-Performing exposures, provided that the relevant approval has been given by the Unlikeliness to Pay Review Committee and based on specific criteria and conditions set out in the Wholesale Banking Credit Policy.

The Credit Committees according to their approval authority level are divided into the following categories:

- Wholesale Banking Credit Committee I
- Wholesale Banking Credit Committee II
- Wholesale Banking Credit Committee III
- Wholesale Banking Credit Committee IV
- Wholesale Banking Credit Committees V

Wholesale Banking Arrears Committees

The Wholesale Banking Arrears Committees review and evaluate requests of Wholesale Banking debtors with Non-Performing Exposures under the competence of the NPEs Strategy, Recovery and Monitoring Business Area.

7.3 Credit Quality of Exposures

Definitions

The following definitions of exposures are provided:

1. Performing exposures

An exposure is considered as performing when the following criteria are met:

- The exposure is less than 90 days past due;
 - No legal actions have been undertaken against the exposure;
 - No unlikeliness to pay is reported on its credit obligation;
 - The exposure is not classified as impaired;
- or
- The exposure is classified as forborne performing exposure, as defined in the Implementing Regulation (EU) 2015/227 of 9 January 2015.

2. Past Due Exposures

As Past Due Exposures is considered the sum of the principal, interest and charges/commissions that have not been paid at the date it was due.

3. Non – Performing Exposures

An exposure is considered as Non-Performing when at least one of the following criteria apply at the time of the credit risk rating assessment:

- The exposure is more than 90 days past due (NPL);
- Legal actions have been undertaken by the Bank – Legal (NPL)
- The exposure is classified as Forborne Non – Performing Exposure (FNPL), as defined in the Implementing Regulation (EU) 2021/451 of 17 December 2020.
- It is assessed as Unlikely to Pay (UTP).

When a Wholesale Banking borrower has an exposure that is more than 90 days past due and the amount of this exposure exceeds 20% of total exposures of the borrower, then all exposures of the borrower are considered as non-performing (Pulling Effect).

4. Forborne Exposures

Forborne Exposure is defined as an exposure to which forbearance measures have been applied. A forbearance measure is a concession towards an obligor that is experiencing or is likely to experience difficulties in meeting its financial commitments (financial difficulty). The concession may entail a loss for the Bank and shall refer to either of the following actions that would not have been granted if the obligor had not experienced financial difficulty: a) a modification of the terms and conditions of a debt obligation. b) a total or partial refinancing of a debt obligation.

Financial Difficulty is defined as the situation where the borrowers are unable to comply or are about to face difficulties in servicing their credit obligations as per the current loan repayment schedule due to the worsening of their financial status. Forborne exposures incorporate denounced loans and advances amounting to €0.1bn as at 31.12.2024, that were forborne prior to denouncement.

5. Unlikelihood to Pay

An exposure is flagged as “**Unlikely To Pay**” (UTP) when the Group assesses that the borrower is unlikely to fully meet his credit obligations without the liquidation of collateral, regardless the existence of any past due amount or the number of days past due, with the exception of the cases of collaterals that are part of the production and trade chain of the borrower (e.g. properties for Real Estate companies, corporate shares for Holding companies).

For Wholesale Banking, the procedure is distinguished into two pillars:

- (a) Events determined which when occur the borrower is identified as defaulted without any assessment needed by any Credit Committee (Hard UTP Triggers),
- (b) Triggers determined which when occur, the borrower should be assessed by the competent Wholesale Banking Credit Committee to decide if the borrower’s exposures should be identified as Unlikely to Pay (UTP) and consequently as defaulted (Soft UTP Triggers). This assessment takes place when reviewing borrower’s credit limits.

If a borrower is flagged as UTP, then he is considered as Defaulted and his credit risk rating should be D (Default) in the Bank systems. If a borrower flagged as UTP belongs to a group of companies, then the group should also be assessed as a whole by the competent Credit Committee for the existence or not of UTP.

For Wholesale Banking exposures the following Hard UTP Triggers exist:

- Withdrawal of a license of particular importance in companies that require public authorization to carry out their activities such as banks and insurance companies. The same applies for technical and construction companies, telecommunications companies, pharmaceutical, mining, transport, food, chemical, petroleum, recycle, media etc.
- There are strong indications that the borrower is unable to meet his debt obligations (e.g. termination of business).
- Fraud cases
- Excess of the minimum acceptable Loan to Value (LTV), as depicted contractually, for loans collateralized with securities, e.g. bonds, shares etc (Margin Financing).
- Disappearance of an active market for the debtor's financial instruments, held by the Group.
- Write-off debts due to inability to pay
- Debt Forgiveness with or without debt restructuring (conditional or unconditional) at least for the first 12 months since the debt forgiveness.
- The credit institution or the leader of consortium starts bankruptcy/insolvency proceedings (application for insolvency).
- A credit event is declared under the International Swaps and Derivatives Association - ISDA).
- Out-of-court settlement/negotiation between Banks and Borrower for settlement / debt repayment of borrowers that are under bankruptcy proceedings (application for the bankruptcy).
- The borrower has requested to enter into bankruptcy or insolvency status (application for bankruptcy).
- A Bank has initiated bankruptcy or insolvency proceedings (application for bankruptcy).
- Sale of Credit Obligation.
- Diminished financial obligations with NPV Loss exceeding 1%.
- Refinancing/Extensions of loans whose lifetime exceeds the economic lifetime of the funded investment.
- Loan is accelerated or called / Institution has called any collateral including a guarantee /
- Lawsuit, execution or enforced execution in order to collect debt.
- Cured FPL exposure where Days past Due exceed 30 days (30+dpd) (at facility level).
- Cured FPL exposures where new forbearance measure is granted (at facility level).

- An exposure was purchased or originated with deep discount that reflects the low credit quality of the borrower (POCI) (at facility Level).
- The Borrower is under Arrears Unit's monitoring.

Additionally, for Wholesale Banking exposures the following Soft UTP Triggers exist:

- Exposures that were modified by providing a 'balloon' payment while the initial terms of the loan agreement did not include this repayment method, as well as exposures that the initial terms of the loan agreement included the 'balloon' payment and were modified by including an increase of the "balloon" amount and simultaneously by reducing the current installment.
- Diminished financial obligations with NPV Loss less than or equal to 1%.
- Multiple modifications in the same exposure.
- Deterioration of the leverage ratio (Debt to Equity) by at least 25% compared to the corresponding ratio at the time of initial financing when it is not due to a positive event for the company (e.g., sales increase, investment plan development), or decrease of equity by 50% compared to the time of initial financing.
- An exposure was purchased or originated with deep discount that reflects the low credit quality of the borrower (POCI) (at obligor Level).
- The debt service coverage ratio indicates that debt is not viable and in particular the
- EBITDA/interest ratio is less than 1.
- 5 Years Credit Default Swaps (CDS) above 1.000 bps in the last 12 months.
- Loss of an important customer or lessee representing at least 20% of the Borrower's turnover or the total property income, respectively.
- A turnover decrease resulting in a cash flow reduction of at least 30%.
- An affiliated customer, representing at least 20% of Borrower's turnover, has applied for bankruptcy.
- An external auditor report with qualified or adverse opinion that results to significant deterioration of key financial ratios of the borrower and worsened estimated future cash flows of the borrower.
- It is expected that an exposure with repayment at maturity or a due installment cannot be refinanced under current market conditions.
- Disappearance of an active market for the debtor's financial instruments, not held by the Group.
- The borrower has breached the financial covenants of the loan agreement by at least 10%.
- There is significant deterioration of the borrower's sector activity prospects.

- Adverse changes in the ownership structure or the management of the company or serious administrative problems.
- Due payments to Tax Authorities and Social Security Funds.
- Defaulted exposures in an Alpha Bank subsidiary.
- Cured FPL exposure where days past due exceed 30 days (30+dpd) (at obligor level)
- Cured FPL exposure where new forbearance measure is granted (at obligor level)
- A third party (excluding Banks) has started bankruptcy or insolvency proceedings (application for Bankruptcy).

For Retail Banking the procedure is distinguished into two pillars:

- a. Events are determined which when occur the exposure is identified as defaulted without any assessment needed by any Retail Banking Arrears Committee (Hard UTP Triggers),
- b. Specific Triggers are defined which, if they occur, should be taken into account when assessing whether the borrower's exposures will be considered as exposures with Unlikelihood to Pay (UTP) and therefore as exposures in default (Soft UTP Triggers). This assessment takes place at the date of a forbearance measure request by the competent Retail Banking Arrears Committee.

If an exposure is flagged as UTP, then it should be classified as Non-Performing in the systems of the Group's companies.

For Retail Banking exposures the following indicative Hard UTP Triggers exist:

- Diminished financial obligations with NPV Loss exceeding 1%
- Diminished financial obligations with NPV Loss less than or equal to 1% and balloon payment surpasses 20% of the total obligation.
- Diminished financial obligations with NPV Loss less than or equal to 1% and non-payment of principal above 1 year.
- Diminished financial obligations with NPV Loss less than or equal to 1% and multiple restructurings (Three within two years)
- Fraud cases.
- Obligor death.
- Loan Denouncement.
- Write-off amount
- Debt Forgiveness with or without debt restructuring (conditional or unconditional), at least for the first 12 months from the time of the debt forgiveness.
- Obligor has filed for bankruptcy or insolvency (application for bankruptcy code through Law 3869/2010 or any new upcoming Law).

- A financial asset was purchased or originated at a material discount that reflects the deteriorated credit quality of the debtor (POCI).
- Cured FPL exposure where Days past Due exceed 30 days (30+dpd).
- Cured FPL exposures where new forbearance measure is granted.
- Obligor restructuring request is rejected.
- Obligor restructuring request is approved and the client does not proceed with implementation.

Additionally, for Retail Banking exposures the following Soft UTP Triggers exist:

- The borrower has other exposures in the Group in default.
- The borrower is unemployed.
- The borrower is the sole owner of a company whose exposures are default and for which he has personally guaranteed.
- License Withdrawn.
- Inadequate financial data of the parties involved.
- Multiple restructuring of debts with the same product.

6. Return to Non-Defaulted Status (Curing)

For the Curing of an exposure and the re-classification to non-defaulted status, any concern for the ability of the borrower to meet his contractual obligations without recourse to the liquidation of collateral should have been eliminated (Absence of Concern).

7. Default Exposures

An exposure is considered as Default when the criteria specified by the definition of Non – Performing Exposures are met.

8. Credit Impaired Exposures

An exposure is considered as Credit Impaired when the criteria specified by the definition of Non-Performing Exposures are met.

Expected Credit Loss Estimation Methodology for Wholesale and Retail Banking

The Group, at each reporting date, recognizes a provision for expected credit losses on loans and advances to customers not measured at fair value through profit or loss as well as for off-balance sheet exposures (letters of guarantee, letters of credit, and undrawn loan commitments).

The expected credit losses calculation Methodology is common and applicable for both the Wholesale and Retail Banking Portfolios.

Default definition

The Group has fully aligned the perimeters of the portfolios characterized as "EBA Non-performing Exposures", "Exposures in Default" and "IFRS 9 Impaired Exposures".

The definition of Non-Performing Exposures is consistently used to develop models for estimating credit risk parameters (Probability of Default, Loss Given Default, Exposure at Default).

In addition, the definition of default is consistent with the one used for internal credit risk management purposes, as well as capital adequacy measuring objectives.

Portfolio Classification in Stages based on the Credit Risk (Staging)

After an exposure's initial recognition, classification to Stages based on credit risk characteristics follows. The classification of loans in stages is based on the changes of the credit quality compared to the initial recognition.

Upon initial recognition of an exposure, the Group must determine whether this exposure is considered as credit impaired (Credit Impaired at Initial Recognition). After an exposure's initial recognition, classification to Stages based on its credit risk characteristics follows.

The POCI category (Purchased or Originated Credit Impaired, POCI) includes the following:

- Exposures that at the time of purchase (Purchased) meet the criteria to be classified as Non-Performing Exposures.
- Exposures that as per accounting rules are derecognised and a new exposure is recognised and for which the following apply (Originated): if the exposure was classified as credit impaired (hence NPE) prior to derecognition, the new exposure will continue to maintain this classification and it will be classified as POCI.

Concerning the POCI exposures, the expected credit losses calculated are the lifetime losses.

For exposures not classified as POCI, the classification in stages is performed as follows:

- **Stage 1** includes performing credit exposures that have no significant increase in credit risk since the initial recognition date. The expected credit losses calculated are based on the probability of default within the next 12 months and the assessment is carried out on a collective basis.
- **Stage 2** includes credit exposures with significant increase in credit risk since the initial recognition date but are not non-performing. The expected credit losses calculated are lifetime credit losses and the assessment is carried out on a collective basis.
- **Stage 3** includes the non-performing / default exposures. The expected credit losses calculated are the lifetime losses and the assessment is performed on a collective or individual basis.

All possible movements between Stages of credit risk are presented below:

- An exposure which has been classified in Stage 1 in the previous quarter of reference could be classified either in Stage 1 in the next reporting quarter, if the credit risk has not deteriorated and the exposure is still performing, or in Stage 2, if the exposure is still performing but the credit risk has deteriorated, or in Stage 3 if the exposure is non-performing/default.
- An exposure which has been classified in Stage 2 in previous quarter of reference could be classified either in Stage 1 in the next reporting quarter, if the exposure is performing and does not meet any criteria of “Significant increase in credit risk” and in particular, for case of Forborne Performing loans (FPL), if the exit criteria from the 2-years’ probation period are met or it could also remain in Stage 2, if the credit risk has not substantially changed, or be transferred to Stage 3, if the exposure is non-performing/default.
- An exposure which has been classified in Stage 3 in previous quarter could be classified either in Stage 1 in the next reporting quarter, if the exposure is performing and does not meet any of the criteria of “Significant increase in credit risk”, or transferred in Stage 2, if it is no longer considered as non-performing but meets one of the criteria of “Significant increase in credit risk”, or remain in Stage 3, if it is still non performing/ default.

The Group does not make use of the exemption provided by the standard for low credit risk exposures.

For classification purposes, for wholesale banking revolving exposures, initial recognition date is the date of the most recent credit assessment credit risk rating reflecting the annual thorough credit risk review.

Significant Increase in Credit Risk

For the timely identification of significant increase in credit risk (SICR) for an Exposure after the initial recognition leading to the calculation of lifetime credit losses of the exposure instead of twelve months credit losses, the risk of default at the reference date is compared to the risk of default at the initial recognition date for all Performing Exposures, including those with no days past due (Delinquencies).

The assessment to determine whether an exposure shows significant increase in credit risk or not is based on the following:

- **Quantitative Indicators:** They refer to the use of quantitative information and specifically to the comparison between the probability of default (PD) at the reference date and the probability of default at the initial recognition date. The assessment of significant increase in credit risk is based either on a relative or on an absolute increase of PD between the reporting date and the initial recognition date. As a result of the annual update of Credit Risk parameters, the relative increase can range between 75% and 200% depending on the asset class of the loans. The absolute threshold, when used, can range between 3 and 5 percentage points depending on the asset class of the loans and acts as a backstop to the relative increase (i.e., just one of the two triggers needs to be hit in order to trigger stage 2). Additionally, in the case of wholesale exposures, the Credit Risk Rating is taken into account separately as a criterion for determining the significant increase in credit risk. Finally, the threefold increase in annualized PD as backstop is ensured. Threshold determination derives based on portfolio level analyses. The assessment of the exposures for significant increase in credit risk is applied on account level. It is noted that the critical points - both for the absolute increase and for the relative increase of PD between the reference date and initial recognition - are validated on an annual basis, in order to confirm their correct application and to confirm that the established criteria have sufficiently identified the significant increase in credit risk.
- **Qualitative Indicators:** They refer to use of qualitative information which is not necessarily depicted in the probability of default, such as the assessment of an exposure as performing forborne ("FPL" within 2 years' probation period according to EBA ITS) or as exposure with Financial Difficulty or as exposure with Operating Risk (for Wholesale exposures). Additional qualitative indicators for the Wholesale Banking portfolios and the Retail Banking portfolios are included in Credit Risk Early Warning mechanisms where according to the assessment performed, an exposure may be considered as significant increase in credit risk or not. Especially for Specialized Lending portfolios through rating (slotting category) additional qualitative indicators are identified.
- **Backstop Indicators:** In addition to the above, and with a view to addressing cases where there is no evidence of significant credit risk deterioration based on the quantitative and qualitative indicators, exposures over 30 days past due are considered by definition to show significant increase in credit risk.

Expected Credit Loss estimation

Exposures assessed on individual basis (Individual Assessment)

Expected credit losses are calculated either on an individual basis or on a collective basis, taking into account the significance of the or common risk characteristics and historical behavioral data.

On an individual basis, the Exposures to Companies with the following characteristics are assessed:

- Borrowers with at least one Non-Performing Exposure whose Customer overall credit Limit in the Bank exceeds the amount of Euro 2million.
- Specialized Lending Borrowers regardless the overall credit limit with at least one Non-Performing Exposure or.
- Exposures that do not share common risk characteristics or for which no relevant historical data that enables a collective analysis is available.

Any remaining exposure to Companies assessed collectively.

On an individual basis, the exposures of Individual Borrowers are assessed when they are classified as Non-Performing Exposures (NPE), and they relate to:

- **Consumer Loans:** Exposures of Consumer Credit Borrowers with total debit outstanding balances **over** Euro 500 thousand.
- **Mortgage Loans:** Exposures of Mortgage Credit Borrowers with total debit outstanding balances over Euro 2 million.

Any remaining exposure to Individuals is assessed collectively.

Exposures assessed on collective basis (Collective Assessment)

Collective Assessment applies to credit exposures which are not assessed individually, i.e. exposures classified in Stage 1 and Stage 2 as well as non-performing exposures that do not meet the above criteria for individual assessment, after having been categorized based on similar credit risk characteristics of the group and the portfolio to which the borrower or the credit facility is allocated.

For the classification of credit facilities into groups, similar credit risk characteristics are taken into consideration (e.g. Staging according to Credit Risk, Type of Product, Days Past Due, Time in default, Indication of unlikelihood to pay, Modification of contractual terms for borrowers showing financial difficulty (Forbearance Measures), Existence of Collateral/ Greek State Guarantee, Credit Risk Rating etc).

The grouping is reviewed on a regular basis to ensure that each group is comprised of homogenous exposures in terms of credit risk. Expected Credit Loss is calculated on account level.

Calculation of allowance for expected credit losses

Allowance for expected credit losses is reassessed at each financial statement date, reflecting the reassessment of credit risk.

Credit risk parameters

Calculation of Expected Credit Loss is based on the following credit risk parameters which are incorporated in the internal statistical models based on historical data.

- **Probability of Default (PD):**

It is an estimate of the probability of a borrower to default over a specific time horizon.

The Probability of Default is determined with the assistance of the Credit Risk Models. The Group uses statistical models through regression in order to analyze the collected data and make estimates of the remaining probability of default over the life of the exposures and how they will evolve over time.

Specifically, based on historical time series of observations, specialized models have been developed per portfolio and portfolio type, which evaluate separately the twelve-month probability of default (12-month PD models) as well as the probability of default throughout the lifetime of exposures (Lifetime PD models). The twelve-month default models basically evaluate the behavioral characteristics of the loan (behavioral models), while the Lifetime models evaluate two types of factors: the endogenous such as the maturity of the loan and the exogenous ones such as the macroeconomic environment (unemployment, annual percentage change in GDP, change in property prices, inflation). The final estimate of the probability of default is derived from the combination of the two components (12-month PD & Lifetime PDs).

- **Exposure at default (EAD):** Exposure at Default is an estimate of the amount of the exposure at the time of the default taking into account: (a) expected changes in the exposure after the reporting date, including principal and interest payments; (b) the expected use of credit limits and (c) accrued interest. The approved credit limits that have not been fully disbursed represent a potential credit exposure and are converted into a credit exposure equal to the approved undrawn loan commitments multiplied by a Credit Conversion Factor (CCF). The Credit Conversion factor of credit exposure is calculated based on statistical models. The maximum period for which credit losses are calculated is the remaining contractual maturity of a financial instrument unless the Group has the legal right to recall the financial instrument earlier. Exceptionally, for Credit Cards and loan agreements to individuals, the maximum period is set at three years, while for revolving loans to Small Businesses, the corresponding maturity is set at five years. Regarding Wholesale Banking loan agreements, the period is set to one year, given the thorough credit review performed at least once a year. If the residual maturity of the loan agreements classified in Stage 2 was increased by one year, Expected Credit Losses would increase by € 2 mil. as at 31.12.2024 (31.12.2023: € 4.3 mil.)

The Group uses models for exposure at default that reflect the characteristics of each portfolio.

- **Loss given default (LGD):** Loss given default is an estimate of the loss that will occur if the default occurs at a given time. It is based on the difference between the contractual cash flows due and those expected to be received, including the liquidation of collaterals, cure rate and cash recoveries based on historical data.

For unsecured loans, the Estimated Expected loss at the time of the default, takes into account expected recovery rates which vary throughout the recovery period as well as the cure rate.

Expected recoveries from tangible collaterals are based on the following inputs: the most recent (updated within the year {see Para 2. 1}) market value of the collateral, the time required for the liquidation/sale of the collateral (ranging between 3 to 5 years depending on the legal action status of the loan), the expected market value at liquidation /sale date based on the evolution of real estate prices within the next 4 years, the expected recoveries through foreclosure process or sale (as derived from historical data obtained for foreclosures and sales of collateral). The recovery rate is adjusted at the end to reflect value of preferential claims. Expected cash flows are discounted using the original effective interest rate.

As part of the annual update, credit risk parameters are reviewed and revised if needed to incorporate the impact of any changes in the business environment.

Finally, it is noted that the LGD varies based on each macroeconomic scenario since it differentiates the value of collateral, cash recoveries and the cure rate.

Estimates of expected cash recoveries are adjusted by incorporating macroeconomic indexes (i.e. unemployment, annual percentage change in GDP, change in real estate prices, inflation) through the development of corresponding statistical models. More specifically, based on historical time series of observations, specialized models (regression) have been developed per portfolio, which evaluate the expected recoveries combined with the impact of macroeconomic indicators.

In respect of cure rate estimates, statistical models (regression) per portfolio have been developed based on historical time series of observations which incorporate the effect of the macroeconomic environment through relevant indicators (indicative unemployment, annual percentage change in GDP, change in property prices, inflation).

- **Management overlays:**

Sale scenarios

In case the Group's business plan includes targets and strategies for recovery through sale, then for the loans and advances to customers included in the portfolio that may be sold, the recoverable amount is calculated by weighting:

- (i) the value in case of sale (sale price) and
- (ii) the amount expected to be recovered according to the internal methods applied by the Group for the impairment of non-performing loans, i.e. based on the individual assessment for exposures exceeding a specified limit and based on the collective assessment for the rest.

The weighting is based on the probability of sale attributed to each non-performing loan portfolio, assessing the stage of preparation of the underlying portfolios, the importance of the conditions preceding the realization of the sale as well as the recovery time.

Taking into account the developments regarding the sale transactions of NPL portfolios which are included in the Business plan for the management of non-performing exposures (NPE Business Plan), the calculation of expected credit losses risk has been adjusted, incorporating a sell scenario with 100% probability, for the following portfolios:

- Portfolio of non-performing business credit loans (Project "Solar")
- Portfolio of non-performing Cypriot loans (Project ACAC)
- Portfolio of mainly non-performing housing loans with collateral (Project "Gaia I")
- Portfolio of non-performing mainly small and medium-sized enterprises (Project "Gaia II")
- Portfolio of non-performing leasing leases of Alpha Leasing S.A. (transaction "Leasing")
- Other loan portfolios.

The adjustments made by the Group concern the incorporation of alternative recovery scenarios in relation to the NPL reduction targets included in the Group's strategic plan.

Post model adjustments (PMA)

Moreover, Management proceeds, when deemed necessary, to additional adjustments which cannot be captured by the expected credit losses internal models. These adjustments are recognized by the Group after detailed review of the results that the expected credit losses internal models calculated, market and/or data from the Group Strategy that can not be incorporated in the internal models due their nature.

The Group implements a robust internal process and governance framework to timely recognize any required adjustment as well support the management, the calculation and application of these adjustments.

The Group's governance framework requires such adjustments to be adequately documented and approved by the Groups' appropriate authorization levels.

On a regular basis and at least on each reporting period, the Group examines whether the PMA have a more permanent impact and there is the necessary historical data in order to incorporate it in the expected credit losses internal models.

Within 2024 Management reassessed PMAs and determined that for a specific portfolio of the Group's retail loans with certain characteristics, a post-model adjustment is required. The PMA was applied to specific retail non-performing exposures amounting to € 462 mil. (31.12.2023: € 687 mil.) for which based on the current circumstances the collection of the outstanding balance (through liquidation or other alternative strategy) is extremely difficult. Furthermore, based on the Group's assessment these specific retail non-performing exposures are more vulnerable to the inflationary pressures and are at a non-performing status for a long period, which makes their collection even more difficult. As result of the above assessment, Management has identified that these specific factors that are interrelated with the characteristics of these retail non-performing exposures and the profile of the underlying borrowers, cannot be captured by the credit risk models and therefore proceeded with an adjustment in the loss rate applied for this retail sub-portfolio.

In this context the Group has recognized an accumulated PMA as of 31.12.2024 of € 103 versus € 123 as of 31.12.2023.

Incorporation of forward-looking information

The Group calculates allowance for expected credit losses based on the weighted probability of three alternative scenarios.

More specifically, the Group produces forecasts for the possible evolution of macroeconomic variables that affect the level of allowance for expected credit losses of loan portfolios under a baseline and under two alternative macroeconomic scenarios (an upside and a downside one) and also estimates the cumulative probabilities associated with these scenarios.

The macroeconomic variables affecting the level of expected credit losses are the Gross Domestic product (hereinafter "GDP"), the unemployment rate, the inflation rate and forward-looking prices of residential and commercial real estates.

The main features of these scenarios can be described as follows:

Baseline Scenario

Amidst a volatile international environment, the Greek economy continued its upward trajectory in the first nine months of 2024, growing by 2.3% on an annual basis, outperforming the respective euro area average. Despite the high level of uncertainty surrounding the economic outlook, the growth momentum of the Greek economy is expected to continue over the scenario horizon amidst favorable conditions:

- the investment grade status and the upgrade of Greece's credit rating by Scope Ratings within the investment grade (to BBB),
- the achievement of fiscal surpluses which, along with the projected growth path, are expected to further reduce the debt-to-GDP ratio,
- the increasing contribution of investment to the growth mix, also as a result of the absorption of the Resilience and Recovery Facility (RRF) funds,
- the ongoing recovery in euro area and
- the expected strong tourism performance.

Economic growth is expected to be supported by private consumption – on the back of rising real disposable income following ongoing employment gains and de-escalating inflation - and investment supported by the RRF implementation. The unemployment rate is expected to continue to decline to single-digit levels over the scenario horizon, in line with the projected economic recovery and the anticipated new investments, which will create new jobs. In 2024, inflation based on the Harmonised Index of Consumer Prices (HICP) averaged 3% compared to 4.2% in 2023, as a result of the more moderate price increases in food and industrial goods. The baseline scenario foresees a further, gradual de-escalation of headline inflation to 2.7% in 2025 and convergence towards the European Central Bank's medium-term inflation target. The upward trend in residential property prices is expected to continue, albeit at a slower pace.

Upside Scenario

In the upside scenario, Greek economy is assumed to record stronger growth rates compared to the baseline scenario, supported by rising investment and consumption, a stronger performance in tourism, a faster deceleration of the unemployment rate and high growth rates in residential property prices.

Downside scenario

- In the downside scenario, Greek economy is assumed to register weaker growth rates compared to the baseline scenario, reflecting, inter alia, increased geopolitical uncertainty, weaker-than-expected growth in the European economy and delays in the absorption of RRF funds.

Specifically in Greece, the average of the macroeconomic variables which impact both the Probability of Default and the Loss Given Default in the estimation of expected credit losses at 31.12.2024 (period 2025-2028) and the comparative period (period 2024-2027) are the following:

31.12.2024	2025-2028		
GREECE	Downside Scenario	Baseline Scenario	Upside Scenario
Real GDP growth	0.1%	1.9%	3.6%
Unemployment rate	11.4%	8.6%	5.8%
Inflation	3.4%	2.4%	1.4%
RRE prices change	(0.4) %	2.5%	5.3%
CRE Price Index change	0.1%	1.9%	3.8%

31.12.2023	2024 – 2027		
GREECE	Downside Scenario	Baseline Scenario	Upside Scenario
Real GDP growth	0.0%	1.8%	3.7%
Unemployment rate	10.6%	8.5%	6.4%
Inflation	3.4%	2.4%	1.5%
RRE prices change	(0.1) %	2.7%	5.7%
CRE Price Index change	0.3%	1.9%	3.6%

In the countries where the Group mainly operates, the year-on-year average of macroeconomic variables for the period 2025-2027 affecting the expected credit risk loss as at 31.12.2024, is presented in the following tables:

	2025 – 2027		
CYPRUS	Downside Scenario	Baseline Scenario	Upside Scenario
Real GDP growth (% change)	0.4%	3.0%	5.6%
Unemployment (% change)	6.5%	4.8%	3.0%
Inflation prices (% change)	3.6%	2.0%	0.8%
RRE Price Index (% change)	1.5%	3.4%	5.4%
CRE Price Index (% change)	0.9%	2.2%	3.4%

Respectively, the average of the macroeconomic variables for the period 2024-2026 that impacted the expected credit losses at 31.12.2024 is presented in the following tables:

	2024 – 2026		
CYPRUS	Downside Scenario	Baseline Scenario	Upside Scenario
Real GDP growth (% change)	1.1%	3.0%	4.8%
Unemployment (% change)	7.6%	5.7%	3.9%
RRE prices (% change)	1.0%	3.2%	5.6%
CRE Price Index (% change)	(0.5) %	1.3%	2.9%

The production of baseline scenario, supported by a consistent economic description, constitutes the most likely scenario according to the current economic conditions and the Group's basic assessment of the course of the economy.

The cumulative probabilities of the macroeconomic scenarios for the Greek economy indicate that the economy performs better or worse than forecasts of the baseline scenario and the alternative scenarios, i.e. the upside and downside scenario. For each one of the alternative scenarios, the allowance for expected credit losses is calculated and weighted against the probability of each scenario in order to calculate the weighted expected credit loss.

The cumulative probability assigned to the baseline scenario remained 60%, while cumulative probability assigned to the downside and upside scenario remained 20% for each of the scenario.

If the assigned cumulative probability of the downside scenario was weighted at 100%, Expected Credit Losses would increase by € 106 mil. at 31.12.2024 (31.12.2023: € 102 mil.).

If the assigned cumulative probability of the upside scenario was weighted at 100%, Expected Credit Losses would decrease by € 72 mil. at 31.12.2024 (31.12.2023: € 88 mil.).

Undrawn loan commitments

According to IFRS 9, these contracts fall within the scope for expected credit losses recognition.

In estimating the expected credit losses over the life of an undrawn loan commitment, the Group assesses the expected part of the loan commitment that will be used throughout its expected life.

Inherent Model Risk

The Group recognizing the inherent model risk, derived from the model complexity and aggregated model risk, has adopted a Model Risk management framework which includes the principles of credit risk models development policy and risk models validation framework. In this context, the independent Risk Models and Data Validation Business Area validates all credit risk models used for the calculation of IFRS9 expected credit losses.

Governance

The Credit Risk Committee is responsible for approving the Expected Credit Losses as well as the methodologies developed by the Group for calculating the expected credit loss (ECL Methodology) for loan portfolio.

The Board of Directors approves the Group Loan Impairment Policy through the Risk Management Committee.

Credit risk measurement systems

In order to effectively manage credit risk, the Group has developed specific methodologies and credit risk measurement systems in accordance with regulatory and Basel II requirements while incorporating banking industry best practices. These methodologies and systems are continuously evolving to provide the Business Units with timely and effective support in the decision-making process and to avoid possible adverse consequences for the Group.

Definition of Default

Definition

A Default event is considered to have occurred, regarding a particular Borrower, when at least one of the following criteria has taken place:

- Past Due Criterion

The Borrower is past due more than 90 consecutive days on any material amount of the credit obligation(s).

Particularly, for Alpha Bank Greece, exposures at Alpha Leasing and ABC Factors are taken into consideration at the calculation of the Past Due Criterion.

- Unlikelihood to Pay (UTP) Criterion

The Group considers that the Borrower is unlikely to pay when assessed as unlikely the repayment of obligations unless actions such as the liquidation of collaterals are enforced.

Additionally, it is necessary to harmonize the classification of exposures in Default and the classification of exposures according to EBA and therefore any Forborne non-performing exposure (FNPL) or non-performing exposure (NPL) is considered as an exposure at Default.

For Retail exposures, the above specified definition of Default is applied at the level of an individual credit facility.

For Wholesale exposures, the definition of Default is applied at the obligor level meaning that when at least one of the above specified criteria is met, the Obligor is considered as Defaulted. The Past Due Criterion is applied both at facility and at obligor level for exposures classified as Wholesale, in order to be able to identify exposures for which the Past Due Criterion is satisfied at facility level, but not at obligor level.

The Group has decided since 2018 to align the perimeter of exposures recognized as “Non-Performing loans”, as “Default Exposures” and as “IFRS 9 Credit Impaired exposures”.

Template 14a: EU CR1-A: Maturity of exposures 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	103	7,010	17,661	14,276	-	39,050
2	Debt securities	-	1,505	6,311	9,591	-	17,407
3	Total	103	8,515	23,972	23,867	-	56,457

Template 14b: EU CR1-A: Maturity of exposures 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	99	6,893	16,984	11,848	-	35,824
2	Debt securities	-	1,882	6,288	8,798	-	16,968
3	Total	99	8,775	23,272	20,646	-	52,792

Template 15a: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	
	Gross carrying amount			Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures	
		Of which non-performing	Of which defaulted				
010	Agriculture, forestry and fishing	251	6	6	251	(2)	-
020	Mining and quarrying	21	4	4	21	(1)	-
030	Manufacturing	3,636	150	150	3,625	(78)	-
040	Electricity, gas, steam and air conditioning supply	3,067	1	1	3,043	(1)	-
050	Water supply	42	1	1	42	(0)	-
060	Construction	834	31	31	834	(15)	-
070	Wholesale and retail trade	3,167	140	140	3,167	(66)	-
080	Transport and storage	5,142	25	25	5,050	(7)	-
090	Accommodation and food service activities	3,053	23	23	3,053	(12)	-
100	Information and communication	364	3	3	364	(2)	-
110	Financial and insurance activities	242	0	0	242	(0)	-
120	Real estate activities	1,738	15	15	1,738	(8)	-
130	Professional, scientific and technical activities	496	2	2	496	(2)	-
140	Administrative and support service activities	465	7	7	465	(4)	-
150	Public administration and defense, compulsory social security	1	0	0	1	(0)	-
160	Education	80	1	1	80	(0)	-
170	Human health services and social work activities	129	3	3	129	(2)	-
180	Arts, entertainment and recreation	77	2	2	77	(1)	-
190	Other services	243	7	7	243	(42)	-
200	Total	23,045	421	421	22,919	(245)	-

Template 15b: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f
		Gross carrying amount			Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing	Of which defaulted				
010	Agriculture, forestry and fishing	163	6	6	163	(2)	-
020	Mining and quarrying	22	4	4	22	(1)	-
030	Manufacturing	3,385	146	146	3,374	(77)	-
040	Electricity, gas, steam and air conditioning supply	2,809	1	1	2,786	(1)	-
050	Water supply	30	1	1	30	(0)	-
060	Construction	803	27	27	803	(13)	-
070	Wholesale and retail trade	2,990	158	158	2,990	(80)	-
080	Transport and storage	4,136	41	41	4,040	(13)	-
090	Accommodation and food service activities	2,874	38	38	2,874	(10)	-
100	Information and communication	344	3	3	344	(2)	-
110	Financial and insurance activities	181	0	0	181	(0)	-
120	Real estate activities	1,151	19	19	1,151	(3)	-
130	Professional, scientific and technical activities	283	5	5	283	(3)	-
140	Administrative and support service activities	350	11	11	350	(5)	-
150	Public administration and defense, compulsory social security	1	0	0	1	(0)	-
160	Education	83	1	1	83	(0)	-
170	Human health services and social work activities	138	3	3	138	(2)	-
180	Arts, entertainment and recreation	79	4	4	79	(2)	-
190	Other services	33	11	11	33	(27)	-
200	Total	19,854	477	477	19,725	(243)	-

The tables below present the credit quality of the Group's exposures broken down by significant geographical area as of 31.12.2024 and 30.06.2024

Template 16a: EU CQ4: Quality of non-performing exposures by geography as of 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g
	Gross carrying/nominal amount			Of which subject to impairment	Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	Of which non-performing	Of which defaulted					
010	On-balance-sheet exposures	59,225	1,567	1,567	58,491	(742)	(5)
020	Greece	37,101	1,473	1,473	36,920	(686)	(5)
030	United Kingdom	2,084	23	23	2,074	(13)	-
040	Romania	708	0	0	708	(6)	-
050	Cyprus	1,626	25	25	1,622	(13)	-
070	Other countries	17,706	46	46	17,167	(24)	-
080	Off-balance-sheet exposures	10,285	200	200		24	
090	Greece	9,684	198	198		22	
100	United Kingdom	33	0	0		0	
110	Romania	0	0	0		0	
120	Cyprus	187	1	1		2	
140	Other countries	381	0	0		0	
150	Total	69,510	1,767	1,767	58,491	(742)	(5)

Template 16b: EU CQ4: Quality of non-performing exposures by geography as of 30.06.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g
	Gross carrying/nominal amount			Of which subject to impairment	Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	Of which non-performing	Of which defaulted					
010	On-balance-sheet exposures	54,911	1,784	1,784	54,227	(807)	(7)
020	Greece	34,774	1,693	1,693	34,665	(755)	(5)
030	United Kingdom	1,671	21	21	1,660	(13)	-
040	Romania	391	2	2	391	(2)	(2)
050	Cyprus	1,501	22	22	1,497	(16)	-
070	Other countries	16,574	46	46	16,013	(21)	-
080	Off-balance-sheet exposures	9,575	252	252		25	
090	Greece	9,066	249	249		22	
100	United Kingdom	68	0	0		0	
110	Romania	10	0	0		0	
120	Cyprus	182	2	2		3	
140	Other countries	249	0	0		0	
150	Total	64,486	2,036	2,036	54,227	(807)	(7)

Template 17a: EU CQ2: Quality of forbearance as of 31.12.2024

(Amounts in millions of Euro)

		a
		Gross carrying amount of forborne exposures
010	Loans and advances that have been forborne more than twice	2,020
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	273

Template 17b: EU CQ2: Quality of forbearance as of 31.12.2023

(Amounts in millions of Euro)

		a
		Gross carrying amount of forborne exposures
010	Loans and advances that have been forborne more than twice	3,071
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	699

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

Template 18a: EU CQ1: Credit quality of forborne exposures as of 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h
	Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
	Performing forborne	Non-performing forborne		Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-
010	Loans and advances	1,724	764	764	764	(66)	(183)	1,960
020	Central banks	-	-	-	-	-	-	-
030	General governments	-	0	0	0	-	(0)	0
040	Credit institutions	-	-	-	-	-	-	-
050	Other financial corporations	-	-	-	-	-	-	-
060	Non-financial corporations	322	160	160	160	(11)	(42)	393
070	Households	1,403	605	605	605	(56)	(141)	1,567
080	Debt Securities	-	-	-	-	-	-	-
090	Loan commitments given	1	-	-	-	0	-	0
100	Total	1,725	764	764	764	(66)	(183)	1,960

Template 18b: EU CQ1: Credit quality of forborne exposures as of 30.06.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	
	Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures		
	Performing forborne	Non-performing forborne		Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
		Of which defaulted							
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	
010	Loans and advances	2,250	989	989	989	(95)	(239)	2,534	652
020	<i>Central banks</i>	-	-	-	-	-	-	-	-
030	<i>General governments</i>	-	0	0	0	-	(0)	0	0
040	<i>Credit institutions</i>	-	-	-	-	-	-	-	-
050	<i>Other financial corporations</i>	-	-	-	-	-	-	-	-
060	<i>Non-financial corporations</i>	345	228	228	228	(11)	(59)	454	157
070	<i>Households</i>	1,905	762	762	762	(84)	(179)	2,081	495
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	1	0	0	0	0	-	0	0
100	Total	2,251	989	989	989	(95)	(239)	2,535	652

Template 19a: EU CQ3: Credit quality of performing and non-performing exposures by past due days as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
005	Cash balances at central banks and other demand deposits	2,781	2,781	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	40,266	40,125	141	1,561	557	142	153	126	135	58	390	1,561
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	62	62	-	1	0	0	0	-	0	-	0	1
040	Credit institutions	2,016	2,016	-	70	-	-	-	-	-	-	70	70
050	Other financial corporations	6,942	6,942	-	0	0	-	0	0	0	0	0	0
060	Non-financial corporations	22,624	22,596	28	421	168	24	30	19	32	17	131	421
070	Of which SMEs	8,001	7,974	27	355	109	24	30	18	31	15	128	355
080	Households	8,622	8,509	113	1,069	389	117	123	108	103	41	189	1,069
090	Debt securities	17,391	17,391	-	7	-	-	-	7	-	-	-	7
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	13,606	13,606	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	1,819	1,819	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	805	805	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	1,161	1,161	-	7	-	-	-	7	-	-	-	7
150	Off-balance-sheet exposures	10,085			200								200
160	Central banks	-			-								-
170	General governments	201			-								-
180	Credit institutions	924			-								-
190	Other financial corporations	536			0								0
200	Non-financial corporations	6,928			197								197
210	Households	1,495			3								3
220	Total	70,524	60,297	141	1,767	557	142	153	133	135	58	390	1,767

Template 19b: EU CQ3: Credit quality of performing and non-performing exposures by past due days as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
005	Cash balances at central banks and other demand deposits	4,252	4,252	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	36,164	36,040	124	1,778	814	128	151	121	194	69	301	1,778
020	<i>Central banks</i>	-	-	-	-	-	-	-	-	-	-	-	-
030	<i>General governments</i>	64	64	-	1	0	-	-	-	0	-	0	1
040	<i>Credit institutions</i>	1,293	1,293	-	70	-	-	-	-	-	-	70	70
050	<i>Other financial corporations</i>	6,695	6,695	-	0	0	0	-	0	0	0	0	0
060	<i>Non-financial corporations</i>	19,376	19,314	62	477	246	17	22	15	38	21	118	477
070	<i>Of which SMEs</i>	7,567	7,534	33	372	147	17	22	15	37	19	115	372
080	<i>Households</i>	8,736	8,675	62	1,230	568	111	129	106	156	48	112	1,230
090	Debt securities	16,963	16,963	-	6	-	-	-	6	-	-	-	6
100	<i>Central banks</i>	-	-	-	-	-	-	-	-	-	-	-	-
110	<i>General governments</i>	13,258	13,258	-	-	-	-	-	-	-	-	-	-
120	<i>Credit institutions</i>	1,741	1,741	-	-	-	-	-	-	-	-	-	-
130	<i>Other financial corporations</i>	719	719	-	-	-	-	-	-	-	-	-	-
140	<i>Non-financial corporations</i>	1,246	1,246	-	6	-	-	-	6	-	-	-	6
150	Off-balance-sheet exposures	9,323			252								252
160	<i>Central banks</i>	-			-								-
170	<i>General governments</i>	198			-								-
180	<i>Credit institutions</i>	853			-								-
190	<i>Other financial corporations</i>	484			0								0
200	<i>Non-financial corporations</i>	6,248			248								248
210	<i>Households</i>	1,540			3								3
220	Total	66,702	57,255	124	2,036	814	128	151	128	194	69	301	2,036

Template 20a: EU CR1: Performing and non-performing exposures and related provisions as of 31.12.2024

(Amounts in millions of Euro)

		a		b		c		d		e		f		g		h		i		j		k		l		m		n		o	
		Gross carrying amount/nominal amount								Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions								Accumulated partial write-off		Collateral and financial guarantees received											
		Performing exposures				Non-performing exposures				Performing exposures – accumulated impairment and provisions				Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions																	
		Of which stage 1	Of which stage 2			Of which stage 2	Of which stage 3			Of which stage 1	Of which stage 2			Of which stage 2	Of which stage 3																
005	Cash balances at central banks and other demand deposits	2,781	2,781	-	-	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
010	Loans and advances	40,266	35,584	3,250	1,561	-	1,325	(197)	(65)	(104)	(526)	-	(450)	(1,431)	28,627	908															
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
030	General governments	62	62	0	1	-	1	(0)	(0)	(0)	(1)	-	(1)	(1)	16	0															
040	Credit institutions	2,016	2,016	-	70	-	70	(0)	(0)	-	(70)	-	(70)	-	-	-															
050	Other financial corporations	6,942	6,345	1	0	-	0	(2)	(2)	(0)	(0)	-	(0)	(26)	5,646	0															
060	Non-financial corporations	22,624	20,984	1,461	421	-	370	(81)	(48)	(30)	(165)	-	(139)	(558)	16,318	228															
070	Of which SMEs	8,001	7,181	781	355	-	307	(29)	(5)	(21)	(141)	-	(115)	(525)	5,638	191															
080	Households	8,622	6,178	1,787	1,069	-	885	(114)	(15)	(74)	(291)	-	(241)	(846)	6,646	680															
090	Debt securities	17,391	17,381	-	7	-	7	(15)	(15)	-	(5)	-	(5)	-	-	-															
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-															
110	General governments	13,606	13,606	-	-	-	-	(11)	(11)	-	-	-	-	-	-	-															
120	Credit institutions	1,819	1,819	-	-	-	-	(2)	(2)	-	-	-	-	-	-	-															
130	Other financial corporations	805	794	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-															
140	Non-financial corporations	1,161	1,161	-	7	-	7	(2)	(2)	-	(5)	-	(5)	-	-	-															
150	Off-balance-sheet exposures	10,085	9,745	337	200	-	200	(2)	(2)	(1)	(21)	-	(21)		935	33															
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-															
170	General governments	201	200	1	-	-	-	(0)	(0)	(0)	-	-	-	-	0	-															
180	Credit institutions	924	914	10	-	-	-	(1)	(1)	(0)	-	-	-	-	-	-															
190	Other financial corporations	536	527	9	0	-	0	(0)	(0)	(0)	(0)	-	(0)		13	-															
200	Non-financial corporations	6,928	6,662	264	197	-	197	(1)	(1)	(0)	(21)	-	(21)		882	33															
210	Households	1,495	1,442	53	3	-	3	(0)	(0)	(0)	(0)	-	(0)		40	0															
220	Total	70,524	65,491	3,586	1,767	-	1,532	(214)	(82)	(104)	(552)	-	(476)	(1,431)	29,563	941															

Template 20b: EU CR1: Performing and non-performing exposures and related provisions as of 30.06.2024

(Amounts in millions of Euro)

		a		b		c		d		e		f		g		h		i		j		k		l		m		n		o	
		Gross carrying amount/nominal amount								Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions								Accumulated partial write-off		Collateral and financial guarantees received											
		Performing exposures				Non-performing exposures				Performing exposures – accumulated impairment and provisions				Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions								On performing exposures	On non-performing exposures								
		Of which stage 1	Of which stage 2			Of which stage 2	Of which stage 3			Of which stage 1	Of which stage 2			Of which stage 2	Of which stage 3																
005	Cash balances at central banks and other demand deposits	4,252	4,252	-	-	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
010	Loans and advances	36,164	31,000	3,757	1,778	-	1,468	(216)	(54)	(130)	(572)	-	(481)	(1,631)	26,546	1,057															
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
030	General governments	64	63	0	1	-	1	(0)	(0)	(0)	(1)	-	(1)	(1)	18	0															
040	Credit institutions	1,293	1,293	-	70	-	70	(0)	(0)	-	(70)	-	(70)	-	-	-															
050	Other financial corporations	6,695	6,153	1	0	-	0	(2)	(2)	(0)	(0)	-	(0)	(26)	5,634	0															
060	Non-financial corporations	19,376	18,012	1,183	477	-	406	(66)	(41)	(22)	(177)	-	(146)	(677)	14,085	273															
070	Of which SMEs	7,567	6,804	718	372	-	318	(25)	(4)	(19)	(142)	-	(115)	(549)	5,282	208															
080	Households	8,736	5,478	2,573	1,230	-	991	(148)	(12)	(107)	(325)	-	(264)	(928)	6,808	783															
090	Debt securities	16,963	16,948	-	6	-	6	(16)	(16)	-	(4)	-	(4)	-	-	-															
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-															
110	General governments	13,258	13,258	-	-	-	-	(11)	(11)	-	-	-	-	-	-	-															
120	Credit institutions	1,741	1,738	-	-	-	-	(2)	(2)	-	-	-	-	-	-	-															
130	Other financial corporations	719	708	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-															
140	Non-financial corporations	1,246	1,245	-	6	-	6	(2)	(2)	-	(4)	-	(4)	-	-	-															
150	Off-balance-sheet exposures	9,323	9,100	222	252	-	251	(2)	(1)	(2)	(23)	-	(23)		853	34															
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-															
170	General governments	198	197	1	-	-	-	(0)	-	(0)	-	-	-	-	0	-															
180	Credit institutions	853	853	0	-	-	-	(0)	(0)	(0)	-	-	-	-	-	-															
190	Other financial corporations	484	483	1	0	-	0	(0)	(0)	(0)	(0)	-	(0)		13	-															
200	Non-financial corporations	6,248	6,101	146	248	-	248	(2)	(0)	(1)	(23)	-	(23)		801	34															
210	Households	1,540	1,465	74	3	-	3	(0)	(0)	(0)	(0)	-	(0)		39	0															
220	Total	66,702	61,299	3,980	2,036	-	1,726	(234)	(71)	(131)	(599)	-	(508)	(1,631)	27,399	1,090															

Template 21a: EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries as of 31.12.2024

(Amounts in millions of Euro)

		a	b
		Gross amount	Related net accumulated recoveries
		carrying	
010	Initial stock of non-performing loans and advances	2,309	
020	Inflows to non-performing portfolios	857	
030	Outflows from non-performing portfolios	(1,606)	
040	Outflow to performing portfolio	(582)	
050	Outflow due to loan repayment, partial or total	(173)	
060	Outflow due to collateral liquidations	(21)	10
070	Outflow due to taking possession of collateral	(20)	0
080	Outflow due to sale of instruments	-	-
090	Outflow due to risk transfers	(3)	-
100	Outflows due to write-offs	(125)	
110	Outflow due to other situations	(4)	
120	Outflow due to reclassification as held for sale	(677)	
130	Final stock of non-performing loans and advances	1,561	

Template 21b: EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries as of 31.12.2023

(Amounts in millions of Euro)

	a		b	
	Gross amount	carrying	Related accumulated recoveries	net
010	Initial stock of non-performing loans and advances			
020	Inflows to non-performing portfolios			
030	Outflows from non-performing portfolios			
040	Outflow to performing portfolio			
050	Outflow due to loan repayment, partial or total			
060	Outflow due to collateral liquidations		1	
070	Outflow due to taking possession of collateral		0	
080	Outflow due to sale of instruments		1	
090	Outflow due to risk transfers		-	
100	Outflows due to write-offs			
110	Outflow due to other situations			
120	Outflow due to reclassification as held for sale			
130	Final stock of non-performing loans and advances			

7.4 Banks' use of external credit ratings under the standardised approach

Alpha Bank Group uses the available credit ratings from Moody's Investors Service, Standard & Poor's Ratings Services, Fitch Ratings and ICAP CRIF S.A. which have been approved from Bank of Greece as eligible External Credit Assessment Institutions (ECAIs) for the use of their credit ratings in regulatory capital calculation (Decision 250/25.9.2007). Credit ratings of the Moody's Investors Service, Standard & Poor's Ratings Services and Fitch Ratings are used, where available, for all Group portfolios. ICAP ratings are used for credit exposures against corporate customers incorporated in Greece, in accordance with the

related requirements in the CRR.

The asset classes for which Moody's, Standard & Poor's and Fitch ratings are used are the following:

- Exposures to Central Governments and Central Banks
- Exposures to Financial Institutions
- Exposures to Multilateral Development Banks
- Exposures to International Organizations
- Exposures to Corporates
- Exposures in the form of covered bonds

For all other asset classes, credit quality bands are assigned to the corresponding risk weights per exposure type, as described in detail in CRR 575/2013.

Credit ratings are assigned to credit quality bands. Then, credit quality bands are assigned to the corresponding risk weights per portfolio type, as described in detail in CRR 575/2013.

Credit Quality Band	Standard & Poor's Ratings Service	Moody's Investor Services	Fitch Ratings	ICAP CRIF S.A.
1	AAA to AA-	Aaa to Aa3	AAA to AA-	AAA to AA
2	A+ to A-	A1 to A3	A+ to A-	A
3	BBB+ to BBB-	Baa1 to Baa3	BBB+ to BBB-	BBB
4	BB+ to BB-	Ba1 to Ba3	BB+ to BB-	BB
5	B+ to B-	B1 to B3	B+ to B-	B to CCC
6	CCC+ and below	Caa1 and below	CCC+ and below	CC and below

If for a specific exposure there are two available ratings, then the rating leading to the higher risk weight is selected. In case, that there are more than two available ratings, initially the two ratings leading to the lower risk weights are chosen and then from the aforesaid two choices is selected the one corresponding to the higher risk weight.

Exposures to counterparties, for which a credit assessment by a nominated ECAI is not available, shall be assigned a risk weight according to the procedure described to the respective articles of the CRR 575/2013.

Under Standardised approach, credit risk is measured by applying risk weights outlined in CRD IV based on the exposure class to which the exposure is allocated. The following tables outline the Standardised exposure classes by CRD IV prescribed risk weight. Exposures subject to Counterparty Credit Risk are not included in the table.

Template 22a EU CR5 – standardised approach as of 31.12.2024

(Amounts in millions of Euro)

	Exposure classes	Risk weight														Total	Of which unrated	
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%			Others
		a	b	c	d	e	f	g	h	i	j	k	l	m	n			o
1	Central governments or central banks	20,998	-	-	-	11	-	-	-	-	2,419	-	678	-	-	-	-	24,106
2	Regional government or local authorities	-	-	-	-	12	-	-	-	-	-	-	-	-	-	-	-	12
3	Public sector entities	561	-	-	-	0	-	-	-	37	-	-	-	-	-	-	-	598
4	Multilateral development banks	1,007	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,007
5	International organisations	362	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	362
6	Institutions	341	-	-	-	670	-	789	-	560	-	-	-	-	-	-	-	2,359
7	Corporates	-	-	-	-	3,924	-	3,757	-	7,739	555	-	-	-	-	-	-	15,975
8	Retail exposures	-	-	-	-	-	-	-	-	2,551	-	-	-	-	-	-	-	2,551
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	5,725	2,914	-	514	465	2	-	-	-	-	-	9,621
10	Exposures in default	-	-	-	-	-	-	-	-	724	79	-	-	-	-	-	-	803
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	165	-	-	-	-	-	-	165
12	Covered bonds	-	-	-	39	-	-	-	-	-	-	-	-	-	-	-	-	39
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Units or shares in collective investment undertakings	0	-	-	-	-	-	-	-	12	-	-	-	-	-	-	-	12
15	Equity exposures	-	-	-	-	-	-	-	-	787	-	45	-	-	-	-	-	832
16	Other items	448	-	-	-	-	-	-	-	2,183	-	-	-	-	-	-	-	2,632
17	TOTAL	23,718	-	-	39	4,616	5,725	7,461	-	3,065	14,925	802	722	-	-	-	-	61,073

Template 22b EU CR5 – standardised approach as of 30.06.2024

(Amounts in millions of Euro)

	Exposure classes	Risk weight														Total	Of which unrated	
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%			Others
		a	b	c	d	e	f	g	h	i	j	k	l	m	n			o
1	Central governments or central banks	22,827	-	-	5	6	-	-	-	-	2,499	-	660	-	-	-	463	26,459
2	Regional government or local authorities	-	-	-	-	13	-	39	-	-	-	-	-	-	-	-	-	52
3	Public sector entities	674	-	-	-	0	-	-	-	-	237	-	-	-	-	-	-	910
4	Multilateral development banks	810	-	-	-	0	-	-	-	-	-	-	-	-	-	-	-	810
5	International organisations	340	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	340
6	Institutions	336	-	-	-	664	-	645	-	-	585	-	-	-	-	-	-	2,231
7	Corporates	-	-	-	-	34	-	2,582	-	-	10,009	426	-	-	-	-	-	13,051
8	Retail exposures	-	-	-	-	-	-	-	-	2,927	-	-	-	-	-	-	-	2,927
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	7,129	3,999	-	579	792	0	-	-	-	-	-	12,500
10	Exposures in default	-	-	-	-	-	-	-	-	-	870	142	-	-	-	-	-	1,012
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	119	-	-	-	-	-	119
12	Covered bonds	-	-	-	39	-	-	-	-	-	-	-	-	-	-	-	-	39
13	Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Units or shares in collective investment undertakings	0	-	-	-	-	-	-	-	-	14	-	-	-	-	-	-	14
15	Equity exposures	-	-	-	-	-	-	-	-	-	478	-	35	-	-	-	-	513
16	Other items	504	-	-	-	-	-	-	-	-	2,270	-	-	-	-	-	-	2,774
17	TOTAL	25,491	-	-	44	717	7,129	7,266	-	3,506	17,754	687	695	-	-	-	463	63,751

7.5 Credit risk mitigation

Credit risk mitigation techniques reduce exposure value and expected loss. According to CRR 575/2013, only specific types of credit risk mitigation are eligible for capital adequacy calculation purposes.

Moreover, the Bank of Greece sets additional criteria which should be satisfied during the collateral management process (market value monitoring, insurance, legal validity) and the terms and conditions of the relevant agreements.

7.5.1 Collateral valuation and management policies and procedures

Collateral can be used in order to mitigate the Credit Risk created to a financial instrument in case a customer or counterparty fails to meet his contractual obligations.

Collaterals are holdings or rights of every type provided to the Bank by its debtors or third parties to be used as additional funding sources in case of claim liquidation.

The main collateral types held for retail customers are mortgages, cash, mutual funds and sovereign securities (repos, bonds). Additionally, in case of real estate loans maximum Loan to Value (LTV: loan amount to property commercial value) limits have been set, depending upon loan purpose and collateral. The amount the customer contributes to the asset being financed is a very important factor during the loan approval process since it directly affects customer's repayment ability.

In case the debtor is a private individual, the Group seeks to have her/him insured against death and severe injuries.

As far as wholesale customers are concerned, loan repayment depends upon the viability and growth perspectives of the company, the servicing ability of the company and its owners, the circumstances prevailing at the sectors and markets they are active in, as well as unexpected factors, positively or negatively affecting their operation.

In order to assess an acceptable value for collateral, the Bank calculates the value based on the potential proceeds that could arise if and when this collateral is liquidated. This estimation is referred to as the acceptable value of the collaterals provided to the Bank for the determination of which the quality of the assets as well as their market value are taken into account. In this way, the ratio of acceptable values is determined for each type of collateral, those are expressed as a percentage of their market value, nominal or weighted value, depending on the type of collateral. Depending on the type of collateral, the assessments of the value of collateral is carried out by partners (Appraisers), with the necessary expertise and specialization. The selection of the appraiser is subject to specific criteria, while their performance is assessed on an ongoing basis.

Especially for tangible collaterals, the Bank entrusts independent qualified appraisers who have the necessary qualifications, ability and experience in evaluation (as defined in the article 208 paragraph 3 of the EU Regulation No 575/2013).

According to the Bank's Credit Policy, the existence and the valuation of both pledged collateral and mortgaged property are closely monitored. The frequency of the valuation varies according to the right or asset on which the pledge may be registered, up to a maximum of one year.

In addition to the review of collateral values, the Bank also validates such collateral values on an annual basis. On a regular basis and through proper sampling, the Bank performs audits for the procedures of implementation of the Group's Loan Collateral Policy and audits (back-testing) for the verification of property valuations. Audits are based on indices and individual assessments in order to ensure the proper collateral valuation is captured in the Bank's core systems and controls are in place for the Bank's relevant committee reviews and approvals.

Regarding the rest of the companies of Alpha Bank Group, apart from the general principles applying to the Group as a whole, additional clauses also exist. To specify, as far as leasing contracts are concerned, apart from the leased property, Alpha Leasing might request additional collateral. Moreover, Factoring customers are subject to collateral limits depending upon debtor's creditworthiness and reexamined according to the Bank's Policy regarding loans to corporate customers.

7.5.2 Description of the main collateral types

Collateral used to mitigate risk, both for mortgage and other lending is diversified. The main types of guarantors are corporates, individuals, financial institutions and sovereigns. Their creditworthiness is assessed on a case by-case basis.

There are two broad categories of collateral: Contractual collaterals – guarantees and tangible collaterals.

Guarantees are the most common collateral type of the first category. A guarantee is a legally enforceable relationship between the Bank and the borrower, through which the guarantor assumes the responsibility of paying the debt. It is documented and presupposes the existence of another legally enforceable relationship between the Bank and the borrower (loan).

Provided guarantees are usually found in banking practice in the following forms: Personal Guarantee, Corporate Guarantee, Credit Institutions Guarantee, Greek State Guarantee, Guarantee of HDB (Hellenic Development Bank), Guarantee Programs of the European Investment Fund (EIF) and Letter of Comfort. The most common types of tangible collateral are: mortgages on real estate properties and pledges on commodities, deposits and cheques or claims and receivables.

Tangible collateral value is estimated on a regular basis, at least annually, except for cases where the contract foresees something different, in cases of known changes on the property or in the business process, or in cases there are urban planning changes or other considerable factors; in case of exceptional/unforeseen events, additional valuation can take place. In case of significant negative changes at collateral values, the Bank seeks to restore the loan to collateral value ratio to the desired levels. The initial valuations of a real estate property, provided as collateral, are carried out through on-site appraisals and internal property inspections to further improve the effect of credit risk mitigation. The Bank requests that all mortgages are covered by an insurance contract and the compensation is assigned to the Bank. The same might apply, on a case-by-case basis, on other physical collaterals as well.

The following table presents the exposure value covered through eligible collateral and guarantees / credit derivatives for each asset class, based on regulatory standards while it also shows the volume of unsecured and secured exposures. Secured exposures are limited to those exposures against which eligible collateral which meets CRR definitions is held and has been used in the calculation of the Group's capital requirements. Haircuts are applied consistent with CRR requirements.

Exposures where the Group nets derivative mark-to-market positions with certain interbank counterparties against cash collateral placed and received with those counterparties under CSA agreements are excluded. For cash collateral held against derivative exposures refer to the counterparty credit risk section.

Template 23a: EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 31.12.2024

(Amounts in millions of Euro)

		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	14,350	29,535	21,848	7,687	-
2	Debt securities	17,398	-	-	-	-
3	Total	31,748	29,535	21,848	7,687	-
4	<i>Of which non-performing exposures</i>	660	908	719	189	-
EU-5	<i>Of which defaulted</i>	660	908			

Template 23b: EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 30.06.2024

(Amounts in millions of Euro)

		Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives	
		a				b
1	Loans and advances	13,804	27,602	20,181	7,421	-
2	Debt securities	16,969	-	-	-	-
3	Total	30,774	27,602	20,181	7,421	-
4	<i>Of which non-performing exposures</i>	728	1,057	851	206	-
EU-5	<i>Of which defaulted</i>	728	1,057			

Template 24a: EU CR4 – standardised approach – Credit risk exposure and CRM effects as of 31.12.2024

(Amounts in millions of Euro)

	Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	19,112	195	24,106	-	4,115	17.07%
2	Regional government or local authorities	12	1	12	0	2	20.00%
3	Public sector entities	349	1	598	0	37	6.19%
4	Multilateral development banks	185	-	1,007	-	-	0.00%
5	International organisations	362	-	362	-	-	0.00%
6	Institutions	1,974	912	1,975	385	1,088	46.12%
7	Corporates	16,420	6,159	14,612	1,363	10,121	63.35%
8	Retail	3,141	2,761	2,388	163	1,771	69.41%
9	Secured by mortgages on immovable property	9,697	56	9,604	17	3,933	40.88%
10	Exposures in default	874	178	779	23	842	104.93%
11	Exposures associated with particularly high risk	191	-	165	-	248	150.00%
12	Covered bonds	39	-	39	-	4	10.00%
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0.00%
14	Collective investment undertakings	12	-	12	-	12	98.17%
15	Equity	832	-	832	-	899	108.08%
16	Other items	2,632	-	2,632	-	2,183	82.96%
17	TOTAL	55,830	10,264	59,122	1,951	25,255	41.35%

Template 24b: EU CR4 – standardised approach – Credit risk exposure and CRM effects as of 30.06.2024

(Amounts in millions of Euro)

	Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	21,031	193	26,459	0	4,265	16.12%
2	Regional government or local authorities	52	1	52	0	22	42.57%
3	Public sector entities	570	1	910	0	237	25.99%
4	Multilateral development banks	193	-	810	0	0	0.00%
5	International organisations	340	-	340	-	-	0.00%
6	Institutions	1,849	903	1,853	378	1,041	46.63%
7	Corporates	13,344	5,703	11,937	1,115	10,736	82.26%
8	Retail	3,546	3,196	2,713	214	2,017	68.92%
9	Secured by mortgages on immovable property	12,736	133	12,467	33	5,248	41.99%
10	Exposures in default	1,167	229	985	27	1,083	107.01%
11	Exposures associated with particularly high risk	145	-	119	-	178	150.00%
12	Covered bonds	39	-	39	-	4	10.00%
13	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0.00%
14	Collective investment undertakings	14	-	14	-	14	98.45%
15	Equity	513	-	513	-	565	110.26%
16	Other items	2,774	-	2,774	-	2,270	81.84%
17	TOTAL	58,313	10,358	61,984	1,767	27,682	43.42%

7.6 Concentration Risk on Collateral

Collaterals are received both for Wholesale and Retail lending in order to mitigate credit risk that may arise from the obligor's inability to fulfill his contractual obligations. Collaterals include all kind of assets and rights which are made available to the Bank either by their debtors or by third parties, in order to be used as complementary liquidity sources of relative loans. The mitigation tools applied by the Bank include two broad categories: intangible and tangible collaterals.

For credit exposures, the most commonly accepted collaterals for credit risk mitigation purposes are real estate assets. Usually, consumer loans are not collateralised, except for car loans where the Bank retains ownership until full loan repayment and some cash collateralized loans. Mortgage loans are fully collateralised with residential real estate properties. Business loans are mainly collateralized with commercial and residential real estate properties.

For treasury transactions the risk due to collaterals is immaterial. For derivative interbank transactions the Bank signed CSA agreements with exchange of cash collateral. For Repo / Reverse Repo transactions the Bank signed GMRA agreements.

Template 25a: EU CQ6: Collateral valuation - loans and advances as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l						
		Loans and advances																	
		Performing			Non-performing														
					Unlikely to pay that are not past due or are past due ≤ 90 days			Past due > 90 days											
		Of which past due > 30 days ≤ 90 days						Of which past due > 90 days ≤ 180 days		Of which: past due > 180 days ≤ 1 year		Of which: past due > 1 years ≤ 2 years		Of which: past due > 2 years ≤ 5 years		Of which: past due > 5 years ≤ 7 years		Of which: past due > 7 years	
010	Gross carrying amount	41,827	40,266	141	1,561	557	1,003	142	153	126	135	58	390						
020	<i>Of which secured</i>	33,239	32,027	121	1,212	478	734	115	118	87	85	47	281						
030	<i>Of which secured with immovable property</i>	13,898	12,936	110	961	434	527	101	108	73	64	34	147						
040	<i>Of which instruments with LTV higher than 60% and lower or equal to 80%</i>	3,336	3,138		198	117	80												
050	<i>Of which instruments with LTV higher than 80% and lower or equal to 100%</i>	3,775	3,514		261	109	152												



		a	b	c	d	e	f	g	h	i	j	k	l
Loans and advances		Performing											
		Non-performing			Past due > 90 days								
		Of which past due > 30 days ≤ 90 days	Unlikely to pay that are not past due or are past due ≤ 90 days	Of which past due > 90 days ≤ 180 days	Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years				
060	<i>Of which instruments with LTV higher than 100%</i>	2,652	2,301		352	139	212						
070	Accumulated impairment for secured assets	(380)	(98)	(5)	(282)	(62)	(220)	(16)	(16)	(15)	(31)	(20)	(121)
080	Collateral												
090	<i>Of which value capped at the value of exposure</i>	21,848	21,129	103	719	397	322	87	90	57	43	14	31
100	<i>Of which immovable property</i>	12,449	11,781	98	668	367	301	85	86	55	35	13	28
110	<i>Of which value above the cap</i>	22,785	22,032	68	753	307	445	49	60	61	71	40	163
120	<i>Of which immovable property</i>	9,542	8,919	59	622	229	393	47	58	58	56	36	138
130	Financial guarantees received	7,687	7,498	5	189	7	182	8	8	14	11	13	129
140	Accumulated partial write-off	(1,431)	(643)	(10)	(788)	(270)	(517)	(26)	(34)	(59)	(94)	(40)	(265)



Template 25b: EU CQ6: Collateral valuation - loans and advances as of 31.12.2023

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l				
Loans and advances																	
		Performing			Non-performing												
					Past due > 90 days												
					Of which past due > 30 days ≤ 90 days	Unlikely to pay that are not past due or are past due ≤ 90 days						Of which past due > 90 days ≤ 180 days	Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years
010	Gross carrying amount	38,218	35,909	108	2,309	1,092	1,217	144	153	208	273	75	365				
020	<i>Of which secured</i>	30,905	29,076	87	1,829	954	875	108	116	146	216	58	231				
030	<i>Of which secured with immovable property</i>	14,407	12,793	71	1,614	896	718	98	104	132	183	39	160				
040	<i>Of which instruments with LTV higher than 60% and lower or equal to 80%</i>	3,145	2,865		280	198	82										
050	<i>Of which instruments with LTV higher than 80% and lower or equal to 100%</i>	4,344	3,905		439	256	183										



		a	b	c	d	e	f	g	h	i	j	k	l
Loans and advances													
		Performing			Non-performing								
					Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days							
		Of which past due > 30 days ≤ 90 days				Of which past due > 90 days ≤ 180 days		Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years	
060	<i>Of which instruments with LTV higher than 100%</i>	3,364	2,677		687	328	360						
070	Accumulated impairment for secured assets	(548)	(113)	(3)	(435)	(127)	(308)	(15)	(21)	(40)	(77)	(21)	(134)
080	Collateral												
090	<i>Of which value capped at the value of exposure</i>	20,468	19,236	73	1,232	767	465	78	80	96	123	25	63
100	<i>Of which immovable property</i>	12,735	11,578	64	1,158	730	428	76	78	90	110	23	51
110	<i>Of which value above the cap</i>	18,926	17,925	62	1,001	485	516	53	63	74	122	57	147
120	<i>Of which immovable property</i>	8,893	8,079	48	814	406	408	52	55	58	102	41	101
130	Financial guarantees received	7,897	7,786	6	111	23	88	12	10	7	14	12	34
140	Accumulated partial write-off	(1,927)	(625)	(7)	(1,302)	(436)	(866)	(34)	(69)	(113)	(158)	(97)	(396)

Template 26a: EU CQ7: Collateral obtained by taking possession and execution processes as of 31.12.2024

(Amounts in millions of Euro)

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	35	(10)
020	Other than PP&E	667	(132)
030	<i>Residential immovable property</i>	230	(23)
040	<i>Commercial Immovable property</i>	430	(108)
050	<i>Movable property (auto, shipping, etc.)</i>	0	-
060	<i>Equity and debt instruments</i>	7	(1)
070	<i>Other collateral</i>	-	-
080	Total	702	(141)

Template 26b: EU CQ7: Collateral obtained by taking possession and execution processes as of 30.06.2024

(Amounts in millions of Euro)

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	35	(10)
020	Other than PP&E	802	(188)
030	<i>Residential immovable property</i>	233	(26)
040	<i>Commercial Immovable property</i>	560	(160)
050	<i>Movable property (auto, shipping, etc.)</i>	0	-
060	<i>Equity and debt instruments</i>	9	(2)
070	<i>Other collateral</i>	-	-
080	Total	836	(197)



Template 27a: EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c		d	e	f		g	h	i	j	k	l
		Debt balance reduction		Total collateral obtained by taking possession											
				Foreclosed ≤ 2 years				Foreclosed > 2 years ≤ 5 years		Foreclosed > 5 years		Of which non-current assets held-for-sale			
		Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
010	Collateral obtained by taking possession classified as PP&E	-	-	35	(10)										
020	Collateral obtained by taking possession other than that classified as PP&E	437	(11)	667	(132)	52	(1)	183	(11)	432	(120)	145	(41)		
030	<i>Residential immovable property</i>	139	-	230	(23)	27	(0)	104	(6)	99	(17)	31	(3)		
040	<i>Commercial immovable property</i>	284	-	430	(108)	25	(1)	72	(4)	333	(103)	114	(39)		
050	<i>Movable property (auto, shipping, etc.)</i>	-	-	0	-	-	-	-	-	0	-	-	-		
060	<i>Equity and debt instruments</i>	13	(11)	7	(1)	-	-	7	(1)	-	-	-	-		
070	<i>Other collateral</i>	-	-	-	-	-	-	-	-	-	-	-	-		
080	Total	437	(11)	702	(141)	52	(1)	183	(11)	432	(120)	145	(41)		

Template 27b: EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown as of 31.12.2023

(Amounts in millions of Euro)

		a	b	c		d	e	f		g	h	i	j	k	l
		Debt balance reduction		Total collateral obtained by taking possession											
		Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Foreclosed ≤ 2 years		Foreclosed > 2 years ≤ 5 years		Foreclosed > 5 years		Of which non-current assets held-for-sale			
						Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
010	Collateral obtained by taking possession classified as PP&E	-	-	38	(12)										
020	Collateral obtained by taking possession other than that classified as PP&E	537	(74)	838	(200)	130	(7)	221	(23)	487	(170)	319	(101)		
030	<i>Residential immovable property</i>	136	-	244	(28)	51	(3)	103	(7)	90	(19)	58	(10)		
040	<i>Commercial immovable property</i>	325	-	579	(165)	74	(4)	112	(14)	392	(147)	261	(91)		
050	<i>Movable property (auto, shipping, etc.)</i>	-	-	0	-	-	-	-	-	0	-	-	-		
060	<i>Equity and debt instruments</i>	76	(74)	15	(6)	5	(0)	6	(2)	4	(4)	-	-		
070	<i>Other collateral</i>	-	-	-	-	-	-	-	-	-	-	-	-		
080	Total	537	(74)	876	(212)	130	(7)	221	(23)	487	(170)	319	(101)		

8 Counterparty credit risk (CCR)

Counterparty credit risk is the risk of default of a counterparty before the final settlement of all existing transactions' cash flows. An economic loss would occur if the portfolio of transactions with the counterparty has a positive economic value to the Group at the time of counterparty default. According to CRR 575/2013 the term transaction refers to:

- Over the counter (OTC) derivative transactions, such as FX or interest rate derivative transactions
- Repurchase transactions, securities or commodities lending or borrowing transactions or margin lending transactions
- Long settlement transactions

Alpha Bank Group has the first two types of transactions.

The exposures generating counterparty credit risk are monitored on a daily basis. The Group has set limits per counterparty group, per counterparty and per product.

In order to reduce counterparty credit risk exposure, Alpha Bank Group uses ISDA (International Swap and Derivatives Association) and GMRA (Global Master Repurchase Agreement) bilateral contracts for financial products transactions with financial institutions.

Since 30/06/2021 Alpha Bank Group has adopted the Standardised approach for counterparty credit risk (SA-CCR), the new methodology for calculating the EAD under CRR II, which is significantly different to its predecessor, the CEM under the CRR I. The SA-CCR is more risk sensitive compared to the prescribed approaches under CRR I, thus is expected to provide an EAD value which better reflects the risks to which Banks are exposed to as a result of derivative transactions.

The tables below present the Group's counterparty credit exposures, including the impact of netting and collateral. Current credit exposures consist of the replacement cost of contracts together with potential future credit exposure.

Template 28a: EU CCR1 – Analysis of CCR by approach as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU2	EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1	SA-CCR (for derivatives)	204	194		1.4	1,060	556	556	223
2	IMM (for derivatives and SFTs)			-		-	-	-	-
2a	<i>Of which securities financing transactions netting sets</i>			-		-	-	-	-
2b	<i>Of which derivatives and long settlement transactions netting sets</i>			-		-	-	-	-
2c	<i>Of which from contractual cross-product netting sets</i>			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					4,319	40	40	24
5	VaR for SFTs					-	-	-	-
6	Total					5,378	596	596	247

Template 28b: EU CCR1 – Analysis of CCR by approach as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU2	EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1	SA-CCR (for derivatives)	86	123		1.4	1,122	292	292	164
2	IMM (for derivatives and SFTs)			-		-	-	-	-
2a	<i>Of which securities financing transactions netting sets</i>			-		-	-	-	-
2b	<i>Of which derivatives and long settlement transactions netting sets</i>			-		-	-	-	-
2c	<i>Of which from contractual cross-product netting sets</i>			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					3,266	42	42	19
5	VaR for SFTs					-	-	-	-
6	Total					4,389	334	334	183

According to CRR 575/2013 Article 381, financial institutions are required to calculate the own funds requirements for Credit Valuation Adjustment (CVA Risk).

The CVA reflects the current market value of the counterparty credit risk to the institution. Own Funds requirements for CVA risk, are calculated for all derivative transactions with financial institutions all OTC derivative instruments excluding credit derivatives.

In order to calculate CVA, Alpha Bank incorporates the Standardized methodology according to article 384 of CRR 575/2013. Value at Risk is calculated with a 99% confidence interval and with one-year risk horizon.

The most important factors that influence the capital requirements of CVA are the Weight of the counterparty, the real notional-weighted maturity, the contribution of the exposures to the counterparties as well as the number of the counterparties of the portfolio.

The following tables present the CVA calculation of the Group:

Template 29a: EU CCR2 – Transactions subject to own funds requirements for CVA risk as of 31.12.2024

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method	-	-
2	(i) VaR component (including the 3× multiplier)		-
3	(ii) stressed VaR component (including the 3× multiplier)		-
4	Transactions subject to the Standardised method	95	43
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5	Total transactions subject to own funds requirements for CVA risk	95	43

Template 29b: EU CCR2 – Transactions subject to own funds requirements for CVA risk as of 30.06.2024

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method	-	-
2	(i) VaR component (including the 3× multiplier)		-
3	(ii) stressed VaR component (including the 3× multiplier)		-
4	Transactions subject to the Standardised method	103	51
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5	Total transactions subject to own funds requirements for CVA risk	103	51

The tables below present the Group's exposures to central counterparties (CCPs) and related capital requirements.

Template 30a: EU CCR8 – Exposures to CCPs as of 31.12.2024

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	Exposures to QCCPs (total)	-	7
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	370	7
3	(i) OTC derivatives	370	7
4	(ii) Exchange-traded derivatives	-	-
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	91	-
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	-	-
10	Unfunded default fund contributions	-	-
11	Exposures to non-QCCPs (total)	-	-
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	-
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

The tables below present the Group's exposures to central counterparties (CCPs) and related capital requirements.

Template 30b: EU CCR8 – Exposures to CCPs as of 30.06.2024

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	Exposures to QCCPs (total)		6
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	290	6
3	(i) OTC derivatives	290	6
4	(ii) Exchange-traded derivatives	-	
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	-	
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	-	-
10	Unfunded default fund contributions	-	-
11	Exposures to non-QCCPs (total)		-
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

The tables below show the CCR exposures by regulatory portfolio and risk as of 31.12.2024 and 30.06.2024.

Template 31a: EU CCR3 – Standardized approach – CCR exposures by regulatory portfolio and risk as of 31.12.2024

(Amounts in millions of Euro)

	Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
		Risk weight											Total exposure value
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
1	Central governments or central banks	28	-	-	-	-	-	-	-	-	-	-	28
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	114	370	-	-	27	93	-	-	-	-	-	604
7	Corporates	-	-	-	-	46	192	-	-	79	13	-	330
8	Retail	-	-	-	-	-	-	-	5	-	-	-	5
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	-	-	-
11	Total exposure value	141	370	-	-	73	285	-	5	79	13	13	967

Template 31b: EU CCR3 – Standardized approach – CCR exposures by regulatory portfolio and risk as of 30.06.2024

(Amounts in millions of Euro)

	Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
		Risk weight											Total exposure value
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
1	Central governments or central banks	17	-	-	-	-	-	-	-	-	-	-	17
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	81	290	-	-	43	86	-	-	-	-	-	499
7	Corporates	-	-	-	-	-	21	-	-	124	10	-	156
8	Retail	-	-	-	-	-	-	-	10	-	-	-	10
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	0	-	-	0
11	Total exposure value	97	290	-	-	43	107	-	10	124	10	10	681

The following tables provide a breakdown of all types of collateral posted or received to support or reduce CCR exposures related to derivative transactions or to securities financing transaction (SFTs) as of 31.12.2024 and 30.06.2024.

Template 32a: EU CCR5 – Composition of collateral for CCR exposures 31.12.2024

(Amounts in millions of Euro)

	Collateral type	a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	229	338	336	268	-	-	-	1,168
2	Cash – other currencies	1	-	0	-	-	-	-	-
3	Domestic sovereign debt	-	2	-	255	-	104	-	39
4	Other sovereign debt	-	-	-	-	-	156	-	122
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	492	-	121
7	Equity securities	-	-	-	-	-	-	-	32
8	Other collateral	-	-	-	-	-	3,368	-	2,628
9	Total	230	340	336	523	-	4,120	-	4,109

Template 32b: EU CCR5 – Composition of collateral for CCR exposures 30.06.2024

(Amounts in millions of Euro)

	Collateral type	a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	246	492	294	207	-	-	-	882
2	Cash – other currencies	0	1	0	-	-	-	-	-
3	Domestic sovereign debt	-	-	-	400	-	90	-	161
4	Other sovereign debt	-	-	-	-	-	166	-	617
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	284	-	58
7	Equity securities	-	-	-	-	-	-	-	30
8	Other collateral	-	-	-	-	-	2,619	-	1,382
9	Total	246	494	294	607	-	3,159	-	3,131

9 Exposure to Securitisation positions

According to the provisions set by points (a) to (i) of Article 449 of Regulation (EU) 575/2013 CRR regarding Exposures to securitisation positions, the Group provides details of traditional and synthetic securitization exposures in the banking and trading book.

9.1 Traditional Securitisations

In accordance with article 4(37) of the Banking Consolidation Directive (Definitions), traditional securitization entails the economic transfer of the exposures being securitized under a securitisation special purpose entity which in return issues securities. This must be accomplished by the transfer of ownership of the securitized exposures from the originator. Securities issued by the securitization SPVs do not represent any payment obligations of the originator institution.

Project “Galaxy”

On 22 June 2021, Alpha Bank completed the Galaxy transaction, which involved the securitization of a portfolio of Non-Performing Exposures (NPEs) with a total gross book value of c. €10.8bn as of cut-off date, following fulfillment of all conditions' precedent, as per the securitization framework. The portfolio was segmented to three distinct securitization SPVs based on the underlying assets' type:

- a) Orion X Securitisation DAC, consists of secured residential Mortgages of total gross book value c. €1.9bn., as of 31.03.2019
- b) Galaxy II Funding DAC, consists of secured residential Mortgages and Consumer Loans and Small Business Lending (“SBL”) of total gross book value c. €5.7bn as of 30.06.2019, and
- c) Galaxy IV Funding DAC, consists of wholesale exposures to SMEs and Large corporates of total gross book value c. €3.2bn as of 30.06.2019, and

Following the implementation of Alpha Bank SA's demerger by way of hive down of the banking sector with the incorporation of a new banking entity under the name Alpha Bank, the said entity retained 100% of the Senior Notes, which are guaranteed from the State under the Hellenic Asset Protection Scheme (“HAPS” – refer below). The holding entity resulted from the aforementioned corporate action, namely Alpha Services & Holdings, sold the 51% of the Mezzanine and Junior Notes of the securitisation SPVs (Galaxy subordinated Notes) to an entity managed and advised by Davidson Kempner Capital Management LP (“Davidson Kempner”), in accordance with the definitive agreement entered on 22.2.2021. Alpha Bank also retains 5% of Galaxy subordinated Notes, pursuant to the provisions of the securitization law. As part of the overall Galaxy transaction, an entity managed by Davidson Kempner acquired 80% of Cepal Services & Holdings SMSA, whose subsidiary, Cepal Hellas Financial Services Single Member, was assigned as the long-term servicer of Galaxy portfolio.

Project “Cosmos”

Following the completion of Galaxy transaction, Alpha Bank expedited the deleveraging opportunities of its remaining NPE pool through inorganic actions in accordance to its NPE Business Plan, initiating within 2021 the disposal of an additional portfolio of Greek NPEs, in the form of a rated securitization named Project Cosmos, which alike Project Galaxy, utilized the provisions of HAPS. The Cosmos portfolio consisted of predominantly secured Residential Mortgage loans, Large Corporate, Small and Medium Enterprises (“SMEs”), Small Business Lending (“SBL”) of c.€3.4bn, in terms of gross book value, as of 30.6.2020, which were securitized under a single securitization special purpose entity. The transaction was completed on 17 December 2021 and consisted on the sale of 51% of Mezzanine and Junior Notes (subordinated Cosmos Notes) to an entity managed and advised by Davidson Kempner, while Alpha Bank retained 100% of the Senior Notes along with 5% of the subordinated Cosmos Notes, pursuant to the risk retention requirements of article 6 of the Securitisation Regulation.

In 2022, the 44% of Galaxy & Cosmos Class B (Mezzanine) Notes as well as the 44% of Galaxy & Cosmos Class C (Junior) Notes, which had been retained by the Alpha Services & Holdings, were contributed to Galaxy Cosmos Mezz Plc. Consequently, Alpha Bank Group currently retains the 5% of Galaxy & Cosmos Mezzanine and Junior Notes.

In accordance with Art. 247 of the CRR and given that Galaxy and Cosmos transactions are traditional non-STS securitizations and SRT requirements are fulfilled, Alpha Bank can exclude the underlying exposures from its calculation of risk-weighted exposure amounts, and calculate the risk-weighted exposure amounts for the positions it holds in the securitizations. Specifically, Alpha Bank uses the SECSA method for the calculation of risk-weighted exposure amounts for mezzanine and junior securitisation notes according to EU 2017/2401 Art. 261. However, it must be noted that, as per EU 2017/2401 Art. 254 (2):

For rated positions or positions in respect of which an inferred rating may be used, an institution shall use the SEC-ERBA instead of the SEC-SA in each of the following cases:

- (a) where the application of the SEC-SA would result in a risk weight higher than 25 % for positions qualifying as positions in an STS securitisation;
- (b) where the application of the SEC-SA would result in a risk weight higher than 25 % or the application of the SEC-ERBA would result in a risk weight higher than 75 % for positions not qualifying as positions in an STS securitisation;
- (c) for securitisation transactions backed by pools of auto loans, auto leases and equipment leases.

Since the SEC-SA application results in a risk-weight for a senior securitisation position (prior to any adjustment) above the thresholds of 25% and 75% respectively, the risk-weight of a senior securitisation position shall be calculated with the SEC-ERBA methodology upon the availability of a rating report from one recognized ECAI.

In the context of their application under Hercules Asset Protection Scheme (“HAPS”), Galaxy and Cosmos senior securitisation positions received a rating from a recognized ECAI.

Hellenic Republic Asset Protection Scheme

In December 2019, the Greek parliament voted for the creation of an Asset Protection Scheme (“APS”) (Greek Law 4649/2019, as currently in force) also known as the “Hercules Scheme”. The Hercules Scheme was an HFSF strategic initiative, implemented by the Ministry of Finance, designed to support banks on deleveraging NPEs through securitisation, with the aim of obtaining greater market stability. Under the Hercules Scheme, an individually managed, private securitization vehicle buys NPEs from the bank and disposes notes to investors. The State then provides a guarantee for the senior, less risky notes of the securitization vehicle. In exchange for such guarantee, the State receives a commission at market terms. The Hercules Scheme becomes effective only when the originator has sold at least 50% plus one of junior tranches (and mezzanine if any) and such notes are of such amount that allows the derecognition and the Significant Risk Transfer (“SRT”) of the securitized receivables. The Hercules Scheme was initially extended in April 2021 under the “Hercules II” programme and further extended in December 2023 under the “Hercules III” programme, pursuant to Greek law 5072/2023 and it was expected to run for 12 months, until December 2024. “Hercules III” programme was further extended until June 30, 2025, following European Commission approval while the budget for the guarantee programme was also increased from €2 to €3 billion.

Greek banks are expected to continue to reap the benefits of the Hercules Scheme while, the Greek State will continue to provide guarantees up to €3bn on the senior tranches of securitisations.

Investment in securitisation positions

On December 30th, 2024, the Group held investments in collateralized loan obligations (“CLOs”) with a total carrying amount of € 775 mn.

9.2 Synthetic Securitisations

In synthetic securitisation, the ownership of the securitised exposures remains with the originator and the transfer of the credit risk of an asset portfolio risk is achieved by the use of credit derivatives or guarantees (mainly Credit Default Swaps (CDS) or Financial Guarantees). An institution which implements a synthetic securitisation, may elect to structure the transaction either with the use of an SSPE or not. In the first case, the SSPE issues a Note only for the protected portion of the securitised pool which is purchased by investors and then the institution and the SSPE conclude a credit derivative or financial guarantee agreement. In the second case, the institution issues directly the Note equivalent to the protected portion of the securitised pool and enters into a credit derivative or financial guarantee with the investor.

The Bank, as an originator institution, has completed four synthetic securitisations, which are comprised of performing corporate/SME exposures (Aurora, Blue, Eleven and Tokyo) as well as another one based on performing shipping exposures (Project Compass). Bank retains at least 5% of each of the securitized exposures in compliance with the retention rule laid down by the supervisory regulations.

Aurora, Compass, Blue and Eleven securitisation transactions achieve Significant Risk Transfer (SRT), as well as Simple, Transparent and Standardised (STS) designation, which enhances risk-weighted exposure amounts relief. With respect to the transactions' structure, the Bank has entered into a Financial Guarantee for the protection of the Mezzanine Tranche with an SSPE (Protection Seller). In turn, the SSPEs have issued an equivalent Credit Linked Note purchased by the investors. Regarding Eleven's structure, the Bank has issued directly a Credit Linked Note subscribed by an investor acting as funded credit protection for the hedged tranche.

Tokyo securitisation transaction achieves Significant Risk Transfer (SRT) which enhances risk-weighted exposure amounts relief. Tokyo securitisation consists of the Bank entering into a Financial Guarantee agreement with the Guarantor (EIF/EIB), through which any credit losses that pertain to the First Loss Tranche (c. 6.7 mn as of 31/12/2024) of the portfolio will be covered. The Guarantee is issued directly by the EIF/EIB and there is no SPV involved. Moreover, as the Guarantor in Tokyo is a Supranational, there is no requirement for the Guaranteed Amount to be collateralized.

The Bank applies the SEC-SA method to calculate the capital requirements for synthetic securitisations. In accordance with article 247 of Regulation (EU) 2401/2017 and given that the relevant SRT requirements are fulfilled, Bank can exclude the underlying exposures from its calculation of risk-weighted exposure amounts and calculate the risk-weighted exposure amounts for the positions it holds in the securitisation. Specifically, the Bank uses the SEC-SA method for the calculation of risk-weighted exposure amounts according to articles 261 and 262 of Regulation (EU) 2401/2017 for the transactions that are designated as STS (Aurora, Compass, Blue and Eleven). Any losses initially realized in the portfolio of securitised loans, will be covered by the Junior Tranches and retained SES (applicable only in Aurora). The Junior tranches as well as Aurora's SES are deducted from CET I Capital as the alternative provided by Regulation (EU) 575/2013 Art. 36.1 (k).

The template EU SEC1 below presents the total non-trading book securitization exposure split by exposure type that is securitized as either originator or sponsor and finally positions which have been purchased through investment activities as investor.

Template 33a: EU-SEC1 - Securitisation exposures in the non-trading book as of 31.12.2024

(Amounts in millions of Euro)

	a	b	c		d	e		f	g	h		i	j	k	l		m	n	o
	Institution acts as originator							Institution acts as sponsor				Institution acts as investor							
	Traditional			Synthetic		Sub-total	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total					
	STS	Non-STS		of which SRT	STS		Non-STS	STS			Non-STS	STS			Non-STS				
	of which SRT		of which SRT																
1	Total exposures	-	-	4,385	1	4,660	4,660	9,045	-	-	-	-	-	-	-	786	-	786	
2	Retail (total)	-	-	4,384	0	-	-	4,384	-	-	-	-	-	-	-	11	-	11	
3	residential mortgage	-	-	3,719	0	-	-	3,719	-	-	-	-	-	-	-	11	-	11	
4	credit card	-	-	665	-	-	-	665	-	-	-	-	-	-	-	-	-	-	
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Wholesale (total)	-	-	1	1	4,660	4,660	4,661	-	-	-	-	-	-	-	775	-	775	
8	loans to corporates	-	-	1	1	4,660	4,660	4,661	-	-	-	-	-	-	-	775	-	775	
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	



Template 33b: EU-SEC1 - Securitisation exposures in the non-trading book as of 30.06.2024

(Amounts in millions of Euro)

	a	b	c		d	e		f	g	h			i	j	k	l		m	n	o
	Institution acts as originator							Institution acts as sponsor				Institution acts as investor								
	Traditional			Synthetic		Sub-total		Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total					
	STS	Non-STS		of which SRT	of which SRT	STS	Non-STS	STS	Non-STS			STS	Non-STS							
	of which SRT	of which SRT																		
1	Total exposures	-	-	3,837	2	4,008	4,008	7,846	-	-	-	-	-	-	-	705	-	705		
2	Retail (total)	-	-	3,836	1	-	-	3,836	-	-	-	-	-	-	-	11	-	11		
3	residential mortgage	-	-	3,170	1	-	-	3,170	-	-	-	-	-	-	-	11	-	11		
4	credit card	-	-	666	-	-	-	666	-	-	-	-	-	-	-	-	-	-		
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Wholesale (total)	-	-	1	1	4,008	4,008	4,009	-	-	-	-	-	-	-	694	-	694		
8	loans to corporates	-	-	1	1	4,008	4,008	4,009	-	-	-	-	-	-	-	694	-	694		
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

Templates EU-SEC3 and EU-SEC4 include information on securitisation exposures in the non- trading book only with significant risk transfer



Template 34a: EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor as of 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/deductions	SEC-IRB A	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRB A	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRB A	SEC-ERBA (including IAA)	SEC-SA	1250% RW/deductions
1	Total exposures	4,569	-	-	4	88	-	-	4,661	-	-	-	489	-	-	-	39
2	Traditional transactions	-	-	-	1	-	-	-	1	-	-	-	9	-	-	-	1
3	Securitisation	-	-	-	1	-	-	-	1	-	-	-	9	-	-	-	1
4	Retail underlying	-	-	-	0	-	-	-	0	-	-	-	5	-	-	-	0
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	1	-	-	-	1	-	-	-	4	-	-	-	0
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	4,569	-	-	3	88	-	-	4,660	-	-	-	481	-	-	-	38
10	Securitisation	4,569	-	-	3	88	-	-	4,660	-	-	-	481	-	-	-	38
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	4,569	-	-	3	88	-	-	4,660	-	-	-	481	-	-	-	38
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Template 34b: EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/deductions
1	Total exposures	3,934	-	-	5	72	-	-	4,011	-	-	-	454	-	-	-	36	-
2	Traditional transactions	-	-	-	2	-	-	-	2	-	-	-	20	-	-	-	2	-
3	Securitisation	-	-	-	2	-	-	-	2	-	-	-	20	-	-	-	2	-
4	Retail underlying	-	-	-	1	-	-	-	1	-	-	-	15	-	-	-	1	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	1	-	-	-	1	-	-	-	6	-	-	-	0	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	3,934	-	-	3	72	-	-	4,008	-	-	-	434	-	-	-	35	-
10	Securitisation	3,934	-	-	3	72	-	-	4,008	-	-	-	434	-	-	-	35	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	3,934	-	-	3	72	-	-	4,008	-	-	-	434	-	-	-	35	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Template 35a: EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor as of 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap				
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	
1	Total exposures					775	0	10	-	786	273				22			
2	Traditional securitisation					775	0	10	-	786	273				22			
3	Securitisation					775	0	10	-	786	273				22			
4	Retail underlying					-	0	10	-	11	118				9			
5	Of which STS					-	-	-	-	-	-				-			
6	Wholesale					775	-	-	-	775	155				12			
7	Of which STS					-	-	-	-	-	-				-			
8	Re-securitisation					-	-	-	-	-	-				-			
9	Synthetic securitisation					-	-	-	-	-	-				-			
10	Securitisation					-	-	-	-	-	-				-			
11	Retail underlying					-	-	-	-	-	-				-			
12	Wholesale					-	-	-	-	-	-				-			
13	Re-securitisation					-	-	-	-	-	-				-			

Template 35b: EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor as of 30.06.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap				
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	
1	Total exposures					694	0.4	10	-	705	258				21			
2	Traditional securitisation					694	0.4	10	-	705	258				21			
3	Securitisation					694	0.4	10	-	705	258				21			
4	Retail underlying					-	0.4	10	-	11	119				9			
5	Of which STS					-	-	-	-	-	-				-			
6	Wholesale					694	-	-	-	694	139				11			
7	Of which STS					-	-	-	-	-	-				-			
8	Re-securitisation					-	-	-	-	-	-				-			
9	Synthetic securitisation					-	-	-	-	-	-				-			
10	Securitisation					-	-	-	-	-	-				-			
11	Retail underlying					-	-	-	-	-	-				-			
12	Wholesale					-	-	-	-	-	-				-			
13	Re-securitisation					-	-	-	-	-	-				-			

Templates EU-SEC5 reflect the exposures in default and credit risk adjustments made during the period

Template 36a: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments 31.12.2024

(Amounts in millions of Euro)

		a	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
	Of which exposures in default			
1	Total exposures	21,801	11,429	841
2	Retail (total)	13,670	8,633	897
3	residential mortgage	13,005	8,628	904
4	credit card	665	5	(7)
5	other retail exposures	-	-	-
6	re-securitisation	-	-	-
7	Wholesale (total)	8,131	2,796	(56)
8	loans to corporates	8,131	2,796	(56)
9	commercial mortgage	-	-	-
10	lease and receivables	-	-	-
11	other wholesale	-	-	-
12	re-securitisation	-	-	-

Template 36b: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments 30.06.2024

(Amounts in millions of Euro)

		a	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
	Of which exposures in default			
1	Total exposures	20,553	12,004	(1,067)
2	Retail (total)	13,058	9,074	(1,171)
3	residential mortgage	12,392	9,067	(1,170)
4	credit card	666	7	(1)
5	other retail exposures	-	-	-
6	re-securitisation	-	-	-
7	Wholesale (total)	7,494	2,930	104
8	loans to corporates	7,494	2,930	104
9	commercial mortgage	-	-	-
10	lease and receivables	-	-	0
11	other wholesale	-	-	-
12	re-securitisation	-	-	-

10 Market Risk

10.1 Market Risk Management Framework

Market risk is the risk of reduction in economic value arising from unfavorable changes in the value or volatility of interest rates, foreign exchange rates, stock exchange indices, equities and commodities.

Market risk management is conducted in accordance with policies and procedures that have been developed and are implemented by all Group companies.

The Group Risk Management Committee is responsible for supporting and supervising the Market Risk management framework and ensuring the application of all the necessary measures to identify, estimate, monitor and control this type of risk. - Group ALCO is responsible for approving Market Risk guidelines, strategy and market risk organizational structure. Group ALCO is also responsible for overseeing the Market Risk management strategy, policy and procedures, and ensuring the appropriate communication or forwarding of market risk management issues.

Market Risk is controlled through the establishment and implementation of a well-structured set of limits, according to the Group Market Risk Appetite while satisfying the relevant customer needs.

Alpha Bank calculates Value at Risk (VaR) for internal risk management purposes since 1999. In 2008, the Bank of Greece validated the Bank's internal model for VaR and approved its application for the calculation of capital requirements for general market risk on a solo level in accordance to the Bank of Greece Governor's Acts 2577/2006 and 2591/2007. From the end of 2011 and in accordance to the Bank of Greece Governor's Act 2646/093093.2011, the Bank became compliant with Basel 2.5 and Stressed VaR was estimated together with VaR for the calculation of capital. After the acquisition of Emporiki Bank in 2013, and following the approval of the Bank of Greece, Alpha Bank applied the internal model on a consolidated basis for the combined trading books for general market risk.

The VaR methodology applied is historical simulation, using a 99% percentile, one tailed confidence interval, a historical observation period of 2 years un-weighted data and a 1 and 10-day holding period. 10 day VaR is calculated with a 10 day horizon and a 1 day fixed step (overlapping periods). Calculation of the value-at-risk value is performed on a daily basis using full valuation across all risk factors and positions. Market and position data are updated on a daily basis. The model uses a mixed approach when applying variations in market rates and prices. For Interest rate and credit spread market risk factors absolute change is performed, while relative changes are used for FX, volatility and equity. The VaR methodology used is the same both for regulatory VaR and internal risk management VaR, with the only difference being that credit spread risk is not addressed for regulatory purposes.

10.2 IMA approach for market risk

For the purpose of the calculation of the own fund requirements for the general market risk according to Article 365 the Capital Requirements Regulation (CRR) ((EU) No 575/2013), institutions are expected to calculate at least weekly a “stressed value at risk” of the current Trading book. Historical data is used from a continuous 12-month period of financial stress relevant to the Bank’s portfolio. The Stressed Period is reviewed at least annually and the authorities are notified of any changes accordingly. The Stressed VaR methodology is based on the current VaR methodology. All risk factors included in the regulatory VaR model are considered in the Stressed VaR model. The Bank computes the Stressed VaR measure on a daily basis, to coincide with the VaR periodicity. The applicable stress period was 26/09/2012 – 25/09/2013.

The risk categories covered by Alpha Bank’s regulatory internal model are general risk of equity instruments, general risk of debt instruments, foreign exchange risk and commodities risk.

The own fund requirements under the IMA at 31.12.-2024 are displayed in the following table:

Template 37a: EU MR2-A - Market risk under the internal Model Approach (IMA) as of 31.12.2024

(Amounts in millions of Euro)

		a	b
		RWAs	Own funds requirements
1	VaR (higher of values a and b)	104	8
(a)	Previous day’s VaR (VaRt-1)		2
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		8
2	SVaR (higher of values a and b)	170	14
(a)	Latest available SVaR (SVaRt-1))		2
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		14
3	IRC (higher of values a and b)		
(a)	Most recent IRC measure		
(b)	12 weeks average IRC measure		
4	Comprehensive risk measure (higher of values a, b and c)		
(a)	Most recent risk measure of comprehensive risk measure		
(b)	12 weeks average of comprehensive risk measure		
(c)	Comprehensive risk measure Floor		
5	Other		
6	Total	274	22

Template 37b: EU MR2-A - Market risk under the internal Model Approach (IMA) as of 30.06.2024

(Amounts in millions of Euro)

		a	b
		RWAs	Own funds requirements
1	VaR (higher of values a and b)	136	11
(a)	Previous day's VaR (VaRt-1)		5
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		11
2	SVaR (higher of values a and b)	213	17
(a)	Latest available SVaR (SVaRt-1))		6
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		17
3	IRC (higher of values a and b)		
(a)	Most recent IRC measure		
(b)	12 weeks average IRC measure		
4	Comprehensive risk measure (higher of values a, b and c)		
(a)	Most recent risk measure of comprehensive risk measure		
(b)	12 weeks average of comprehensive risk measure		
(c)	Comprehensive risk measure Floor		
5	Other		
6	Total	348	28

A flow statement explaining the variations in the market RWAs is displayed in the following table:

Template 38a: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g
		VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
1	RWAs at previous period end	117	194	-	-	-	311	25
1a	Regulatory adjustment ⁽¹⁾	87	137	-	-	-	223	18
1b	RWAs at the previous quarter-end (end of the day)	30	58	-	-	-	88	7
2	Movement in risk levels	(3)	(31)	-	-	-	(34)	(3)
3	Model updates/changes	-	-	-	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-	-
6	Foreign exchange movements	-	-	-	-	-	-	-
7	Other	-5	-	-	-	-	-5	-0
8a	RWAs at the end of the disclosure period (end of the day)	22	26	-	-	-	48	4
8b	Regulatory adjustment ⁽¹⁾	82	144	-	-	-	226	18
8	RWAs at the end of the disclosure period	104	170	-	-	-	274	22

Template 38b: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 30.09.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g
	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
1	RWAs at previous period end						
	136	213	-	-	-	348	28
1a	Regulatory adjustment ⁽¹⁾						
	72	150	-	-	-	222	18
1b	RWAs at the previous quarter-end (end of the day)						
	63	63	-	-	-	126	10
2	Movement in risk levels						
	(22)	(5)	-	-	-	(27)	(2)
3	Model updates/changes						
	-	-	-	-	-	-	-
4	Methodology and policy						
	-	-	-	-	-	-	-
5	Acquisitions and disposals						
	-	-	-	-	-	-	-
6	Foreign exchange movements						
	-	-	-	-	-	-	-
7	Other						
	(12)	-	-	-	-	(12)	(1)
8a	RWAs at the end of the disclosure period (end of the day)						
	30	58	-	-	-	88	7
8b	Regulatory adjustment ⁽¹⁾						
	87	137	-	-	-	223	18
8	RWAs at the end of the disclosure period						
	117	194	-	-	-	311	25

⁽¹⁾ The regulatory adjustment takes into account the Bank's multiplier in terms of the Internal Model which is embedded in the calculation of the RWAs.

In order to investigate any extreme market situations, market risk stress tests are performed on the banking and trading book portfolios. Stress Tests are performed by creating scenarios ('what if' hypothesis) to estimate the losses that may occur on the positions from potential unfavorable substantial movements/shocks in the market and in order to identify potential concentration risk within the portfolios.

Stress Tests may be carried out at any time on any position; however, they are carried out on a regular basis at the end of every month on the banking and trading book portfolios as well as in the context of ICAAP and the results are reported to the Risk Management Committee and ALCO.

Typical stress scenarios consider the following changes in risk factors:

Interest rates:

+/-200bp (up/down) parallel movement

+50bp (0 to 1 year); +150bp (1 to 5 years); + 300bp (5-10 years); (up – steepening)

-0bp (0 to 1 year); -100bp (1 to 5 years); -200bp (5-10 years); (down – flattening)

FX rates:

+/- 30% against EUR (worst case - depending on the overall position of the portfolio)

Prices (e.g. equities and indices):

+/-30% (depending on the portfolio position)

Volatilities:

-/+ 50% (depending on the portfolio position)

VaR and SVaR values as estimated during 2024 for the Bank trading portfolio, including the FX position due to participations, are given in the following table:

Template 39a: EU MR3 - IMA values for trading portfolios as of 31.12.2024

(Amounts in millions of Euro)

		a
		31.12.2024
VaR (10 day 99%)		
1	Maximum value	5
2	Average value	3
3	Minimum value	2
4	Period end	2
SVaR (10 day 99%)		
5	Maximum value	6
6	Average value	5
7	Minimum value	2
8	Period end	2
IRC (99.9%)		
9	Maximum value	-
10	Average value	-
11	Minimum value	-
12	Period end	-
Comprehensive risk measure (99.9%)		
13	Maximum value	-
14	Average value	-
15	Minimum value	-
16	Period end	-

Template 39b: EU MR3 - IMA values for trading portfolios as of 30.06.2024

(Amounts in millions of Euro)

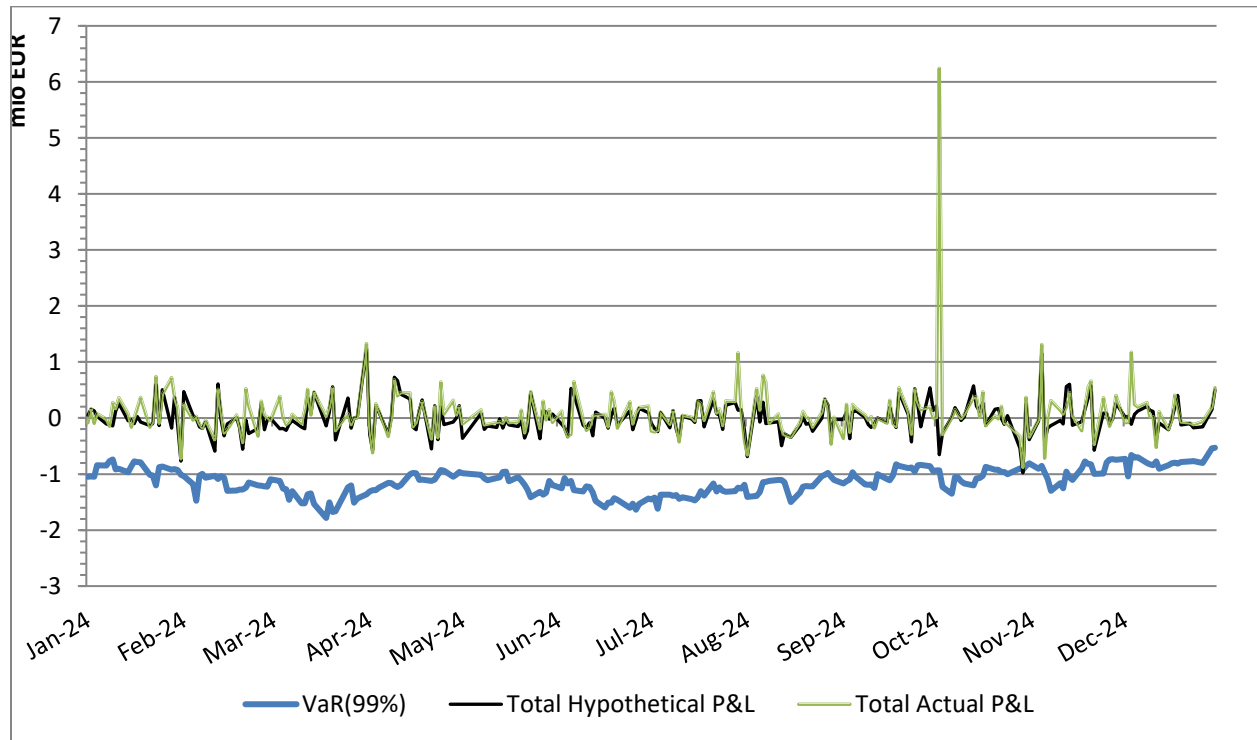
		a
		30.6.2024
VaR (10 day 99%)		
1	Maximum value	5
2	Average value	3
3	Minimum value	2
4	Period end	5
SVaR (10 day 99%)		
5	Maximum value	6
6	Average value	5
7	Minimum value	5
8	Period end	5
IRC (99.9%)		
9	Maximum value	-
10	Average value	-
11	Minimum value	-
12	Period end	-
Comprehensive risk measure (99.9%)		
13	Maximum value	-
14	Average value	-
15	Minimum value	-
16	Period end	-

Additionally, VaR model validation (back testing) is performed on a daily basis. Both actual and hypothetical back testing is conducted in order to comply with the regulatory requirements. In terms of the hypothetical back testing process the daily VaR at a 99% confidence level is compared to the buy-and-hold profit and loss, i.e. the profit and loss impact if the trading portfolio is held constant at the end of the day and re-priced the following day considering the daily change in the underlying risk factors, excluding realized trading revenue, net interest, fees and commissions. Moreover, actual back testing is performed by comparing the daily VaR at 99% confidence interval with the actual daily profit/loss of the Bank's trading portfolio excluding net interest, fees and commissions. In both tests, based on a 99% confidence level of the VaR model, the losses would be expected to exceed the VaR of the portfolio two to three days in any one year. Periods of unstable market conditions could increase the number of back testing exceptions.

A comparison between the results of estimates from the regulatory VaR model with both hypothetical and actual trading outcomes is presented in the following graph:

Template 40: EU MR4 - Comparison of VaR estimates with gains/losses

(Amounts in millions of Euro)



Alpha Bank Group is in compliance with Bank of Greece requirements regarding the systems and controls through which the requirement for the provision of accurate and reliable valuation results is satisfied with, as described in Appendix VII of Directive 2591/20.8.2007.

During 2024 one overshooting was observed in hypothetical Back testing and the Competent Authorities were notified accordingly.

10.3 Standardized approach for market risk

Capital charges for specific risk on a solo basis are calculated with the Standardized approach. Alpha Bank Group uses also the Standardized approach for the measurement of market risk exposure and capital requirements for all its subsidiaries.

The following table summarizes the capital requirements for market risk per risk factor based on Standardized approach:

Template 41a: EU MR1 - Market risk under the standardised approach as of 31.12.2024

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	1
2	Equity risk (general and specific)	47
3	Foreign exchange risk	7
4	Commodity risk	-
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	Total	54

Template 41b: EU MR1 - Market risk under the standardised approach as of 30.06.2024

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	1
2	Equity risk (general and specific)	60
3	Foreign exchange risk	7
4	Commodity risk	-
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	Total	67

11 Non-Financial Risks

11.1 Definition

The Group acknowledges the need for managing the non-financial risks that stem from its business activities, as well as the need for holding adequate capital, in order to absorb potential losses related to these types of risk.

Non-Financial Risks are defined as the risk of financial or qualitative effects resulting from inadequate or failed internal processes, IT systems, people (intentionally or unintentionally) and external events. The Group acknowledges that there are certain non-financial risk sub-categories which due to their nature and relevance are considered an integral part of non-financial risk management. Such non-financial risk sub-categories are the following:

- Legal Risk
- Information and Communication Technology (ICT) Risk
- Fraud Risk
- Conduct Risk
- Reputational Risk
- Model Risk
- Compliance Risk
- Outsourcing Risk
- Data Risk
- Physical Damage Risk
- Execution Risk
- Human Capital Risk

11.2 Capital Requirements

The calculation of Pillar I capital requirements for operational risk is performed in accordance with the Standardized Approach of the Capital Requirements Regulation 575/2013. Specifically, the Group's gross operating income for 2022, 2023 and 2024 is split into the eight Basel Business Lines.

The Gross Income for operational risk capital requirements is defined as the sum of the following elements:

- Interest receivable and similar income (used as one of the components for the calculation of Net Interest Income)
- Interest payable and similar charges (used as one of the components for the calculation of Net Interest Income)

- Income from shares and other variable or fixed yield securities (used as one of the components for the calculation of Net Interest Income)
- Commissions/ Fees receivable
- Commissions/ Fees payable
- Net profit or loss on financial operations
- Other operating income

It is noted that the first three bullets listed above represent the main inputs towards the calculation of Net Interest Income (NII) which is one of the main profit drivers related to core banking activities.

Therefore, the Gross Income definition is as follows:

Gross Income = NII + Net Commissions + Net profit or loss on financial operations + Other operating income.

The capital requirements for operational risk are the average, over the three years mentioned above, of the risk-weighted gross income. According to Regulation (EU) No 575/2013, the risk weighted gross income is calculated each year across the eight (8) business lines by using specific beta factors.

Pillar II Capital Calculation Approach: The Group has implemented an internal methodology based on the Advanced Measurement Approach (AMA) for Pillar II purposes. This entailed the development of a robust internal calculation model as well as the enhancement of existing policies, procedures and systems for non-financial risk management through specific Initiatives.

Regarding Pillar I Capital Requirements the respective capital charges on a Group basis as at 31.12.2024 are presented in the following table

Template 42a: EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts as of 31.12.2024

(Amounts in millions of Euro)

Banking activities		a	b	c	d	e
		Relevant indicator			Own funds requirements	Risk weighted exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)	0	0	0	0	0
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	1,913	2,147	2,204	291	3,636
3	<u>Subject to TSA:</u>	1,913	2,147	2,204		
4	<u>Subject to ASA:</u>	0	0	0		
5	Banking activities subject to advanced measurement approaches AMA	0	0	0	0	0

Template 42b: EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts as of 31.12.2023

(Amounts in millions of Euro)

Banking activities		a	b	c	d	e
		Relevant indicator			Own funds requirements	Risk weighted exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)	0	0	0	0	0
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	1,715	1,913	2,147	267	3,339
3	<u>Subject to TSA:</u>	1,715	1,913	2,147		
4	<u>Subject to ASA:</u>	0	0	0		
5	Banking activities subject to advanced measurement approaches AMA	0	0	0	0	0

11.3 Non-Financial Risk Management Framework

Framework Components

The Group has adopted and implemented its Non-Financial Risk Framework which focuses on the following areas:

- Non-Financial Risk Events: management of non-financial risk events occurring across the Group
- Risk Assessments and Scenario Analysis: various non-financial risk assessments are performed (e.g. Risk & Control Self-Assessment, Outsourcing Risk Assessment) and Scenarios are developed to proactively identify and mitigate potential non-financial risk exposures.
- Indicators: Key Risk Indicators have been developed to Group Entities (both at RAF and operational level) to monitor the non-financial risk exposures
- Control Testing: Testing the effectiveness of identified controls.
- Mitigating Actions: Corrective actions are developed and monitored to mitigate the non-financial risk exposures
- Risk Transfer: The partial transfer of certain types of Non-Financial Risk through the purchase and activation of certain Insurance Policies, i.e., Bankers Blanket Bond, Civil Liability, Directors and Officers Liability, Cyber Crime Bond
- Reporting: Internal and regulatory reports are generated and disseminated to various stakeholders across the Group
- Capital Requirements: calculation of capital requirements for operational risk (under Pillar I and II).

Governance Structure

The Framework is supported by an appropriate organizational structure with clear roles and responsibilities under the core assumption that the prime responsibility for non-financial risk management remains with the business units throughout the Group. This structure includes three lines of defense and the involvement of the Group's senior management in managing them. The roles and responsibilities of the relevant Group's Committees and Units that are in place in order to ensure the proper implementation of the non-financial risk framework are as follows:

- Non-Financial Risks and Internal Control Committee, which is delegated by the Risk Management Committee to supervise non-financial risk management activities. Similar Committees are also established in the Group Companies.
- **1st Line of Defense:** Bank Business Areas and Group Company Units, which manage their non-financial risks and are responsible for the implementation of the Non-Financial Risk Management Framework. In addition to their own non-financial risks, some Units may be delegated to manage or have an oversight role in specific areas of non-financial risks (e.g., Information Security Units, Physical Security Units, Business Continuity Units, etc.). All Units appoint a Non-Financial Risk Partner (NFRP). The NFRP is a Business Area senior/experienced employee who is the liaison between their Business Area and the Non-Financial Risks Control Business Area.



They actively participate in the effective implementation of the Non-Financial Risks Management framework. They are appointed by the Chief who supervises the Unit and are mainly responsible for:

- Ensuring timely recognition and announcement of loss events
- Drafting of proposals for the management of loss events for their presentation to the relevant Committees
- Performing a root-cause analysis of loss events
- Leading the annual RCSA process
- Proposing extreme scenarios (if applicable)
- Proposing and monitoring KRIs
- Proposing corrective actions where needed and monitoring their implementation
- Monitoring the remediation of various Findings
- Monitoring of controls effectiveness by performing relevant validation/testing
- Increasing non-financial risk awareness within their Business Area
- Cooperating with the Non-Financial Risk concerning the effective management of non-financial risks in their Business Area.
- **2nd Line of Defense:** Non-Financial Risks Control and Operational Risk Units in the Group Companies. Non-Financial Risks Control develops the appropriate tools, processes, procedures and techniques relevant to non-financial risks management, monitors the implementation of appropriate action plans for its mitigation at Group level and submits reports to the relevant Committees and Senior Management of the Group. The Group Companies' Operational Risk Units implement the non-financial risk framework at the Company and local level and ensure its compliance with the national laws and regulations.
- **3rd Line of Defense:** Internal Audit, which provides an independent review of the proper implementation of the Non-Financial Risk Management framework.

11.4 Recent Developments and new Initiatives

Recent Developments

The following initiatives were implemented during 2024:

- Non-Financial Risks Management - New Operating Model: a new Operating Model regarding non-financial risks management was introduced. The new Operating Model introduces the role of Non-Financial Risk Partner across the 1 Line of Defense Business Areas, who has an enhanced role in managing the non-financial risks within his/ her Business Area. The expected benefits of the new model are the following: minimize of non-financial risks losses, proactive risk management, effective control performance, enhanced risk culture, facilitation of decision making.
- Introduction of the Control Testing process: the Control Validation Framework was updated enhancing the control testing process.
- RAF Indicator Updates: the Risk Appetite Indicators regarding Non-Financial Risks were updated and enhanced in order to introduce:
 - More Forward-looking Indicators
 - More risk sensitive and linked to Pillar II Capital Indicators

- Indicators for all Non-Financial Risk subcategories (Reputational Risk, Legal Risk, Outsourcing Risk, etc.)
- Non-Financial Risk Taxonomy: Review and update the Non-Financial Risk Taxonomy to have more granularity in certain Non-Financial Risks subcategories.
- Outsourcing Risk Assessment: Review and update the Outsourcing Risk Assessment Questionnaire.
- Training: Various training sessions were held throughout the year within the Group on Non-Financial Risk management issues.
- Reputational Risk: The Reputational Risk Committee was established in order to decide on issues that could potentially result in significant Reputational Risk for the Bank and its Group Companies.
- Insurance Coverage enhancements: Reinsurance structure for the renewal of the insurance contracts has been completed.

New Initiatives

The Group will continue its initiatives towards the reinforcement of its Risk Management Framework in 2025, the main objectives of which are as follows:

- Implementation of the newly introduced Control Testing process.
- RAF Indicators: Introduction of new RAF Indicators for additional Non-Financial Risk subcategories, such as Human Capital Risk and further enhancement of existing Risk Categories, such as ICT Risk.
- NFR Platform enhancements: implementation of new enhancements in the Non-Financial Risk Platform (Archer).
- Implementation of the actions designed to remediate the identified gaps vis a vis the Digital Operational Resilience Act (DORA).

12 Equity exposures not included in the trading book

Alpha Bank Group equity exposures that are not included in the trading book are equity exposures measured either at fair value through profit or loss or at fair value through other comprehensive income.

Equity exposures measured at fair value through profit or loss

This category is measured at fair value. Changes in fair value are recognized directly in profit or loss.

Equity exposures measured at fair value through other comprehensive income

In this category are classified equity instruments that are neither held for trading nor contingent consideration recognized by an acquirer in a business combination and that Group decides, at initial recognition, to measure at fair value through other comprehensive income. This decision is irrevocable. With the exception of dividends, which are directly recognized in profit or loss, all other gains and losses arising from those instruments are directly recognized in other comprehensive income and are not reclassified to profit or loss. For those equity instruments there is no impairment assessment

Fair value measurement

The fair value of shares measured both at fair value through other comprehensive income and at fair value through profit or loss and which are quoted in active markets is determined on the basis of the quoted prices. For those not quoted in an active market, fair value is determined, where possible, using valuation techniques and taking into consideration the particular facts and circumstances of the shares' issuers.

Template 43: Equity exposures not included in the trading book

(Amounts in millions of Euro)

	a	b
	31.12.2024	31.12.2023
Type	Book value	Book value
Listed	84	92
Non-listed	93	72
Total	177	164

13 Interest Rate and Credit Spread Risk in the Banking Book

13.1 Definition

IRRBB refers to the current or prospective risk to the Bank's capital and earnings arising from adverse movements in interest rates that affect the Bank's book positions. When interest rates change, the present value and timing of future cash flows change. This in turn changes the underlying value of the Bank's assets, liabilities and off-balance sheet items and hence its economic value of equity (EVE). Changes in interest rates also affect the Bank's earnings by altering interest rate – sensitive income and expenses, affecting its net interest income (NII).

The main components of IRRBB are the following:

- **Gap risk** arises from the term structure of banking book instruments and describes the risk arising from the timing of instruments' rate changes. Since rate may reset on different instruments at different tenors, the risk to the bank arises when the rate of interest paid on liabilities increases before the rate of interest received on assets or reduces on assets before interest rate paid on liabilities. Unless hedged, in terms of tenor and amount, the bank may be exposed to a period of reduced or negative interest margins or may experience changes in the relative economic values of assets and liabilities. The extent of gap risk also depends on whether changes to the term structure of interest rates occur consistently across the yield curve (parallel risk) or irregularly by period (non-parallel risk)
- **Basis risk** describes the impact of relative changes in interest rates for financial instruments that have similar tenors but are priced using different interest rates indices (bases). Basis risk arises from the imperfect correlation in the adjustment of the rates earned and paid on different instruments with otherwise similar rate change characteristics.
- **Option risk** arises from option derivative positions or from optional elements embedded in the Bank's assets, liabilities and/or off-balance sheet items, where the Bank or the customer can alter the level and timing of the cash flows. Option risk can be further be characterized into automatic option risk and behavioral option risk:
 - **Automatic option risk** arising from over-the-counter option contracts or explicitly embedded within the contractual terms of a financial instruments (i.e. capped rate loan) and where the holder will almost exercise the option if it is in their interest to do so,
 - **Behavioral option risk** arising from flexibility embedded implicitly or within the terms of financial contracts, such that changes in interest rates may affect a change in the behavior of the client (i.e. rights of a borrower to prepay a loan, with or without a penalty, or the right of a depositor to withdraw their balance in search of higher yield).

Credit spread risk in the Banking Book (CSRBB) refers to the risk driven by changes of the market price for credit risk, for liquidity and for potentially other characteristics of credit-risky instruments, which are not captured by another existing prudential framework such as IRRBB or by expected credit/(jump-to-) default risk. CSRBB captures the risk of an instrument's changing spread while assuming the same level of creditworthiness, i.e. how the credit spread is moving within a certain rating/PD range.

The Bank recognizes CSRBB as a significant risk and conducts a comprehensive assessment of CSRBB within its risk management and internal capital assessment processes, focusing on the following CSRBB components:

- **Market Credit Spread Changes:** This aspect covers potential fluctuations in the market credit spread, representing the credit risk premium required by market participants for a given credit quality, distinct from the idiosyncratic credit spread³³.
- **Market Liquidity Spread Changes:** This element addresses potential fluctuations in the market liquidity spread, representing the liquidity premium that influences the market appetite for investments and the presence of willing buyers and sellers.

13.2 Interest Rate and Credit Spread Risk Identification and Assessment

The Bank aims to maximize its profitability in line with its risk appetite and business objectives. Therefore, it recognizes the need to provide a sound framework for the identification, estimation, monitoring, controlling and reporting of interest rate and credit spread risk in the Banking Book, in a consistent manner across the Group. In 2016, Alpha Bank was self-assessed as Level 3 bank in the classification set out by EBA on Interest Rate Risk in the Banking Book (IRRBB). Currently, Alpha Bank is classified in Category 1 under the SREP Guidelines in terms of level of sophistication in risk measures.

For interest rate risk assessment and monitoring the following estimation techniques in line with EBA guidelines are used:

- Static Gap analysis for each currency.
- Scenario analysis for each currency.

When performing Interest Rate Static Gap Analysis, Group assets and liabilities are allocated into time buckets according to their repricing date for variable interest rate instruments, or according to their maturity date for fixed rate instruments. Assets or Liabilities with no specific re-pricing schedule (such as revolving loans or savings and sight deposits), are allocated into time buckets according to a specific statistical model, as well as qualitative and quantitative business analysis. Alpha Group Interest Rate Gap Analysis results are presented in the table below:

Template 44a Interest Rate Gap Analysis as of 31.12.2024

(Amounts in millions of Euro)

	<1 Month	1 to 3 Months	3 to 6 months	6 to 12 months	1 to 5 Years	> 5 Years	Non-Interest bearing	Total
Assets	28,653	14,234	5,060	1,353	10,638	8,278	9,802	78,019
Liabilities	29,536	4,237	3,172	4,679	19,553	8,642	1,922	71,741
Equity	0	0	0	0	0	0	6,277	6,277
Total Liabilities and Equity	29,536	4,237	3,172	4,679	19,553	8,642	8,200	78,019
Gap	-884	9,997	1,888	-3,325	-8,915	-364	1,602	0
Cumulative Gap	-884	9,114	11,002	7,677	-1,238	-1,602	0	0

Template 44b Interest Rate Gap Analysis as of 31.12.2023

(Amounts in millions of Euro)

	<1 Month	1 to 3 Months	3 to 6 months	6 to 12 months	1 to 5 Years	> 5 Years	Non-Interest bearing	Total
Assets	26,981	10,914	3,913	1,696	10,778	8,614	10,459	73,356
Liabilities	12,856	4,573	3,020	3,623	31,929	8,834	2,442	67,276
Equity	0	0	0	0	0	0	6,080	6,080
Total Liabilities and Equity	12,856	4,573	3,020	3,623	31,929	8,834	8,521	73,356
Gap	14,126	6,342	893	-1,927	-21,151	-220	1,938	0
Cumulative Gap	14,126	20,467	21,360	19,433	-1,718	-1,938	0	0

With respect to CSRBB, the identification of the CSRBB-sensitive balance sheet items is a critical step in the measurement of the risk, since not all items are sensitive to changes in the market credit and liquidity spread. As the CSRBB is defined in reference to market prices, each type of Banking Book item, irrespective of its accounting classification, is analyzed for being potentially subject to CSRBB according to its remote connection with an active recognized market. The sole exemption is non-performing exposures, which are explicitly out-of-scope for CSRBB purposes. Items lacking a connection to a reference market, such as customer loans and deposits priced without market references, were examined, and subsequently excluded from the CSRBB.

13.3 Interest Rate and Credit Spread Risk Metrics

Interest Rate Risk Stress Scenarios

The stress tests which are performed on a monthly basis cover both regulatory requirements and internal needs. The stress scenarios imply the parallel movement, the steepening as well as the flattening of the yield curve by either changing the short-term rates or the long-term rates or both. These scenarios are applied to IRRBB exposures in each currency for which the bank has material positions. Specifically, the Bank performs regulatory interest rate shocks for IRRBB measurement purposes according to EBA Guidelines (EBA/GL/2022/14):

- Parallel shock up (+200bps)
- Parallel shock down (-200bps)
- Steepener shock (short rates down and long rates up)
- Flattener shock (short rates up and long rates down)
- Short rates shock up
- Short rates shock down

Furthermore, Market Risk Control implements additional interest rate shocks for internal purposes:

- Parallel shock up (+25bps);
- Parallel shock down (-25bps);
- Parallel shock up (+50bps);
- Parallel shock down (-50bps);
- Parallel shock up (+100bps);
- Parallel shock down (-100bps);
- Long rates shock up
- Long rates shock down
- Parallel shock up (+200bp);
- Parallel shock down (-200bp);
- Short rates shock up;
- Short rates shock down;
- Steepener shock (short rates down and long rates up); and
- Flattener shock (short rates up and long rates down).

ALCo is responsible for approving and reviewing stress test scenarios for their appropriateness on an annual basis. Market Risk Control is in charge to calculate the impact of the stress scenarios on forecasted earnings as well as on economic value by incorporating assumptions relating to Alpha Group's business developments, customer behavior and future market developments.

13.4 Interest Rate Risk and Credit Spread Monitoring

Alpha Bank has adopted an adequate, timely and accurate information system to monitor and report risk in line with its policies and regulatory requirements.

Group ALM and countries' local Treasuries are responsible for managing Alpha Group's positions in compliance with any established limits and escalating any significant issues with respect to the Group's interest rate and credit spread positions to Group ALCO and local ALCOs respectively. In addition, Market Risk Control provides support and input to Group ALCO, regarding Alpha Group's balance sheet management issues.

According to BIS standards concerning interest rate limits on banking book, Alpha Bank implements limits on consolidated basis in terms of both economic value and earnings.

13.5 Interest Rate Risk management and mitigation strategies

The Bank manages its IRRBB holistically taking into account short, medium and long-term considerations like macro and micro economic environment, forward looking balance sheet dynamics, capital, liquidity and regulatory requirements. Regarding hedging strategy, natural hedging within assets and liabilities are complemented with derivatives to achieve the optimal IRRBB structure given the Bank's Balance Sheet. Fair value and cash flow hedging strategies can be used with the aim to maintain an accounting geography symmetry. At times, economic hedges can also be deployed to optimally manage the Bank's IRRBB. All the above-mentioned hedging strategies are incorporated in Bank's Interest Rate Gaps and other relevant IRRBB reports in order to monitor their impact on the management of the IRRBB.

Assets Liabilities Management Committee, in the framework of its responsibilities, discusses, acknowledges and approves the strategies and the relevant proposed actions for the management and hedging of Financial Risks of the Bank, including Interest Rate Risk in the Banking Book (IRRBB).

ALCo deck incorporates an in-depth analysis of IRRBB, inclusive of monitoring tools and metrics. Calculated outcomes related to the Bank's EVE and NII under several stress scenarios in relation to specific limits, Interest Rate Gaps, hedging actions and current IRRBB profile of the Bank's balance sheet is presented on a monthly basis to ALCo members.

The Committee meets once a fortnight or extraordinarily upon request, closely monitoring market conditions and developments.

13.6 Interest Rate Risk Key modelling and parametric assumptions

The Bank develops behavioral models for Non-Contractual Assets and Liabilities taking into consideration Post Model Adjustments. The models are subject to validation by the independent validation unit of the Bank and are submitted for approval by ALCo. More specifically regarding Non-Maturity Deposits (NMDs), the Bank performs time series analysis to determine the behavioral/repricing of the NMDs under BAU. As a first step the Bank via its models distinguishes the stable and non-stable part of NMDs and estimates an amortization tenor. In a second step the stable subset of NMDs is further broken into a core and non-core component. To achieve this the Bank via its interest rate model estimates the rate sensitive part (i.e. pass through rate) distinguishing the core and non-core part of the stable subset.

The magnitude of the optionality risk (loan prepayments and fixed term deposits early withdrawals) is considered nonmaterial, due to the small size of the fixed-rate loan book, the limited tenor of term deposits, and the penalties applied in case of early withdrawal.

The Bank's product mix does not include material exposures in financial products with embedded optionality, apart from the embedded floors on loan products.

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

Changes of interest rates lead to changes in the present value (PV) and timing of future cash flows. The changes in PV and the timing of future cash flows lead to changes in the underlying value of the Bank's assets, liabilities and off-balance sheet items and hence its economic value. Changes in interest rates affect the Bank's earnings by altering interest rate-sensitive income and expenses, affecting the Bank's Net Interest Income (NII). Excessive exposure to IRRBB can pose a significant threat to the Bank's current capital base and/or future earnings, if not managed appropriately.

Furthermore, IRRBB remained within risk appetite framework limits. This also includes subsidiary level limits.

Template 45a: EU-IRRBB1 - Interest rate risks of non-trading book activities as of 31.12.2024

(Amounts in millions of Euro)

Supervisory scenarios	shock	a		b		c		d	
		Changes of the economic value of equity				Changes of the net interest income			
		Current period		Last period		Current period		Last period	
1	Parallel up	(462)	(533)	(134)	(160)				
2	Parallel down	377	291	(123)	(184)				
3	Steeper	(43)	(63)						
4	Flattener	(76)	(124)						
5	Short rates up	(211)	(282)						
6	Short rates down	59	56						

Template 45b: EU-IRRBB1 - Interest rate risks of non-trading book activities as of 30.06.2024

(Amounts in millions of Euro)

Supervisory scenarios	shock	a		b		c		d	
		Changes of the economic value of equity				Changes of the net interest income			
		Current period		Last period		Current period		Last period	
1	Parallel up	(533)	(341)	(160)	(10)				
2	Parallel down	291	212	(184)	(273)				
3	Steeper	(63)	(184)						
4	Flattener	(124)	80						
5	Short rates up	(282)	(48)						
6	Short rates down	56	(127)						

14 Liquidity Risk

14.1 Liquidity risk management strategies and processes

Alpha Bank's liquidity risk management principles are documented in the "Liquidity Risk Policy" which provides a reference document to guide the Bank's Units when implementing actions for liquidity risk management, measurement, and control. The individual roles and responsibilities within the Liquidity Risk Management Framework Governance have been laid out in ILAAP, designed to provide clarity and transparency across all involved stakeholders. Furthermore, ILAAP allows for liquidity planning taking into consideration the Group's risk appetite (RAF) and Business Plan. The ILAAP constitutes one of the pillars supporting the Group in the implementation of its overall business strategy and continuous operation under normal and adverse economic conditions. It aims to ensure that sufficient levels of liquidity are maintained on an ongoing basis by identifying the key liquidity and funding risks to which the Bank is exposed, by monitoring and measuring these risks, and by maintaining tools and resources to manage and mitigate these risks.

Furthermore, the Bank through its Funds Transfer Pricing methodology (FTP Policy Manual) allocates among Business Units the financial result associated with raising or using liquidity and applies a commercial policy on the sources of funding.

14.2 Liquidity risk management structure and organization

The Board of Directors (BOD) approves the liquidity risk strategy for the Bank through the ILAAP process and the Risk Capital Strategy (RCS) monitors the quantitative and qualitative aspects of liquidity risk, based on recommendations made by the Asset and Liability Committee (ALCO) and Risk Management Committee (RMC).

The liquidity managing functions are organized in alignment with the three lines of defense structure. Asset Liability Management Division (ALM) and Treasury Division comprise the first line of defense responsible for executing the steps needed to manage the Bank's liquidity position and liquidity strategy.

The second line of defense consists of the risk management function and other relevant functions, independent from the first line of defense. They are responsible for measuring, monitoring, controlling and reporting the bank's risk-taking activities related to liquidity risk.

14.3 Centralized group liquidity management and individual legal entity Liquidity management

Alpha Bank ensures at the level of the parent bank and of each subsidiary that all liquidity metrics are managed in compliance with the defined risk appetite and comply with the liquidity thresholds set by the regulators. Foreign subsidiaries address their liquidity needs in their local currencies by accessing local Central Bank facilities or interbank market. Nevertheless, the parent company remains the main liquidity provider in cases of liquidity restraint, while a frequent monitoring of the subsidiaries' liquidity position is applicable through relevant suitable reporting and communication, both on a regular and ad hoc basis.

14.4 Scope and nature of liquidity risk measurement and reporting system

The Bank's liquidity risk measurement systems support regulatory reporting, as well as internal liquidity risk management reporting for discussion or decision-making purposes. In particular, the provision of risk information to senior management enables the relevant governing bodies to monitor, steer and control the Bank's liquidity risk-taking activities effectively. The risk infrastructure incorporates also the material legal entities and provides the basis for reporting on liquidity risk positions and limit utilization to the relevant functions on a regular and ad-hoc basis.

14.5 Liquidity stress testing and scenario analysis

The Bank performs stress testing to estimate losses that could result from short term extreme, yet plausible, stress events, to identify, better understand and manage its potential vulnerabilities and risk concentrations. The short stress scenarios that are conducted, are idiosyncratic, systemic and combined, encompassing both bank-specific and market-wide stress events that are calibrated to different levels of severity. The stress testing has a key role in the Bank's risk appetite, limits' framework and business planning processes. In particular, through the scenario analysis the Bank monitors the nature and amount of embedded liquidity risk exposure and limits liquidity risk to acceptable levels, thus supporting a number of decision-making processes. Model validation Division performs the independent validation of liquidity risk models estimates.

Furthermore, a long-term Stress Test is performed under 3 macroeconomic systemic scenarios of varying severity (the assumptions of the scenarios concern the macroeconomic environment, as well as the evolution of key business and risk metrics) over a 3-year horizon. These scenarios are conducted annually in line with Business Plan and the forward-looking assessment performed under the normative perspective of ILAAP/ICAAP. The key role of long-term stress testing is to ensure that sufficient levels of liquidity are maintained on an ongoing basis by identifying the key liquidity and funding risks to which the Group is exposed, by monitoring and measuring these risks, and by maintaining tools and resources to manage and mitigate these risks.

14.6 An outline of the bank's contingency funding plans

The Contingency Funding Plan (CFP) is a dedicated document of the Bank, aiming to ensure confidence and continuation of the Bank's operations, including the following aspects for appropriately addressing liquidity shortfalls in emergency situations:

- Establishment of clear lines of responsibility, including clear escalation procedures. It has pre-defined escalation levels aimed at maximizing the likelihood that the Bank is able to take certain measures to address liquidity or funding shortfalls
- Set up of key liquidity indicators and triggers
- Identification of market-wide and bank-specific liquidity threats and risk factors, assessment of alternative funding sources and contingency procedures

14.7 Legal, regulatory and operational limitations on the transferability of liquidity between individual legal entities, foreign branches and subsidiaries

Risk measures are prepared at the level of individual entities/branches. The Bank takes into account legal and regulatory issues that may affect the transferability of liquidity between individual entities (including the timing of availability of liquidity/release of funding lines).

14.8 Liquidity Coverage Ratio (LCR)

Definition

The LCR refers to the proportion of the high-quality liquid assets held by financial institutions, to ensure their ability to meet their short-term net cash flows, over a 30-day stress period. The LCR became mandatory on 1 October 2015. The regulatory limit established is 100%.

The Bank monitors and reports the LCR on an individual and on consolidated basis. The LCR disclosures of the Pillar III report refer to the consolidated figures.

As of December 2024, the HQLA buffer stood at EUR 16.2 billion and the Group LCR stood at 203%.

The following table provides a breakdown of the LCR as of 31 December 2024, in accordance with Article 435 of the Regulation (EU) No 575/2013 and the respective guidelines on LCR disclosure (EBA/GL/2017/01).

The figures are calculated as simple averages of end-of-month observations of the Group LCR.

Template 46: EU LIQ1 - Quantitative information of LCR as of 31.12.2024

(Amounts in millions of Euro)

		a				b				c				d				e				f				g				h											
		Total unweighted value (average)								Total weighted value (average)																															
EU 1a	Quarter ending on (DD Month YYY)	31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2024	30.09.2024	30.06.2024	31.03.2024	31.12.2024	30.09.2024	30.06.2024	31.03.2024												
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12												
HIGH-QUALITY LIQUID ASSETS																																									
1	Total high-quality liquid assets (HQLA)									15,689	15,626	15,672	15,614																												
CASH - OUTFLOWS																																									
2	Retail deposits and deposits from small business customers, of which:	38,342	38,471	38,242	37,998	2,255	2,244	2,244	2,256																																
3	Stable deposits	19,975	20,063	20,096	20,189	999	1,003	1,005	1,009																																
4	Less stable deposits	10,504	10,427	10,404	10,458	1,255	1,240	1,238	1,246																																
5	Unsecured wholesale funding	11,681	11,927	12,220	12,409	5,470	5,558	5,663	5,669																																
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	277	286	286	292	69	71	71	73																																
7	Non-operational deposits (all counterparties)	11,379	11,617	11,908	12,107	5,395	5,462	5,566	5,586																																
8	Unsecured debt	24	25	26	10	24	25	26	10																																
9	Secured wholesale funding									68	64	28	21																												
10	Additional requirements	1,329	1,365	1,344	1,365	605	600	579	556																																
11	Outflows related to derivative exposures and other collateral requirements	527	518	497	470	527	518	497	470																																
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-																																
13	Credit and liquidity facilities	802	847	848	895	78	82	82	86																																
14	Other contractual funding obligations	306	312	319	407	306	312	319	400																																
15	Other contingent funding obligations	9,939	9,828	9,676	9,531	640	666	693	721																																
16	TOTAL CASH OUTFLOWS									9,362	9,444	9,525	9,623																												
CASH - INFLOWS																																									
17	Secured lending (e.g. reverse repos)	75	82	64	33	8	15	14	7																																
18	Inflows from fully performing exposures	1,702	1,722	1,744	1,638	1,119	1,154	1,186	1,085																																
19	Other cash inflows	159	154	146	207	51	46	38	97																																
20	TOTAL CASH INFLOWS	1,937	1,958	1,955	1,878	1,179	1,215	1,238	1,189																																
EU- 20c	Inflows subject to 75% cap	1,937	1,958	1,955	1,878	1,179	1,215	1,238	1,189																																
TOTAL ADJUSTED VALUE																																									
EU-21	LIQUIDITY BUFFER									15,689	15,626	15,672	15,614																												
22	TOTAL NET CASH OUTFLOWS									8,183	8,230	8,287	8,434																												
23	LIQUIDITY COVERAGE RATIO									192%	190%	189%	185%																												

14.9 Net Stable Funding Ratio

The NSFR ratio relates the Bank's available stable funding to its required stable funding and it should be equal to at least 100%. The ratio is calculated in accordance with the Regulation (EU) 2019/876 of the European Parliament and of the Council and a limit of 100% became binding in June 2021.

Template 47a: EU LIQ2: Net Stable Funding Ratio as of 31.12.2024

(Amounts in millions of Euro)

		Unweighted value by residual maturity				Weighted value
		a No maturity	b < 6 months	c 6 months to < 1yr	d ≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	8,115	150	9	987	9,101
2	Own funds	8,115	150	9	987	9,101
3	Other capital instruments		-	-	-	-
4	Retail deposits		35,789	1,726	11	34,922
5	Stable deposits		22,154	788	5	21,800
6	Less stable deposits		13,635	938	6	13,122
7	Wholesale funding:		18,292	1,187	2,338	8,549
8	Operational deposits		325	-	-	162
9	Other wholesale funding		17,967	1,187	2,338	8,387
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	0	1,121	-	26	26
12	NSFR derivative liabilities	0				
13	All other liabilities and capital instruments not included in the above categories		1,121	-	26	26
14	Total available stable funding (ASF)					52,598
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					375
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		4,705	2,189	33,970	30,744
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		467	1	258	306
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,969	1,980	20,339	24,095
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		234	129	2,364	5,026
22	Performing residential mortgages, of which:		175	173	6,008	-

		Unweighted value by residual maturity			Weighted value	
		a No maturity	b < 6 months	c 6 months to < 1yr		d ≥ 1yr
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		135	146	4,873	-
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		94	35	7,365	6,343
25	Interdependent assets		-	-	-	-
26	Other assets:		1,810	44	9,519	10,156
27	Physical traded commodities				-	-
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		-	-	274	233
29	NSFR derivative assets		-			-
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>		707			35
31	<i>All other assets not included in the above categories</i>		1,104	44	9,245	9,888
32	Off-balance sheet items		490	976	4,707	730
33	Total RSF					42,006
34	Net Stable Funding Ratio (%)					125%

Template 47b: EU LIQ2: Net Stable Funding Ratio as of 30.06.2024

(Amounts in millions of Euro)

		Unweighted value by residual maturity			Weighted value	
		a No maturity	b < 6 months	c 6 months to < 1yr		d ≥ 1yr
Available stable funding (ASF) Items						
1	Capital items and instruments	7,555	-	-	1,097	8,652
2	<i>Own funds</i>	7,555	-	-	1,097	8,652
3	<i>Other capital instruments</i>		-	-	-	-
4	Retail deposits		35,642	2,985	178	36,122
5	<i>Stable deposits</i>		22,315	1,281	80	22,496
6	<i>Less stable deposits</i>		13,327	1,704	98	13,625
7	Wholesale funding:		19,286	386	2,641	8,355
8	<i>Operational deposits</i>		287	-	-	143
9	<i>Other wholesale funding</i>		18,999	386	2,641	8,212
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	115	1,225	-	24	24
12	<i>NSFR derivative liabilities</i>	115				
13	<i>All other liabilities and capital instruments not included in the above categories</i>		1,225	-	24	24

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
14	Total available stable funding (ASF)					53,152
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					351
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		4,594	2,424	33,858	30,320
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		-	-	-	-
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		613	8	246	311
20	<i>Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		3,506	2,134	18,775	23,659
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		176	155	2,487	6,074
22	<i>Performing residential mortgages, of which:</i>		258	191	7,548	-
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		209	163	6,316	-
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		217	92	7,289	6,350
25	Interdependent assets		-	-	-	-
26	Other assets:		2,277	48	10,257	10,338
27	<i>Physical traded commodities</i>				-	-
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		-	-	209	177
29	<i>NSFR derivative assets</i>		-			-
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>		863			43
31	<i>All other assets not included in the above categories</i>		1,414	48	9,395	10,118
32	Off-balance sheet items		460	1,013	4,387	743
33	Total RSF					41,752
34	Net Stable Funding Ratio (%)					127%

15 Encumbered and Unencumbered Assets

Information on Group Asset Encumbrance

The Group is funded through unsecured and secured funding lines. Secured funding lines may involve encumbrance of (a) the assets of the Group, (b) any collateral received by the Group and (c) own debt instruments issued and held by the Group.

The Group adopts and applies the following definition for asset encumbrance, in line with EBA regulatory guidelines:

“An asset is encumbered if it has been pledged or subject to any form of arrangement to secure, collateralise or credit enhance any on-Balance Sheet or off-Balance Sheet transactions from which they cannot be freely withdrawn.

Assets pledged that are subject to any restrictions in withdrawal, such as assets that require prior approval before withdrawal or replacement by other assets, should be considered encumbered”.

Asset encumbrance is an integral part of Group’s liquidity, funding and collateral management process. In this context, asset encumbrance risk management framework incorporates and adopts the overarching principles of the Group’s Risk Management Framework as well as the Group’s Risk Appetite Framework.

The overall Group’s encumbrance through 2024 has decreased, mainly attributable to the decreased reliance of the Group to funding through transactions that require Group’s assets to be encumbered.

Given the nature and source of funding or transaction that require Group’s assets to be encumbered, the Group utilises collateral agreements with the respective counterparties, where the terms and conditions clearly stipulate the Group’s and the counterparty’s rights and obligations on collateral posted. Where relevant, widely accepted market standardised agreements are utilized, such as GMRAs, ISDAs and CSAs in the relevant transactions that these apply.

Throughout 2024, Central Bank funding has decreased mainly due to TLTROs prepayments, while interbank repos funding remained generally stable. Funding from Derivatives presented a slight downward trend. In accordance with the Group’s business model and the nature and scale of activities it undertakes, the Group mainly identifies the following sources of asset encumbrance, prioritized by matching liability amount throughout 2024:

- **Lending through repurchase contracts/agreements in the interbank market:** This source of secured funding involves repo transactions in the interbank market
- **Funding from Central Bank:** This source of secured funding comprises ECB lending facilities and requires the Group to provide eligible collateral to Central Bank
- **Derivative transactions directly with counterparties or through clearing systems:** Collateral is placed by the Group for the market value of derivative transactions or as margin to the clearing system

The main asset categories that were encumbered throughout 2024, prioritized by the median of their carrying amount, are the following:

- Wholesale Loan Portfolio (Non marketable assets)

- Retail Loan Portfolio (Non marketable assets)
- Loans on demand (Marketable Assets)
- Debt securities issued by general governments (Marketable Assets)
- Debt securities issued by credit institutions (Marketable Assets)
- Debt securities issued by non-financial corporations (Marketable Assets)

All of the asset encumbrance is coming from the assets of the Bank.

The median of assets that were not considered encumberable throughout 2024 amounted to 16.8% of the Group Assets and mainly include tangible assets, such as investment property, intangibles, tax assets, non-current assets and disposal groups classified as held for sale. The relevant percentage for 2023 was 12.8%.

At a Group level, the collateral received utilized for ECB funding, repo transactions or other types of encumbrance for 2024 was immaterial. The Group did not use as collateral any own securities issued and held by the Group (other than Covered Bonds).

For 2024, the overall overcollateralization of secured liabilities of the Group (including collateral received) was at the level of 53.2%, with an average haircut of c. 34.6%. The respective percentages for 2023 were 32.1% and 24.3% respectively.

Further details regarding asset pledged can be found in note 39 “*Contingent Liabilities and Commitments*” par. d “*Assets Pledged*” of the published annual report of the Group for the period from 01.01. - 31.12.2024.

Template 48a: EU AE1 – Encumbered and unencumbered assets as of 31.12.2024

(Amounts in millions of Euro)

	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
	010	of which notionally eligible EHQLA and HQLA 030	040	of which notionally eligible EHQLA and HQLA 050	060	of which EHQLA and HQLA 080	090	of which EHQLA and HQLA 100
010 Assets of the reporting institution	10,642	1,000			61,925	16,649		
030 Equity instruments	0		0		0	0	232	0
040 Debt securities	1,589	1,000	1,617	981	15,547	13,461	14,964	12,933
050 of which: covered bonds	0	0	0	0	39	39	39	39
060 of which: securitisations	210	0	211	0	467	0	469	0
070 of which: issued by general governments	957	1,000	981	981	12,385	12,256	11,832	11,751
080 of which: issued by financial corporations	485	0	486	0	1,941	534	1,933	528
090 of which: issued by non-financial corporations	137	0	133	0	1,115	659	1,082	642
120 Other assets	9,064	0			47,166	4,183		

Template 48b: EU AE1 – Encumbered and unencumbered assets as of 31.12.2023

(Amounts in millions of Euro)

	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
	010	of which notionally eligible EHQLA and HQLA 030	040	of which notionally eligible EHQLA and HQLA 050	060	of which EHQLA and HQLA 080	090	of which EHQLA and HQLA 100
010 Assets of the reporting institution	10,284	1,803			62,320	11,310		
030 Equity instruments	0		0		0	0	188	0
040 Debt securities	2,096	1,404	2,026	1,348	12,645	11,310	11,672	10,408
050 of which: covered bonds	0	0	0	0	0	0	0	0
060 of which: securitisations	0	0	0	0	10	0	10	0
070 of which: issued by general governments	899	899	875	875	10,964	10,964	10,081	10,081
080 of which: issued by financial corporations	527	5	523	5	1,175	238	1,110	225
090 of which: issued by non-financial corporations	670	507	630	475	532	107	510	102
120 Other assets	8,054	377			49,865	0		

Template 49a: EU AE2 - Collateral received and own debt securities issued as of 31.12.2024

(Amounts in millions of Euro)

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
			of which notionally eligible EHQLA and HQLA	Fair value of collateral received or own debt securities issued available for encumbrance	
					of which EHQLA and HQLA
		010	030	040	060
130	Collateral received by the reporting institution	9	9	911	903
140	Loans on demand				
150	Equity instruments				
160	Debt securities	9	9	911	903
170	of which: covered bonds	0	0	501	501
180	of which: securitisations	0	0	0	0
190	of which: issued by general governments	9	9	321	321
200	of which: issued by financial corporations	0	0	534	534
210	of which: issued by non-financial corporations	0	0	0	0
220	Loans and advances other than loans on demand				
230	Other collateral received				
240	Own debt securities issued other than own covered bonds or securitisations	0			
241	Own covered bonds and asset-backed securities issued and not yet pledged			714	0
250	TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	10,644	1,002		

Template 49b: EU AE2 - Collateral received and own debt securities issued as of 31.12.2023

(Amounts in millions of Euro)

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
				Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
130	Collateral received by the reporting institution	40	40	373	373
140	Loans on demand				
150	Equity instruments				
160	Debt securities	40	40	373	373
170	of which: covered bonds	40	0	0	0
180	of which: securitisations	0	0	0	0
190	of which: issued by general governments	0	0	280	280
200	of which: issued by financial corporations	40	40	90	90
210	of which: issued by non-financial corporations	0	0	0	0
220	Loans and advances other than loans on demand				
230	Other collateral received				
240	Own debt securities issued other than own covered bonds or securitisations	0			
241	Own covered bonds and asset-backed securities issued and not yet pledged			1,121	0
250	TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	10,364	1,883		

Template 50a: EU AE3 - Sources of encumbrance as of 31.12.2024

(Amounts in millions of Euro)

		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	Carrying amount of selected financial liabilities	6,701	9,981

Template 50b: EU AE3 - Sources of encumbrance as of 31.12.2023

(Amounts in millions of Euro)

		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	Carrying amount of selected financial liabilities	7,667	10,251

16 Environmental, Social and Governance (ESG) Risks

16.1 ESG Strategy and Governance

16.1.1 Environmental Risk

Business Strategy and Processes

Alpha Services and Holdings, assesses regularly and prioritizes the environmental and climate issues which are related to its activities and might impact the Group's operations and/or its Stakeholders. The Double Materiality Analysis performed has enabled the identification of the actual and potential, positive or negative impacts on people and nature with regards to the Group's own operations, upstream (suppliers) as well as downstream (business) activities. Sustainability risks and opportunities were assessed based on the magnitude of financial effects for the current financial effects and the likelihood of occurrence and the potential magnitude of their financial effects in the short- (2025), medium- (2026-2030) and long-term (>2030) horizons.

Following the recommendations of the European Sustainability Reporting Standards (ESRS) and the Task Force on Climate-related Financial Disclosures (TCFD), the Bank assesses current and impending environmental policies, legal requirements and regulatory guidelines relating to climate and the environment, including the recording and the efficient management of any transitional risks, related to its activities. In this context, the Group has developed a comprehensive approach to integrate climate and environmental risk management across its business activities. Leveraging on work performed in this context, during 2021-2023, the Bank developed a cohesive Group's ESG strategy including concrete commitments. As part of these commitments, in 2024 the Group developed Science Based Targets for the Decarbonization of specific sector portfolios. Alpha Services and Holdings is continuously monitoring the emerging business and regulatory requirements, further enhancing its policies and procedures, where deemed necessary.

Further information on business strategy, policies, and processes, as well as ESG Commitments and targets are presented in the Sustainability Statement within the Annual Report 2024, which is publicly available on the [website](#). The Climate-related TCFD and Sustainability Reports are also available on the [website](#) of Alpha Services and Holdings.

Strategic Plan and Double Materiality Assessment

Alpha Bank has deployed a comprehensive strategic plan, and in this context has taken the following actions:

- a) Identified, assessed, and prioritized the ESG issues related to its activities that may impact the Group's operations and/or its Stakeholders. This was achieved through a materiality analysis process, in line with the European Sustainability Reporting Standards for materiality analysis by utilizing the UNEPFI PRB Tool for Banks to understand the positive and negative, environmental, and social impacts, risks and opportunities of its portfolio.
- b) Introduced environmental, social and governance KPIs (such as disbursements to RES over total sustainable disbursements, total sustainable disbursements aligned with Sustainable Finance Framework, Green asset ratio, etc.), which are monitored quarterly, semi-annually, and annually to establish progress and take corrective actions when needed.

- c) Committed to achieve net zero greenhouse gas emissions by 2050, in alignment with the Net Zero Banking Alliance (NZBA) guidelines and the objectives of the Paris Agreement. The Bank has committed to support the transition to a net-zero economy and set interim financed emissions' reduction targets for 2030 on four sectors: Power Generation, Oil & Gas, Iron & Steel, and Cement. The process for target setting takes into consideration the clients' decarbonization plans.
- d) Aligned the decarbonization targets with its 3-year Business Plan and annual budgets, via rules incorporated into its Risk Appetite Framework.

For the reporting year, the Group performed a double materiality assessment to identify its material impacts, risks and opportunities as per the Corporate Sustainability Reporting Directive (CSRD). The assessment was implemented in consultation with internal and external stakeholders, by taking into consideration the Group's business operations, its value chain, and international best practices. The methodology followed is presented in detail in the Sustainability Statement Section of the Annual Report 2024, which is available on the Alpha Services and Holdings Group [website](#).

The **impact materiality** was performed by leveraging supplier data (i.e. sectors of suppliers and associated spending) for **upstream activities**, and portfolio data [i.e., associated financial metrics related to the products/services provided to Customers (corporate or individuals)] for **downstream activities**, respectively.

- UNEP FI resources were utilized for both upstream and downstream impact identification and assessment to provide sectoral impacts.
- The impact materiality for **own operations** has been performed by leveraging material topics as resulted from the 2023 materiality, in combination with reviews of peers and ESG standards (GRI, SASB).

The **financial materiality** for risks was performed by leveraging existing ESG Risk Materiality methodologies followed by the Bank. Also, The UNEP FI Tool utilized Alpha Bank's portfolio data for performing the materiality assessment of nature-related risks.

- The Risk and Control Self-Assessments (RCSA) for the inherent risk assessment, as well the outcome from Compliance Risk Assessments served as a basis for the Financial Materiality Assessment for social and governance risk.
- Appropriate thresholds on inherent risk basis were introduced to arrive at materiality results and conclusions.

The prioritization and final list of material impacts, risks and opportunities were presented and debated within the dedicated Steering Committee which acted as the first control frontier with the participation of Directors of the key business areas, including Governance and Sustainability, Climate and ESG Risk, Internal Audit, Legal, Accounting, Group Data Protection, Human Resources. The Group Sustainability Committee functioned as the second level approval, followed by the Corporate Governance Sustainability, and Nominations Committee and the Audit Committee.

The materiality analysis' results in the context of the environment, whether positive or negative are the following:

- Material negative impact to **climate stability**, across the value chain, though GHG emissions created indirectly by the Group's products/services and business relationships, energy consumption in own operations, and associated transition risks and opportunities for the Group.

- **Climate physical risks and adaptation** opportunities, through Group's products/services and business relationships with Customers.
- Material negative impact to **Habitats (which affects the status of Biodiversity and Ecosystems)**, created indirectly through the Group's products/services and business relationships.
- Material negative impact to **Resource Security (which affects the development of a Circular Economy)**, through the Group's products/services and business relationships and transition opportunities for the Group.

Based on this analysis, the Bank is deploying a comprehensive strategic plan to support an environmentally sustainable economy and mitigate climate change. The Bank's actions focus on the increase in Sustainable Financings and the gradual reduction of financings that may have a negative impact on the environment. The Bank applies the **PCAF methodology**, to measure financed emissions per asset class (i.e. listed and unlisted equity, corporate bonds, business loans, project finance, commercial real estate, mortgages, motor vehicle loans, sovereign debt), to enable the identification of climate-related transition risks and opportunities, to set and implement climate targets and finance the transition in different sectors of the economy.

In addition, the Group progressed with an impact analysis which has been performed in the portfolio of its subsidiary company in Cyprus, utilizing the UNEP FI impact analysis tool. Results of the analysis will inform the subsidiary's sustainability strategy and support the alignment with the Group's sustainability strategy.

Moreover, the Group has developed policies and procedures to reduce the operational environmental footprint and to strengthen its commitments associated with this objective.

The **Bank's Strategic Plan** incorporates the following commitments to support an environmentally sustainable economy:

- Support Bank's customers' decarbonization
- Align portfolio emissions to meet the Paris Agreement objectives
- Mitigate key drivers of biodiversity loss
- Support the transition to a circular economy
- Achieve Net Zero emissions in own operations

The relevant targets to meet the Bank's environmental and climate commitments in its financing activities are described below:

Support an environmentally sustainable economy			
Commitments	Targets	Target Date	KPIs
Support our Customers' decarbonization and align Bank's portfolio emissions with the objectives set in the Paris Agreement	Allocate Euro 4.4 billion to new Sustainable Financings, increasing the target by Euro 1.4 billion compared to 2023 - 2025 target announcement	2026	New financing volumes (in Euro million)
	Within the total Sustainable Financings, achieve at least Euro 2.6 billion to Renewable Energy Systems by 2026, increasing the target by Euro 1.6 billion compared to 2023-2025 target announcement	2026	New financing volumes (in Euro million)
	Within the total Sustainable Financings, achieve at least Euro 300 million of Retail Sustainable loans, including loans to small businesses	2026	New financing volumes (in Euro million)
	Launch new sustainability-based Mortgage, Credit Cards & Consumer Loan products	2025	Number of Products Launched
	Zero financing to new investments in thermal coal mining, upstream oil exploration or coal-fired electricity generation	Ongoing	New financing volumes (in Euro million)
Mitigate key drivers of biodiversity loss	Zero financing to targeted activities harming species diversity, habitats and waterbodies	Ongoing	New financing volumes (in Euro million)
Support the transition to a circular economy	Reduction of annual paper usage rate by 50% (base year 2019)	2025	Tones of paper used (including copying paper, statements, bank forms, etc.)
Achieve Net Zero emissions in our own operation	Reduction of Scope 1 and 2 GHG emissions by 20% (base year 2022)	2025	Scope 1 and 2 emissions (tCO ₂ e)
	Upgrade lighting to LED lighting throughout the network	2028	Number of Branches with upgraded LED lighting
	Continue to procure 100% renewable electricity for all Bank's buildings and branches	Ongoing	Percentage of electrical power used that is derived from non-renewable energy sources (<i>Alpha Bank</i>)
	Replacement of 70 % of the Bank's fleet with electric and/or plug-in vehicles (base year 2022)	2025	Number of vehicles replaced with electric and/or plug-in ones.

Certified Management Systems (ISO)

Regarding in-house impacts across the Bank's operations and its supply chain, certain business areas and subsidiaries of the Group also apply, among other measures, internal management systems certified with ISO (14001, 14064, 45001, 22301, 22316, 27001, 27017, 27018, 27701, 9001, 20000-1, 20400, 50001)¹.

Additionally, through its Environmental Management System, the Bank aims to reduce its environmental and carbon footprint by promoting the rational use of lighting, heating and cooling installations in its buildings, the use of environment-friendly class A++ or higher energy efficiency equipment, by implementing initiatives for the efficient use of raw and other materials and by applying the "reduce, reuse, recycle" principles of circular economy in waste management. Indicatively, the Bank recycles paper, batteries, light bulbs, printer consumables, electric and electronic equipment, and donates old office equipment.

For monitoring and reporting its GHG emissions, the Bank implements procedures certified with the ISO14064 standard, verified by TÜV AUSTRIA.

The certified management systems (ISO) implemented by the Group aim to enable it to better respond to the ever-changing business environment and to the needs of Customers, in full alignment with current legislative and regulatory requirements. Since 2021 Alpha Bank submits to the Greek Ministry of Environment and Energy an annual voluntary statement based on the EU EMAS guidelines for all our central operations and Bank branches. Alpha Bank's most recent registration to the European eco-management and audit scheme (EMAS) was on 05/11/2024 by decision of the Ministry. The Statement referred to 2023 data.

The Bank has also established a holistic ESG training program, as well as organizes, supports, and participates in environmental initiatives aiming to cultivate the environmental awareness of its Employees and their families.

As part of its broader ESG strategy, Alpha Services and Holdings has recognized the EU Taxonomy (EU Regulation 2020/852), as the central pillar of its institutional framework on climate change, environmental protection, and equitable development for all. The company has adopted a holistic approach to its ESG strategy, aiming to support its customers in their transition to sustainability, and to ensure the long-term value proposition for its investors.

Through the structured collection, management, and application of material sustainability data, for its lending and investment activity, the Bank assesses the quality of its assets. Moreover, the sustainability data constitute the basis for target setting and prioritization of actions to improve the Group's sustainability KPIs, in line with the evolving requirements of investors, regulators, markets and society.

¹ ISO 14001 (Environmental Management System), ISO 14064 (Greenhouse Gas Emissions Management System), ISO 45001 (Occupational health and safety), ISO 22301 (Business Continuity Management System), ISO22316 (Organizational resilience), ISO 27001 (Information Security Management System incorporating), ISO 27017 (Information Security Controls for Cloud Services), ISO 27018 (Protection of Personally Identifiable Information on Public Clouds), ISO 27701 (Privacy Information Management), ISO 9001 (Quality Management System), ISO 20000-1 (Information technology –Service Management System), ISO 20400 (Sustainable Procurement), ISO 50001 (Energy Management System)

Sustainable Finance

Alpha Services and Holdings has developed and published its Sustainable Finance Framework (SFF or framework) to mobilize capital towards sustainable economic activities and enhance transparency. The framework constitutes the basis for the Bank's sustainable lending strategy as well as supporting future funding operations by defining the use of proceeds and impact assessment of financings.

The **Sustainable Finance Framework** incorporates environmental and social criteria in lending activities and stipulates the decision and classification process that the Bank implements to classify its financial products and services as sustainable. It also serves as a guide for the development of sustainable finance products with specific green or social characteristics. The purpose of the framework is to contribute to Alpha Bank's sustainability objectives and commitments by mobilizing capital to sustainable economic activities.

The framework has been prepared with reference to the core principles and recommendations of the International Capital Market Association (ICMA) and the Loan Market Association (LMA) as well as the EU Taxonomy Regulation. An External Review of the framework was conducted by an independent third party to validate the environmental and social credentials for positive contribution to the UN Sustainable Development Goals (SDGs) and to demonstrate its credibility as a tool for capital allocation decisions.

The Sustainable Finance Framework and the External Review are published on Alpha Services & Holdings ESG Reporting Hub, available [here](#).

Alpha Bank classifies its sustainable financing solutions into the categories of dedicated-purpose financing and general-purpose financing, aiming at establishing an overarching set of sustainability guardrails across the Bank's operating system; creating a coherent path for more coordinated action; producing metrics to track performance; and creating meaningful sustainability results both for the Bank and its clients.

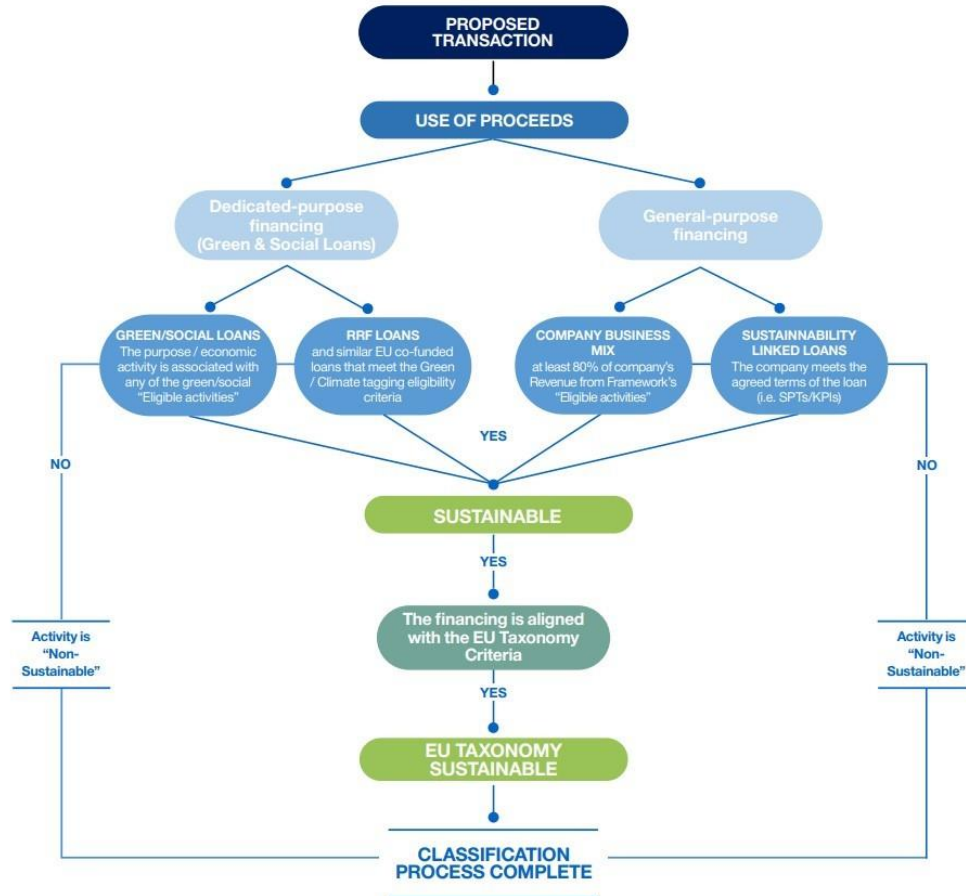
A. Dedicated Purpose Financing

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

B. General Purpose Financing

- *Company Business Mix*: When a company derives a certain percentage (at least 80%) of its revenues from eligible activities.
- *Sustainability-Linked Loans/Facilities*: General Purpose financing that is linked with measurable ESG targets at obligor level based on pre-determined sustainability performance targets agreed with the client.

Sustainable Finance Framework decision process diagram:



Green eligible categories are grouped into five distinct themes: **Energy efficiency, Green Buildings, Renewable Energy, Sustainable Transport and Resource efficiency and Pollution Control**. Each theme is divided into sub-themes to facilitate the activities' categorization purpose. Exclusions may apply at the activity level.

Sustainable Finance Framework, Green and Social loan themes:



The underwriting process was revised to incorporate ESG factors and risks at the point of loan origination. Specific policies and procedures are in place when providing environmentally sustainable lending, including processes for assessing the credibility and business objectives of clients related to ESG. In that context, in December 2023 the revised “*Climate related, environmental, social and governance risk management policy on group’s business lending*” was issued as well as the revised Wholesale Banking Credit Manual.

The ESG assessments performed as part of the loan approval process, are as follows:

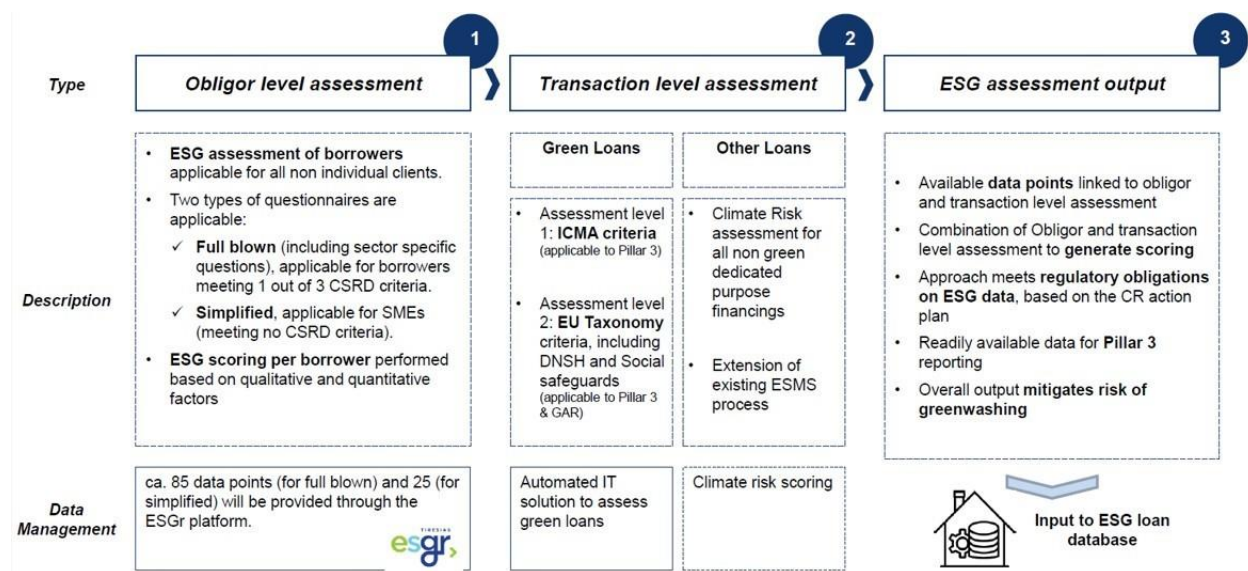
- (i) ESG obligor assessment,
- (ii) ESG transaction assessment,
- (iii) Overall ESG assessment per transaction which determines the overall or combined ESG score
- (iv) integration of the ESG assessments into the credit approval process.

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

Alpha Services and Holdings has implemented assessment processes for ESG arising from customer activities, via the introduction of an ESG questionnaire, which is operated by the Hellenic Bank Association on behalf of all Greek Banks on a common IT platform. The ESG questionnaire which is compulsory for all clients on an annual basis, is tailored to their size and sector of economic activity, so micro enterprises and small businesses have a relatively smaller questionnaire, whereas larger corporates are assessed on a larger set of criteria, which are tailored to the particular characteristics of their business in terms of high levels of potential impacts in the environment or social factors. The questionnaire also assesses Governance factors in line with the company’s structure (i.e. listed vs-non-listed companies). Data from the questionnaire is used by the Bank to derive an ESG Risk score for each client (the “Obligor Assessment”), based on the Bank’s own risk scoring methodology. The score is used in credit and pricing decisions, combined with an assessment of each individual transaction (the “Transaction Assessment”).

The Transaction Assessment and Obligor Assessment are combined to derive the “Overall ESG Assessment” which then determines credit decisions and loan pricing, where Sustainable Finance Loans are selectively incentivized with lower pricing, while non-sustainable loans to clients characterized as “High ESG Risk” can be penalized with higher pricing. The exact range of these pricing variations is determined by the Bank’s Credit Policy and the Sustainable Loan Pricing Strategy, both of which are periodically updated.

The above process ensures that all elements of Environmental (including Climate), Social and Governance risks at the client base are assessed on an annual basis and incorporated in each lending decision.



Favorable pricing scenarios with respect to the categories of dedicated-purpose loans, company business-mix loans and sustainability-linked loans are in place, in line with the transition dynamics of different sectors and eligible economic activities. For wholesale clients, the pricing scenarios considered are expected to differentiate between high climate risk sectors, depending on the availability of commercially viable transition investments, as well as low emission sectors. In terms of retail clients, the pricing scenarios will effectively address housing/vehicle loans and green consumer loans.

Retail financing initiatives

In the context of sustainable financing, the Bank offers a wide range of “**green**” retail loans (Alpha Green Solutions) with preferential interest rate which can cover consumers’ needs, such as:

- Purchase or construction of a house classified at least with Energy Efficiency Performance class A and above.
- Renovation of a house classified at least under Energy Efficiency Performance class B+.
- Purchase of electric/hybrid vehicles and bicycles.

- Purchase and installation of home equipment, such as photovoltaic and solar panels, heat pumps for a home energy upgrade.

To further enhance its commitment to sustainable environmental solutions, the Bank also participates in various State funded energy-saving programs such as “Exoikonomo 2023” and “Exoikonomo 2021”, and “e-Astypalea”. Alpha Bank, being the only Bank with presence on the island of Astypalea, is an integral member of the local community, contributing to the initiatives of the authorities for the creation of a clean mobility model island.

More details about the retail green products can be found on the Bank's [website](#).

Corporate financing initiatives

For corporate clients, the Bank provides financing opportunities in relation to “Greece 2.0 National Recovery and Resilience Plan”. Through the Recovery and Resilience Facility, the Bank provides financing for the green transition, with a focus on renewable energy sources. Eligible categories under the “green pillar” include green technologies, green skills, biodiversity, energy efficiency, building renovation, preservation of energy security, circular economy, sustainable development, and creation of jobs.

With respect to green solutions for small and medium size businesses, the Bank offers financing to install and operate photovoltaic stations as well as access to state programmes. The year marked the launch of the New Financing Programme by the Hellenic Development Bank (HDB) “**Green co-financing loans**”, with the purpose of financing mainly the upgrade of businesses energy efficiency and support investment plans for energy production from renewable energy (solar, wind etc.).

The Bank has a **specialized Project Finance Unit**, which works on securing financing for investments in Renewable Energy Sources (RES) projects, large infrastructure projects and Public-Private Partnerships (PPPs). New disbursements to projects related to renewables, waste, other energy and distribution networks and infrastructure confirm the Bank's dominant position. Following the disbursement of credit, adherence to environmental terms and commitments is certified on an annual basis, throughout the long duration of such financing.

Investments

Since 2021, the Bank promotes **Impact Investing** to Private Banking Customers by creating an environmental “bonus” scheme linked to Structured Notes. Through this action, sustainable investing is promoting reforestation. Through the collaboration with “Reforest’ Action” and the Forest Research Institute, a total of 60,786 trees have been financed for planting and specifically in 2024, nearly 4,648 trees have been financed for planting. This effort has resulted in the storage of 697.2 thousand tons of CO₂ and the creation of 14,052 natural shelters for wild animals according to the certificates the Group has received for the completion of each initiative. The above initiative is benefits not only the environment but also the residents of affected areas by recent wildfires since the reforestation prevents severe floods. Additionally, it raises Customers’ awareness on environmental issues with direct and measurable positive environmental impact from investments.

The Bank ensures it will not finance transactions that impose environmental or social threat, through the incorporation of the “**Group Environmental and Social Risk Management Policy on Legal Entities Lending**” in the Group’s existing Credit Risk Management Framework and the Group’s Credit Policy. An industry-specific list of economic activities² that the Group does not finance is provided. From 1.1.2024 the Bank applies an enhanced Exclusion List. The new included activities are, among others, “Any activity involving significant degradation, conversion or destruction of the sites included in the Natura map”, “Wholesale and retail trade of thermal coal”, “Conversion of natural forests into plantation”.

Participation in global initiatives for sustainability

Alpha Services and Holdings actively participates in the global effort to build a sustainable future for the economy and the planet. In this context, the Bank has **joined the UN-convened Net Zero Banking Alliance (NZBA), committing to net zero greenhouse gas emissions by 2050**. This undertaking reflects the Bank’s societal responsibility, as a leading financial institution in Greece, to help mitigate climate change and drive the transition to a net zero economy.

As part of its commitment to environmental stewardship, Alpha Bank has developed a **comprehensive strategy** to achieve net zero emissions, focusing on the following key actions:

- **Setting Science Based Targets for Financed Emissions:** To align with the NZBA overarching principles of setting and disclosing long-term and intermediate targets to support meeting a net zero by 2050 greenhouse gas emissions goal, the Group announced in 2024 the first-round of sector targets across its lending and investment portfolios. The process followed key steps:
 1. **Establishing an Emissions Baseline:** The Group established an emissions baseline by completing a comprehensive measurement of its financed emissions for 2022, covering investment and lending portfolios, across all financed sectors. The asset class coverage included on-balance sheet exposures in Listed and Unlisted Equity, Corporate Bonds, Sovereign Bonds, Corporate Loans, Commercial Real Estate (CRE), Residential Real Estate (RRE), Motor-Vehicle Loans and Project Finance. SMEs were excluded from the initial perimeter for target setting. The baseline measurement relied on the GHG emissions of its borrowers or investee companies and followed the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the PCAF.
 2. **Focusing on Carbon-Intensive Sectors:** As a second step, the target setting exercise focused on the financed emissions within the carbon-intensive sectors recommended by the NZBA. The sectors identified by the NZBA: agriculture, cement, coal, commercial and residential real estate, iron and steel, oil and gas, power generation and transport were mapped to internationally recognized sector classification codes applied by the Group.
 3. **Prioritizing Key Sectors for Target Setting:** the Group prioritized setting targets for the Power Generation, Oil and Gas, Cement and Iron and Steel sectors, taking into consideration each sector’s materiality based on the financed emissions measurement, outstanding exposure, sectoral contribution to Greece’s emissions, the availability of credible sectoral target-setting guidance, data quality and availability, as well as the market practice.

² More details are presented in the 2022 Sustainability report and Climate related (TCFD) reports.

4. **Selecting the Value Chain:** For each of the four priority sectors, the Group selected the parts of the sector's value chain that are most material to the Group by exposure and financed emissions, and in which the Bank's clients have the most control over their emissions. After accounting for the appropriate value chain, these sectors correspond to ~15% and ~54% of Bank's outstanding exposure and financed emissions, respectively, of the sectors in scope for the NZBA.

The targets are compatible with limiting global warming to 1.5C degrees because they employ the widely used, science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE) scenario as its benchmark pathway.

Alpha Services and Holdings recognizes the important role of financial institutions in mobilizing capital towards environmentally sustainable activities and in supporting their clients' transition to a low-carbon economy. The SFF serves as a key enabler to deliver the sustainable finance strategy of the Group by financing climate mitigation projects.

Loyal to its commitment towards the support of an environmentally sustainable economy and to mitigate climate change, the Group has an ambitious plan, with the main decarbonization levers being the increase in Sustainable Financings and the reduction of financings that may have a negative impact on climate and the environment. Additionally, the Group has developed policies and procedures to reduce its operational environmental footprint with the overarching aim being net-zero emissions and setting targets associated with this objective.

Alpha Services and Holdings actively participates in the global effort to build a sustainable future for the economy and the planet. The Group's strategy is to align all material elements of the loan and (on balance sheet) investment portfolio with a Science-Based 1.5C pathway, based on the International Energy Agency Net Zero Emissions (IEA NZE) Scenario, adapted to the Bank's portfolio composition and national characteristics as they apply. The first set of sectors for which targets have been set are Power Generation, Oil and Gas, Iron and Steel and Cement. These sectors correspond to ~20%³ and ~64%^{3, 4} of the Bank's outstanding financed emissions, respectively of the sectors in scope for the NZBA. The metrics selected for targets are Carbon Intensity metrics for all the above sectors, except for Oil and Gas for which absolute emissions have been used.

The remaining material carbon-intensive sectors will be included in a subsequent round of target-setting in accordance with the NZBA guidelines to contain global temperature rise to 1.5C and no more than 2C, as well as EU Climate Law, Regulation and Policy. Some sectors may be excluded from target setting due to either methodological limitations and/or due to their limited materiality to the Bank's portfolio.

³ Before exclusions on segments on value chain covered and SMEs

⁴ Excluding shipping financed emissions

Table 1. Summary of targets for Power, Oil & Gas, Cement, and Iron & Steel

Sector	Exposure, 2022 (€ Mn)	Scope of emissions	Metric	Reference scenario	Baseline year	Portfolio value (2022)	IEA value (2022)	IEA value (2030)	Bank target (2030)	Reduction, target vs baseline, %
Power	1,254	Scope 1	kgCO _{2e} / MWh	IEA NZE2050	2022	223	460	186	132	41%
Oil & Gas	607	Scope 1,2	Indexed tCO _{2e} of 2022 = 100	IEA NZE2050	2022	100	100	77	74	26%
Cement	73	Scope 1,2	kgCO _{2e} / t Cementitious product	IEA NZE2050	2022	687	628	465	584	15%
Iron & Steel	197	Scope 1,2	kgCO _{2e} / t Steel	IEA NZE2050	2022	540	1,738	1,260	Intensity of portfolio to remain below the reference pathway	N/A

- **Financing sustainable projects:** Alpha Bank allocates capital to Green and Social investments, in line with its Sustainable Finance Framework, with emphasis on the power generation sector, buildings and transportation. Through sustainable financing, the Bank aims to support the development of low-carbon infrastructure and accelerate Greece's transition to an environmentally sustainable and resilient economy.
- **Engaging Customers:** The Bank is committed to support its customers transition to a low carbon economy, offering advice and flexible financing solutions while facilitating access to funding, via tools like the EU Resilience and Recovery Facility and the Hellenic Development Bank.
- **Reducing operational emissions:** The Bank implements energy-efficiency measures across all Branches, offices, and data centers to reduce its carbon footprint. This includes using electricity from renewable energy sources, optimizing energy consumption, and adopting sustainable practices in day-to-day Group operations.
- **Collaboration and advocacy:** Alpha Bank actively engages with its stakeholders, aiming to increase awareness and foster sustainable practices to the entire spectrum of financial and social activity.

In the same direction, the Bank is a signatory to the **Principles for Responsible Banking** (2019), which were developed as an international initiative of the United Nations – Environment Programme Finance Initiative (UNEP FI).

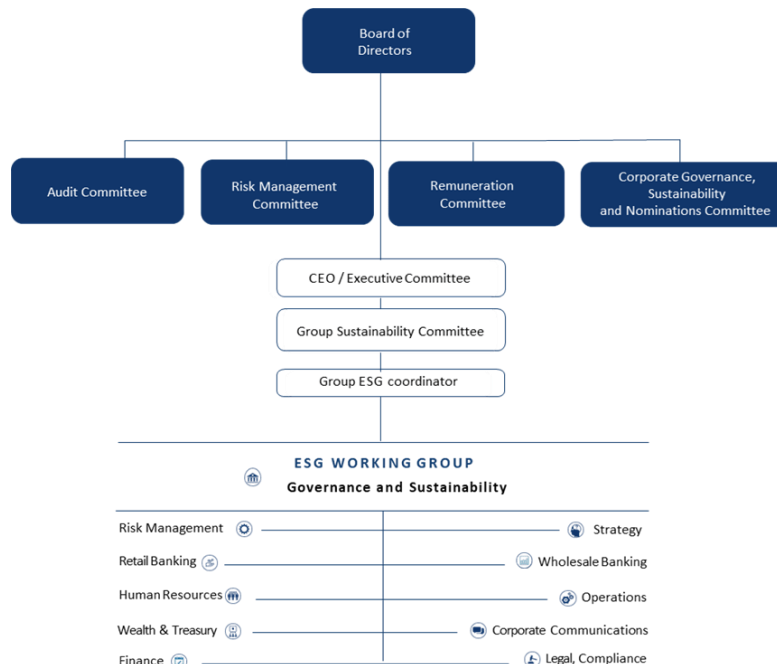
For the purpose of implementing the Principles for Responsible Banking, Alpha Bank has already submitted four self- assessment reports. It should be noted that at end of 2022, a new dedicated portfolio alignment analysis was conducted, in accordance with the UNEP FI Principles for Responsible Banking (PRB) Impact Analysis, using the Portfolio Impact Analysis Tool for Banks. Positive and negative impacts that the Bank creates through its institutional and consumer banking portfolios, were assessed, and mapped against the impact areas and topics of the revised Impact Radar (June 2022). The Bank identified positive and negative associations between its portfolio and the environmental, economic, and social areas as defined by the UNEP FI PRB. The results of the analysis were used to define the Group’s Sustainability Strategy, as per the Double Materiality Assessment section.

As part of the company’s commitment to incorporate ESG criteria into its investment process, Alpha Asset Management M.F.M.C. has been a signatory of the United Nations-backed **Principles for Responsible Investment (PRI)** since December 2018. In September 2024, the company submitted its 2023 PRI Transparency report covering the responsible investment activities that occurred through 2023.

Governance

Alpha Bank’s organization and operation are governed by the principles of integrity, honesty, objectivity and independence, confidentiality and discretion, disciplined and reasonable risk taking, transparency as provided for in the Bank’s Code of Ethics and in the principles of Corporate Governance. There is focus to the identification, measurement and management of risks undertaken, to the compliance with the current legal and regulatory framework and to transparency with the provision of full, accurate and truthful information to the Bank’s Stakeholders.

The following diagram presents the Organizational Structure for supervising and managing the implementation of the objectives, strategy, and policies in the context of Climate and ESG initiatives, as well as to effectively identify, manage, monitor and report the risks that might be exposed.



Board level oversight

The Board of Directors (BoD) is responsible for managing the affairs of Alpha Services and Holdings S.A. and representing it vis-à-vis third parties. Further, it has the ultimate and overall responsibility for the Company and defines, oversees and is accountable for the implementation of the governance arrangements within the Company that ensure effective and prudent management.

The BoD, among others, supervises and approves the ESG objectives and commitments and it has the oversight of the Group risk management framework. Within this context, the BoD reviews the risk management strategy, delegates authorities to Committees and Senior Management for implementing the risk management strategy, reviews the overall risks assumed under the delegated authorities, provides guidelines, and ratifies the Group's risk appetite. Additionally, it promotes and ensures a robust risk and compliance culture.

Four Committees operate at Board level, namely the:

- Audit Committee,
- Risk Management Committee,
- Remuneration Committee,
- Corporate Governance, Sustainability and Nominations Committee.

The responsibilities of the above Committees in the context of ESG, among others, are as follows:

- **The Corporate Governance, Sustainability and Nominations Committee** acts as the ultimate liaison between the Board Committees and the Board, ensuring proper coordination with respect to all sustainability/ESG issues and promotes respective communications and feedback from all the Board of Directors Committees.
- **The Risk Management Committee** has oversight of the identification, monitoring, and management of Climate & Environmental risks.
- **The Remuneration Committee** is responsible for ensuring ESG metrics are incorporated in Remuneration Policies.
- **The Audit Committee** performs the oversight of the Non-Financial Information and Sustainability Report, sustainability and ESG disclosures.

The BoD, through the Risk Management Committee, receives regular reports by the Chief Risk Officer (CRO) and the Chief Financial Officer (CFO) on the implementation of the risk strategy and risk appetite of the Company and the Group.

Lines of reporting and frequency of reporting relating to environmental risk

The Risk Management Committee and the Corporate Governance Sustainability and Nominations Committee are informed, on an at least bi-monthly basis, by the Group ESG coordinator, the CRO, the General Manager of Wholesale Banking and the Chief of Corporate Center, on issues related to Sustainability and Climate Risk. Specific Climate & Environmental Risk KPIs are included in the Risk Management Committee report. In addition, the Risk Appetite Framework Dashboard, which is reported quarterly includes indicators on Climate & Environmental Risk.

The Chairman of each Committee endorses for approval by the BoD, specific items that are being discussed and the BoD proceeds to the final approval.

Executive level decision making

The **Group Sustainability Committee (GSC)** was established in November 2021 to approve and oversee the sustainability strategy and to steer all related initiatives. The Committee takes cognizance of and decides upon Sustainability and ESG related matters to ensure an internal governance framework that allows the Bank to manage ESG risks and consider all sustainability topics.

GSC membership includes five General Managers as permanent members and additional (non-voting) members at the senior executive level. During 2024, the committee met 10 times, highlighting Management's commitment to enhancing the Bank's sustainability position. The Group Sustainability Committee's agenda covered a range of topics, including progress of the Bank's ESG Action Plan, risk identification and materiality assessment of Climate Risk, Sustainable Finance strategy, setting Science Based Targets, as well as key disclosures and regulatory submissions.

Operational level implementation

At the Operational level, an **ESG Working Group** is in place to monitor, coordinate and implement key initiatives, led by the Group ESG Coordinator, who is also responsible for providing direction to subsidiaries and other units. The ESG Working Group represents all areas of the Bank that take ownership of ESG integration and ensures the flow of information across relevant teams.

The Bank's **Governance and Sustainability Business Area** drives the ESG agenda and ensures the adoption of best practices across the Group. In addition, high-level responsibilities are defined in the updated Operating Model emphasizing the ESG Strategy and ESG integration, including integral components of Sustainable Finance operationalization, stakeholder engagement and disclosures in line with regulation-driven and other initiatives. The Governance and Sustainability Division also leads communication and the exchange of knowledge and expertise between the Bank and its Group Companies.

The **Climate, ESG and Enterprise Risk Business Area** is an 'umbrella' and holistic risk function collaborating and coordinating the rest of Chief Risk Control Officer functions and Business Units, while undertaking a limited number of risks under its controlling capabilities related to Bank-wide and even Group matters. Among others, the Climate and ESG Risk function collaborates with the GSD Division and provides expert guidance for ESG integration in the risk management framework, supports consistency and adequacy of risk input across risk types, reviews questionnaires in the borrower assessment process, designs assessment methodologies (e.g. for physical climate risk) and is responsible for risk-related aspects of strategy-setting and business planning.

The Bank has implemented an **ESG Operating Model** across the three Lines of Defense which defines the roles and responsibilities of relevant divisions and their respective Management, on major activities and workflows relevant for Climate Risk and ESG issues.

Remuneration Policy

As per the [2024 Remuneration Policy](#) of the BoD Members a Combined Bonus Plan (CBP) has been established which explicitly incorporates ESG criteria for Material Risk Takers including Senior Leadership Team (SLT) and directors. This includes short and long-term performance metrics, which may vary annually and are always approved by the BoD. In terms of short-term metrics and as part of the criteria for the payment of variable remuneration, specific ESG-related metrics are included that concern actions and initiatives that the Alpha Bank S.A. may be developing. In terms of long-term performance metrics, the CBP includes KPIs, such as sustainable finance disbursement targets, and female participation at middle management level and above. These metrics are linked to the material impacts, risks and opportunities identified through our due diligence processes. As such, ESG criteria are incorporated in long-term incentive remuneration and are weighted at 20%.

The remuneration policy objectives and criteria will be continuously aligned with the evolution of the bank's strategy for Financed Emissions and the decarbonization of the portfolio. In addition, the policy also adheres to the principles of the United Nations Global Compact (UNGC) and the International Labor Organization (ILO) standards; comply with national labor laws and the European Union's directives on fair pay; align with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

16.1.2 Social Risk

Business Strategy and Processes

Social Risk in the client base and credit decisions

Social Risk arising from client activities are assessed via the “Obligor Assessment” questionnaire and process and incorporated in the bank’s risk management framework, including the assessment of criteria for reputational risk arising from negative social impacts, which can trigger an additional risk assessment process with a dedicated questionnaire.

Risk arising from the Bank’s own activities and financings

Double Materiality Assessment

Through the materiality analysis performed the Group has identified the following **social impact, risks and opportunities** for the short, mid- and long-term horizon:

- Material positive impact to the **livelihood own workforce through provision of secure employment, social dialogue and freedom of association**
- Material positive impact to own workforce through **improvement of diversity (contribution to Equality and Justice)**
- Material inherent risk through insufficient/ inadequate **training and skills development** of own workforce
- Material positive impact to Customers and broader society/economy through the Group’s products/services and business relationships **(Access to Housing and Finance)**
- Material inherent risk through **data privacy issues relating to Customers**
- Material inherent risk through incomplete/ incorrect information for Customers **(unsuitable promotion practices from information disclosure perspective and inadequate disclosure of product terms)**
- Material inherent risk through the Group’s products/services and business relationships with Customers **(product suitability issues, unsuitable promotion/ sales practices, and fiduciary breaches)**
- Material positive impact to Customers and broader society/economy through the Group’s products/services and business relationships **(Contribution to Healthy Economies)**

In addition, the Bank also ran an internal exercise and determined the following risks that are related to social and governance matters that have been defined by the Greek Law 4548/2018 and could negatively affect the organization’s operations:

- Conduct Risk
- ICT & Information Security
- Financial Crime risk
- Fraud Risk
- Execution, Delivery & Process Management
- Outsourcing Risk

Social Targets

Based on the identified impact areas, the Bank has set concrete targets to:

- Enhance people's financial health through inclusive access to financing
- Provide an Inclusive and Safe Work environment
- Support equal access to Healthcare, Education, Culture and Heritage

Social-related commitments and targets of Alpha Bank are presented in the following table:

Foster Healthy Economies and Societal Progress			
Commitments	Targets	Target Date	KPIs
Enhance people's financial health through inclusive access to financing	Increase employment of young people by 20% (base year 2019)	2025	Percentage of Employees in the age group of 18-25
			Percentage of hirings in the age group of 18-25
	Support financial inclusion through educational programs addressed to teachers, students and people over 55, women & young entrepreneurs	Ongoing	Number of CSR programs implemented for the financial inclusion addressed to people over 55 years
	Increase access to people with mobility limitations to 85% of Branches	2025	Percentage of branches accessible (ramp or easily accessible) to people with disabilities (%)
	Full digitalization of banking services and increase of digital sales by 30%	2025	Percentage of all consumer loan applications were submitted via digital channels (%)
Provide an inclusive and safe work environment	Provide a safe and inclusive work environment	Annual	Number of injuries in the workplace
	Maintain >40% women representation in Managerial positions	Annual	Percentage of women in managerial positions
Support inclusivity and access to Healthcare, Education, Culture and Heritage	Support equal access to culture for people with disabilities, cognitive impairment, the elderly and children in remote areas	Ongoing	Number of CSR initiatives targeted to the provision of equal access to cultural programs
	Limited financing to activities that can affect health and well-being, including gambling, tobacco, and alcohol	Ongoing	Financing provided to gambling, tobacco and alcoholic beverages as % of total loan portfolio (aggregate financing cap of 5%)

Social Initiatives

Alpha Services and Holdings respects and promotes human rights through the business policies it applies, its responsible supply chain and the relations it develops with its Customers. Alpha Bank's Corporate Responsibility Policy and its Code of Conduct and Ethics describe its approach and commitment to the management of human rights. At the same time, it applies the law and follows internationally acclaimed directives, principles and initiatives to protect human rights, such as the Core Labor Conventions of the International Labor Organization (ILO) and the Universal Declaration of Human Rights (UDHR). The Bank recognizes the right to union membership and collective bargaining (see section "Social and employee matters – Alpha Services and Holdings' Management of this Report) and opposes all forms of child, forced or compulsory labor.

As stated in its **Corporate Responsibility Policy**, Alpha Services and Holdings respects and defends the diversity of its Employees and treats all Employees with respect. The Bank promotes a culture that fosters diversity and inclusion for its workforce and implements appropriate metrics to monitor diversity at all levels. For Alpha Bank, the integration of diversity and inclusion practices in its operating culture and, of course, in all aspects of its corporate and social activity is of paramount importance. To this end, it adopted a modern framework against bullying and harassment at the workplace since 2022.

A framework of interventions has been developed over the past years, not only with respect to providing equal opportunities for professional development, equal performance evaluation and rewards, but most importantly, a framework for personal development for women throughout their life cycle. A key part of these interventions has been the practice of mentoring, acceleration, and partnerships. Important examples of the empowerment initiatives implemented in 2024 were: The "Financial Literacy Lessons" program, a nine-month educational initiative exclusively addressed to female Employees of the Group mainly in managerial positions. The PosiDives program was a key initiative within the Group's DE&I strategy, exclusively addressed to female Employees at Manager, Expert, and Branch Manager level.

The Group acknowledges the importance of fostering a safe and healthy work environment and promotes a strong health and safety and wellbeing culture, by ensuring regulatory compliance and investing in efficient health and safety management, personnel consultation, and trainings.

To further strengthen HR communication with all employees, especially those who work remotely or are located outside of Athens, and improve employee experience and engagement, a new communication platform was launched (#talk2us), through which employee can book appointments with Human Resources Business Partners (HRBPs) who act as 'people advocates' and serve as a first point of contact for employees to discuss and help resolve professional issues of concern.

As a mean to promote collaboration and networking, employee groups with common interests or characteristics, the "**Communities of Change**" were further developed within 2023 to facilitate:

- Learning from the unique experiences of employees capitalizing on their diverse professional backgrounds.
- Distributing best practices among Units in order to achieve the goal of shaping the next day for Alpha Bank.
- Nurturing cross-functional alliances for employees from different areas and promote collaboration.
- Establishing Alpha Bank as an employer of choice and introducing practices that enhance Bank's employee value proposition.

In 2023, Alpha Bank’s strategic commitment to sustainable growth was extended, focusing strongly on empowering our 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.

Table 2: Thematic areas addressed through ESG Academy

Horizontal Awareness	Technical capabilities for ESG
<ul style="list-style-type: none"> ○ Understanding of the ESG components and their impact on the Banking Sector while inspiring behavioral change inside and outside of work ○ Fundamentals towards ESG integration ○ ESG Governance and Operating Model ○ Risk Management Framework ○ Sustainable Finance Framework ○ Business and Strategic Planning around ESG ○ Health and Safety Awareness 	<ul style="list-style-type: none"> ○ Sustainable Finance Framework Operationalization ○ Loan Origination Process (Integrating ESG criteria in lending and the transaction assessment process) ○ ESG scoring and modeling ○ Data Governance and Processes

During 2024, 79% of workforce of Alpha Bank Greece participated in training organized by the ESG Academy, while over 80% of retail and wholesale banking business Employees followed dedicated ESG lessons specializing on the understanding of the ESG landscape, the SFF the Bank has developed and the necessity of the ESG assessment. Employees across the Bank benefited from introductory eLearning courses on ESG fundamentals and the ESG Risks and Opportunities. A dedicated training was conducted on “ESG Risk Management for Risk Professionals” with participation of all Employees in risk management. Additionally, the Bank collaborated with the Hellenic Banking Association for the provision of an open-registration webinar on ESG and Sustainable Finance.

Sustainable Finance

Social eligible categories are grouped into four distinct themes: **Economic inclusion, Affordable basic infrastructure, Access to essential services, Affordable housing**. Each theme is divided into sub-themes to facilitate activities’ categorization purposes. The framework targets socioeconomically disadvantaged population, living in rural areas or isolated islands with limited or inadequate basic infrastructure, undereducated, long-term unemployed and working population vulnerable at losing their job due to the energy transition. In addition, aging population, vulnerable youth, persons with different abilities or in need of medical attention. Exclusions may apply at the activity level.

More information can be found at the Environmental Risk section.

Investments

With the aim to increase its positive effect on society, through new business opportunities that generate value for all stakeholders, the Bank for the first time selected and promoted Social Bonds to its customers within the year. Social Bonds are defined fixed income products that have a social benefit, in the sense that the funds raised from their issuance, or equivalent amounts, are used to finance or refinance, in whole or in part, new and/or existing projects with social sustainability characteristics (Social Projects).

The criteria for the selection of the bond issues were based on their ability to cover areas such as basic social infrastructure (transport, drinking water and water supply, energy), access to basic social services (education, health, finance), housing, employment and unemployment reduction, food safety, technology and sustainability, elimination of socio-economic inequalities and ensuring equal opportunities for different social groups.

Finally, the Bank manages the social dimension of financing through its responsible financing approach, as explained in the S4- Consumers and End Users and Contribution to Healthy Economies sections of the [Sustainability Statement](#) within the Annual Report 2024 (p. 130-147).

Certified Management Systems (ISO)

The development of a comprehensive and effective Business Continuity Management (BCM) Framework ensures, to the maximum extent possible, the protection of the health and safety of Employees, the uninterrupted provision of services to Customers and other Stakeholders (Shareholders, business partners, suppliers, Regulatory and State Authorities etc.) and the minimization of the consequences (in terms of operation, finances, legal issues and reputation) in case of an unforeseen event which can affect its operation. The BCM processes of Alpha Bank Group include the assessment of climate related, environmental and social risks that may cause business disruption.

The BCM framework of the Alpha Bank Group is certified with ISO22301. The ISO22301 certification applies to certain divisions of Alpha Bank S.A., and the following subsidiaries: Alpha Leasing S.A., Alpha Finance Investment Services Single Member S.A., Alpha Supporting Services S.A.

Health and Safety

Alpha Bank was also certified in 2022 with an Occupational Health and Safety Management System in accordance with ISO 45001:2018 (for Alpha Bank S.A., Alpha Services and Holdings S.A., Alpha Supporting Services S.A.), covering all its activities and employees. In addition, there is a permanent presence of Occupational Physicians within work premises with large number of Personnel, while the Bank engages with experts (i.e. psychologists) and offers Employees the opportunity for consultation and support services. Occupational Physicians are available full time to premises with many employees. Evacuation drills are scheduled by branches at least every 3 months. Training (both live events and e learning) are available to all, covering fire safety, emergencies, first aid and violence and harassment at the workplace.

All personnel are offered and covered by medical insurance. Additionally, licensed psychotherapists are available for off-site counselling at no cost, to employees. Alpha Bank seeks to continuously improve its management system while introducing new training programs and improving personnel participation.

Governance

The BoD and its Committees have oversight of all issues with the Corporate Governance, Sustainability and Nominations Committee having overall ownership of the Sustainability agenda, including Social Risks.

In this respect, over 2024 the Corporate Governance, Sustainability and Nominations Committee:

- Reviewed the Double Materiality Analysis which was conducted for the first year under the CSRD
- Monitored the disclosure strategy, drafting procedure and endorsed the Sustainability Statement under the CSRD and reviewed the relevant Limited Assurance Reports by an External Auditor. reviewed the material impact areas identified through the materiality analysis and
- Has been informed on the drafting and release of Task Force on Climate-related Financial Disclosures (TCFD) report.
- Received updates on the respective social-related targets and was informed on the ESG Workplan, the timeline for key disclosures and reviewed performance of the Group in implementing its sustainability strategy.

The Risk Management Committee was:

- Updated on ESG and Climate Risk, as well as on the progress of the ESG Workplan and Sustainability Disclosures.
- Informed on the Climate Net Target setting.

During 2024 the Audit Committee, among others:

- Monitored the Double Materiality Analysis
- Monitored the drafting procedure and approved the Sustainability Statement under the CSRD (first year of implementation) and endorsed for approval the Limited Assurance Report by an External Auditor.

The Remuneration Committee, during 2024, endorsed the Remuneration Policy as per Law 4548/2018 which was updated in order to incorporate, among others, disclosures on ESG criteria.

At the Executive level, the Group Sustainability Committee approves any new social initiatives and monitors its implementation to ensure alignment with the Group's overall Sustainability Strategy and targets.

The ESG Working Group, guided by the ESG Coordinator, represents all areas of the Bank that take ownership of ESG integration and ensures the flow of information across relevant teams. Those teams consist of specialists and dedicated representatives of relevant functions (Retail Banking, Wholesale Banking, Risk Management, Strategy, Human Resources, Wealth Management and Treasury, and others). Representatives from each area participating in the ESG Working Group form the Operating Committee, which is responsible for providing the Group Sustainability Committee with information on the progress of the respective ESG project areas, including social issues.

The Bank's Governance and Sustainability Business Area drives the ESG agenda and ensures the adoption of best practices across the Group. The Division also leads communication and the exchange of knowledge and expertise between the Bank and its Group Companies. In addition, high-level responsibilities are defined in the updated Operating Model emphasizing ESG Strategy and ESG integration.

16.1.3 Governance Risk

Regarding the governance processes of Alpha Services and Holdings, including Committees, see also the governance as described in the respective environmental and social risk sections.

Double Materiality Assessment

Alpha Services and Holdings Group is committed to conducting business according to applicable laws, rules, regulations and the highest ethical standards, as an essential element of the responsibility towards its Customers, other Stakeholders and Shareholders for the protection of the reputation and long-term success of business. Through the materiality analysis performed the Group identified the following **impact, and risks** related to Business Conduct for the short, mid- and long-term horizon:

- Material positive impact to stakeholders across the value chain through initiatives that foster an ethical corporate culture (**Contribution to Transparency and the Rule of Law**)
- Material inherent risk through **AML issues** across the value chain (AML/ CFT issues)

Targets

Governance-related commitments and targets of the Group are presented in the following table:

Ensure Robust and Transparent Governance			
Commitments	Targets	Target Date	KPIs
Ensure the Diversity and Independence of the BoD	A majority of Independent Members in the Board of Directors and its Committees	2025	Percentage of Independent Non-Executive Members of the Board of Directors
Embed sustainability in Governance practices and Strategy	A minimum of 40% female representation in Non-Executive Board Members	2025	Percentage of Female Board Members
	Proactive engagement with Investors and Stakeholders to align priorities	2025	Number of engagement initiatives/ meetings with Investors and Stakeholders to align priorities
	Increase material information disclosure to all Stakeholders	2025	Number of Sustainability- related publications within the year
Enhance transparency and safeguard business ethics	Incorporate ESG criteria in our Remuneration and Risk Management frameworks	2025	Embed ESG criteria in Directors' Remuneration Policy
	Safeguard internal risk controls that protect the Customers' data	2025	Personal Data breach incidents (number of incidents notified to the Personal Data Protection Authorities)

With respect to counterparties, the Group has incorporated the "Environmental and Social Risk Management Policy on Legal Entities Lending" in the Group's existing Credit Risk Management Framework and the Group's Credit Policy, thereby enhancing the effective management of the environmental and social dimension of financing. The Policy presents the responsibilities and the approach followed in managing environmental and social risk at every stage of the lending process and also provides an industry-specific Exclusion List (i.e. a list of sectors that the Group does not finance), as well as a list of crucial industry sectors/activities associated with environmental and social risk.

For corporate clients in the wholesale banking and the retail Small Business Unit, the Bank has developed ESG customer assessment questionnaires, aiming at collecting data and assessing the borrowers in terms of ESG criteria.

The Bank also applies a granular sector-specific customer assessment during the credit origination process that assesses material topics for designated sectors against certain environmental, social and governance criteria. Those customers whose economic activity falls into the CPRS⁵ perimeter, tobacco & gambling will be assessed through the sector-specific questionnaire. For customers, whose economic activity falls into the non- CPRS perimeter, a sector agnostic assessment will be applied, considering fundamental aspects of ESG criteria that are common across all sectors.

The **ESG customer assessment questionnaires** comprise three independent sections (Environmental, Social, Governance). Each of the Environmental & Social sections is further segmented into:

- **Management approach:** Captures customer's ability to manage Environmental and Social factors.
- **Evaluation of the Management approach:** Captures customer's ability to evaluate the management approach for Environmental and Social factors.
- **Performance Assessment:** Assesses customer's efficiency regarding Environmental and Social factors and detects whether the customer keeps track of quantitative sector-specific information.

Governance assessment is common across sectors and captures the decision-making process and roles & responsibilities regarding Environmental and Social factors.

⁵ The Climate Policy Relevant Sectors (CPRS) is a classification of economic activities to assess climate transition risk, first developed in the article by Battiston et al. (2017) published on Nature Climate Change. CPRS is identified considering: i) role in the energy value chain (technology), ii) role in the GHG emissions chain, iii) specific policy processes and iv) business model (input substitutability of fossil fuel)

ESG criteria to evaluate corporate customers:



The Bank has re-designed the ESG risk assessment approach through the application of changes in several aspects of credit origination. The updated approach assesses both quantitatively and qualitatively ESG aspects of obligors through questionnaires that capture ESG risks relevant per sector (based on materiality principles), as well as transaction-specific characteristics in order to adequately evaluate their ESG risk profile. The Bank has also developed ESG scorecards for assessing the Obligors.

The ESG questionnaires consider relevant standards published by various organizations, such as the Sustainability Accounting Standards Board (SASB), the Carbon Disclosure Project (CDP), S&P Global, Fitch, Morgan Stanley Capital International (MSCI), International Petroleum Industry Environmental Conservation Association (IPIECA) and European Financial Reporting Advisory Group (EFRAG), as well as industry best practices.

When specific criteria are met, an environmental and social due diligence, i.e. on-site visit at customer's premises, is conducted by environmental and social specialists in order to assess customer's compliance with the respective legislation. Similarly, to assess the investments, the Project Finance team collaborates with specialized technical advisors on the projects' environmental licensing and environmental due diligence. Following the disbursement of credit, adherence to environmental terms and commitments is obligatory, throughout the long duration of the said financings.

Certified Management Systems (ISO)

Alpha Bank was distinguished for its organizational resilience, as it obtained a certification in accordance with the ISO 22316 international standard by TÜV AUSTRIA, becoming the first bank in Greece to obtain a certificate of compliance with this international standard. This distinction confirms Alpha Bank's commitment to best practices and innovative methodologies that ensure its successful adaptation and resilience to the changing business environment, as well as the smooth attainment of the objectives of its daily operation. At the same time, the adoption of the requirements of ISO 22316 standard helps create within Alpha Bank the right conditions to improve its ability to absorb, adapt and rise to the challenges of the changing business environment.

Finally, they are a strong factor in strengthening governance structures with a view successfully managing processes related to critical administrative and operational functions, such as, among others, strategic planning, cybersecurity management, risk and crisis management, financial control, fraud, environmental management, etc.

Governance Risk in the client base and credit decisions

Governance Risk arising from client activities are assessed via the “Obligor Assessment” questionnaire and process and incorporated in the bank’s risk management framework, including the assessment of criteria for reputational risk arising from poor Governance practices, which can trigger an additional risk assessment process with a dedicated questionnaire.

16.2 ESG Risk Management Framework

16.2.1 Environmental Risk

Risk Management

The Group adopts a proactive approach to the management of Environmental, Social and Governance (ESG) risks. Emphasis is placed on risks arising from climate change, which is a key component of its Risk Management Strategy. Following the recommendations of the Task Force on Climate-related Financial Disclosures (“TCFD”), the Bank assesses current and upcoming environmental policies, legal requirements and regulatory guidelines relating to climate and the environment, in order to record and efficiently manage any transitional risks related to its activities.

The Group has developed a comprehensive action plan, submitted to the European Central Bank (ECB) in May 2021, in which it presented how the climate risk assessment would be incorporated in its operations and in the risk management process. The implementation of the plan began in June 2021, continued throughout 2022 and was enhanced, taking into consideration the feedback provided by the Single Supervisory Mechanism (SSM) in the context of the Climate Stress Test, conducted in January 2022, and the Thematic Review of Climate-related and Environmental Risk Strategies, Governance and Risk Management Frameworks, conducted in June 2022. Leveraging on the work already performed in 2023 the Bank has proceeded with targeted implementations during 2024 in accordance with Group’s ESG plan commitments, which will continue to be applicable in 2025.

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

- The Bank has enhanced its credit policy to incorporate the ESG obligor, transaction and overall per transaction (combination of obligor and transaction) assessment, into its credit approval process.

- The Bank has updated its Risk Inventory to provide a comprehensive overview of the enhancements and progress achieved in climate and nature-related risks in the Bank's Risk Registry. The main climate-risk transmission channels in the area of risk management include transition risk (e.g. the risk of any negative financial impact on the institution, stemming from the current or from prospective impacts of the transition to an environmentally-sustainable economy on its counterparties or its invested assets), physical risk (e.g. the risk of any negative financial impact on the institution, stemming from the current or prospective impacts of the physical effects of environmental factors on its counterparties or its invested assets) and other social and nature-related risk aspects.
- In alignment with the guidance across different sources [e.g. ECB, European Banking Authority (EBA), European Commission], the Bank considers Climate and Environmental risks as a theme, i.e., as a transversal risk, incorporating such factors as drivers of existing financial and operational risk categories in its risk management framework. The Bank has enhanced its Materiality Assessment of ESG risks incorporating time horizons (short/ 2025-medium/2030-long time/2050) and identifying the sectors that are most vulnerable to climate and nature-related risks. In addition, with respect to nature-related factors, the Bank has examined the “inside-out” and “outside-in” impact by utilizing the UNEP FI and ENCORE tools.
 - The Bank has developed a Reputational Risk Policy setting the principles and processes for managing reputational risk exposures, including those stemming from ESG factors.
 - The Bank carries out regular training/awareness initiatives for its staff, to ensure that the Bank's personnel is informed regarding climate-risk issues and Bank' responsibilities in this area.
 - The Bank safeguards that the infrastructure used for its core activities is insured against damages from extreme weather events, while the Bank also ensures that a robust Business Continuity Plan is in place, encompassing provisions for climate risk issues.
 - The Bank aims to minimize and mitigate its reputational risk exposure stemming from obligors' controversial activities. In this context, obligors' controversial activities are assessed and taken into consideration by the respective Credit Committees. The controversial activities assessment has been incorporated into the credit approval process.

Climate & Environmental Risk Definitions and Risk Drivers

Climate, Environmental, Social and Governance (ESG) Risks are the risks of any negative financial impact to the Bank stemming from the current or prospective impacts of Climate and ESG factors on its counterparties or invested assets.

Moreover, ESG risks may directly impact the Bank's operations and/or performance, in terms of process disruption, litigation/liability or reputation-related consequences. ESG factors may have an impact on the financial performance or solvency of an entity by manifesting themselves in financial or operational prudential risks, such as credit, market, operational, business and liquidity risks.

- **Environmental risks:** Environmental risks are the financial risks posed by the exposure of the Bank to counterparties or invested assets that may potentially be affected by/or contribute to the negative impacts of environmental factors, such as climate change and other forms of environmental degradation (e.g., air pollution, water pollution, scarcity of fresh water, land contamination, biodiversity loss and deforestation).
- **Climate-related risks:** Climate-related risks are the financial risks posed by the exposure of institutions to counterparties that may potentially contribute to or be affected by climate change. This could, for example, take the form of physical damage caused by extreme weather events or a decline in the asset value of a counterparty that operates in carbon-intensive sectors subject to taxation on CO₂.
 - **Physical:** Physical risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of the physical effects of environmental factors on its counterparties or invested assets. They are typically defined as risks which arise from the physical effects of climate change and environmental degradation and can be categorized as following:
 - Acute: which arise from particular/ extreme events, especially weather-related events such as droughts, storms, floods, fires or heatwaves, or other environmental hazards that may damage production facilities and disrupt value chains.
 - Chronic: which arise from longer-term trends (progressive shifts in climate and weather patterns or a gradual loss of ecosystem services), such as temperature changes, rising sea levels, reduced water availability, biodiversity loss and changes in land and soil productivity.
 - **Transition:** Transition risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of the transition to an environmentally sustainable economy on its counterparties or invested assets, including:
 - climate and environment related policy changes, for example, as a result of energy efficiency requirements, carbon-pricing mechanisms that increase the price of fossil fuels, or policies to encourage a sustainable use of environmental resources;
 - technological changes, for example, if a technology with a less damaging impact on the climate or the environment replaces a technology that is more damaging, hence making it obsolete or uncompetitive;
 - behavioral changes, for example, if the choices of consumers and investors shift towards products and services that are more sustainable; or if it becomes more difficult to attract and retain customers, employees, business partners and investors when a counterparty has a reputation for damaging the climate and the environment.

- Liability: Liability risk in the context of ESG factors relates to the risk stemming from people or businesses seeking compensation for losses they may have incurred due to ESG factors, e.g., when institutions' counterparties are held accountable for the negative impact, they have on ESG factors through their activities.⁶

In alignment with the relevant external guidance across different sources⁷, Alpha Bank has incorporated ESG factors as drivers of existing risk categories (e.g. credit risk, operational risk, market risk, liquidity risk etc.) in its risk management framework. The table below provides an indicative illustration of the way existing risk types could be affected by Climate and Environmental drivers:

⁶ Liability risks are sometimes considered either physical or transition risks. They could, however, also be considered a separate risk category as they may not only arise from climate-related and other environmental risks but also from social and governance risks.

⁷ Some indicative regulatory and other references are:

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



Indicative impact of Climate related and Environmental risk drivers				
Risk Type	Transition		Physical	
	Climate	Environmental	Climate	Environmental
Credit risk	<ul style="list-style-type: none"> - Impact on the credit risk parameters (PD, LGD, EAD) as a result of transition risk events, affecting the creditworthiness of counterparties (e.g. increased PD of companies sensitive to transition risk factors, impact on collateral values from physical risk related events and from disorderly transition to low-carbon economy). 		<ul style="list-style-type: none"> - Impact on the credit risk parameters (PD, LGD, EAD) as a result of physical risk events, within sectors or geographies vulnerable to physical risk (e.g. through lower collateral valuations in real estate portfolios as a result of increased flood risk). 	
Market risk	<ul style="list-style-type: none"> - Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from climate-related factors (e.g. from transition risk drivers leading to repricing of securities and derivatives). 		<ul style="list-style-type: none"> - Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from climate-related factors (e.g. from physical events leading to repricing of securities and/or derivatives). 	
Liquidity risk	<ul style="list-style-type: none"> - Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from climate-related factors (e.g. from transition risk drivers leading to repricing of securities and derivatives), which may reduce the value of high-quality liquid assets, thereby affecting the liquidity buffer. - Impact through Bank's ability to raise funds or liquidate assets, e.g.: <ul style="list-style-type: none"> - The ability to access stable sources of funding is reduced. - Climate-related asset classes/instruments are prioritized over other traditional asset classes/instruments. - Deposits and credit lines are drawn down by counterparties. 		<ul style="list-style-type: none"> - Volatility and reduction in values and risk returns of financial assets (e.g. corporate/sovereign bonds, equity) from climate-related factors (e.g. from physical events leading to repricing of securities and derivatives), which may reduce the value of high-quality liquid assets, thereby affecting the liquidity buffer. - Impact through Bank's ability to raise funds or liquidate assets, e.g.: <ul style="list-style-type: none"> - The ability to access stable sources of funding is reduced. - Climate-related asset classes/instruments are prioritized over other traditional asset classes/instruments. - Deposits and credit lines are drawn down by counterparties. 	

Indicative impact of Climate related and Environmental risk drivers				
Risk Type	Transition		Physical	
	Climate	Environmental	Climate	Environmental
Operational risk	<ul style="list-style-type: none"> - The Bank may incur fines due to lack of consideration on compliance with environmental standards or as a result of the greenwashing, leading to conduct risk. 		<ul style="list-style-type: none"> - The Bank's operations may be disrupted due to physical risk events, (e.g. extreme weather event) leading to damages to physical assets or critical infrastructure that is essential for providing services to customers (e.g. property, branches, energy supply, data centers etc.). 	
Business & Strategic risk	<ul style="list-style-type: none"> - Failure to account for rising ESG factors, having as key drivers the potential shift in consumer preferences, behavioural/ demand patterns, market sentiment and the potential change in the competitive landscape, leading to misalignment of business model to market practices (e.g. not being able to finance the environmental transition). 		<ul style="list-style-type: none"> - Failure to account for the occurrence of extended physical risk events (chronic and/or acute) impacting financed activities /sectors more vulnerable to such risks and consequently the Bank's business model 	
Reputational risk	<ul style="list-style-type: none"> - Impact on the Bank's public perception and reputation and consequently in its valuation, considering also changing market and consumer sentiment, due to its association with activities and counterparties linked to adverse environmental impacts (e.g. financing of companies with significant polluting activities, investments in sectors with high GHG emissions etc.). - Continually rising stakeholder expectations in the area of climate risk (e.g. Bank's commitments regarding the mitigation of climate risk) could lead to reputational risk, if the Bank does not deliver fully on its position. 		<ul style="list-style-type: none"> - 	

Climate-related Risks Materiality Assessment

The Bank has incorporated Climate and ESG risks in its regular risk identification process. In the context of annual review of Climate and ESG materiality assessment, the Bank takes into account several factors, covering both financial materiality (e.g. exposures sensitive to Transition Risk factors as i) % of total assets and ii)% of total loan portfolio, or similar metrics), as well as qualitative factors, such as the perceived impact on the environment and society and potential reputational-related aspects, in alignment with the “double materiality” principle.

The Bank performs the identification and materiality assessment of ESG risks on an annual basis, as part of its broader recurring risk materiality assessment process.

In 2024 the Bank further enhanced its materiality assessment methodologies in order to incorporate time horizons across physical and transition risk in all risk types. The following table depicts a summary of the materiality assessment outcome of Climate factors on traditional risk types across the different time horizons, where materially affected risk types per type horizon are marked.

Risk Type	Transition Risk			Physical Risk		
	Short 2025	Medium 2030	Long 2050	Short 2025	Medium 2030	Long 2050
Credit risk		ü	ü		ü	ü
Market risk						
Liquidity risk						
Operational risk (incl. Legal)		ü	ü		ü	ü
Business & Strategic risk		ü	ü		ü	ü
Reputational risk		ü	ü		ü	ü

The risks are estimated in different time horizons, aligned with ESRS recommendations: (a) for the short-term time horizon: one year (2025); (b) for the medium-term time horizon: from the 2nd year and up to 5 years (2030); and (c) for the long-term time horizon: more than 5 years (2050). These horizons were chosen to align with scientific pathways that limit warming to 1.5°C. This requires halving global GHG emissions by 2030 and approaching zero by 2050. These time horizons are also in line with the Greek Climate Law that has set a target for net zero by 2050, and an interim target of reducing GHG emissions by 55% in 2030 compared to 1990 emissions.

Credit Risk – Transition Risk

NFC Portfolio

Credit risk is considered to be materially affected by transition risks in the Non-Financial Corporate (NFC) portfolio in the medium and long-term horizons. The assessment for the NFC portfolio examines the Bank's performing exposures within the ESG Sensitive Perimeter distributed to total average transition risk score for all time horizons (short-, medium- and long-term).

In particular, the Bank conducted a transition risk assessment exercise in its Non-Financial Corporations (NFC) portfolio. The determination of activities/sectors more sensitive to transition risk was based on a number of factors:

- Climate Policy Relevant Sectors (CPRS) perimeter,
- Sensitive sectors to transition risk according to Net Zero Banking Alliance (NZBA) and Long-Term Strategy for Greece for 2050 (LTS)
- Examination of the emission intensities at sector level and forward-looking Probability of Defaults (PDs) based on the short-term disorderly transition scenario that ECB published as part of the 2022 ECB climate stress test exercise.
- Exclusion of: i) RES loans, ii) dedicated-purpose sustainable loans that are aligned with EU Taxonomy (and substantially contribute to Climate Change Mitigation (CCM) objective) and iii) other loans that are sustainable according to the Bank's Sustainable Finance Framework, provided that they are linked to and affect Climate Change Mitigation (CCM) objective.

In addition, the Bank has conducted a top-down materiality assessment for transition risk sub-types per sector (market, technology, reputation, policy & legal) as proposed by the Task Force on Climate-Related Financial Disclosures (TCFD), in order to identify the climate-related transition risks that materially affect each sector.

Transition risk drivers have been analyzed considering sectoral transition requirements under the Net Zero (NZE) Scenario pathway, using a top-down approach. For this analysis, scenarios developed by IPCC and their implementation to Greece such as the national long-term strategy for 2050, the Greek climate law, the National Energy and Climate Plan and other scenarios from internationally acclaimed bodies (i.e., IEA), as well as Sectoral Decarbonization Approaches (SDA) from SBTi were utilized. Specifically, for each key sector, a set of risk drivers were defined in alignment with the NZE pathway providing an overview of relevant description to assess risk per sector. The analysis does not take into consideration the potential transition of the counterparty that the Bank is exposed to but rather analyses the inherent risk of the sector overall. Additionally, more recent literature is used, such as the updated National Energy and Climate Plan (NECP) released in August 2024.

Retail Portfolio

The Bank recognizes the materiality of Climate and Environmental risks in its retail portfolio, in terms of the energy efficiency of real estate collateral held by the Bank and is considered to be materially affected by transition risks in the Retail portfolio secured by Real Estate in the medium and long-term horizons. The assessment is based on the EPC distribution of the real estate assets and the minimum EPC requirements set in the “Report on the proposal for a Directive by the European Parliament and the Council concerning the recast of energy performance standards for non-residential buildings”. In this context, the Bank has incorporated in its credit decision making process the Energy Performance Certificate (EPC). In parallel, the Bank has developed a model in order to calculate proxies for the energy efficiency score and EPC label of collaterals without an EPC, that enabled the distribution of energy efficiency score bands and EPC label of the real estate properties included in the Bank’s portfolio (as real estate owned assets) or used as collateral on existing assets. Finally, the Bank participates actively in the collective initiative organized by the HBA and the Ministry of Environment & Energy which aims at the provision of access for the financial institutions to the EPC registry in order to facilitate the collection of actual EPCs and increase the rate of EPC over the total real estate pool.

Additionally, the Bank is evaluating approaches for assessing transition risk at a more granular level, enabling the identification and mitigation of potential risks. In general, materiality is a crucial consideration in ESG risk assessment. Given the bank’s overall portfolio composition, unsecured consumer portfolios do not seem to pose material risks in terms of financial performance or stakeholder concerns since currently these portfolios are not typically within the scope of economic sectors with significant ESG risks, as they do not involve resource consumption, emissions, labor practices, or community impacts to the same extent as other industries. Also, depending on the jurisdiction, regulations and reporting requirements may primarily focus on specific industries or sectors that have higher ESG risks or are considered strategically important. Unsecured portfolios do not fall within the mandatory reporting requirements.

Credit Risk – Physical Risk

The Bank has laid down a methodology based on sensitivity and exposure analysis to derive vulnerability to physical risk factors. Vulnerability analysis is performed to identify potential significant hazards per subsector covered by the analysis for Business portfolio, as well as across the different geographic regions where real estate properties used as collateral extend. Leveraging the outcomes of the vulnerability assessment by sector and region, credit risk is considered immaterial in the short term but materially impacted by physical risks in the medium and long-term horizons. The first ESG materiality assessment performed in March 2023 for physical risk was through the execution of a vulnerability analysis (based on RCP 8.5 W/m² scenario) of both, NACE sectors at a country level (Greece) and real estate properties at climate zones level, to 16 physical climate risks (8 chronic and 8 acute). More specifically, the vulnerability assessment aims to identify potential significant hazards and related risks and forms the basis for the decision to continue the risk assessment, while it is aligned with the Invest EU methodology (“Technical guidance on the climate proofing of infrastructure in the period 2021-2027”) and with the “ECB: Good practices for climate related and environmental risk management: Observations from the 2022 thematic review”). The analysis was applied to the Business portfolio per 1-digit NACE sector (22 NACE codes) at a country level (Greece), while for exposures covered by real estate collateral the analysis was applied at a regional level for each of the 4 climatic zones in Greece (as defined by the Greek Ministry Environment & Energy), both for 16 climate risks and for selected (sea level rise, soil & coastal erosion, wildfire, cyclones/hurricane/typhoon, and floods), based on the location of the real estate property. The vulnerability analysis (either by NACE sector, or climatic zone) combines the outcome of the sensitivity analysis and the exposure analysis, categorizing physical climate risk as High, Medium or Low. From 2024 onward, the Bank uses a more granular approach for the physical risk assessment and examines separately the two main portfolios where physical risk has a profound impact: (1) Business portfolio and (2) Secured by real estate collaterals and REOs in short (2025), medium (2030) and long-term (2050) time horizons.

In order to achieve a more granular and detailed risk level analysis, the Bank has proceeded with:

1. the development of Sensitivity analysis for the effects of physical risks with the highest exposure on a country level (Heat stress, Water stress, Heatwaves, Droughts & Floods) at a more granular level of the top subsectors. In 2024, the Bank proceeded with the development of Sensitivity analysis for the remaining eleven (11) physical risks (Changing temperature, Changing wind patterns, Changing precipitation patterns, Sea level rise, Soil and coastal erosion, Soil degradation, Coldwaves/ frost, Wildfire, Cyclone, hurricane, typhoon, storm and tornado, Heavy precipitation (rain, hail, snow/ ice), Landslide and subsidence), of the top subsectors.
2. a location-specific risk analysis for the effects of physical risks on real estate properties using geospatial mapping and local geographical characteristics. This analysis results to the vulnerability assessment at NUTS 3 level, which allows to assess materiality to the aforementioned selected hazards, in a more granular level in terms of the location of collaterals.

Based on the above extended sensitivity and location-specific risk analysis, it was observed that in both NACE sector level and NUTS3 level, there are limited exposures in NACE sectors lying within the High vulnerability perimeter (the range refers to acute, chronic and chronic & acute risks), as well as limited exposures in locations within the High vulnerability perimeter (the range depends on the timeframe considered – Short (2025) / medium (2030)/ Long (2050) and the type of physical risk – chronic, acute, chronic & acute). It is noted that the selected climate physical risks are a. Chronic: sea level rise, soil & coastal erosion and b. Acute: wildfire, cyclone/ hurricane/ typhoon/ storm/ tornado, floods. However, from an inherent risk perspective, the Bank considers physical risk to be material, given that going forward it could significantly increase in case it is not appropriately monitored and managed.

Alpha Bank offers solutions for mortgage insurance through a full range of products including benefits associated with risks related to natural disasters as flood, wildfires and storm. Moreover, the level of total insured amount is based on the real replacement cost of the building, based on the square meters of the household and the average construction value per square meter and not linked only with the loan amount. According to the Bank's Credit Policy, insurance for real estate assets pledged as collateral against fire and earthquake risks has been mandatory in previous years. Starting from January 1, 2024, insurance covering flood risk has also been compulsory for all new loan originations in addition to the existing fire and earthquake coverage.

Operational Risk

The Bank has identified within its database and assessed operational risk events that were driven by ESG risk factors. Despite the fact that the analysis showed very limited materiality of such events, the Bank has introduced certain enhancements to better manage, monitor and mitigate ESG-related risks, effectively acknowledging that there are potentially material ESG factors that could drive operational risk in the future and cause greater losses compared to historical ones. Such material ESG factors could be related to climate physical risk events such as extreme weather, causing damage to physical assets or critical infrastructure essential for providing services to customers (e.g., property, branches, energy supply, data centers). In 2024, the Bank assessed the physical damage component of its operational risk focusing on its own-used assets and leveraging the current materiality assessment conducted for physical risk in real estate properties, as employed for credit risk. The Bank assessed the transition risk of its own used assets based on the Report on the proposal for a Directive by the European Parliament and the Council regarding the recast of energy performance standards for non-residential buildings, in order to monitor and mitigate potential risks such as fines for non-compliance with environmental standards. The outcomes of the aforementioned assessments conclude that Operational Risk is materially affected by transition and physical risks in the medium and long term.

Regarding Legal/Litigation risk component, and specifically Greenwashing Risk, is deemed immaterial in the short term, due to limited sustainable financing exposure, and materially affected by C&E risks in medium and long-term, taking into the following considerations: i) the EBA guideline on Green Mortgages and EBA's report "Greenwashing monitoring and supervision" and the relevant EBA report on Green Loans & Mortgages, ii) the limited current number of exposures and anticipated increased exposures in the future related to sustainable financings and the iii) the greenwashing risk related scenario: "Fine imposed to the Bank due to Greenwashing". More specifically, the Bank has introduced enhancements to better identify, manage, mitigate and monitor legal risk driven by ESG-related factors. Emphasis is placed to ESG-related legal risk due to customer and third-party controversial activities (through enhancements on the obligor assessment process), as well as to internal mitigating actions that are being established to prevent greenwashing going forward (through the introductions of internal controls around the identification and tagging of sustainable finance exposures). More specifically, the Operational Risk Platform (Archer) has been enhanced incorporating a flag for the classification of ESG Risk lawsuits and all labor lawsuits have already been classified as "Social Risk related". As far as the commercial lawsuits are concerned, a mechanism has been initiated 2024 in cooperation with the Civil, Administrative, Criminal Law Disputes and NPEs' Legal Support Business Area to identify, flag and report relevant cases accordingly.

Additionally, the Bank continues to implement the following components to monitor and manage ESG Factors from an Operational Risk perspective:

- Risk Taxonomy: The Bank has enhanced its Risk Taxonomy to include the E, S and G flags which will be used to capture and monitor environmental, social and governance factors.
- Operational Risk Events Management: Operational risk events are mapped to respective risks and flags of the Risk Taxonomy. Existing and prospective events are mapped to the appropriate ESG flag as required. This allows the Bank to swiftly define the perimeter of environmental, social and governance events within the loss dataset.
- Risk and Control Self-Assessment (RCSA): The update of the Risk Taxonomy has an impact on the RCSA exercise as each risk and control is mapped to respective risks and flags of the Risk Taxonomy. Therefore, RCSA risks, and controls related to environmental, social and governance risks are mapped to the ESG flag as applicable and the results of the RCSA can be used to measure the impact of environmental, social and governance factors the Bank faces.
- Scenario analysis: The bank has incorporated ESG-related scenarios into its scenario analysis exercise to assess the impact of extreme events that may significantly harm the bank's profitability and reputation. These scenarios are evaluated within a specific perimeter and mapped to the bank's risk taxonomy, which now includes the newly introduced ESG flag.
- Key Risk Indicators (KRIs): Through the regular monitoring of success ratios/indicators (KPIs) the Bank demonstrates the effectiveness of the underlying safeguards against climate-related, environmental and social risk events. These KPIs have been included in the ISO22301 (Business Continuity Management System) of the Group and are subject to annual audits by the certification body (TUV AUSTRIA), and the internal audit function of the Bank. Moreover, the Bank has also introduced specific KRIs for monitoring ESG risk exposures.

- Outsourcing Risk Assessment: The Bank's Vendor Risk Assessment Questionnaire has been enhanced to incorporate questions regarding ESG risk drivers that might affect vendors' operations and consequently the services offered to the Bank. Also, considerations taking into account the new Operational Resilience Framework have been incorporated in the Questionnaire.

Although historical data do not reflect material losses from ESG-related events in the short-run, the Bank introduced the abovementioned enhancements to better manage, monitor and mitigate ESG-related risks, effectively acknowledging that there are material ESG factors (as depicted in the RCSA and Scenario Analysis processes) that will drive operational risk in the medium/long run and cause greater losses compared to historical ones. Moreover, such events may have material reputational impact in the future, due to the shifting expectations of customers and the broader society around ESG matters.

Market Risk

Based on the materiality assessment of the Bank's bond portfolio, there seems to be limited potential effect from climate related and other ESG factors in all three horizons for both transition and physical risk. The materiality assessment of the Bank's bond portfolio using the Transition Sensitive perimeter (combination of the Climate Policy Relevant Sectors (CPRS), Net Zero Banking Alliance (NZBA) and Long-Term Strategy (LTS), as described in Credit Risk), taking also into consideration the average residual maturity of the ESG sensitive perimeter, in order to identify the portfolio's sensitivity to climate risks that are expected to materialize in long-term horizons. The bank has also proceeded with a materiality assessment of the Physical risk from chronic, acute and both acute and chronic events, for the Corporate Portfolio of Greek Issuers. With respect to sovereign bonds, which constitute the majority of the Bank's bond portfolio, these primarily relate to issuers that are either EU member states, while a quite immaterial exposure is outside the Union (towards USA) that has a "strong" currency and is in position to manage extreme physical risk events without material impacts on their overall economic stability and prospects. The materiality of ESG factors on the prices of EU members' issuances is considered particularly limited, considering that coordinated actions at the EU level (e.g. through recovery packages, state of emergency frameworks etc.) will be taken, in case any of these countries was severely impacted by environmental factors, primarily concerning physical risk. Furthermore, in 2024, the Bank incorporated a more comprehensive analysis of the Equity and Funds portfolio in relation to Climate risk, despite the immaterial size of the portfolio. The assessments employed are aligned with the methodology of Credit Risk.

Liquidity Risk

There seems to be no material effect from climate – related and other ESG factors analyzing the impact on both assets and liabilities. On the asset side, the main concern is the potential volatility in the value of liquidity buffer assets, primarily sovereign and corporate bonds, due to climate-related factors. The exposure is considered low due to the predominance of EU-issued sovereign bonds. On the liability side, key funding sources, such as secured and unsecured funding and deposits, were evaluated for potential risks arising from ESG factors, including shifts in investor preferences and depositor behavior. Secured funding, predominantly backed by high-quality, ECB-eligible collateral, has low risk, while unsecured funding faces minimal climate-related challenges as the Bank actively monitors green bond market trends. Deposits, the primary funding source, were assessed for transition and physical risks. For non-financial corporates (NFCs), the sensitivity to ESG factors was mapped to sectors, with most deposits classified as low-risk. Similarly, individual deposits were geographically assessed for climate vulnerability, revealing a well-diversified base with low overall risk. The assessment leveraged qualitative and scenario-based analyses, considering acute climate risks across short-, medium-, and long-term horizons. The findings indicate that climate-related and ESG factors currently pose low material liquidity risk. However, the Bank acknowledges potential future risks and is committed to revising its framework as necessary to address emerging ESG and climate challenges.

Reputational Risk

Reputational risk is considered to be materially affected by C&E risks in the medium and long-term. Specifically, reputational risk is generally considered to arise as a result of the manifestation of other risk types (i.e. a second-order impact such as Non-Financial Risks, Credit Risk, Liquidity Risk etc), while it could also give rise to other risk types subsequently (e.g. liquidity outflows, following a reputational impact). Reputational risk may affect the Group's ability to enter into new business relationships and to provide new services, as well as its ability to serve existing business relationships. The Bank has identified the following key drivers for reputational risk:

- *Greenwashing Risk*: Greenwashing or its perception is a material driver of reputational risk in the medium and long term. Risks may arise due to media campaigns, consumer complaints, and litigation alleging greenwashing or harmful environmental and social practices.
- *Laggers to Transition Risk*: Clients with delayed responses to transition risks, known as laggards, pose reputational risks.
- *Controversial Activities*: The Bank employs a Reputational Risk Assessment process to monitor obligors involved in controversial activities. Triggers, if activated, prompt an evaluation to assess the event's impact and remediation efforts. Similarly, vendor risks are assessed for ESG factors that may affect the Bank's reputation.

The Group has developed the Reputational Risk Policy to effectively define the main principles and governance structure for effectively managing its exposure to reputational risk, including reputational risk stemming from ESG factors. In this context, regarding the Bank's obligors, 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.

The Policy also describes the processes and mitigation actions for managing Reputational Risk (including those stemming from ESG factors) that may arise from:

- Reputational Risk Assessment: In the context of the Reputational Risk Assessment process, the Bank has designed an approach for identifying obligors involved in controversial activities. More specifically, the Reputational Risk Assessment questionnaire includes certain questions which are considered as triggers for Obligors with potentially controversial activities and which could potentially lead to Reputational Risk for the Bank. If triggers are activated, an assessment (through desktop review and/ or client communications) is required to understand the nature of the triggering event and to identify and evaluate remediation actions adopted by the client following the event. Based on the examination of the trigger, the Reputational Risk for the Bank is assessed, and any additional actions are determined.
- Vendor Risk Assessment: The Bank's Vendor Risk Assessment Questionnaire has been enhanced to incorporate questions regarding ESG risk drivers that might affect vendors' operations and consequently the services offered to the Bank and its reputation.

Although historical data do not reflect material losses from reputational risk ESG-related events, the Bank acknowledges that there are potentially material ESG factors that could drive reputational risk exposures in the future. Therefore, the Group will continue to closely monitor and manage the existing or potential reputational risk exposures stemming from ESG factors, as dictated by the Reputational Risk Policy.

Business and Strategic Risk – Transition Risk

Following the same approach with Credit risk, Business and strategic risk is considered to be materially affected by transition risk over the medium- and long-term horizons. The assessment examines the Gross Interest and Fees & Commissions Income of the Bank's performing portfolio within the ESG Sensitive Perimeter distributed to total average transition risk score for all time horizons (short-, medium- and long-term). The relevance of ESG factors in Business and Strategic Risk is reflected through the failure to account for rising ESG factors, considering both idiosyncratic (strategic) and systemic (business) components.

The Bank acknowledges that ESG factors could have a significant impact from a Business and Strategic Risk perspective. The impact on Business & Strategic risk would materialize through several drivers, including the Bank's inability to properly execute its strategy (e.g. not being able to finance the environmental transition), or changes in the customers' demand of various Bank's products (e.g. shift in market expectations for green products) and adjustments in the related product pricing due to ESG factors, with a financial impact on the Bank's interest income. The impact on profitability could also materialize from downward fees and commissions, as well as from the structure of the Bank's funding side (e.g. reliance to deposits from clientele not aligned to "green" strategies, prone to transition risk). Taking into consideration the above, a forgone profitability risk is observed through the reduced market share in the sustainable/transition finance market, which is relatively limited in the short-term, while the market share loss could lead to magnified impacts in the medium/long-term.

Another ESG driver that the Bank recognizes for the manifestation of business & strategic risk would be the design and execution of the transition strategy for its corporate portfolio, on an individual communication basis for large corporate customers, in the context of the more granular, sector-specific obligor credit assessment process to be implemented, incorporating ESG factors. The impact that ESG factors can have on Business and Strategic Risk is also highlighted by the fact that they can lead to significant reputational risk, as a second-order effect, in terms of a long-term impact on the Bank's brand and reputation (e.g. the Bank gradually lagging in terms of strategy and brand in ESG – related issues, compared to its peers).

The impact of the Bank's financing activity and overall strategic direction on the environment is often subject to public scrutiny and, hence, associated with reputational considerations. The Bank has performed the materiality assessment of Business and Strategic risk for the Gross Interest and Fees & Commissions income generated by the Non-Financial Corporations (NFC) portfolio, broken down to activities/sectors more sensitive to transition risk, based on the Climate Policy Relevant Sectors (CPRS), Net Zero Banking Alliance (NZBA) and Long Term Strategy (LTS) for Greece perimeters by using the NACE code assigned at the obligor.

Business and Strategic Risk – Physical Risk

Business and strategic risk is considered immaterial in the short-term and materially affected by physical risks over the medium- and long-term horizons. Given that the Bank's strategy is closely tied to its loan book composition, a materiality assessment on physical risk was conducted for the Non-Financial Corporations (NFC) portfolio for the years 2025, 2030, and 2050. This assessment identified activities and sectors more vulnerable to physical risk, classifying the Gross Interest and Fees & Commissions Income of each sector based on vulnerability scores. The analysis was performed using the NACE code assigned at the obligor level.

Nature – Related Risks Materiality Assessment

With respect to nature-related factors, the following table summarizes the materiality per risk type for all time horizons:

Risk Type	Nature – Related Risks		
	Short (2025)	Medium (2030)	Long (2050)
Credit risk			ü
Market risk			
Liquidity risk			
Operational Risk		ü	ü
Business & Strategic risk			ü
Reputational risk		ü	ü

Credit Risk

Credit Risk is considered to be materially affected by nature-related risks (and more specifically by biodiversity) over long-term horizon.

The Bank has developed a comprehensive and granular risk materiality assessment per nature-related factor for obligors within the Non-Financial Corporates (NFC) perimeter. The analyses conducted, Impact and Dependency Analysis, present the materiality assessment of nature-related factors from an inherent risk perspective, that examines the “inside-out” and “outside-in” impact by utilizing the UNEP FI and ENCORE tool, respectively.

UNEP FI

In order to enhance the relationship between specific activities/ NACE codes with negative impact on social & nature-related risks, performed an analysis based on additional information from the UNEP FI Portfolio Impact Analysis Tool. The Sector-Impact Map portrays the positive and negative associations between industries / sectors / activities on the three pillars of sustainable development (and therefore they are closely aligned with the UN Sustainable Development Goals (SDGs): social, socio-economic and natural environment through a holistic set of Impact Areas (such as Integrity & Security of Person, healthy economies and biodiversity & healthy ecosystems) and Impact Topics (such as soil, air, waterbodies, etc.) of the Impact Radar, as shown in the figure below. The mapping builds on resources such as the Environmental Health and Safety Guidelines of the International Finance Corporation, UNEP FI’s Risk Briefings, as well as thematic resources such as ENCORE. The mapping has also benefited from the reviews of several specialist organizations. Based on this mapping, the Bank assessed the negative impact of the social and socio-economic pillars of sustainable development, as well as the negative impact of the environmental pillar in 6 different areas: Waterbodies, Air, Soil, Resource Intensity, Waste and Biodiversity (the latter consisting of the Species and Habitat categories) in its portfolio per sector, taking into consideration the relevant impact topics. As a second step, and for the sectors with a key negative impact on each nature-related topic, a risk assessment was performed using a literature review covering short-, medium-, and long-term horizons. Specifically, a sector-level assessment identified economic activities (at the NACE code level) with a high impact on nature and assessed their transition risk across material nature-related topics.

Figure: The Impact Radar



ENCORE

ENCORE (Exploring Natural Capital Opportunities, Risks, and Exposure) is a tool developed by Global Canopy, the UNEP Finance Initiative, and UN Environment Programme World Conservation Monitoring Centre (UNEP-WCMC) to help assess nature-related risks by analyzing dependencies on natural resources. It evaluates the relationship between 25 ecosystem services and 271 economic activities using comprehensive literature reviews from scientific journals, peer-reviewed papers, grey literature, and targeted searches, including input from industry experts. This ensures a thorough assessment of critical ecosystem service dependencies for various economic sectors.

To identify and mitigate risks associated with other environmental and social factors, the Bank has established the following dedicated processes during its credit origination process such as:

- **Exclusion list:** List to encompass the additional activities with environmental and social impact (i.e., activities affecting biodiversity, pollution, social, etc), which are not allowed to be financed. The criteria for exclusion span across various environmental and social matters.
- **ESG Obligor Assessment Questionnaires:** A bottom-up process including inter-banking industry-specific questionnaires, at the obligor level, which is used to evaluate the performance of each obligor on managing environmental, social and governance-related topics and better inform the credit origination processes in place.
The industry-specific questionnaires assess obligors on a wide range of questions related to other environmental risks (e.g. biodiversity, pollution, water and liquid waste, etc.). The material topics per sector have been identified following a thorough review of the applicable reporting standards (i.e., SASB, Fitch, S&P Global and MSCI or other sector specific guidelines).
- **Transaction Assessment:** Evaluation of each requested transaction, on top of the assessment at obligor level aligned with specific criteria, as defined on the Bank's Sustainable Finance Framework, to identify and capture sustainable activities, as well as transaction-specific characteristics. In specific financing cases categorized as non-sustainable transactions according to the ESG transaction assessment outcome, a due diligence is carried out and a respective plan of corrective actions is drawn up with a schedule implementation on behalf of the customer if needed.
- **Reputational Risk Assessment:** Questionnaires to identify obligors involved in controversial activities including questions for Obligor's triggering with potentially controversial activities and which could potentially lead to Reputational Risk for the Bank.

These processes have been developed in alignment with international standards and enable the Bank to mitigate ex ante environmental and/or social risks within its portfolio. Considering the effect of those processes, the residual risks associated with those environmental and social risk factors are considered to be immaterial on a portfolio basis.

Operational Risk

Operational risk, in alignment with the assessment of climate-related risks, appears to be materially affected by nature-related factors over the medium- and long-term horizons. The materiality assessment approach for nature-related risk is consistent with the methodology applied to climate risk. Specifically, regarding the Legal/Litigation Risk component of Operational Risk, the Bank has focused on assessing the materiality of Greenwashing Risk. Additionally, it has integrated ESG factors into its Operational Risk Management Framework to effectively monitor and manage these factors from an operational risk perspective.

Market Risk

Following the same methodology with Credit Risk, the Bank has performed a materiality assessment for Nature-Related Risks for Market Risk. Leveraging on the Impact and Dependency analyses, the Bank assesses the respective impacts and dependencies of its Corporate Bonds portfolio to nature-related topics. Market risk is currently immaterially affected by nature-related risks across time horizons, given the limited size of corporate bonds portfolio and the fact that for sovereign portfolio the materiality of ESG factors on the prices of EU members' issuances is considered particularly limited, considering that coordinated actions at the EU level will be taken, in case any of these countries was severely impacted by nature-related factors.

Liquidity Risk

For Liquidity Risk, there seems to be no material effect from nature-related factors across time horizons. On the asset liquidity side, this is driven by the composition of the buffer, mainly consisting of sovereign rather than corporate bonds, which are considered to be immaterially impacted by nature-related factors. On the funding side, deposits are the main funding source; corporate clients constitute a relatively smaller part of the bank's funding position limiting the exposure to ESG risks.

Reputational Risk

Reputational risk seems to be materially affected by nature-related factors in the medium and long-term horizon. The materiality assessment of reputational risk simultaneously considers i) the impact of Greenwashing Risk in alignment with the assessment of Climate-related risks and ii) the delayed response of clients to transition risks, as applied to Credit Risk related to nature-related risks. Regarding the laggards of the transition risk, a delayed response to nature-related transition risks by the bank's clients, has the potential to precipitate reputational harm for the financial institution. Therefore, a sector-level evaluation was conducted to identify economic activities with significant negative impacts on nature-related factors and to assess their transition risk across different time horizons. “

Business & Strategic Risk

Business and strategic risk is considered to be materially affected by nature-related risks (and more specifically by biodiversity) over long-term horizon. Following the same methodology with Credit Risk, the Bank has performed a materiality assessment for Nature-Related Risks for Business and Strategic Risk. Utilizing the Impact and Dependency analyses outlined in the respective section of Credit Risk, the Bank evaluates the corresponding impacts and dependencies on environmental issues.

Environmental Data related to Collection Structure, Quality and Accuracy

The Bank is committed to incorporate Climate & Environmental Risk Management into its operations. More specifically, the Bank recognizes the importance of reliable data and their proper use in order to produce useful information. The holistic data flow is assessed from the data capturing until the data usage, considering both the front lines' needs and the monitoring or reporting requirements. The introduction of the ESG related data follows the principles of Bank's Data Governance Framework for ensuring that the data governance procedures are effectively applied. The objective is to ensure high quality data is available, to support decision making both in terms of new credit approvals as well as to ensure clear visibility of the loan and investments portfolios' ESG related characteristics, enabling prudent and effective risk management of Climate & Environmental Risk. In 2024, the Bank launched targeted initiatives to identify environmental data requirements and address data gaps within its systems. Specifically, the Bank has centralized data related to the CPRS sector and Physical Risk assessment on obligor and real estate level, ensuring both credit assessment and reporting needs are efficiently met. Also, in order to assess the impact of climate risk on the calculation of Expected Credit Loss (ECL), detailed information on the ESG profile of the obligor and the collateral (e.g. location of collateral as well as information on EPCs) is being collected. These efforts aimed to enhance data accuracy, reduce reliance on proxies, and improve client engagement to collect real data directly. By doing so, the Bank sought to ensure regulatory compliance, strengthen decision-making processes, and foster greater transparency in its operations.

For the long-term implementation of a comprehensive solution to incorporate all data requirements into the bank's systems and data architecture, the Bank has already commenced a project. The scope of this project is to provide deliverables in a phased approach and simultaneously, within its scope it will identify and define complementary needs in ESG data management, analysis & modelling for Emissions/Science Based Targets, with which to support business planning, monitoring and management decision making. This aims to deliver a Target Systems and Data architecture in H1 2025, which will subsequently be implemented by the bank's IT Division, in order to reach a higher level of maturity and full integration of Climate and Environmental Risk related data into the bank's core systems.

Incorporation of C&E risk in Risk Management Framework & Scenario Analysis

Risk Management Framework

The Group has incorporated a set of quantitative indicators and qualitative commitments regarding climate risks into its Risk Appetite Framework (RAF) and climate risks have been integrated into the overall risk management framework.

In terms of quantitative indicators, the Bank enhanced and expanded its Climate and Environmental (C&E) indicators to address all material C&E risks, improve portfolio sustainability, and mitigate potential exposures. These indicators are fully integrated into the RAF. In 2024, the Bank upgraded its C&E RAF indicators to Tier II status, establishing limits and thresholds to align with the escalation process applied to all non-C&E RAF indicators.

Additionally, in 2024, the Bank designed and implemented a dedicated internal report incorporating ESG metrics for loans and advances. This report is presented quarterly to the Group Sustainability Committee and the Risk Management Committee (RMC) and, through the RMC, to the Board of Directors.

Scenario Analysis

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

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

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

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

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

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

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

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

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

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

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

Additionally, regarding the climate risk impact on operational risk, the Group has adopted an AMA oriented quantification methodology with the intention to introduce a more risk sensitive estimation of the internal operational risk capital. In this respect, data from the Operational Risk Framework components (the operational risk events, the RCSA results and the Scenarios) are used in the capital calculations through a specific internal statistical model. For ESG Risk purposes, the Group has developed operational risk ESG related scenarios and has flagged ESG Risk-related operational risk events and RCSA risks accordingly. The abovementioned data is used in the model for capital calculation purposes. Using allocation techniques, the contribution of the ESG Risk factors to the Total Capital requirements is calculated. In addition to the above, a long-term horizon (2050) analysis providing an additional Pillar 2 add-on (yet without leading to a capital add-on considering the P1 capital is higher) has, also, been considered.

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

The total impact of climate risk on CET1 Capital has been calculated at 1.4% of total CET1 Capital. The climate risk impact estimated is bank specific since it depends on the internal assumptions followed during the ICAAP as well as on the internal models and the associated on respective climate scenarios.

ESG Risks in ILAAP

As mentioned above, the Bank has assessed the climate and environmental risk impact for the main products affected by key liquidity risks and concluded that the impact is immaterial. Given that the materiality assessment across all risk types is submitted in the ICAAP report, and that the liquidity risk impact is assessed as low, it was deemed unnecessary to include the analysis in the ILAAP report.

Credit Risk Models

In order to assess the impact of climate risk on the calculation of Expected Credit Loss (ECL), detailed information on the ESG profile of the obligor and the collateral (e.g. location of collateral as well as information on EPCs) is being collected. The information has been incorporated into the respective data systems and methodological approaches are examined to adapt the models for calculating the ECL. More specifically, the following are in progress:

- Data collection regarding ESG related information of the obligor through the use of the inter-banking ESG platform were ongoing in 2024.
- Further enhancement and recalibration of the Bank's ESG scorecards leveraging the data above.
- The models assessing environmental, governance and social risks will be validated in line with the updated Group Credit Risk Models Validation Framework.
- Development of a Counterparty risk model to enable bottom-up adjustments to an obligor's creditworthiness under certain climate scenarios.
- Development of a real-estate value indexation model that is based on the EPC of the collateral.
- Identifying enhancements or additions to the current set of models used for risk parameter estimation and prediction, in order to integrate ESG risks.

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

Alpha Bank Group is committed to sustainable finance, including the effective management of the Environmental dimension of its lending activities. To this direction, during the credit approval process, supplementary to the credit risk assessment, the climate related and environmental risk dimension is taken into account.

The "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending", includes the basic principles and rules regarding the assessment of climate related, environmental, social and governance risks in the context of the Group's business lending approval process. The climate and ESG risks management approach is based on the Group's sustainability strategy and is part of the overall risk management framework. The Business and Credit Units of the Group have to implement all required procedures and tools in order to identify, assess, manage, offset, minimize, and where feasible, eliminate climate and ESG risks that result from the obligor's/project's operations and are associated with credit exposures.

The purpose of the Policy is:

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

The required climate and ESG risk assessment is conducted in parallel with the existing credit risk assessment process, according to the following principles and requirements:

- Definition of critical industry sectors that are connected with potential climate and ESG risks. In particular, definition of a:
 - Industry specific Exclusion List, i.e., a list of activities, established on specific criteria that address high climate and ESG risks, which are not funded by the Group.
 - Climate Policy Relevant Sectors' List, which is a classification of economic activities in terms of transition risk assessment. In particular, it is a standardized classification of activities (Nace Rev.2, four-digit level), based on their energy technology (e.g. based on fossil fuel, or renewable energy), whose revenues could be positively or negatively affected by a disorderly transition to a low-carbon economy.
- The applicable national and international laws and regulations on climate, environment, society and governance and relevant standards established with the Policy.
- The definition and implementation of climate and ESG risks assessment and monitoring procedures including ESG assessment at obligor, transaction and overall level in accordance with the provisions of the relevant Credit Policy Manuals, the due diligence conduction and the guidelines on the performance standards of the European Bank for Reconstruction and Development (EBRD).
- Managing Obligor's/Project's Non-Compliance with the Policy Rules and Standards.
- Annual Environmental and Social Performance Report to stakeholders (EBRD).

In 2024, enhanced credit assessment process took place according to the "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending" and the Credit Policy Manuals. The main amendments concern:

- ESG assessment per se, which is more holistic and is carried out at obligor, transaction and overall level. More specifically:
 - ESG assessment at obligor level is based on specific ESG questionnaires completed by the Clients. The answered questionnaires are scored via internal rating models and the outcome of the assessment may be Low, Medium or High ESG risk. Regarding the ESG obligor scoring process, a series of scorecards has been developed, based on the industry the obligor belongs to. The main inputs of the scorecards have been categorized to three groups, namely environmental ("E"), social ("S") and governance ("G"). A series of questions/variables that pertain to these groups have been collected (e.g. from sustainability reports) and have been used to train the scorecards, under the condition that E, S and G analytically derived scores converge to the target scores (externally sourced from LSEG Data & Analytics, formerly Refinitiv). Regarding the environmental component, the questions have been grouped to three (3) sections; Management Approach (qualitative), evaluation of the Management Approach (qualitative and quantitative) and Performance Assessment (quantitative). The model weights have been optimized at the section level (such that the condition above has been met) and are allocated down to final metric weights. The model produces distinctive E, S and G (numerical) scores, which are aggregated to ESG scores, according to a weighting combination that depends on the industry of the obligor.
 - ESG assessment at transaction level concerns the activity for which the client is applying or has received financing based on the information provided during the preparation of the credit request. The outcome of this assessment may be "sustainable" or "non-sustainable" financing. Sustainable financings are further divided into aligned or not aligned with the EU Taxonomy. Non-sustainable financings are rated and classified as Low, Medium, or High ESG risk.
 - ESG overall assessment which is a combination of the ESG assessment at obligor and transaction level and is captured per transaction. The outcome of this assessment may be Low, Medium or Increased ESG Impact.
 - Following the ESG assessment at obligor, transaction and overall level and considering the respective outcomes specific actions are defined in the Credit Policy, such as conduction of a due diligence (on-site visit) by a specialist, , pricing adjustment.
- As of January 1, 2024, the Group has expanded its Exclusion List to encompass additional activities with environmental impact, such as "the conversion of natural forests into plantation", "the wholesale and retail trade of thermal coal", "the construction of new nuclear power plants", "any activity involving significant degradation, conversion or destruction of the sites included in the Natura map".
- The consideration of the "Climate Policy Relevant Sectors" classification instead of the "EBRD Environmental and Social Risk Categorization List – Revised 2014" in the context of the ESG assessment.

The Group has enhanced its due diligence process with respect to the assessment of its Customers' ESG/climate risk profile, through the collection of relevant information. This effort aims to ensure obligors' compliance with the Group's ESG requirements. The Group aims to finance its counterparties' green/sustainable transition both in the short-and in the long-term.

It should also be noted that Bank's Credit Policy stipulates that the energy performance of buildings securing loans must be considered during the credit approval process. In this vein the Energy Performance Certificate (EPC) is included in the documentation for the technical inspection of the property while relevant information is included in the credit proposal note and the core banking system. As regards the existing real estate collaterals it is noted that in the absence of an EPC a methodological approach is applied.

The Group with the aim to mitigate reputational risks has designed a robust process that involves identifying and assessing the potential participation of its Obligor in controversial activities.

Additionally, as a mitigating action to physical risk impact, the mandatory property insurance securing new financing that is provided to the Bank also includes the risk of flooding.

Next Steps

The Bank is looking to further enhance the incorporation of environmental aspects into its Risk Management Framework through actions that are currently underway and refer to the following areas:

- Further enhance ESG risk materiality assessment
- Track developments in the regulatory frameworks, including ESG guidelines and CSRD, and ensure alignment with the requirements.
- C&E responsibilities regarding compliance business area
- Greenwashing assessment expansion to portfolios beyond wholesale
- Introduction of 5 new ESG e-learning
- Upskilling sessions on ESG topics

16.2.2 Social Risk

Risk Management

Social risks are the risks of any negative financial impact on the institution stemming from the current or prospective impacts of social factors on its counterparties or invested assets. Social factors are related to the rights, well-being and interests of people and communities, and include factors such as (in)equality, health, inclusiveness, labor relations, workplace health and safety, human capital and communities.

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

Alpha Bank Group is committed to sustainable finance, including the effective management of the social dimension of its lending activities. To this direction, during the credit approval process, supplementary to the credit risk assessment, the principles of a socially responsible credit facility are also examined.

The "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending", includes the basic principles and rules regarding the assessment of climate related, environmental, social and governance risks in the context of the Group's business lending approval process. The climate and ESG risks management approach is based on the Group's sustainability strategy and is part of the overall risk management framework. The Business and Credit Units of the Group have to implement all required procedures and tools in order to identify, assess, manage, offset, minimize, and where feasible, eliminate climate and ESG risks that result from the obligor's/project's operations and are associated with credit exposures.

The required social risk assessment is conducted in parallel with the existing credit risk assessment process, according to the following principles and requirements:

- Definition of an Industry specific Exclusion List, i.e., a list of activities, established on specific criteria that address inter alia high social risks which are not funded by the Group.
- The applicable national and international laws and regulations on the society and relevant standards established with the Policy;
- The definition and implementation of climate and ESG risks assessment and monitoring procedures including ESG assessment at obligor, transaction and overall level in accordance with the provisions of the relevant Credit Policy Manuals, the due diligence conduction and the guidelines on the performance standards of the European Bank for Reconstruction and Development (EBRD);
- Managing Obligor's/Project's Non-Compliance with the Policy Rules and Standards;
- Annual Environmental and Social Performance Report to stakeholders (EBRD).

In 2024, enhanced credit assessment process took place according to the "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending" and the Credit Policy Manuals. The main amendments concern:

- ESG assessment per se, which is more holistic and is carried out at obligor, transaction and overall level. More specifically:

- ESG assessment at obligor level is based on specific ESG questionnaires completed by the Clients. The answered questionnaires are scored via internal rating models and the outcome of the assessment may be Low, Medium or High ESG risk. The main inputs of the scorecards have been categorized to three groups, namely environmental (“E”), social (“S”) and governance (“G”). A series of questions/variables that pertain to these groups have been collected (e.g. from sustainability reports) and have been used to train the scorecards, under the condition that E, S and G analytically derived scores converge to the target scores (externally sourced from LSEG Data & Analytics, formerly Refinitiv). Regarding the social component, the questions have been grouped to three (3) sections; Management Approach (qualitative), evaluation of the Management Approach (qualitative and quantitative) and Performance Assessment (quantitative). The model weights have been optimized at the section level (such that the condition above has been met) and are allocated down to final metric weights. The model produces distinctive E, S and G (numerical) scores, which are aggregated to ESG scores, according to a weighting combination that depends on the industry of the obligor. The scores are also mapped, via a rating scale, to twelve (12) ratings (between aaa and c-) and further to three (3) grades, according to a RAG (Red-Amber-Green) classification.
 - ESG assessment at transaction level concerns the activity for which the client is applying or has received financing based on the information provided during the preparation of the credit request. The outcome of this assessment may be "sustainable" or "non-sustainable" financing. Sustainable financings are further divided into aligned or not aligned with the EU Taxonomy. Non-sustainable financings are rated and classified as Low, Medium, or High ESG risk.
 - ESG overall assessment which is a combination of the ESG assessment at obligor and transaction level and is captured per transaction. The outcome of this assessment may be Low, Medium or Increased ESG Impact.
 - Following the ESG assessment at obligor, transaction and overall level and considering the respective outcomes specific actions are defined in the Credit Policy, such as conduction of a due diligence (on-site visit) by a specialist, pricing adjustment.
- As of January 1, 2024, the Group has expanded its Exclusion List to encompass additional activities with social impact, such as the financing of “clients who are involved in violations of human rights, according to the United Nations “Universal Declaration of Human Rights”.

The Group has enhanced its due diligence process with respect to the assessment of its Customers' ESG/climate risk profile, through the collection of relevant information. This effort aims to ensure obligors' compliance with the Group's ESG requirements. The Group aims to finance its counterparties' social/sustainable transition both in the short-and in the long-term.

The Group with the aim to mitigate reputational risks has designed a robust process that involves identifying and assessing the potential participation of its Obligors in controversial activities.

Social Risk Materiality Assessment

Credit Risk

Social risks in regard with Credit Risk, are assessed based on the gross carrying amounts of the NFC portfolio & their key negative impacts to Social factors. Taking also into account the various processes and controls established by the Bank (e.g. standard KYC process, ESMS process etc.), it is anticipated that no material risks will arise from the downstream portfolio for all horizons. Specifically, in the context of social risks materiality assessment, the Bank examines the “inside-out” negative impact of social factors through the UNEP FI tool methodology. The Bank, in order to enhance the relationship between specific activities/ NACE codes with negative impact on social, performed an analysis based on additional information from the UNEP FI Portfolio Impact Analysis Tool. The Sector-Impact Map portrays the positive and negative associations between industries / sectors / activities on the three pillars of sustainable development (and therefore they are closely aligned with the UN Sustainable Development Goals (SDGs): social, socio-economic and natural environment through a holistic set of Impact Areas (such as Integrity & Security of Person, healthy economies and biodiversity & healthy ecosystems) and Impact Topics (such as soil, air, waterbodies, etc.) of the Impact Radar. The mapping builds on resources such as the Environmental Health and Safety Guidelines of the International Finance Corporation, UNEP FI’s Risk Briefings, as well as thematic resources such as ENCORE. The mapping has also benefited from the reviews of several specialist organizations.

Based on this mapping, the Bank assessed the negative impact of the social and socio-economic pillars of sustainable development, taking into consideration the relevant impact topics. This negative impact considers the following two dimensions a. whether a sector/activity is associated with an impact area and b. whether the sector is “key sector” for the impact area (which is considered more direct than the abovementioned dimension).

Operational Risk

In addition to portfolio-related risks, the Bank also addresses operational risks linked to social factors. These include risks associated with working conditions, wages, privacy, and social inclusion. The Bank has performed a mapping of social topics with the risk types identified within the Operational Risk Taxonomy framework and the corresponding inherent risk assessment outcomes derived from the RCSA. Social topics that are assessed as having a High or Medium High inherent risk are deemed material, while qualitative overlays have been adopted as applicable. In this context the following social topics are considered material in the short-medium and long-term: own workforce: training & skills development and for consumers and end users: privacy, access to (quality) information, responsible marketing practices. The inherent risk assessment is conducted without accounting for existing controls, focusing on short-term risks while assuming that the conclusions remain relevant for medium- and long-term horizons.

The materiality assessment identifies specific social topics as requiring greater attention, particularly in areas such as training and skills development, privacy, and social inclusion. These risks are managed through robust processes, including regulatory compliance measures, operational safeguards, and strategic planning.

Activities for Mitigating Social Risk

The Bank offers a range of specialized loan programs designed to address critical societal needs while mitigating social risks. These initiatives aim to empower individuals, foster equitable opportunities, and support sustainable development:

- Young Housing Program – “My Home”: A state-sponsored housing program providing young individuals (aged 25-39) with affordable home loans to purchase their first residence.
- Consumer Loan for Educational Needs: Personal loans tailored to meet educational expenses across all levels of education.
- Alpha Anaptixi: Medium-term working capital loans for small businesses to meet operational and productive needs.
- Social Benefit Prepaid Visa: A prepaid card solution for the disbursement of regular government allowances.

Through these carefully designed financial solutions, the Bank demonstrates its commitment to reducing social vulnerabilities, fostering inclusion, and supporting a sustainable future for all.

Furthermore, the Bank has established the following dedicated processes to identify and mitigate risks associated with social factors during credit origination with a specific implementation schedule in case of High-risk outcome, Transaction Assessment & Due-Diligence process and Reputation Risk Assessment. Those processes have been developed in alignment with international standards and enable the Bank to mitigate social risks within its portfolio.

Additional details related to the identification and management of Social and Employee, Human Rights, Anti – Corruption & Bribery matters can be found in the respective sections, as well as the Responsible Investments and Financing of the Non – Financial report section of the Alpha Services & Holdings Annual Report ([Group-Holdco-31122023-ENG060324Disclaimer.pdf \(alphaholdings.gr\)](#)).

16.2.3 Governance Risk

Risk Management

Governance risk refers to potential detrimental financial impacts on the financial institution due to existing or anticipated influences of governance factors on its counterparties or invested assets. Governance also has a substantial role in ensuring the incorporation of environmental and social aspects by a respective counterparty. Acknowledging the possible implications of climate and environmental disruptions, along with their associated physical and transition risks, is generally considered as a sign of effective governance. Conversely, overlooking these potential impacts during a counterparty's strategic planning could introduce further governance risks. From an inherent risk perspective, Governance risk is currently considered to be material given the size of Non-Financial Corporate Loans portfolio and impact of this risk type. The Bank has established processes to identify and mitigate risks related to Governance factors, therefore the associated residual risks are considered immaterial.

Recognizing significant variations in the management of governance-related topics across different companies, the Bank is implementing a bottom-up process at the obligor level, utilizing the ESG Obligor Assessment questionnaires.

Some indicative governance risk related aspects/ dimensions that are part of the ESG Obligor Assessment questionnaires are presented below:

- Aspects of accountability, reporting, and transparency.
- Business ethics and regulatory compliance, including anti-corruption measures.
- Issues concerning Diversity strategy and group's composition.
- Remuneration practices and performance evaluation.
- ESG Governance matters, specifically focusing on the engagement of the management body in supervising environmental and social issues.
- Strategy & Risk Management.
- Collective Knowledge, emphasizing on the development and enhancement of environmental and socioeconomic effects.

Regarding the ESG obligor scoring process, a series of scorecards has been developed, based on the industry the obligor belongs to. The main inputs of the scorecards have been categorized to three groups, namely environmental (E), social (S) and governance (G). A series of questions/variables that pertain to these groups have been collected (e.g. from sustainability reports) and have been used to train the scorecards, under the condition that E, S and G analytically derived scores converge to the target scores (externally sourced from LSEG Data & Analytics, formerly Refinitiv). Regarding the Governance component, the questions have been grouped to ten (10) areas; Composition/Diversity, Regulatory Compliance, Business Ethics, Strategy and Risk Management, Transparency, Stakeholder Engagement, Roles & Responsibilities, Remuneration, Performance Evaluation and Collective Knowledge, all of which are qualitative, apart from Composition/Diversity which is quantitative. The model weights have been optimized at the area level (such that the condition above has been met) and are allocated down to final metric weights. The model produces distinctive E, S and G (numerical) scores, which are aggregated to ESG scores, according to a weighting combination that depends on the industry of the obligor. The scores are also mapped, via a rating scale, to twelve (12) ratings (between aaa and c-) and further to three (3) grades, according to a RAG (Red-Amber-Green) classification.

Governance Risk Materiality Assessment

To evaluate governance risks, the Bank maps governance topics to compliance risks using its Compliance Risk Assessment framework. This process incorporates an inherent risk assessment that considers the impact (potential effect on the Bank's objectives) and the likelihood (possibility of the risk manifesting over a specific timeframe). The inherent risk assessment is conducted without accounting for existing controls, focusing on short-term risks while assuming that the conclusions remain relevant for medium- and long-term horizons.

Governance topics are classified as material if they pose a high or medium-high inherent risk. In this context Corruption and Bribery governance topic is considered material in the short-, medium- and long-term.

Reputational Risk Assessment

The Group Reputational Risk Management Framework outlines the governance structure and approach for identifying, assessing, mitigating, avoiding, managing, and reporting the primary sources of reputational risk within the Group. It includes a comprehensive Reputational Risk Questionnaire, designed to assess obligors involved in potentially controversial activities. This questionnaire covers key factors such as corruption, ethical considerations, and anti-competitive behavior, ensuring the proactive identification of risks that could adversely affect the Bank's reputation. By incorporating these elements, the framework ensures robust monitoring and management of reputational risks.

Conflict of Interest

The Bank has incorporated in its Vendor Risk Assessment Questionnaire questions regarding ESG risk drivers that might affect vendors' operations and consequently the services offered to the Bank. Specifically in the Questionnaire, the conflict of interest of counterparties is addressed and evaluates whether the Vendor has a documented Conflict of Interest policy, a history of identified conflict incidents, and any professional relationships between the Vendor's employees (or their close family members) and the Alpha Bank Group.

Know-Your-Customer Policies & Processes

The Bank implements a robust Know Your Customer (KYC) framework in line with applicable laws, regulations and international best practices. In the context of the KYC process, Customer Due Diligence (CDD) measures are taken on a risk-based approach. Based on the risk classification of the Customer, specific management measures are taken and the required due diligence (standard, enhanced or simplified) is applied.

CDD measures, both at the inception and during the course of the business relationship, include the identification and verification of the Customer's and Beneficial Owner's identity, based on documents, data or information, from reliable and independent sources.

CDD measures also includes the creation of a financial/transactional profile of the Bank's Customers, which contains information such as the purpose for which the account is opened, or a business relationship is entered into; the intended transactional activity of the account, the types of transactions that may be performed, the expected source of funds to be credited to the account, the expected destination of outgoing remittances or payments; the size and sources of the Customer's assets and income and the description of the Customer's professional or business activity.

Furthermore, important role in the CDD measures framework, plays the scrutiny of any transaction or activity, which by its nature or the way in which it is carried out, or the information concerning the person, or the capacity of the person involved in the transaction, can be linked to ML/TF especially if the transaction is complex or of unusually high value, or without an obvious economic or clear legal reason.

The exercise of continuous monitoring, with regards to the business relationship, throughout the duration of the business relationship is crucial in order to ensure that the transactions and activities carried out are consistent with the Customer's profile.

Moreover, the Bank implements additional appropriate measures, including not allowing to complete the transaction and refusing services or activities, if the Customer's identification and verification requirements are not met, due diligence measures are lacking, or ongoing reporting to the local FIU for the Customer.

It is mentioned that the Bank, does not proceed with transactions, provide services, conduct activities and promptly notifies the relevant Authorities, if the Customer's name appears on sanction lists issued by the EU, UN or OFAC.

Finally, all Customers are obliged to complete KYC Questionnaire which is an integral part of KYC process of the Bank.

Anti-Money Laundering / Terrorist Financing (AML/TF) Policies & Processes

The Bank is committed to comply with the AML/CFT regulatory and legislative framework across its operations and to cooperate closely with supervisory authorities to detect, prevent, and eliminate any activities, practices, or behaviors that may result in relevant violations. It continuously monitors its compliance performance and implements corrective measures as needed, in line with Greek, European, and international standards. The Bank's AML/CFT Policy outlines robust internal controls, comprehensive Customer Due Diligence (CDD) measures, and ongoing transaction monitoring systems to identify and mitigate potential risks. Regular employee training programs and independent audits reinforce the effectiveness of these controls.

Furthermore, the Bank is required to have a thorough understanding of the risks related to Money Laundering (ML) and Terrorist Financing (TF) employing a risk-based approach to AML/CFT compliance, ensuring heightened scrutiny of high-risk customers and transactions. For this reason, the AML/CFT Policy describes the risk assessment process that consists of two interrelated steps:

- a. Identifying ML/TF risk factors, and
- b. Conducting an ML/TF risk assessment.

When assessing the residual ML/TF risk linked to the Bank's operations, business relationships, and occasional transactions, the Bank evaluates both inherent risks and the effectiveness of mitigating measures. The Bank also ensures that the risk assessment reflects the measures implemented to assess AML/CFT risks related to business relationships or occasional transactions, considering the risk appetite of the Bank and each Company within the Group specifying the unacceptable risk category customers as described in the AML/CFT Policy.

Additionally, AML/CFT Policy defines explicitly the role and the responsibilities of the AML/CFT Compliance Officer according to the latest legislation and the role and responsibilities of the Board of Directors and the Audit Committee in the AML/CFT framework.

Finally, compliance with sanctions or restrictive measures against countries, persons, or entities according to the regulations issued by the EU, the UN Security Council and the national Competent Authorities is also required. The Bank, as described in AML/CFT Policy, monitors the legal and regulatory requirements, proceeds to the screening of customers, transactions of payments and services and products against sanctions lists and implements the necessary measures where appropriate.

Next Steps

In the context of the incorporation of the Corporate Sustainability Reporting Directive (CSRD), counterparties will be required to publicly disclose aspects of their internal policies, as specified in the European Sustainability Reporting Standards (ESRS), developed by the European Financial Reporting Advisory Group (EFRAG). This will give the Bank new dimensions to consider in the governance risk assessment practices affecting the counterparties.

Additional details related to governance aspects can be found in the respective section of the Non – Financial report section of the Alpha Services & Holdings Annual Report ([Group-Holdco-31122023-ENG060324Disclaimer.pdf \(alphaholdings.gr\)](#)).

16.3 Quantitative Disclosures on Climate change transition, Physical Risks and Mitigating actions

16.3.1 Banking book–Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

1. Overview

The template includes Group exposures towards non-financial corporates, including loans and advances, debt securities and equity instruments, classified in the accounting portfolios in the banking book, by sector of economic activities using NACE codes based on the principal activity of the counterparty. The template excludes financial assets held for trading or assets held for sale.

2. Approach, applicable standards and key assumptions

Exposures towards sectors that highly contribute to climate change

It is noted that the Bank utilized a multi-factor approach for defining ESG sensitive perimeter when conducting the materiality assessment, which is also applied within the ICAAP framework and reporting. This approach involves considering several factors, the definition of CPRS perimeter (Climate Policy Relevant Sectors), sectors sensitive to transition risk according to Net Zero Banking Alliance (NZBA) and Long-Term Strategy for Greece for 2050 (LTS), as well as emission intensities at sector level and forward-looking Probability of Defaults (PDs) based on the short-term disorderly transition scenario that ECB published as part of the 2022 ECB climate stress test exercise. However, the exposures included by the Bank in Template 1 under 'Exposures towards sectors that highly contribute to climate change', exceed those in the ESG sensitive perimeter due to the particular design of the Template i.e., the particular NACE code breakdown presented therein. (e.g., for NACE sector G, only G45 and specific subsectors of G46 & G47 fall under CPRS, whereas the majority of G46 & G47 is not ESG sensitive).

Exposures towards companies excluded from EU Paris-aligned Benchmarks

The majority of the Bank's counterparties do not yet disclose information on their corresponding revenue split per sector of economic activity. To overcome this limitation, the NACE code of the counterparty's principal activity has been used to identify exposures towards companies excluded from EU Paris-aligned Benchmarks. The following NACE codes have been selected for this purpose: 0510, 0520, 0610, 0620, 1920, 3511, 3521, 3522, 3523, 4671, 4730, 1910, 0910, 4950. Regarding NACE sector D35, the exposures towards Renewable Energy Sources have not been considered in PAB exclusions. Additionally, CCM aligned exposures were not included in PAB exclusions.

Non-performing status for exposures is fully aligned with the new Definition of Default regulatory guidelines and Stage 3 classification according to the IFRS9 accounting standard. Stage 2 exposures have been defined according to the IFRS9 accounting standard and exclude POCI loans.

Exposures have been allocated to maturity buckets according to the remaining maturity of the relevant financial instrument. The contractual maturity has been used for term loans whereas the IFRS9

behavioral maturity has been used for revolving loans, open loans and credit cards. A perpetual maturity has been applied for equities (set to 21yrs for weighting calculation purposes). Average maturity has been calculated by weighing the maturity of each exposure by the gross carrying amount of the exposures.

Financed Emissions

The PCAF Standard acknowledges that limited data availability is often the main challenge when calculating financed emissions. To overcome this challenge and to promote transparency as the main driving force, the Standard provides a variety of options in order to estimate financed emissions, depending on data availability. Each option is asset class-specific and corresponds to a "data quality score" (1=highest data quality; score 5=lowest data quality).

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

Whereas the latter was not possible, obligors' financial data (specifically the turnover or revenue) have been used as a proxy to estimate the financed emissions using appropriate emission factors based on the economic activity of the company. The most commonly used economic-based emission factors are derived from an environmentally extended input-output model (EEIO) and provide emission factors for all scopes of obligor's emissions, based on the sector in which it operates.

Other Financial Corporations (Sector K)

Exposures towards both Non-Financial Corporations and Other Financial Corporations in Sector K are included in the perimeter according to the latest (31.12.2024) FinRep classification and the instructions of the regulator (Q&A ID: 2022_6600).

3. Limitations

In calculating Financed Emissions, the Bank is utilizing proxies to address the data limitations associated with actual emissions. Further details are provided in the respective sections.

4. Plans for enhanced disclosure

The Bank intends to capture information with respect to the revenue split per sector of economic activity, in addition to applying relevant data from PAB Administrators when such data becomes available, for the more accurate identification of PAB exclusions according to Art. 12.1, points (d) to (g) and Art. 12.2 of Commission Regulation (EU) 2020/1818.

Template 51: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 31.12.2024

Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	≤ 5 years	> 5 year ≤ 10 years	> 10 year ≤ 20 years	> 20 years	Average weighted maturity
	Of exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures	Of which Scope 3 emissions	Of which Scope 3 emissions								
1 Exposures towards sectors that highly contribute to climate change*	21,898	2,036	1,247	1,342	402	-197	-27	-158	18,839,449	12,376,603	21%	14,417	3,647	2,439	1,396	6
2 A - Agriculture, forestry and fishing	251	0	0	21	6	-2	0	-1	418,034	88,180	0%	243	4	2	3	2
3 B - Mining and quarrying	30	0	0	6	4	-1	0	-1	11,406	5,246	0%	26	2	1	1	4
4 B.05 - Mining of coal and lignite	0	0	0	0	0	0	0	0	297	98	0%	0	0	0	0	1
5 B.06 - Extraction of crude petroleum and natural gas	0	0	0	0	0	0	0	0	7	3	0%	0	0	0	0	1
6 B.07 - Mining of metal ores	10	0	0.00073543	0	0	0	0	0	5,323	3,231	0%	10	0	0	0	4
7 B.08 - Other mining and quarrying	17	0	0.01002427	5	3	-1	0	-1	4,908	1,625	0%	14	1	1	1	5
8 B.09 - Mining support service activities	3	0	0	0	0	0	0	0	871	289	0%	2	1	0	0	5
9 C - Manufacturing	4,119	505	109	205	157	-83	-5	-74	10,613,630	9,158,005	37%	3,064	908	93	54	4
10 C.10 - Manufacture of food products	1,040	0	0	63	43	-19	-1	-17	476,895	411,960	23%	710	314	7	9	4
11 C.11 - Manufacture of beverages	175	0	0	7	2	-1	0	0	28,507	24,312	22%	156	16	1	2	2
12 C.12 - Manufacture of tobacco products	20	0	0	0	0	0	0	0	4,158	3,490	0%	19	1	0	0	1

Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	=<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
	Of exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures	Of which Scope 3 financed emissions	Of which Scope 3 financed emissions								
13 C.13 - Manufacture of textiles	53	0	2	6	8	-5	0	-5	12,936	9,374	24%	40	7	4	2	5
14 C.14 - Manufacture of wearing apparel	48	0	0	7	18	-9	0	-8	4,126	3,469	17%	40	2	1	5	5
15 C.15 - Manufacture of leather and related products	11	0	0	2	2	-1	0	-1	712	528	0%	8	1	1	1	6
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	19	0	0	4	8	-5	0	-5	1,867	1,259	0%	14	0	1	4	8
17 C.17 - Manufacture of pulp, paper and paperboard	134	0	0	8	8	-6	0	-6	29,715	14,806	0%	104	20	8	3	4
18 C.18 - Printing and service activities related to printing	24	0	0	2	3	-1	0	-1	2,533	1,866	0%	21	2	1	1	4
19 C.19 - Manufacture of coke oven products	510	505	5	0	0	0	0	0	8,475,433	7,846,178	96%	467	43	0	0	3
20 C.20 - Production of chemicals	203	0	6	7	8	-4	0	-4	77,468	39,763	9%	152	14	36	1	5

Sector/subsector	a	b			c	d	e	f		g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)											
Of exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures	Of which Scope 3 financed emissions	Of which Scope 3 financed emissions												
21 C.21 - Manufacture of pharmaceutical preparations	173	0	5,221,768	12	0	1	-1	0	0	10,857	7,159	5%	134	33	5	0	3		
22 C.22 - Manufacture of rubber products	180	0	1	7	18	-7	0	-7	35,439	28,158	0%	168	9	1	2	3			
23 C.23 - Manufacture of other non-metallic mineral products	220	0	8	22	8	-5	-1	-4	584,498	98,061	9%	205	5	4	7	4			
24 C.24 - Manufacture of basic metals	392	0	12	1	2	-1	0	-1	334,062	162,372	50%	187	203	1	1	5			
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	162	0	6	26	6	-3	-1	-2	26,761	22,372	0%	115	34	5	8	5			
26 C.26 - Manufacture of computer, electronic and optical products	72	0	0,211,136	14	1	0	0	0	6,792	6,173	54%	55	16	1	0	3			
27 C.27 - Manufacture of electrical equipment	430	0	56	3	1	-1	0	-1	204,588	186,513	70%	268	160	2	0	4			
28 C.28 - Manufacture of machinery and equipment n.e.c.	86	0	0,884,045	06	21	9	-6	0	-6	36,117	33,676	66%	79	3	3	2	4		

Sector/subsector	a	b			c	d	e	f		g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)											
Of exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures	Of which Scope 3 financed emissions	Of which Scope 3 financed emissions												
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	73	0	7	1	0	0	0	0	0	0	253,069	250,466	67%	56	17	0	1	2
30	C.30 - Manufacture of other transport equipment	25	0	0	4	1	0	0	0	0	0	1,719	1,518	0%	19	5	0	1	4
31	C.31 - Manufacture of furniture	35	0	0	5	4	-3	0	-3	0	0	2,502	2,109	0%	23	3	6	2	7
32	C.32 - Other manufacturing	22	0	0	4	3	-2	0	-2	0	0	1,621	1,349	0%	16	1	2	2	7
33	C.33 - Repair and installation of machinery and equipment	13	0	0	2	4	-3	0	-3	0	0	1,255	1,074	0%	10	0	2	1	5
34	D - Electricity, gas, steam and air conditioning supply	3,307	1,066	987	16	1	-3	0	0	0	0	1,830,813	886,440	61%	2,192	551	519	45	6
35	D35.1 - Electric power generation, transmission and distribution	3,303	1,063	987	16	0	-2	0	0	0	0	1,828,280	886,128	88%	2,189	550	519	45	6
36	D35.11 - Production of electricity	2,270	1,063	923	14	0	-1	0	0	0	0	1,155,648	456,200	47%	1,417	331	498	24	6
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	3	3	0.00000109	0	0	0	0	0	0	0	869	107	0%	3	0	0	0	2
38	D35.3 - Steam and air conditioning supply	1	0	0	0	0	0	0	0	0	0	1,664	205	0%	0	1	0	0	7

Sector/subsector	a	b	c	d	e	f			g	h	i	j	k	l	m	n	o	p	
						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)													GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)
		Gross carrying amount (Mln EUR)																	
		Of exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions	GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity		
39	E - Water supply; sewerage, waste management and remediation activities	70	0	12	3	1	0	0	0	53,720	19,906	44%	53	4	14	0	5		
40	F - Construction	848	0	33	179	31	-15	-1	-13	187,948	139,171	11%	532	117	173	26	6		
41	F.41 - Construction of buildings	399	0	4.76419569	111	12	-5	-1	-5	11,875	9,333	4%	286	58	52	3	6		
42	F.42 - Civil engineering	314	0	20	53	13	-7	0	-6	73,482	61,357	5%	132	49	115	18	8		
43	F.43 - Specialised construction activities	135	0	8	14	6	-3	0	-3	102,591	68,481	48%	114	10	6	5	4		
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,177	376	19	254	140	-66	-9	-54	1,263,305	1,109,838	7%	2,506	336	238	98	5		
45	H - Transportation and storage	5,178	89	17	52	25	-7	-1	-6	4,189,313	858,490	11%	3,193	445	484	1,057	8		
46	H.49 - Land transport and via pipelines	169	89	0	10	1	-1	0	0	177,831	123,183	62%	44	81	41	3	9		
47	H.50 - Water transport	3,132	0	0	20	24	-6	0	-5	3,689,892	530,016	0%	2,850	281	1	0	4		
48	H.51 - Air transport	200	0	10.50307773	0	0	0	0	0	47,826	38,715	10%	7	0	193	0	13		
49	H.52 - Warehousing and support activities for transportation	1,654	0	1	20	1	-1	0	0	263,579	156,574	25%	291	67	243	1,054	16		
50	H.53 - Postal and courier activities	23	0	5.80280745	3	0	0	0	0	10,185	10,002	94%	1	16	6	0	8		
51	I - Accommodation and food service activities	3,067	0	53.05883859	325	23	-12	-4	-6	141,051	78,965	0%	1,552	749	726	40	7		

Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	=<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
	Of exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures	Of which Scope 3 financed emissions	Of which Scope 3 financed emissions								
52 L - Real estate activities	1,850	0	16	282	15	-8	-7	-1	130,229	32,362	8%	1,058	530	190	72	6
53 Exposures towards sectors other than those that highly contribute to climate change*	4,087	0	173	120	25	-56	-3	-11				2,780	814	301	191	2
54 K - Financial and insurance activities	1,927	0	151.7840626	6	0	-1	0	0				1,101	458	206	162	11
55 Exposures to other sectors (NACE codes J, M - U)	2,160	0	21	115	25	-55	-3	-11				1,679	356	95	29	4
56 TOTAL	25,985	2,036	1,420	1,462	427	-253	-30	-169	18,839,449	12,376,603	21%	17,198	4,460	2,740	1,587	5

* In accordance with the Commission delegated regulation (EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks

-Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/20

16.3.2 Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

1. Overview

The template shows the gross carrying amount of loans collateralised with commercial and residential immovable property and of repossessed real estate collaterals, including information on the level of energy efficiency of the collaterals.

Columns that show the EP score of the collateral include exposures based on the specific energy consumption of the collateral (in kWh/m²) as indicated in the collateral EPC label or estimated by the Bank in the absence of an EPC label. Columns that show collateral EPC labels only, include exposures for those collaterals where the EPC label is actual, not estimated. Exposures for which the Bank does not have the actual EPC label of the collateral are included under Column 'Without EPC label of collateral'.

It is noted that only collateral eligible to receive an EPC label according to the EU Energy Performance of Buildings Directive, is reported in this template.

2. Approach, applicable standards and key assumptions

Estimates of the level of energy efficiency have been performed relying on data and information compiled for the purposes of the Regulation on the Energy Performance of Buildings (KENAK). Energy consumption was calculated using a weighting of the results from two methodologies, the first relying on calculated EPCs for the Bank's property collaterals and associated information per property (e.g., year of construction, property type, postal code etc.) and the second on KENAK recorded data of average energy consumption for residential and commercial buildings per climate zone, derived from actual reported EPCs. The extent to which this data has been estimated and not based on EPC labels is indicated in rows 5 and 10 for the EU Area and non-EU Area, respectively.

The EU / non-EU area distinction has been performed according to the country of collateral location. Additionally, the population of the collateralized by commercial / residential immovable property' rows for exposures that are covered by both CRE and RRE properties has been conducted through implementing an allocation algorithm with relevant collateral prioritization.

For the collateralized loans with eligible property collateral for EPC, the total exposure of the loan has been reported in the template as a result of the respective guidelines provided by the regulator. In all submissions, the exposures collateralised by other collateral types of non-EPC eligible have been excluded.

3. Limitations

The Energy Performance of Buildings Directive introduced the Energy performance certificates (EPC) as instruments for improving the energy performance of buildings. Availability of Energy Performance Certificates is a requirement when conducting property transactions within the EU since the Energy Performance of Buildings Directive (2010/31/EU) and the Energy Efficiency Directive (2012/27/EU) came into force. However the Bank currently has limited data on actual EPCs since i) the Bank does not always have access to this information, especially in cases where other entities are involved in the actual transaction ii) no EPCs were issued for property collaterals in transactions that were concluded before the relevant EU Directive came into force iii) there is no central registry available in the country that collects and consolidates information on EPCs, which could be accessed by financial institutions to retrieve data on a large scale.

4. Plans for enhanced disclosure

The Bank to the extent possible has started collecting EPC rating certificates from its clients, in order to monitor the energy performance class of its real estate secured exposures. In 2024, the Bank has integrated information on the Energy Performance Certificate (EPC) of relevant real estate properties within its credit decision making process as well as each collateral valuation subject to EPC eligibility. In addition, the Bank participates actively in the collective initiative organized by the HBA and the Ministry of Environment & Energy which aims at the provision of access for the financial institutions to the EPC registry in order to facilitate the collection of actual EPCs and increase the rate of EPC over the total real estate pool.

Template 52: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 31.12.2024

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	
Counterparty sector	Total gross carrying amount amount (in MEUR)	Level of energy efficiency (EP score in kWh/m ² of collateral)							Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
		0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m ² of collateral) estimated	
1	Total EU area	10,909	583	4,114	2,417	2,183	418	1,125	268	97	175	127	60	34	75	10,073	99%
2	Of which Loans collateralised by commercial immovable property	4,414	49	546	623	1,850	359	922	97	58	134	65	22	3	9	4,027	98%
3	Of which Loans collateralised by residential immovable property	6,316	533	3,488	1,741	311	48	192	171	39	39	52	31	25	52	5,906	100%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	179	1	80	54	23	11	11	0	0	2	10	8	6	14	140	100%
5	Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	10,003	416	3,829	2,229	2,077	370	1,083								10,003	100%
6	Total non-EU area	531	201	202	23	0	0	0	2	62	137	115	63	24	23	104	0%
7	Of which Loans collateralised by commercial immovable property	243	95	89	16	0	0	0	0	34	61	39	31	19	16	43	0%
8	Of which Loans collateralised by residential immovable property	288	106	113	7	0	0	0	1	29	76	76	32	5	7	62	0%
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
10	Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	0	0	0	0	0	0	0								0	0%

16.3.3 Banking book - Climate change transition risk: Alignment metrics

1. Overview

Alpha Bank became a member of the Net Zero Banking Alliance (NZBA) in May 2023 and committed to align with the NZBA overarching principles of setting and publicly disclosing long-term and intermediate targets to support meeting a net zero by 2050 greenhouse gas emissions goal.

2. Approach, applicable standards and key assumptions

The first round of sector targets across lending and investment portfolios, published in November 2024 and disclosed in the current submission (31.12.2024), represent a key milestone towards the Bank's net zero objective. To establish an emissions baseline, the Bank completed an enhanced measurement of financed emissions for 2022 covering investment and lending across all the sectors it finances based on the GHG emissions of its borrowers or investee companies. As a result, the Bank materially increased the coverage of its financed emissions.

Overall, the Bank includes on-balance sheet exposures in the target-setting exercise. The asset class coverage includes Listed and Unlisted Equity, Corporate Bonds, Sovereign Bonds, Business Loans, Commercial Real Estate (CRE), Residential Real Estate (RRE), Motor-Vehicle Loans and Project Finance. To measure its financed emissions, the Bank follows the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials.

The target setting exercise focuses on the financed emissions in the carbon-intensive sectors included in the NZBA Guidelines. These sectors include agriculture; aluminium; cement; coal; commercial and residential real estate; iron and steel; oil and gas; power generation; and transportation. Alpha Bank prioritised the carbon intensive sectors that are material based on financed emissions' measurement, outstanding exposure and based on the contribution to Greece's emissions, the availability of credible sectoral target setting guidance, data quality and availability as well as peer practice.

Based on these criteria, Alpha Bank set targets for the Power Generation, Oil & Gas, Cement, Iron and Steel sectors, which are published in the current submission.

The Bank employs the widely used, science-based International Energy Agency Net Zero Emissions by 2050 (IEA NZE) scenario as its benchmark pathway. In addition, the Bank collected physical activity data for the clients' representing sectors that targets will be set on physical intensity metrics. Within the financed emissions inventory, the parts of the value chain have been identified and mapped across sectors.

The Bank introduced working sessions with representatives from the business areas that cover the priority sectors used for the first round of net-zero targets to provide training on the target setting approach, scenario modelling and market analysis. As a result, output regarding transition plans and potential financing needs for selected top clients are incorporated into the target setting process.

3. Limitations

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

In this context,

- The targets rely to a great extent on Alpha Bank's key clients meeting their decarbonization commitments. The Bank will continuously engage with its clients on their level of progress and commitments.
- Changes in the operating and macroeconomic environment (for example, prevailing macroeconomic conditions or systemic events) may adversely impact progress towards the target.
- Physical intensity and financed emissions may change due to changes in data and methodology.

4. Plans for enhanced disclosure

The remaining material carbon-intensive sectors will be included in a subsequent round of target-setting in accordance with the NZBA guidelines. Some of the remaining sectors, might be excluded from target setting due to not being material components of Alpha Bank's portfolio, or be treated differently in case of particular specificities relating to technological or other aspects.

Template 53: Banking book - Climate change transition risk: Alignment metrics 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g
	Sector	NACE Sectors (a minima)	Portfolio gross carrying amount (Mn EUR)	Alignment metric**	Year of reference	Distance to IEA NZE2050 in % ***	Target (year of reference + 3 years)
1	Power	3511	1,941.46	222,88 kgCO ₂ e/MWh	2022	20%	188.91
2	Fossil fuel combustion	192	289.18	100 Indexed tCO ₂ e of 2022 = 100	2022	30%	90.29
3	Automotive						
4	Aviation						
5	Maritime transport						
6	Cement, clinker and lime production	2351	115.76	687,28 kgCO ₂ e / t Cementitious product	2022	48%	648.55
7	Iron and steel, coke, and metal ore production	241	176.92	540 kgCO ₂ e / t Steel	2022	0%	1559.00
8	Chemicals						
9	... potential additions relevant to the business model of the institution						

*** PiT distance to 2030 NZE2050 scenario in % (for each metric)

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

Information includes exposures towards 2 (two) counterparties that are subsidiaries of companies included in the top 20 most carbon-intensive corporates worldwide, based on data available at the Carbon Majors Database and Reports of the Carbon Disclosure Project, as well as at Climate Accountability Institute.

Template 54: Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	18.91	0.07%	0	1.3	2

*For counterparties among the top 20 carbon emitting companies in the world

16.3.5 Banking book - Climate change physical risk: Exposures subject to physical risk

1. Overview

The template includes Group exposures in the banking book (including loans and advances, debt securities and equity instruments not held-for-trading and not held-for-sale), towards non-financial corporates, on loans collateralized with immovable property and on repossessed real estate collaterals, exposed to chronic and acute climate-related hazards.

The column of Gross carrying amount includes all exposures irrespective of sensitivity to physical risk with the subsequent columns including only exposures sensitive to impact from climate change physical events.

2. Approach, applicable standards and key assumptions

The Bank has established a methodology to assess vulnerability to physical risk factors based on sensitivity and exposure analysis (when separately assessed) to derive vulnerability to physical risk factors. The vulnerability assessment is in line with the “ECB: Good practices for climate related and environmental risk management: Observations from the 2022 thematic review”⁸ and the Invest EU methodology (“Technical guidance on the climate proofing of infrastructure in the period 2021-2027”)⁹. It aims to identify potential significant hazards per subsectors covered by the analysis for Business portfolio, as well as across the different geographic regions where real estate properties used as collateral.

The first ESG materiality assessment performed in March 2023 with reference date 31.12.2022 for physical risk was through the execution of a vulnerability analysis (based on RCP 8.5 W/m2 scenario) for both, NACE sectors at a country level (Greece) and real estate properties at climate zones level, to 16 physical climate risks (8 chronic and 8 acute). The vulnerability assessment identified the potential significant hazards and related risk in alignment with the Invest EU methodology (“Technical guidance on the climate proofing of infrastructure in the period 2021-2027”) and with the “ECB: Good practices for climate related and environmental risk management: Observations from the 2022 thematic review”). The analysis was applied to the Business portfolio per 1-digit NACE sector (22 NACE codes) at a country level (Greece), while for exposures covered by real estate collateral the analysis was applied at a regional level for each of the 4 climatic zones in Greece (as defined by the Greek Ministry Environment & Energy), both for 16 climate risks and for selected (sea level rise, soil & coastal erosion, wildfire, cyclones/hurricane/typhoon, and floods), based on the location of the real estate property.

In 2023, the Bank enhanced the methodology of physical risk assessment and it was further ameliorated in 2024.

From 2024 onwards, the Bank uses a more granular approach, building upon the initial methodology employed in the initial analysis, incorporating specific enhancements (e.g., in terms of granularity of assessment) depending on the portfolio that is under examination.

The approach examines separately the two main portfolios where physical risk has a profound impact: (1) Business portfolio and (2) Secured by real estate collaterals and REOs in short (2025), medium (2030) and long-term (2050) time horizons.

In order to achieve a more granular and detailed risk level analysis, the Bank has proceeded with:

1. The enhanced development of Sensitivity analysis for physical risks incorporated all physical risks (Heat stress, Water stress, Heatwaves, Droughts & Floods, Changing temperature , Changing wind patterns, Changing precipitation patterns, Sea level rise, Soil and coastal erosion, Soil degradation, Coldwaves/ frost, Wildfire, Cyclone, hurricane, typhoon, storm and tornado, Heavy precipitation (rain, hail, snow/ ice), Landslide and subsidence), at the more granular level of top 20 subsectors (NACE 2 level) in terms of Bank's outstanding gross carrying amount as of 31.12.2024.

⁸ [ECB 2022-Good practices for climate related and environmental risk management:Observations from the 2022 thematic review-link](#)

⁹ Commission Notice — Technical guidance on the climate proofing of infrastructure in the period 2021-2027 – link

2. The development of a location-specific risk analysis for the effects of physical risks on real estate properties using geospatial mapping and local geographical characteristics. This analysis resulted in a vulnerability assessment at NUTS 3 level, in a more granular level in terms of the location of collaterals.

Exposures have been allocated to maturity buckets according to the remaining maturity of the relevant financial instrument. The contractual maturity has been used for term loans whereas the IFRS9 behavioral maturity has been used for revolving loans, open loans and credit cards. A perpetual maturity has been applied for equities (set to 21yrs for weighting calculation purposes). Average maturity has been calculated by weighing the maturity of each exposure by the gross carrying amount of the exposures. Additionally, repossessed assets with no defined maturity are included in the “>20 years” band and their maturity is set to 21 years for the calculation of the weighted average maturity.

3. Limitations

Repossessed assets under an 'investment' accounting classification have been excluded from the data reported.

Assessment for physical risk has been performed on NFC which represent 80% of the total Group NFC exposures.

Template 55: Banking book - Climate change physical risk: Exposures subject to physical risk 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
Variable: Geographical area subject to climate change physical risk - acute and chronic events	Gross carrying amount (Mln EUR)														
	of which exposures sensitive to impact from climate change physical events														
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non- performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			
	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighte d maturity	of which Stage 2 exposur es						Of which non- perform ing exposur es	Of which non- perform ing exposur es		
1 A - Agriculture, forestry and fishing	251	242	4	2	3	2	0	0	250	21	6	-2	0	-1	
2 B - Mining and quarrying	30	2	1	0	0	5	0	0	3	0	0	0	0	0	
3 C - Manufacturing	4,119	741	334	16	9	4	0	1,101	0	65	44	-19	-1	-17	
4 D - Electricity, gas, steam and air conditioning supply	3,307	0	0	0	0	0	0	0	0	0	0	0	0	0	
5 E - Water supply; sewerage, waste management and remediation activities	70	53	4	14	0	5	0	0	70	3	1	0	0	0	
6 F - Construction	848	101	0	1	0	4	0	102	0	96	0	0	0	0	



	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Gross carrying amount (Mln EUR)														
	of which exposures sensitive to impact from climate change physical events														
Variable: Geographical area subject to climate change physical risk - acute and chronic events	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non- performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			
	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighte d maturity	of which Stage 2 exposur es						Of which non- performi ng exposur es	Of which non- performi ng exposur es		
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,177	0	0	0	0	0	0	0	0	0	0	0	0	0
8	H - Transportation and storage	5,178	0	0	0	0	0	0	0	0	0	0	0	0	0
9	L - Real estate activities	1,850	54	1	0	0	2	55	0	0	12	0	0	0	0
10	Loans collateralised by residential immovable property	6,912	72	60	145	202	18	227	239	13	91	54	-13	-2	-10
11	Loans collateralised by commercial immovable property	6,985	364	203	226	82	9	278	597	0	123	20	-8	-2	-5
12	Repossessed colaterals	236	0	0	0	22	21	12	10	0	0	0	0	0	0
13	Other relevant sectors (breakdown below where relevant)	0	0	0	0	0	0	0	0	0	0	0	0	0	0

16.3.6 Summary of GAR KPIs

1. Overview

Regulation (EU) 2020/852 (EU Taxonomy) was created to meet the need for a common system for the classification of environmentally sustainable economic activities. At the same time, it forms an integral part of the European Green Deal, as well as of the EU Action Plan on Sustainable Finance.

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

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

The 1st Delegated Act (commonly known as the "Climate Delegated Act") concerning the technical criteria for economic activities with a significant contribution to the first two objectives, (i.e., the climate change mitigation and the climate change adaptation), was adopted on July 4th, 2021, and is effective as from January 1st, 2022. In 2023, two new Delegated acts issued by the European Commission have been adopted:

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

Furthermore, a reporting guidance has been published by the European Commission including relevant FAQs. This guidance provides definitions as well as interpretation and clarifications of reporting requirements for financial undertakings. Credit institutions shall disclose, according to the EU Taxonomy regulation, taxonomy alignment information for the two climate environmental objectives and taxonomy eligibility information for the remaining four environmental objectives. The ratio that indicates the alignment is the Green Asset Ratio (GAR) which shall be disclosed along with a breakdown by environmental objective, type of counterparty and type of eligible asset.

2. Approach, applicable standards and key assumptions

According to the Regulation (EU) 2020/852 (EU Taxonomy), the term "eligible" is used for economic activities included in the above-mentioned Delegated Acts. However, it should be noted that even if an economic activity is eligible, it does not mean it is also environmentally sustainable. The term "environmentally sustainable activity or investment" is associated with alignment, which requires greater analysis compared to eligibility. To be taxonomy-aligned an economic activity should comply with all the requirements listed in the respective technical criteria, should not do significant harm (DNSH) to other environmental objectives, and should be exercised in accordance with the minimum social safeguards.

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

The European Commission established the basis for the calculation and the first standardized templates. The EBA established similar disclosure requirements within its ITS requirements for Pillar 3, however only the information of the counterparties related to the aligned turnover is used for the calculation of the general purpose, while Pillar 3 templates present minor differences with respect to those included in the Non-Financial Report.

The gross carrying amount of total covered assets amounted to EUR 54,020mn as of 31.12.2024. The eligibility ratio relevant to climate change mitigation and climate change adaptation is 17.6% based on turnover. The total GAR based on turnover is 2.71% of total covered assets as of 31.12.2024. The GAR is predominantly influenced by exposures to NFRD counterparties and exposures where the use of proceeds is known and finances taxonomy-aligned economic activities (i.e., for which the project specific KPIs were used).

GAR calculation provides information on the extent to which Group's activities qualify as environmentally sustainable in accordance with Articles 3 and 9 of Regulation (EU) 2020/852. In particular, this template information on includes Group's gross carrying amounts of institutions' for loans and advances, debt securities and equity instruments on their the banking book, with a breakdown of the information by type of counterparty, including financial corporations, non-financial corporations, households, local governments as well as real estate lending towards households, and the taxonomy eligibility and taxonomy alignment of the exposures with regards to the environmental objectives of climate change mitigation and climate change adaptation. Specialized lending of €1 billion, includes mainly loans to Renewable Energy sources (i.e., solar and wind parks). The corresponding percentage of Specialized lending is 1.97%, dividing loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation.

3. Limitations

The information for financial undertakings is limited as this is the second year of alignment reporting, and most of the financial undertakings have not yet published their 2024 annual reports. Non-financial undertakings have not published taxonomy information yet for 2024, thus the GAR reporting of alignment for non-financial undertakings is based on data publicly available from 2023. Additionally, information on taxonomy-eligibility for the four environmental objectives implemented in 2024 is not possible due to the lack of data as information collected from latest publicly available taxonomy information by counterparties may not include the new economic activities incorporated in the Delegated Acts issued in 2023.

In relation to mortgage lending to households, the technical screening criteria is also constrained due to the lack of complete datapoints for the Energy Performance Certificate (EPC) labels of collaterals. In addition, the assessment of DNSH was not possible. For lending with purpose of financing vehicles, the assessment of DNSH criteria was not possible due to unavailability of relevant data, i.e., tires of the motor vehicle etc.

4. Plans for enhanced disclosure

As the regulatory framework governing sustainability disclosures within the European Union continues to be strengthened a notable enhancement in the quality, consistency, and reliability of ESG-related data reported by corporates is anticipated. In this evolving regulatory environment, the Bank's GAR reporting figures are likewise expected to demonstrate increasing levels of accuracy, completeness, and alignment with both binding legislative requirements and prevailing market standards, thereby reinforcing the Bank's commitment to transparency and accountability in its sustainability practices.

The Bank is presently undertaking the development of dedicated internal systems designed to automate the classification of loans in accordance with the criteria of Taxonomy eligibility and alignment, as set out under the EU regulatory framework. These initiatives aim to materially enhance the precision, efficiency, and consistency of sustainability assessments across the Bank's portfolio, while simultaneously optimizing internal reporting processes.

With respect to household loans, the Bank is currently engaged in a comprehensive assessment of the characteristics of its product offerings, with the objective of identifying and highlighting those products that are aligned with the criteria established under the EU Taxonomy.

Template 56: Summary of GAR KPIs 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d
	KPI			% coverage (over total assets)*
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR stock	2.70%	0.01%	2.71%	76.18%
GAR flow	3.00%	0.04%	3.04%	75.45%

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

16.3.7 Mitigating actions: Assets for the calculation of GAR

This template provides information on the extent to which Group's activities qualify as environmentally sustainable in accordance with Articles 3 and 9 of Regulation (EU) 2020/852. Institutions shall disclose in this. In particular, this template information on includes Group's gross carrying amounts of institutions' for loans and advances, debt securities and equity instruments on their the banking book, with a breakdown of the information by type of counterparty, including financial corporations, non-financial corporations, households, local governments as well as real estate lending towards households, and the taxonomy eligibility and taxonomy alignment of the exposures with regards to the environmental objectives of climate change mitigation and climate change adaptation.

Template 57: Mitigating actions: Assets for the calculation of GAR 31.12.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	
Million EUR		Total gross carrying amount	Disclosure reference date T															
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/adaptation	Of which enabling		
GAR - Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,426	8,935	1,458	1,066	21	97	28	7	0	0	6	8,963	1,465	1,066	21	103	
2	Financial corporations	2,214	535	74	38	0	0	1	0	0	0	0	536	74	38	0	0	
3	Credit institutions	2,149	493	35	0	0	0	0	0	0	0	0	493	35	0	0	0	
4	Loans and advances	764	200	10	0	0	0	0	0	0	0	0	200	10	0	0	0	
5	Debt securities, including UoP	1,385	292	25	0	0	0	0	0	0	0	0	292	25	0	0	0	
6	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
7	Other financial corporations	64	43	39	38	0	0	1	0	0	0	0	44	39	38	0	0	
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	



a b c d e f g h i j k l m n o p

Million EUR		Disclosure reference date T																
		Total gross carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)						TOTAL (CCM + CCA)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)			
			Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which adaptation		Of which enabling		Of which specialised lending		Of which transitional/adaptation	
11	Equity instruments	0	0	0		0	0	0	0	0		0	0	0	0		0	0
12	of which management companies	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0	0		0	0	0
16	of which insurance undertakings	4	2	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	4	2	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0	0		0	0	0
20	Non-financial corporations (subject to NFRD disclosure obligations)	4,521	2,124	1,384	1,028	21	97	27	7	0	0	6	2,151	1,391	1,028	21	103	
21	Loans and advances	3,599	1,923	1,306	1,028	17	70	27	7	0	0	6	1,950	1,313	1,028	17	76	
22	Debt securities, including UoP	916	200	78	0	4	27	0	0	0	0	0	200	78	0	4	27	
23	Equity instruments	6	1	0		0	0	0	0		0	0	1	0		0	0	
24	Households	9,691	6,276	0	0	0							6,276	0	0	0	0	



a b c d e f g h i j k l m n o p

Million EUR		Disclosure reference date T																
		Total gross carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)						TOTAL (CCM + CCA)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)			
			Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which adaptation		Of which enabling		Of which specialised lending		Of which transitional/adaptation	
25	of which loans collateralised by residential immovable property	6,184	6,184	0	0	0	0							6,184	0	0	0	0
26	of which building renovation loans	501	501	0	0	0	0							501	0	0	0	0
27	of which motor vehicle loans	92	92	0	0	0	0							92	0	0	0	0
28	Local governments financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local governments financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	529	529	0	0	0	0	0	0	0	0	0	0	529	0	0	0	0
32	TOTAL GAR ASSETS	16,955	9,464	1,458	1,066	21	97	28	7	0	0	6	9,492	1,465	1,066	21	103	
Assets excluded from the numerator for GAR calculation (covered in the denominator)																		
33	EU Non-financial corporations (not subject to NFRD disclosure obligations)	19,616																
34	Loans and advances	19,379																



a b c d e f g h i j k l m n o p

Million EUR		Disclosure reference date T																
		Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					
			Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling							
35	Debt securities	150																
36	Equity instruments	87																
37	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	169																
38	Loans and advances	66																
39	Debt securities	102																
40	Equity instruments	0																
41	Derivatives	0																
42	On demand interbank loans	242																
43	Cash and cash-related assets	459																
44	Other assets (e.g. Goodwill, commodities etc.)	16,579																
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)	54,020																
Other assets excluded from both the numerator and denominator for GAR calculation																		



a b c d e f g h i j k l m n o p

Million EUR		Disclosure reference date T																
		Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					
			Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling							
46	Sovereigns	13,668																
47	Central banks exposure	2,539																
48	Trading book	681.6																
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	16,889																
50	TOTAL ASSETS	70,908																

16.3.8 GAR %

This template provides information on the percentage of their total assets covered by these KPIs, based on the information on exposures included in Template 7.

Template 58: GAR% 31.12.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
	Disclosure reference date T: KPIs on stock															Disclosure reference date T: KPIs on flows																	
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)							
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of total assets covered	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered	
	Of which environmentally sustainable		Of which environmentally sustainable			Of which environmentally sustainable		Of which environmentally sustainable			Of which environmentally sustainable		Of which environmentally sustainable				Of which environmentally sustainable		Of which environmentally sustainable			Of which environmentally sustainable		Of which environmentally sustainable									
(compared to total covered assets in the denominator)		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which adaptation	Of which enabling		Of which specialised lending	Of which transitional/adaptation	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which adaptation	Of which enabling		Of which specialised lending	Of which transitional/adaptation	Of which enabling		Of which specialised lending	Of which transitional/adaptation	Of which enabling	
1	GAR	17.52%	2.70%	1.97%	0.04%	0.18%	0.05%	0.01%	0.00%	0.00%	0.01%	17.57%	2.71%	1.97%	0.04%	0.19%	76.18%	9.87%	3.00%	1.03%	0.13%	0.11%	0.03%	0.04%	0.00%	0.00%	0.00%	9.90%	3.04%	1.03%	0.00%	0.11%	75.45%
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	54.39%	8.87%	6.49%	0.13%	0.59%	0.17%	0.04%	0.00%	0.00%	0.04%	54.57%	8.92%	6.49%	0.13%	0.63%	23.16%	39.53%	12.00%	4.13%	0.53%	0.44%	0.11%	0.18%	0.00%	0.00%	0.00%	39.64%	12.18%	4.13%	0.00%	0.44%	18.83%
3	Financial corporations	24.19%	3.35%	1.73%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	24.22%	3.35%	1.73%	0.00%	0.00%	3.12%	20.91%	1.37%	0.15%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.91%	1.37%	0.15%	0.00%	0.00%	5.64%
4	Credit institutions	22.91%	1.65%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	22.91%	1.65%	0.00%	0.00%	0.00%	3.03%	20.75%	1.22%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.75%	1.22%	0.00%	0.00%	0.00%	5.54%
5	Other financial corporations	66.70%	60.07%	59.33%	0.00%	0.00%	1.02%	0.02%	0.00%	0.00%	0.00%	67.73%	60.08%	59.33%	0.00%	0.00%	0.09%	29.00%	9.23%	7.88%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	29.00%	9.23%	7.88%	0.00%	0.00%	0.11%
6	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
7	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
% (compared to total covered assets in the denominator)	Disclosure reference date T: KPIs on stock															Disclosure reference date T: KPIs on flows																	
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)							
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered		
	Of which sustainable		environmentally			Of which sustainable		environmentally			Of which sustainable		environmentally			Of which sustainable		environmentally			Of which sustainable		environmentally			Of which sustainable		environmentally					
	Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which adaptation	Of which enabling		Of which specialised lending	Of which transitional/adaptation	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling	Proportion of total assets covered	Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which adaptation	Of which enabling		Of which specialised lending	Of which transitional/adaptation	Of which enabling		Of which specialised lending	Of which transitional/adaptation	Of which enabling		
8	of which insurance undertakings	43.62%	6.96%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	43.62%	6.96%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Non-financial corporations subject to NFRD disclosure obligations	46.98%	30.61%	22.73%	0.47%	2.14%	0.60%	0.16%	0.00%	0.00%	0.13%	47.58%	30.76%	22.73%	0.47%	2.28%	6.38%	46.30%	24.35%	8.59%	1.12%	0.91%	0.24%	0.37%	0.00%	0.00%	0.00%	46.54%	24.72%	8.59%	0.00%	0.91%	8.96%
10	Households	64.76%	0.00%	0.00%	0.00%							64.76%	0.00%	0.00%	0.00%	0.00%	13.67%	50.05%	0.00%	0.00%	0.00%	0.00%						50.05%	0.00%	0.00%	0.00%	0.00%	4.23%
11	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%							100.00%	0.00%	0.00%	0.00%	0.00%	8.72%	100.00%	0.00%	0.00%	0.00%	0.00%						100.00%	0.00%	0.00%	0.00%	0.00%	1.78%
12	of which building renovation loans	100.00%	0.00%	0.00%	0.00%							100.00%	0.00%	0.00%	0.00%	0.00%	0.71%	100.00%	0.00%	0.00%	0.00%	0.00%						100.00%	0.00%	0.00%	0.00%	0.00%	0.03%

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af	
% (compared to total covered assets in the denominator)	Disclosure reference date T: KPIs on stock															Disclosure reference date T: KPIs on flows																	
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)							
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered		
	Of which environmentally sustainable		Of which specialised lending			Of which transitional			Of which enabling			Of which environmentally sustainable		Of which specialised lending			Of which transitional			Of which enabling			Of which environmentally sustainable		Of which specialised lending			Of which transitional				Of which enabling	
		Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	Proportion of total assets covered			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			
13	of which motor vehicle loans	100.00%	0.00%	0.00%	0.00%	0.00%						100.00%	0.00%	0.00%	0.00%	0.00%	0.13%	100.00%	0.00%	0.00%	0.00%	0.00%						100.00%	0.00%	0.00%	0.00%	0.00%	0.33%
14	Local government financing	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	0.00%	0.00%	0.00%	0.00%						100.00%	0.00%	0.00%	0.00%	0.00%	0.75%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

16.3.9 Other climate change mitigating actions that are not covered in the EU Taxonomy

1. Overview

The purpose of this template is to report all exposures to clients that are designed to facilitate climate change adaptation and mitigation objectives and are not reported in the GAR templates, i.e., exposures not aligned to the EU taxonomy.

2. Approach, applicable standards and key assumptions

These exposures have been selected based on the Bank's Sustainable Finance Framework (SFF) which enables the identification and categorization of sustainable activities and lays out the criteria to characterize specific loans as sustainable. The template includes Group Investments to counterparties (credit institutions, other financial corporations, and non-financial corporations) Green Bonds, Loans and Sustainability Linked loans aimed at climate change mitigation. There are:

- General-purpose – Company Business Mix loans referring to transactions which finance general corporate purposes of companies that derive the majority of their revenue from eligible activities. To classify the company as eligible for this type of financing, at least 80% of the company's total revenues must be derived from the eligible activities included in the Group's SFF
- Sustainability-linked loans that incentivize the borrower's achievement of ambitious, predetermined sustainability performance objectives. The main goal of the Sustainability-linked loans is to promote environmentally and socially sustainable economic activity and growth

Dedicated purpose loans that support projects related to mitigation of climate change transition risk, such as generation of renewable energy, development and implementation of products or technology that reduces the use of energy, Resource Efficiency and Pollution Control activities and green buildings for commercial or residential properties with a definitive A-level EPC (Energy Performance Certificate) as granted by the Greek Government for Construction/ Purchase of new buildings and B+ or above for Renovation of existing buildings, etc.

3. Plans for enhanced disclosure

Concurrently, as mentioned above, the Bank is progressing the establishment of dedicated internal infrastructures and automated assessment tools, aimed at facilitating the systematic identification and classification of loans in accordance with the EU Taxonomy's eligibility and alignment criteria. These developments are expected to significantly enhance the Bank's data governance, reliability of sustainability reporting, and support ongoing compliance with the evolving European regulatory framework.

Template 59: Other climate change mitigating actions that are not covered in the EU Taxonomy 31.12.2024

(Amounts in millions of Euro)

a	b	c	d	e		
Type of financial instrument	Type of counterparty	Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions	
1	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	235.56	Yes	No	Group bond exposures include Green Bonds, Sustainable Bonds and Sustainability Linked Bonds that were assessed in accordance with Alpha Bank's Sustainable Finance Framework but are not EU Taxonomy aligned.
2		Non-financial corporations	127.59	Yes	No	Group bond exposures include Green Bonds, Sustainable Bonds and Sustainability Linked Bonds that were assessed in accordance with Alpha Bank's Sustainable Finance Framework but are not EU Taxonomy aligned.
3		Of which Loans collateralised by commercial immovable property	0.00			
4		Households	0.00			
5		Of which Loans collateralised by residential immovable property	0.00			
6		Of which building renovation loans	0.00			
7		Other counterparties	34.75	Yes	No	Group bond exposures include Green Bonds, Sustainable Bonds and Sustainability Linked Bonds that were assessed in accordance with Alpha Bank's Sustainable Finance Framework but are not EU Taxonomy aligned.
8	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	171.44	Yes	No	Group loan exposures towards financial corporations include dedicated purpose loans that support projects related to the mitigation of climate transition risk as per Alpha Bank's Sustainable Finance Framework, but are not assessed as EU Taxonomy aligned.
9		Non-financial corporations	1977.18	Yes	No	Group loan exposures towards non-financial corporations include dedicated purpose loans that support projects related to the mitigation of climate transition risk as per Alpha Bank's Sustainable Finance Framework, but are not assessed as EU Taxonomy aligned.
10		Of which Loans collateralised by commercial immovable property	500.06	Yes	No	Group loan exposures towards non-financial corporations include dedicated purpose loans that support projects related to the mitigation of climate transition risk as per Alpha Bank's Sustainable Finance Framework, but are not assessed as EU Taxonomy aligned.
11		Households	135.95	Yes	No	Group loan exposures towards households include loans that support projects related to the mitigation of climate transition and physical risks (inter alia the acquisition or energy upgrade of real estate, acquisition of electric car, etc.) as per Alpha Bank's Sustainable Finance Framework but were assessed as not EU Taxonomy aligned.
12		Of which Loans collateralised by residential immovable property	121.70	Yes	No	Group loan exposures towards households include loans that support projects related to the mitigation of climate transition and physical risks (inter alia the acquisition or energy upgrade of real estate, acquisition of electric car, etc.) as per Alpha Bank's Sustainable Finance Framework but were assessed as not EU Taxonomy aligned.
13		Of which building renovation loans	0.00			
14		Other counterparties	0.00			

17 Remuneration Policy

A Remuneration Policy has been established which sets the relative framework at Alpha Services and Holdings S.A. and the other Companies of its Group and is in accordance with the Corporate Governance principles.

The Remuneration Policy:

- Complies with the values, the business strategy and targets and with the long-term best interests of the Alpha Services and Holdings S.A. and the other Companies of its Group .
- Motivates personnel for exceptional results within the framework of the performance management system, and at the same time discourages excessive assumption of risk and minimizes situations that do not comply with the sound and consistent risk management
- Seeks to align remuneration with sound performance criteria and existing market dynamics

In order to comply with the regulatory requirements as far as the disclosures regarding the Remuneration Policy are concerned, a separate Remuneration report will be circulated, which will include the basic principles of the Remuneration Policy for all staff, the composition of remuneration, the principles of variable remuneration as well as relevant information for the Identified Staff.

The Remuneration report is posted on the Company's website ([Financial Statements of Bank and Group | ALPHA HOLDINGS](#)).

18 Appendix

18.1 Appendix I – Analysis of the Board Committees

1. Analysis of the Board Committees

The Board has the authority to establish both permanent and ad hoc Committees to support it in discharging its responsibilities effectively. While these Committees primarily serve an advisory role, they may also assume certain delegated authorities as determined by the Board.

Each Committee operates under a dedicated Charter that outlines its composition, tenure, functioning and responsibilities. Currently, there are four Committees at the Board level: the Audit Committee, the Risk Management Committee, the Remuneration Committee, and the Corporate Governance, Sustainability, and Nominations Committee.

Each Committee comprises no fewer than three Members, with the composition proposed to the Board by the Corporate Governance, Sustainability, and Nominations Committee (CGSNC). This proposal takes into account the "Suitability and Nomination Policy for Members of the Board of Directors" as well as relevant legal and regulatory frameworks. It is also important to note that the majority of the Members of each Committee are Independent Non-Executive Members.

The primary focus of these Committees is to oversee policies, practices, and procedures within their respective areas of mandate, as detailed in the Charters of each Committee. They also play a crucial role in preparing draft resolutions for Board approval and submitting relevant briefings, reports, key information, and recommendations to the Board. Furthermore, the Committees report regularly to the Board about their work.

1.1. Audit Committee

The Committee has been established and operates in accordance with all applicable laws and regulations. The determination of the type of the Audit Committee, its term of office, the number and the qualifications of its Members as per article 44 par. 1 case b) of Law 4449/2017 were resolved upon by the Ordinary General Meeting of 27.7.2023. The Audit Committee currently constitutes a Committee of the Board of Directors. Its Members were appointed by a resolution of the Board of Directors of 27.7.2023 and its Chair was appointed by its Members at the meeting of the Committee held on 24.7.2024, in accordance with the provisions of article 44 par. 1 case e) of Law 4449/2017, as in force.

Mr. P.I.-K. Papazoglou and Mr. J.L. Cheval, Independent Non-Executive Members of the Board of Directors, possess adequate auditing and accounting knowledge and experience, and at least one of them shall attend the Committee's meetings relating to the approval of the Financial Statements.

The Committee convenes at least on a quarterly basis, adding meetings on an as-needed basis. It may invite any Member of the Management or Executive as well as external auditors to attend its meetings. The Head of the Internal Audit and the Head of Compliance are regular attendees of the Committee meetings and have unhindered access to the Chair and to the Members.

The main responsibilities of the Audit Committee include but are not limited to those presented below.

The Audit Committee:

- Performs the oversight of the financial reporting processes and procedures for drawing up the Annual and the Interim Financial Statements of the Company and its Subsidiaries, in accordance with the applicable accounting standards.
- Reviews the quarterly Financial Statements of the Group as well as the semi-annual and annual Financial Statements of the Company and its Subsidiaries, together with the Statutory Auditors' Report, where applicable, and the Board of Directors' semi-annual and Annual Management Report, prior to their submission to the Board of Directors for approval.
- Is informed of the evolution of significant accounting standards and oversees the impact on accounting policies.
- Performs the oversight of the Non-Financial Information, the Sustainability Report, reporting processes and the ESG disclosures.
- Reviews the annual or multi-year audit plans and recommends their approval by the Board of Directors.
- Reviews the periodic reports on the activity of the Internal Audit in the Company and its Subsidiaries and the recommendations identified in these reports.
- Reviews and endorses, for approval to the Board of Directors, policies regarding the Internal Audit methodology of the Company as well as any amendments thereto.
- Reviews and endorses, for approval to the Board of Directors, policies regarding the Compliance methodology of the Company as well as any amendments thereto.
- Informs the Board of Directors of the outcome of the statutory audit and explains how the statutory audit contributed to the integrity of the financial reporting and what the role of the Audit Committee was in that process.
- Assists the Board of Directors in ensuring the independent, objective and effective conduct of internal and external audits.
- Assists the Board of Directors in overseeing the effectiveness and performance of the Internal Audit and of the Compliance of the Company and of the overall Units across the Group.
- Is responsible for the procedure followed for the selection of the Statutory Certified Auditors of the Company and its Subsidiaries and makes recommendations to the Board of Directors on the appointment or dismissal, rotation, tenure and remuneration of the Statutory Certified Auditors, according to the relevant regulatory and legal provisions.
- Monitors the independence and performance of the Statutory Certified Auditors in accordance with the applicable laws, a responsibility which includes reviewing, *inter alia*, the provision by them of Non-Audit Services to the Company and its Subsidiaries. In relation to this, the Committee examines and approves all proposals regarding the provision by the Statutory Certified Auditor of Non-Audit Services to the Company and its Subsidiaries, based on the relevant policy that the Audit Committee oversees and recommends to the Board of Directors for approval.
- Monitors and assesses the adequacy and effectiveness of the Internal Control System, based on reports by Internal Audit and by Compliance, on findings of the external auditors, the supervisors and the tax authorities as well as on management information, as appropriate.

- Evaluates the adequacy and effectiveness of the processes and procedures of the Compliance, based on the regular Compliance Reports.
- Assesses the adequacy and effectiveness of the “Anti-Money Laundering and Combating the Financing of Terrorism Policy” and of the respective procedures.
- Oversees the Company’s effort to foster a culture of ethics and discourage unethical behavior in all operational levels.

The Members of the Committee collectively possess adequate knowledge of the financial sector and, in general, the required knowledge, skills and experience to adequately discharge the Committee’s responsibilities. At least one Member, who is Independent from the audited entity, has accounting/auditing knowledge and experience and is present at the meetings regarding the approval of the Financial Statements.

In 2024, the Committee convened thirteen times and the Members’ participation rate in the meetings stood at 100% (based on the composition of the Audit Committee on 31.12.2024).

The specific duties and responsibilities of the Audit Committee are set out in its Charter, which is posted on the Company’s website (<https://www.alphaholdings.gr/en/esg-and-sustainability/advocating-sound-governance-practices/management/committees/audit-committee>).

1.2. Risk Management Committee

The Risk Management Committee has been established and operates in accordance with all applicable laws and regulations. The Members of the current Risk Management Committee were appointed by a resolution of the Board of Directors of 27.7.2023.

The Risk Management Committee comprises four Members, all of them Independent Non-Executive Members. The Chair of the Committee is an Independent Non-Executive Member of the Board of Directors with significant experience in the financial sector. The Chair of the Committee cannot simultaneously act as Chair of the Board of Directors or of any other Board Committee.

The Members of the Committee have prior experience in the financial services sector and, individually and collectively, appropriate knowledge, skills and expertise concerning risk management and control practices.

The main responsibilities of the Risk Management Committee include but are not limited to those presented below.

The Risk Management Committee:

- Assists the Board of Directors in promoting a sound risk culture at all levels throughout the Company and its Subsidiaries (the “Group”), fostering risk awareness and encouraging open communication and challenge across the Organization.
- Reviews regularly and recommends to the Board of Directors for approval the risk and capital management strategy, ensuring alignment with the business objectives of the Company and the Group.



- Reviews and recommends annually to the Board of Directors for approval the Group's Risk Appetite Framework and statement, considering also ESG risks, i.e. the risks of any negative financial impact to the Company, stemming from the current or prospective impacts of ESG factors on its counterparties, such as climate-related risks, and ensuring alignment with the Group's strategic objectives and capital allocation.
- Determines the principles which govern risk management across the Company and the Group in terms of the identification, measurement, monitoring, control and mitigation of risks.
- Ensures that the Group's strategy, budget process, capital and liquidity planning and remuneration framework are aligned with the risk appetite framework and that the Company adequately embeds Environmental, Social and Governance (ESG) risks in the overall risk appetite statement and framework, business strategy and risk management framework.
- Recommends to the Board of Directors for approval high-level policies on the management of risks.
- Evaluates on an annual basis or more frequently, if necessary, the appropriateness of risk identification and measurement systems, methodologies and models, including the capacity of the Company's IT infrastructure to record, report, aggregate and process risk-related information.
- Reviews the Annual Group's Internal Capital Adequacy Assessment Process (ICAAP) and the Internal Liquidity Adequacy Assessment Process (ILAAP) and related target ratios and recommends their approval to the Board of Directors.
- Assesses the overall effectiveness of capital planning, allocation processes and systems and the allocation of capital requirements to risk types.
- Keeps itself informed of and monitors recent regulatory developments, emerging supervisory expectations, the results of supervisory requests and the Supervisory Review and Evaluation Process (SREP) conclusions.
- Collaborates with the Corporate, Governance, Sustainability and Nominations Committee and the Audit Committee as necessary on the effective oversight of the mitigation of certain key areas of risk, including climate-related or other ESG risks, and capital management and their repercussions on the Internal Control System. The Committee also convenes jointly with the Audit Committee to discuss and review issues relevant to the remediation plans from regulatory/supervisory assessments and certain operational risk or other issues of importance and common interest.

The specific duties and responsibilities of the Risk Management Committee are set out in its Charter, which is posted on the Company's website (<https://www.alphaholdings.gr/en/esg-and-sustainability/advocating-sound-governance-practices/management/committees/risk-management-committee>).

The Committee convenes at least on a quarterly basis and may invite any Member of the Group's Management or Executive to attend its meetings. The Chief Risk Officer (CRO) is a regular attendee of the Committee meetings and has unhindered access to the Chair and the Members. The CRO, while administratively reporting to the Chief Executive Officer (CEO), shall report functionally to the Board of Directors through the Committee.

In 2024, the Committee convened fourteen times and the Members' participation rate in the meetings stood at 98% (based on the composition of the Risk Management Committee on 31.12.2024).

The specific duties and responsibilities of the Risk Management Committee are set out in its Charter, which is posted on the Company's website (<https://www.alphaholdings.gr/en/esg-and-sustainability/advocating-sound-governance-practices/management/committees/risk-management-committee>).

1.3. Remuneration Committee

The Committee has been established and operates in accordance with all applicable laws and regulations. The Members of the current Remuneration Committee were appointed by a resolution of the Board of Directors of 27.7.2023.

The Remuneration Committee comprises four Members, out of whom three are Independent Non-Executive Members. The Chair of the Committee is an Independent Non-Executive Member of the Board of Directors.

The Members of the Committee collectively have appropriate knowledge, skills and professional experience concerning remuneration policies and practices, risk management and control activities, as well as concerning the incentives and risks that can arise therefrom. At least one Member has sufficient professional experience in risk management.

The main responsibilities of the Remuneration Committee include but are not limited to those presented below.

The Remuneration Committee:

- Assists the Board of Directors in ensuring that the Group Remuneration Policy as well as the "Remuneration Policy of the Members of the Board of Directors as per the provisions of Law 4548/2018" are consistent with the values, culture, business strategy, risk appetite and strategic objectives of the Company and its Subsidiaries (the "Group"), taking into account Environmental, Social and Governance (ESG) risks that affect the business environment in the short, medium or long term.
- Is responsible for the preparation of decisions on remuneration to be taken by the Non-Executive Members, in particular regarding the remuneration of the Executive Members of the Board of Directors as well as of other identified Staff (i.e. Staff whose professional activities have a material impact on the Institutions' risk profile).
- Provides its support and advice to the Non-Executive Members of the Board of Directors on the design of the Remuneration Policies for the Company and the Group, including that such remuneration policies are gender-neutral according to the relevant legislative and regulatory provisions, support the equal treatment of Staff, promote inclusiveness and respect diversity in general.
- Recommends to the Non-Executive Members the remuneration of the Members of the Board of Directors on a regular basis.
- Reviews and advises on fixed salaries, benefits and total remuneration within the Company on a regular basis.
- Reviews the variable remuneration framework. Recommends to the Board of Directors for approval variable remuneration schemes for Employees across the Company and the Group and proposes the total envelope for variable remuneration across the Company and the Group.

- Reviews the performance of the Executive Members of the Board of Directors (the “Executive Members”), the Chiefs – Members of the Executive Committee and the Key Function Holders (the “KFHs”) of the Company based on the input that it receives from the evaluators, in accordance with the provisions of the “Policy for the Evaluation of Senior Executives and Key Function Holders”.
- Validates the Evaluation Scorecards and the goals of the Executive Members, the Chiefs – Members of Executive Committee and the KFHs.
- Ensures that adequate policies and processes for the regular performance evaluation of Senior Executives and Key Function Holders of the Company and of the Group Staff are in place, adequately implemented and in alignment with the Remuneration Policy and the Human Resources policies and processes (including staff succession planning and talent management systems).

The Chair of the Remuneration Committee regularly informs the Board of Directors of the work of the Committee. The Chair also submits to the Board of Directors a formal annual report on the work of the Committee conducted during the previous year, parts of which are included in the Company’s annual Corporate Governance Statement.

The Committee convenes at least on a quarterly basis and may invite any Member of the Management or Executive to attend its meetings. The Chief Human Resources Officer is a regular attendee of the Committee meetings.

In 2024, the Committee convened eleven times and the Members’ participation rate in the meetings stood at 95% (based on the composition of the Remuneration Committee on 31.12.2024).

The specific duties and responsibilities of the Remuneration Committee are set out in its Charter, which is posted on the Company’s website (<https://www.alphaholdings.gr/en/esg-and-sustainability/advocating-sound-governance-practices/management/committees/remuneration-committee>).

1.4. Corporate Governance, Sustainability and Nominations Committee

The Committee has been established and operates in accordance with all applicable laws and regulations. The Members of the current Corporate Governance, Sustainability and Nominations Committee were appointed by a resolution of the Board of Directors of 27.7.2023.

The Corporate Governance, Sustainability and Nominations Committee comprises four Members, out of whom three are Independent Non-Executive Members. The Chair of the Committee is an Independent Non-Executive Member of the Board of Directors.

The Committee ensures and regularly evaluates that its Members collectively possess the required knowledge, skills and experience relating to sustainability and ESG issues as well as to the business of the Company to assess the appropriate composition of the Board of Directors and, among others, the selection process and the suitability requirements to adequately discharge the Committee’s responsibilities.

The main responsibilities of the Corporate Governance, Sustainability and Nominations Committee include but are not limited to those presented below.

The Corporate Governance, Sustainability and Nominations Committee:



- Is regularly informed of current trends and developments in the area of corporate governance, including best practice and relevant regulations.
- Monitors the compliance of the Company and the Group with the pertinent Hellenic Corporate Governance Code, to which the Company adheres, ensuring appropriate application of the “comply or explain” principle required; provides oversight that the implementation of this principle aligns with the legislation in force, the regulatory expectations and the international corporate governance best practice.
- Reviews the Company’s Internal Governance Regulation and recommends its approval by the Board of Directors.
- Facilitates the regular review of the Charters of the Board Committees, in consultation with the relevant Committees, by providing input to each Committee in order to ensure that the Charters remain fit-for-purpose and align with the Hellenic Corporate Governance Code as well as with corporate governance best practices.
- Reviews, at least semi-annually, current and emerging ESG trends and regulatory developments reporting that may significantly affect the Company’s activities recommending to the Board of Directors areas that may require actions.
- Oversees the process of ESG strategy and targets update by the Board of Directors as well as the development and implementation of the Company’s ESG and Sustainability policies.
- Reviews the sustainability reporting to Stakeholders as well as the respective communication and ratings, in coordination with the Audit Committee.
- Acts as the ultimate liaison between the Board Committees and the Board, ensuring proper coordination with respect to all sustainability/ESG issues and promotes respective communications and feedback from all the Board of Directors Committees.
- Assists the Board of Directors in establishing the conditions required for effective succession and continuity in the Board of Directors.
- Develops and regularly reviews the selection criteria and the appointment process for the Members of the Board of Directors.
- Identifies and recommends for approval by the Board of Directors candidates to fill vacancies, according to the Suitability and Nomination Policy for the Members of the Board of Directors, evaluates the balance of knowledge, skills, diversity and experience of the Board of Directors, prepares a description of the roles and capabilities for a particular appointment and assesses the time commitment expected.
- Assesses periodically, and at least annually, the structure, size, composition and performance of the Board of Directors and makes recommendations to the Board of Directors with regard to any changes.
- Assesses periodically, and at least annually, the knowledge, skills and experience of each Member of the Board of Directors and of the Board of Directors collectively and reports to the Board of Directors accordingly.
- Oversees the design and implementation of the induction program for the new Members of the Board of Directors as well as the ongoing knowledge and skills development for the Members, which support the effective discharge of their responsibilities.

The Chair of the Corporate Governance, Sustainability and Nominations Committee regularly informs the Board of Directors of the work of the Committee. The Chair also submits to the Board of Directors a formal annual report on the work of the Committee conducted during the previous year, parts of which are included in the Company’s annual Corporate Governance Statement.

The Committee convenes at least on a quarterly basis and may invite any Member of the Management or Executive to attend its meetings.

In 2024, the Committee convened fourteen times and the Members' participation rate in the meetings stood at 97% (based on the composition of the Corporate Governance, Sustainability and Nominations Committee on 31.12.2024).

The specific duties and responsibilities of the Corporate Governance, Sustainability and Nominations Committee are set out in its Charter, which is posted on the Company's website (<https://www.alphaholdings.gr/en/esg-and-sustainability/advocating-sound-governance-practices/management/committees/corporate-governance-sustainability-nominations-committee>).

2. Composition of the Board of Directors and the Committee Membership for the year 2024

Board of Directors	Gender	Age	Tenure (in years)	Term ends	Shares owned 31.12.2024		Committees				
					Number of shares	% of the share capital	Audit	Risk Management	Remuneration	Corporate Governance, Sustainability and Nominations	
Chair (Non-Executive Member)											
Vasileios T. Rapanos	M	77	10	2026	0	0	-	-	-	-	
Executive Members											
Vassilios E. Psaltis	CEO	M	56	6	2026	542,424	0.023	-	-	-	-
Spyros N. Filaretos	Chief of Growth and Innovation	M	66	19	2026	377,012	0.016	-	-	-	-
Non-Executive Members											
Efthimios O. Vidalis	M	70	10	2026	0	0	-	-	M	M	
Johannes Herman Frederik G. Umbgrove	M	63	6	2026	0	0	M	M (until 6.3.2024)	M	M	
Independent Non-Executive Members											
Elli M. Andriopoulou	F	49	2	2026	0	0	M	-	-	M	
Aspasia F. Palimeri	F	51	2	2026	0	0	-	M	M	-	
Panagiotis I.-K. Papazoglou	M	65	1	2026	24,050	0.001	C (as of 24.7.2024) M (until 24.7.2024)	-	M	-	
Dimitris C. Tsitsiragos	M	61	4	2026	0	0	-	M (until 31.12.2024)	C	-	
Jean L. Cheval	M	75	6	2026	0	0	M	C	-	-	

Carolyn G. Dittmeier (until 30.9.2024)	F	69	7	2026	-	-	M <i>(as of 24.7.2024 until 30.9.2024)</i> C <i>(until 24.7.2024)</i>	-	-	M <i>In charge of overseeing ESG issues</i> (until 30.9.2024)
Elanor R. Hardwick	F	51	4	2026	0	0	-	M	-	C
Diony C. Lebot	F	62	1	2026	0	0	-	M <i>NPL Expert</i>	-	M
C: Chair M: Member -: The Member does not participate in this Committee										

3. Description of the Diversity Policy applied to the Members of the Board of Directors and Employees

The Diversity Policy is a document of Alpha Services and Holdings S.A. which outlines our principles and approach towards achieving diversity within both our Board of Directors and our Employees. We are committed to adhering to the legislative and regulatory frameworks currently in force, including the Joint ESMA/EBA "Guidelines on the assessment of the suitability of members of the management body and key function holders," as well as embracing European best practices in corporate governance.

In essence, diversity at Alpha Services and Holdings S.A. is defined as the presence of sufficiently varied characteristics among the Members of the Board of Directors and our Employees. This includes factors such as age, gender, geographical provenance as well as educational and professional background. Our goal is to ensure that these differences are significant enough to foster a variety of perspectives and views¹ within the Board of Directors and among our Employees.

By promoting diversity, we aim to create a more inclusive and dynamic environment that values and leverages the unique contributions of each individual. This, in turn, enhances our decision-making processes and ultimately drives our success as an organization.

While the diversity of the Board of Directors is not a criterion for assessing the Members' individual suitability, it is a vital factor when selecting and evaluating Members of the Board. A diverse Board of Directors brings a broader range of experiences, knowledge, skills, and values, which enhances its overall functioning and effectively addresses the phenomenon of "groupthink." By fostering a more diverse Board, we can encourage independent opinions and constructive challenges during the decision-making process.

The Policy applies not only to the selection procedures for the Board Members but also to the appointment of our Senior Management and Employees. The key objectives of this Policy are to support and promote diversity across all levels of our organization. We aim to engage a wide array of qualities and competencies when recruiting Board Members and Employees, ensuring a variety of views and experiences. This approach facilitates independent opinions and sound decision-making within the Board of Directors.

Additionally, we are committed to ensuring appropriate gender representation within the Board of Directors and respecting the principle of equal opportunities during the selection process. This commitment extends to our Employees, guaranteeing equal treatment and opportunities for individuals of all genders.

The objectives of our Policy are first and foremost to support and promote diversity within our Board of Directors and Employees. This means engaging a broad set of qualities and competencies when recruiting. By doing so, we aim to achieve a variety of views and experiences, which we believe are crucial for facilitating independent opinions and sound decision-making within the Board.

Moreover, we strive to ensure appropriate representation of all genders within the Board of Directors. This principle of equal opportunities is paramount when selecting Board Members. Similarly, we are dedicated to ensuring equal treatment and opportunities for Employees of different genders.

Additionally, when setting diversity objectives, the Company considers diversity benchmarking results published by competent authorities, such as the European Banking Authority (EBA) or other relevant international bodies or organizations. This helps us align our goals with best practices and standards in the industry.

Our Policy is approved by the Board of Directors and undergoes a review every two years by the Corporate Governance, Sustainability and Nominations Committee (CGSNC). The CGSNC may propose relevant amendments to the Board of Directors, as necessary.

3.1. Board of Directors

The Company embraces the benefits of having a diverse Board of Directors. It recognizes that diversity can help achieve maximum team performance and effectiveness, enhance innovation and creativity, and promote critical thinking and team cooperation within the Board. In this context, a diversified Board of Directors fosters constructive challenge and discussion on the basis of different points of view, while also contributing to the improvement of decision-making regarding strategies and risk-taking by encompassing a broader range of views, opinions, experience, perception, values and backgrounds, thus reducing the phenomena of “groupthink” and “herd behavior”.

A truly diversified Board of Directors allows and makes good use of differences in skills, regional and industry experience, background, abilities, qualifications, professional training, gender and other distinctions between the Members. Pursuant to the Suitability and Nomination Policy for the Members of the Board of Directors of the Company, all Board appointments, including the succession planning, are made in accordance with legal and regulatory requirements, ensuring an optimal balance, among others, of skills, experience, knowledge independence and high ethical standards, without any discriminations based on sex, race, color, ethnic or social origin, religion or belief, property, birth, disability, sexual orientation, gender, age, geographical provenance and/or educational and professional background.

The above suitability and differentiation parameters should be taken into consideration in determining the best possible composition of the Board of Directors and, when possible, should be balanced appropriately.

At least the following diversity aspects shall be taken into consideration for all Board appointments, without prejudice to the legislative and regulatory framework and to the Suitability and Nomination Policy for the Members of the Board of Directors of the Company:

- **Educational and professional background, skills and knowledge as well as experience in order to facilitate productive challenge and independent thinking**, in accordance with the Suitability and Nomination Policy for the Members of the Board of Directors.
- **Gender:** taking into consideration that different typical attitudes and behaviors can be observed in persons of different genders.
- **Age:** considering that the time period in which a person has grown up influences his/her values, behavior and risk culture.
- **Geographical provenance:** the region where a person has gained a cultural, educational or prior professional background. Diversity regarding geographical provenance ensures that the Board has a direct understanding of the culture, values, market specificities and legal framework present in the main business hubs that the Company is active in and facilitates well-informed decision-making regarding the business strategy in those business and geographical areas.

In reviewing the composition of the Board of Directors and in identifying suitable candidates for appointment, reappointment or during the succession planning, the Corporate Governance, Sustainability and Nominations Committee (the “CGSNC”) will:

- a. Consider the benefits of all aspects of diversity, including, but not limited to, those described above, in order to enable the Board of Directors to discharge its duties and responsibilities effectively.
- b. Consider candidates on the basis of merit and objective criteria pursuant to the strategic objectives of the Company, the legislative and regulatory requirements and with due consideration of diversity in the Board of Directors.

According to the legal and regulatory framework, as described in the “Suitability and Nomination Policy for the Members of the Board of Directors”, the CGSNC assesses or re-assesses on an ongoing basis, and at least annually, on the basis of the “Suitability and Nomination Process for the Members of the Board of Directors”, the collective and individual suitability of the Members of the Board of Directors. As part of this annual evaluation of the effectiveness of the Board of Directors and its Committees, the CGSNC will consider the adequate balance of all aspects of suitability and diversity, including, but not limited to, those described above.

The CGSNC will discuss and agree annually upon all measurable objectives for achieving diversity in the Board of Directors. In the event that any diversity objectives or targets have not been met, the CGSNC shall explain the relevant reasons and the measures to be taken, in order to ensure that the diversity objectives and targets will be met.

The CGSNC reviews and monitors regularly the effectiveness of the Policy and makes relevant recommendations to the Board of Directors. Furthermore, it reviews regularly the proportion of women who are employed by the Company as a whole, in senior management positions and in the Board of Directors.

According to the Diversity Policy, the Board of Directors' actual target is that the percentage of the less represented gender in the Board would reach at least 30% in the next three years, while always considering industry trends and best practices. In light of the above, the Board of Directors' target has been achieved, i.e. at a percentage of 38.5%.

All the candidates for the Board of Directors shall be assessed on the basis of the same criteria, irrespective of gender, since the eligible Members for the Board of Directors must fulfil all the conditions set in relation to their qualifications. In this context, all genders shall have equal opportunities to be nominated under the condition that they fulfil all the other prerequisites in accordance with the Suitability and Nomination Policy for the Members of the Board of Directors of the Company. The Company shall not nominate Members to the Board of Directors with the sole purpose of increasing diversity to the detriment of the functioning and suitability of the Board of Directors collectively or at the expense of the suitability of individual Members of the Board of Directors.

3.2. Employees

The provision of equal opportunities for employment and career advancement to all its Employees is not simply a statutory requirement for the Company, but a fundamental cornerstone of its Human Resources Strategy. Consequently, this principle is integrated into the Company's Human Resources management procedures and practices, with the Company ensuring their implementation in every country in which it operates.

When setting diversity objectives, the Company considers diversity benchmarking results, published by competent authorities, the EBA or other relevant international bodies or organizations.

In its commitment to translating gender equality into practice and addressing the underrepresentation of women in leadership roles, a common challenge in the Greek labor market, the Company has implemented a range of measures to support Employees in balancing their professional and personal lives. This initiative also promotes fair treatment and merit-based career advancement, ensuring equal opportunities for the advancement of female Employees. Furthermore, a variety of training, coaching and mentoring programs have been established to foster gender equality. The Company is also dedicated to achieving gender diversity within its Senior Management, reflecting the diversity of its broader workforce.

The Company applies uniform, gender-neutral Remuneration as well as Benefits and Corporate Expenses Policies to all categories of Employees. It respects and defends the diversity of all Employees in general, promoting inclusiveness and equal treatment.

The Company cultivates a work environment free of discrimination and harassment, recognizing and valuing the contribution and worth of each Employee. It guarantees high-quality working conditions and advancement opportunities that are grounded in merit ensuring fairness and equality across all levels of the Organization. The Company offers fair remuneration, based on contracts that align with the conditions of the corresponding national labor market, ensuring compliance with applicable national regulations, including those related to minimum wage, working hours and the provision of leave. In order to monitor and minimize diversity gaps, the Company reviews relevant data on an annual basis and implements corrective measures to narrow gaps, where these exist.

The Company defends human rights and opposes all forms of child, forced or compulsory labor. It respects employee rights and is committed to safeguarding them fully, in accordance with the national and the European Union Law and the Conventions of the International Labour Organization.

(data for Alpha Services and Holdings S.A. and Alpha Bank S.A.)

Employees in management positions * as of 31.12.2024 (data for Alpha Services and Holdings S.A. and Alpha Bank S.A.)

	Age Breakdown as of 31.12.2024				
Gender	26-40	41-50	51+	Total	Percentage
Male	20	174	183	377	58%
Female	18	110	145	273	42%
Total	38	284	328	650	100%
Percentage	6%	44%	50%	100%	

Educational level	Breakdown as of 31.12.2024	Percentage
Postgraduate Studies (Master's, PhD)	376	58%
Tertiary Education (graduates of Universities or Technological Education Institutes)	165	25%
High School (Lyceum) graduates	109	17%
Total	650	100%

*Management positions are defined as the positions from the level of Branch Manager and above.

** A VSS program was implemented in 2024.

The percentage and the number of Employees in managerial positions per educational level indicate that Employees in managerial positions holding postgraduate degrees represent in 2024 the highest percentage, i.e. 58%.

To enhance the soft skills of Employees with managerial duties and promote continuous training, the Company has invested in various training channels and initiatives. Continuous learning is ensured through specialized leadership journeys and learning paths on the Company's online platform, as well as soft skills training via ACE Academies' webinars and eLearnings. In 2024, Alpha Bank launched additional programs for managerial employees as part of the Leadership Academy. The "Unconscious Bias" Training is aimed at the Bank's Directors and Managers, helping them recognize and understand unconscious biases, and mitigate biases, fostering fairness and respect. The "Leading for Impact" program is an advanced Leadership Development initiative, specifically designed for the Senior Leadership Team, enhancing leadership skills through interactive workshops, practical experimentation, peer learning, and coaching sessions. Lastly, within the context of Digital Certification, a tailor-made initiative for Alpha Bank retail network designed in cooperation with the National Technical University of Athens (NTUA), Branch Managers were exposed to a hands-on training in digital skills, leading to certification by the NTUA.

18.2 Appendix II - CVs of the Members of the Board of Directors

The CVs of the Members of the Board of Directors are presented below and are also available on the Company's [website](#).



Dimitris C. Tsitsiragos
Independent Non-Executive Member

Chair of the Board of Directors since 1.1.2025

Nationality: Greek
Born in Athens, Greece, in 1963.

Membership of Board Committees: Member of the Remuneration Committee as of 27.2.2025

Experience: He worked for 28 years at the International Finance Corporation (IFC) – World Bank Group. He held progressive positions in the Oil, Gas and Mining and in the Central and Eastern Europe Departments, including the positions of Manager, Oil and Gas and Manager, Manufacturing and Services, based in Washington, D.C., USA (1989-2002). Furthermore, he held director positions for South Asia (New Delhi, India), Global Manufacturing and Services (Washington, D.C.) and Middle East, North Africa (Cairo, Egypt) and Southern Europe, overseeing IFC's global and regional investment operations (2002-2011). In 2011, he was promoted to Vice President, EMENA region (Istanbul, Turkey) and in 2014 he was appointed Vice President Investments/Operations (Istanbul/Washington). He served as a Senior Advisor, Emerging Markets at Pacific Investment Management Company (PIMCO) in London, UK (2018-2022). He previously served as a non-executive independent Board Member at the Infrastructure Development Finance Company (IDFC), India and at the Commercial Bank of Ceylon (CBC), Sri Lanka. He has been a Member of the Board of Directors since July 2020.

Other positions of note: He is a member of the Board of Directors of Titan Cement International.

Education: BA in Economics, Rutgers University, USA, MBA, George Washington University, USA, World Bank Group Executive Development Program, Harvard Business School, USA.



Vasileios T. Rapanos

Non-Executive Member

Chair of the Board of Directors from May 2014 to 31.12.2024

Nationality: Greek

Born in Kos, Greece, in 1947.

Experience: He was Deputy Governor and Governor of the Mortgage Bank (1995-1998), Chairman of the Board of Directors of the Hellenic Telecommunications Organization (1998-2000), Chairman of the Council of Economic Advisors at the Ministry of Economy and Finance (2000-2004), member of the Board of Directors of the Public Debt Management Agency (PDMA) (2000-2004) as well as Chairman of the Board of Directors of the National Bank of Greece and of the Hellenic Bank Association (2009-2012). In October 2021 he was re-elected as Chair of the Board of Directors of the Hellenic Bank Association, a position he retained until November 2023.

Other positions of note: He is Professor Emeritus at the Faculty of Economics of the University of Athens and has been an Ordinary Member of the Academy of Athens since 2016. Moreover, he is currently a member of the Board of Directors of the Foundation for Economic & Industrial Research (IOBE), a member of the Board of Directors of the Biomedical Research Foundation Academy of Athens (BRFAA) and Chair of the Board of Directors of the Alpha Bank Cultural Foundation.

Education: B.A., Athens School of Economics and Business (1975), Master's in Economics, Lakehead University, Canada (1977), PhD, Queen's University, Canada.



CEO
Vassilios E. Psaltis
Executive Member

Member of the Board of Directors since November 2018 and Chief Executive Officer since January 2019

Nationality: Greek

Born in Athens, Greece, in 1968.

Experience and contribution:

Vassilios E. Psaltis is the CEO and an Executive Member of the Board of Directors of Alpha Services and Holdings and Alpha Bank. In his capacity as a Board Member since November 2018, and CEO since January 2019, he actively contributes to implementing Alpha Bank's strategic plan. In 2023 he promoted a multilevel milestone deal with UniCredit. This strategic partnership has unlocked the profitability potential of Alpha Bank's international business, while creating upside potential for the rest of the Group. With over 25 years of experience in the banking industry, he has been appointed to key positions at Alpha Bank since 2007. Through these posts he has significantly reinforced the position of Alpha Bank. He spearheaded capital raisings from foreign institutional shareholders, diversifying the Bank's shareholder base, as well as significant mergers and acquisitions that contributed to the consolidation of the Greek banking system.

On top of his duties at Alpha Bank, he has also been serving as a Member of the Board of Directors and the Executive Committee of the Hellenic Federation of Enterprises (SEV) since July 2021 and as a Member of the Board of Directors of the Hellenic Bank Association (HBA) since October 2021. In 2019 he was appointed member of the Institut International d' Études Bancaires (IIEB).

He holds a PhD and MA in Business and Banking from the University of St.Gallen, Switzerland.

Current and past appointments:

- CEO, Alpha Bank (2019 - today)
- General Manager, Alpha Bank (2012-2018)
- Group Chief Financial Officer (CFO), Alpha Bank (2010-2018)
- Senior Manager, Corporate Planning and Controlling, Alpha Bank (2007-2010)
- Deputy (acting) Chief Financial Officer, Emporiki Bank (2002-2006)
- Senior management positions, ABN AMRO Bank's Financial Institutions Group, London (1999-2001)



Lazaros A. Papagaryfallou
Executive Member
Deputy CEO (since 23.7.2024)

Member of the Board of Directors since 27.2.2025

Nationality: Greek

Born in Athens, Greece, in 1971.

Experience: He started his career in Citibank and ABN AMRO, and he joined Alpha Bank in 1998, having served as Manager of the Corporate Development, International Network and Strategic Planning Divisions. On 1.7.2013 he was appointed Executive General Manager of the Bank and has contributed to the implementation of the Group's Restructuring Plan, the capital strengthening of the Bank, the design and closing of mergers, acquisitions and portfolio transactions. During his career he served as Chairman and Member in the Boards of Directors of various Group Companies, both in Greece and abroad, in the banking, insurance, financial services, industry and real estate sectors.

Other positions of note: On 2.1.2019 he was appointed Chief Financial Officer (CFO) for the Group. On 23.7.2024 he was appointed Deputy CEO.

Education: Business Administration at the Athens University of Economics and Business and holds an MBA in Finance from the University of Wales, Cardiff Business School.



Spyros N. Filaretos
Executive Member

Member of the Board of Directors from 2005 until 27.02.2025

Nationality: Greek

Born in Athens, Greece, in 1958.

Experience: In 1985, he joined Alpha Bank, where he held key positions at different branches and Divisions (Organization, Human Resources and Treasury Management). He was appointed Executive General Manager in 1997 and General Manager in 2005. From October 2009 to November 2020, he served as Chief Operating Officer (COO). In December 2020, he was appointed Chief of Growth and Innovation.

Other positions of note: He is a Member of the Boards of Directors of Alpha Bank London Ltd and the Alpha Bank Cultural Foundation as well as Chair of the Board of Directors of Efstathia J. Costopoulos Foundation. Moreover, he is a Member of the Executive Committee.

Education: BA in Economics, University of Manchester, and MPhil in Development Economics and International Development, University of Sussex



Efthimios O. Vidalis
Non-Executive Member

Member of the Board of Directors from May 2014 until 27.2.2025

Membership of Board Committees: Member of the Remuneration Committee and of the Corporate Governance, Sustainability and Nominations Committee

Nationality: Greek
Born in Washington, USA, in 1954.

Experience: He held several leadership positions for almost 20 years at Owens Corning, where he served as President of the Global Composites and Insulation Business Units. He joined S&B Industrial Minerals S.A. in 1998 as Chief Operating Officer (1998-2001), became the first non-family Chief Executive Officer (2001-2011) and served on the Board of Directors for 15 years. He was a member of the Board of Directors of Future Pipe Industries (Dubai, U.A.E.) from 2008 to 2019 and of Fairfield-Maxwell Ltd (USA) from 2018 to 2023. He was Chairman of the Board of Directors of the Greek Mining Enterprises Association (2005-2009) and member of the Board of Directors of the Hellenic Federation of Enterprises (SEV) from 2006 to 2016, where he served as Vice Chairman (2010-2014) and as Secretary General (2014-2016). He is the founder of the SEV Business Council for Sustainable Development and was the Chairman thereof from 2008 to 2016. Furthermore, he was President of the Executive Committee of SEV from 2020 to 2024.

Other positions of note: He is a non-executive member of the Board of Directors of Titan Cement Company S.A. and an independent non-executive member of Eurolife FFH Insurance Group Holdings S.A.

Education: BA in Government, Harvard University, MBA, Harvard Graduate School of Business Administration, USA



Annalisa Areni
Non-Executive Member

Member of the Board of Directors since 27.2.2025

Nationality: Italian
Born in 1967.

Experience: She has more than 30 years of experience in the banking and financial sector. Starting from 1994, she held progressive positions at Credito Italiano SpA, including the role of Head of Personal Banking Segment in Lombardy Region (January 2000- September 2002). Since September 2002, she has been working at UniCredit SpA, where she has held various management positions, including the positions of Market Manager – Milano Cordusio (September 2002 – September 2008), Regional Co-Director – East Lombardy (September 2008 – October 2010), Head of Customer Satisfaction – Lombardy Region (November 2010 – December 2012), Area Manager – East Milan (January 2013 – December 2015), Area Manager – Brescia and Province (January 2016 – December 2016), Head of Retail – Lombardy Region (December 2016 – June 2019) and Regional Manager of Southern Italy (June 2019 – September 2022)]. Furthermore, she was a member of the Board of Directors of CNP Vita SpA (until June 2024).

Other positions of note: Since September 2022, she has been serving as Head of Client Strategies (Italy) at UniCredit SpA and she has been a member of the National Council of Banking Association in Italy (ABI).

Education: Degree in Business and Economics and a master's degree in Banking and Financial Communication from Università Cattolica del Sacro Cuore (Milan). Additionally, she attended the Business Leaders for Transform and Lead Change Programme at IMD Business School – International Institute for Management Development (Lausanne).



Elli M. Andriopoulou
Independent Non-Executive Member

Member of the Board of Directors since January 2022

Membership of Board Committees: Member of the Audit Committee and of the Corporate Governance, Sustainability and Nominations Committee

Nationality: Greek
Born in Athens, Greece, in 1975.

Experience: She commenced her career at Citibank NA (Athens, Greece) (1996-1999) and then worked as a consultant (2000-2003) at Mercer Management Consulting (currently Oliver Wyman), (USA). Afterwards, she re-joined Citibank International Plc (Athens, Greece) (2004-2012), where she held various positions, including those of Sales Development Manager, Branch Expansion Project Manager, Strategy and Development Manager, Customer Interaction Unit Head, Customer Advocacy and Segment Management Head as well as Marketing Director. Subsequently, she served as Co-Chief Operating Officer (2013) at the Stavros Niarchos Foundation, as Chief Operating Officer (2014-2015) of the Stavros Niarchos Foundation Cultural Center (SNFCC) and as SNFCC Grant Manager (2016-2020).

Other positions of note: Since 2020, she has been Chairwoman and Managing Director of the SNFCC.

Education: BA in Psychology, American College of Greece (Deree College), MBA, Kellogg School of Management, Northwestern University, USA



Aspasia F. Palimeri
Independent Non-Executive Member

Member of the Board of Directors since July 2022

Membership of Board Committees: Chair of the Remuneration Committee as of 27.2.2025 and Member of the Risk Management Committee

Nationality: Greek
Born in Athens, Greece, in 1973.

Experience: She commenced her career at Citibank NA (Athens, Greece) (1995-1996) and Eurobank Cards S.A. (Athens, Greece) (1996-1998). After acquiring her MBA, she joined McKinsey & Company (Athens, Greece), where she worked as an Associate Consultant (2000-2001) and as a Junior Engagement Manager (2001-2002), supporting strategic projects for leading Greek banks and corporates. Subsequently, she re-joined Eurobank Cards S.A. as the Group Product Manager for Loans (2002-2005) and as the company's Marketing Manager (2005-2010). She also served as the Cards Business Manager at Marfin Egnatia Bank (Athens, Greece) (2010-2013) and as the Deposit and Investment Products Senior Director at Piraeus Bank (Athens, Greece) (2013-2016). From 2016 to May 2022, she was the Country Manager for Greece, Cyprus and Malta at Mastercard, being responsible for the market share growth and the strategic development of these markets.

Other positions of note: Since 2021, she has been a member of the Board of Directors of the Foundation for Economic & Industrial Research (IOBE).

Education: BA in Accounting and Finance, American College of Greece (Deree College) (1995), MBA in Finance and Marketing, Columbia Business School, New York, USA (2000)



Panagiotis I.-K. Papazoglou
Independent Non-Executive Member

Member of the Board of Directors since July 2023

Membership of Board Committees: Chair of the Audit Committee and Member of the Remuneration Committee

Nationality: Greek

Born in Athens, Greece, in 1959.

Experience: He commenced his career in 1988 at Ernst & Whinney (which was renamed Ernst & Young in 1991), where he was a Partner from 2000 to 2022. He acted as the Engagement (signing) Partner in a number of large Group audits, and the audit of a number of large shipping groups, preparing them for listing on the US and the UK stock markets (2000-2005). He served as Country Managing Partner, Head of Assurance at EY Bulgaria, Sofia (2005-2007) and as Head of Assurance at EY Romania, Bucharest (2008-2010), where he led a number of major assurance and advisory audit projects for international clients. Furthermore, he served as Managing Partner of EY (Ernst & Young) Greece and Southeastern Europe (Greece, Romania, Bulgaria, Cyprus, Albania, Malta, Kosovo, FYROM, Moldova) from June 2010 to December 31, 2022 and from January 2015 to December 2021, he was the Accounts Leader for Central, Eastern and Southeastern Europe and Central Asia. He was a Senior Advisor to EY Greece, retiring from EY on June 22, 2023. He was a Certified Auditor in Greece and in Romania. He was a member of the Supervisory Council of the Institute of Certified Public Accountants of Greece and until June 2023, he was a member of the Board of Directors of the American-Hellenic Chamber of Commerce.

Other positions of note: He is the Vice-Chair and a member of the Executive Committee of the Foundation for Economic and Industrial Research (IOBE) as well as Vice-Chair of the Citizens' Movement for an Open Society. He is also an Independent Non-Executive Member of the Audit Committee (not a Board of Directors Member) of the Helleniq Energy.

Education: BSc in Economics and MA in Economic Theory and Policy, Athens University of Economics and Business, Greece, MBA in Finance and Management, University of Aston, Birmingham, UK, EY Journey to the Boardroom program, Harvard Business Publishing (2022).



Jean L. Cheval
Independent Non-Executive Member

Member of the Board of Directors since June 2018

Membership of Board Committees: Chair of the Risk Management Committee and Member of the Audit Committee

Nationality: French

Born in Vannes, France, in 1949.

Experience: After starting his career at BIPE (Bureau d'Information et de Prévisions Économiques), he served in the French public sector (1978-1983) and then worked at Banque Indosuez-Crédit Agricole (1983-2001), wherein he held various senior management positions, including the positions of Chief Economist, Head of Corporate Planning and Head of Asset-based Finance and subsequently he became General Manager. He served as Chairman and CEO of the Banque Audi France (2002-2005) as well as Chairman of the Banque Audi Suisse (2002-2004). Furthermore, he served as Head of France at the Bank of Scotland (2005-2009). Between 2009 and 2017, he worked at Natixis in various senior management positions, such as Head of the Structured Asset Finance Department and Head of Finance and Risk, second "Dirigeant effectif" of the company alongside the CEO (2012-2017). As of 2017 and until April 2022, he served as Senior Advisor of Natixis' CEO, while chairing the Credit Risk Committee and supervising the main restructuring operations (impaired assets).

Other positions of note: He is currently a member of the Board of Directors and a member of the Audit and Risk Committee of EFG-Hermès, Egypt, a member of the Board of Directors of Natixis Algérie and Chairman of the Natixis Foundation for Research and Innovation.

Education: Engineering, École Centrale des Arts et Manufactures, DES (Diplôme d'Études Spécialisées) in Economics (1974), University of Paris I, France, DEA (Diplôme d' Études Approfondies) in Statistics and in Applied Mathematics, University of Paris VI, France



Carolyn G. Dittmeier
Independent Non-Executive Member

Member of the Board of Directors from January 2017 to September 2024

Nationality: Italian and American
Born in Salem, Massachusetts, USA, in 1956.

Experience: She commenced her career in the US at the auditing and consulting firm Peat Marwick & Mitchell (now KPMG), where she reached the position of Audit Manager. Subsequently, following her transfer to Italy, she assumed managerial responsibilities in the Montedison Group as Financial Controller and later as Head of Internal Audit. In 1999, as associate partner, she successfully, launched the practice of corporate governance services in KPMG Italy. Subsequently, she took on the role of Chief Internal Audit Executive of the Poste Italiane Group (2002-2014). She has carried out various professional and academic activities focusing on risk and control governance and has written two books. She was Vice Chair (2013-2014) and Director of the Institute of Internal Auditors (2007-2014), Chair of the European Confederation of Institutes of Internal Auditing (2011-2012) and Chair of the Italian Association of Internal Auditors (2004-2010). Commencing in 2012, she assumed roles in boards of directors, serving as Independent Director and Chair of the Risk and Control Committee of Autogrill SpA (2012-2017) as well as of Italmobiliare SpA (2014-2017). She was also Chair of the Board of Statutory Auditors of Assicurazioni Generali SpA (2014 - April 2023).

Other positions of note: She is currently a member of the Boards and/or the Audit Committees of some non-financial companies (Moncler, Illycaffè) and since May 2023 she is independent non-executive member of the Board of Directors, Chair of the Nomination Committee as well as member of the Control and Risk Committee of ENI SpA, an energy company.

Education: BSc in Economics, Wharton School, University of Pennsylvania, USA. She is a Statutory Auditor, a Certified Public Accountant (CPA), a Certified Internal Auditor (CIA) and a Certified Risk Management Assurance (CRMA) professional, focusing on the audit and risk management sectors.



Elanor R. Hardwick
Independent Non-Executive Member

Member of the Board of Directors since July 2020

Membership of Board Committees: Chair of the Corporate Governance, Sustainability and Nominations Committee and Member of the Risk Management Committee

Nationality: British
Born in the UK, in 1973.

Experience: She commenced her career in 1995 at the UK Government's Department of Trade and Industry, focusing on the Communications and Information Industries policy, and subsequently held roles as a strategy consultant with Booz Allen Hamilton's Tech, Media and Telco practice and with the Institutional Equity Division of Morgan Stanley. Since 2005, she has held various roles, including Global Head of Professional Publishing and Global Head of Strategy, Investment Advisory at Thomson Reuters (now London Stock Exchange Group). Afterwards, she joined the team founding FinTech startup Credit Benchmark, becoming its CEO (2012-2016). Then, she served as Head of Innovation at Deutsche Bank (2016-2018) and as Chief Digital Officer at UBS (2019-2020). She served as a non-executive member of the Board of Directors of Itiviti Group AB (July 2020 - May 2021) and as a member of the Supervisory Council of Luminor Group (April 2022 - October 2023).

Other positions of note: Since 2018 she has served as a non-executive member of the Board of Directors of specialty (re)insurer Axis Capital, while she is also a member of the Human Capital and Compensation Committee and of the Corporate Governance, Nominating and Social Responsibility Committee. She is an external member of the Audit Committee of the University of Cambridge as of January 2021.

Education: MA (Cantab), University of Cambridge, UK, MBA, Harvard Business School, USA



Diony C. Lebot
Independent Non-Executive Member

Member of the Board of Directors since July 2023

Membership of Board Committees: Member of the Risk Management Committee and Member of the Corporate Governance, Sustainability and Nominations Committee, NPL Expert

Nationality: French and Greek

Born in Beyrouth, Lebanon, in 1962.

Experience: In 1986 she joined Société Générale, where she has held various senior management positions such as Vice President and Director in Asset based and Project Finance (1987-1997), Head of Big Ticket leasing and Asset based Finance (1997-1998), Deputy Global Head of SG Financial Engineering (1998-2001) as well as Global Head of Asset Finance (2001-2004). She was Head of Coverage Europe (Large corporate and Institutional Clients of SGCIB) (2004-2007), before serving as CEO of SG Americas (US, Canada, Latin America), CEO of SG American Securities (2007-2012) as well as Deputy Global Head of Coverage and Investment Banking and CEO of SG Corporate and Investment Banking for Western Europe (2012-2015). Subsequently, she was the Deputy Group Chief Risk Officer (2015-2016) and the Group Chief Risk Officer (2016-2018). Since 2018 and until the 23.5.2023 she has been the Deputy Group Chief Executive Officer at Société Générale. Furthermore, she has held main Board positions over the last 10 years in Franfinance, Société Générale Bank and Trust (SGBT), Société Générale Factoring (previously CGA) and TCW (Asset Management company based in LA – California), Chair of the Board of Directors of Sogecap and of Ayvens (former ALD Automotive). Until 3 March 2025, she served as a non-executive member of the Board of Directors of Ayvens (former ALD Automotive).

Other positions of note: Since 24.5.2023 she is senior advisor to the CEO of Société Générale. She is a Non-Executive Member of the Board of Directors and Chair of the Audit Committee of EQT AB. She is an Independent Non-Executive Director of Barclays PLC since 17 March 2025.

Education: MA in Management from Pantheon-Sorbonne University, France, MSc in Finance and Taxation from University of Paris, France



Johannes Herman Frederik G. Umbgrove

Non-Executive Member

Member of the Board of Directors since April 2018

Membership of Board Committees: Member of the Audit Committee, of the Remuneration Committee and of the Corporate Governance, Sustainability and Nominations Committee. Member of the Risk Management Committee until 6.3.2024

Nationality: Dutch

Born in Vught, the Netherlands, in 1961.

Experience: He worked at ABN AMRO Bank N.V. (1986-2008), wherein he held various senior management positions throughout his career. He served as Chief Credit Officer Central and Eastern Europe, Middle East and Africa (CEEMEA) of the Global Markets Division at The Royal Bank of Scotland Group (2008-2010) and as Chief Risk Officer and member of the Management Board at Amsterdam Trade Bank N.V. (2010-2013). From 2011 until 2013 he was Group Risk Officer at Alfa Bank Group Holding.

Other positions of note: He has been a member of the Supervisory Board of DHB Bank N.V. [former Demir-Halk Bank (Nederland) N.V.] since 2016 and in 2018 he became the Chairman of the Supervisory Board thereof. He is currently the Chair of the Supervisory Board, of the Nomination and Remuneration Committee as well as a member of the Risk and Audit Committee, and of the Related Party Transactions Committee of DHB Bank N.V. Furthermore, since December 2019 he has been an independent member of the Supervisory Board and as of 1.1.2022 he has been the Chairman of the Risk Committee and the Audit Committee of Lloyds Bank GmbH. Additionally, he is a director of the Parel van Baarn Foundation and a member of the Management Committee of the Aston Martin Owners Club Ltd.

Education: LL.M. in Trade Law (1985), Leiden University, MBA, INSEAD (The Business School for the World), Fontainebleau (1991), IN-BOARD Non-Executive Directors Program, INSEAD

18.3 Appendix III – Group’s subsidiaries and associates

The following tables list Alpha Bank Group’s subsidiaries and associates, according to the consolidation method followed for regulatory purposes.

Template 60: EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity) as of 31.12.2024

(Amounts in millions of Euro)

a	b	c	d	e	f	g	h
Name of the entity	Method of accounting consolidation	Method of regulatory consolidation					Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	
Alpha Bank S.A.	Full consolidation	x					Credit Institutions
ALPHA BANK LONDON LTD	Full consolidation	x					Credit Institutions
ALPHA LEASING A.E.	Full consolidation	x					Other Financial corporations other than Credit Institutions
ALPHA FINANCE A.E.P.E.Y.	Full consolidation	x					Other Financial corporations other than Credit Institutions
ALPHA ASSET MANAGEMENT A.E.D.A.K	Full consolidation	x					Other Financial corporations other than Credit Institutions
ALPHA VENTURES A.E.	Full consolidation	x					Other Financial corporations other than Credit Institutions
ALPHA ASTIKA AKINITA A.E.	Full consolidation	x					Non-Financial Corporations
ABC FACTORS A.E.	Full consolidation	x					Other Financial corporations other than Credit Institutions
ALPHA REAL ESTATES MANAGEMENT AND INVESTMENTS S.A.	Full consolidation	x					Other Financial corporations other than Credit Institutions
ALPHA BANK LONDON NOMINEES LTD	Full consolidation				x		Other Financial corporations other than Credit Institutions

ABL INDEPENDENT FINANCIAL ADVISERS LTD	Full consolidation					x		Other Financial corporations other than Credit Institutions
APE FIXED ASSETS A.E.	Full consolidation	x						Non-Financial Corporations
ALPHA GROUP INVESTMENTS LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
KAFE ALPHA A.E.	Full consolidation				x			Non-Financial Corporations
ALPHA REAL ESTATE BULGARIA E.O.O.D	Full consolidation	x						Non-Financial Corporations
ALPHA SUPPORTING SERVICES A.E	Full consolidation	x						Non-Financial Corporations
IONIAN EQUITY PARTICIPATIONS LTD.	Full consolidation	x						Other Financial corporations other than Credit Institutions
ALPHALIFE A.A.E.Z.	Full consolidation					x		Other Financial corporations other than Credit Institutions
ALPHA BANK CYPRUS LTD	Full consolidation	x						Credit Institutions
ALPHA TRUSTEES LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
ALPHA INSURANCE BROKERS S.R.L.(ROMANIA)	Full consolidation				x			Non-Financial Corporations
ALPHA VENTURES CAPITAL MANAGEMENT - AKES	Full consolidation	x						Other Financial corporations other than Credit Institutions
REAL CAR RENTAL A.E.	Full consolidation				x			Non-Financial Corporations
EPIXIRO PLC	Full consolidation	x						Other Financial corporations other than Credit Institutions
GEMINI CORE SECURITISATION DESIGNATED ACTIVITY COMPANY	Full consolidation	x						Other Financial corporations other than Credit Institutions
ALPHA LEASING ROMANIA IFN S.A.	Full consolidation	x						Other Financial corporations other than Credit Institutions



IRIDA PLC	Full consolidation	x						Other Financial corporations other than Credit Institutions
PISTI 2010-1 PLC	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI-BRE PARTICIPATIONS 1 L.T.D.	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI-RRE PARTICIPATIONS 1 L.T.D.	Full consolidation	x						Other Financial corporations other than Credit Institutions
ALPHA REAL ESTATE SERVICES S.R.L.	Full consolidation	x						Non-Financial Corporations
STOCKFORT LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
ZERELDA LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
ALPHA INVESTMENT PROPERTY ATTIKIS A.E.	Full consolidation	x						Non-Financial Corporations
AGI - RRE POSEIDON LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - RRE HERA LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
S.C. ROMFELT REAL ESTATE S.A.	Full consolidation	x						Non-Financial Corporations
EMPORIKI VENTURE CAPITAL DEVELOPED MARKETS LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
EMPORIKI VENTURE CAPITAL EMERGING MARKETS LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
EMPORIKI MANAGEMENT A.E.	Full consolidation	x						Other Financial corporations other than Credit Institutions
ALPHA HOLDINGS SINGLE MEMBER S.A	Full consolidation	x						Non-Financial Corporations
AGI - RRE POSEIDON SRL	Full consolidation	x						Non-Financial Corporations



AGI - BRE PARTICIPATIONS 2 L.T.D.	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - BRE PARTICIPATIONS 3 L.T.D.	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - BRE PARTICIPATIONS 4 L.T.D.	Full consolidation	x						Other Financial corporations other than Credit Institutions
ALPHA REAL ESTATE SERVICES LLC	Full consolidation	x						Non-Financial Corporations
AGI - RRE ARES LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - RRE ARTEMIS LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - BRE PARTICIPATIONS 5 L.T.D.	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - RRE CLEOPATRA LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - RRE HERMES LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - RRE ARSINOE LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI - SRE ARIADNI LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
SC CARMEL RESIDENTIAL SRL	Full consolidation	x						Non-Financial Corporations
AGI-CYPRE EVAGORAS LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI-CYPRE TERSEFANOUE LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI-CYPRE ERMIS LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
ASMITA GARDENS SRL	Full consolidation	x						Non-Financial Corporations



ALPHA BANK DEBT NOTIFICATION SERVICES S.A.	Full consolidation	x						<i>Non-Financial Corporations</i>
CUBIC CENTER DEVELOPMENT S.A.	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI SRE PARTICIPATIONS 1 LTD	Full consolidation	x						<i>Other Financial corporations other than Credit Institutions</i>
AGI SRE PARTICIPATIONS 1 DOO	Full consolidation	x						<i>Non-Financial Corporations</i>
ALPHA INVESTMENTS PROPERTY SPATON S.A.	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 2 LTD	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 5 LTD	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 8 LTD	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 7 LTD	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 15 LIMITED	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 17 LIMITED	Full consolidation	x						<i>Non-Financial Corporations</i>
ABC RE P2 LIMITED	Full consolidation	x						<i>Non-Financial Corporations</i>
ABC RE P3 LIMITED	Full consolidation	x						<i>Non-Financial Corporations</i>
ABC RE L2 LIMITED	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 21 LIMITED	Full consolidation	x						<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 24 LIMITED	Full consolidation	x						<i>Non-Financial Corporations</i>



AIP THESSALONIKI RESIDENTIAL ASSETS S.M.S.A.	Full consolidation	x						Non-Financial Corporations
AIP CRETAN RESIDENTIAL ASSETS S.M.S.A.	Full consolidation	x						Non-Financial Corporations
AIP AEGEAN RESIDENTIAL S.M.S.A.	Full consolidation	x						Non-Financial Corporations
AIP IONIAN RESIDENTIAL ASSETS S.M.S.A.	Full consolidation	x						Non-Financial Corporations
AIP ATTICA RETAIL ASSETS II S.M.S.A.	Full consolidation	x						Non-Financial Corporations
AIP ATTICA RESIDENTIAL ASSETS II S.M.S.A.	Full consolidation	x						Non-Financial Corporations
AIP LAND II S.M.S.A.	Full consolidation	x						Non-Financial Corporations
AGI-CYPRE PROPERTY 37 LTD	Full consolidation	x						Non-Financial Corporations
AGI-CYPRE PROPERTY 38 LTD	Full consolidation	x						Non-Financial Corporations
KRIGEO HOLDINGS LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
ALPHA CREDIT ACQUISITION COMPANY LTD	Full consolidation	x						Other Financial corporations other than Credit Institutions
AGI-CYPRE PROPERTY 40 LTD	Full consolidation	x						Non-Financial Corporations
ALPHA INTERNATIONAL HOLDINGS S.M.S.A.	Full consolidation	x						Other Financial corporations other than Credit Institutions
ABC RE RES AMMOCHOSTOS LIMITED	Full consolidation	x						Non-Financial Corporations
SAPAVA LIMITED	Full consolidation	x						Non-Financial Corporations
AGI-CYPRE PROPERTY 47 LIMITED	Full consolidation	x						Non-Financial Corporations



AGI-CYPRE PROPERTY 48 LIMITED	Full consolidation	x					<i>Non-Financial Corporations</i>
ALPHA CREDIT PROPERTY 1 LIMITED	Full consolidation	x					<i>Non-Financial Corporations</i>
ACARTA CONSTRUCT SRL	Full consolidation	x					<i>Non-Financial Corporations</i>
AGI-CYPRE PROPERTY 52 LIMITED	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
ALPHA CYP PR 56	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
ΑΕΠ ΟΙΚ ΑΤΤ ΙV	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
ΑΕΠ ΕΠΑΓΓ ΑΚΙΝΗΤΩΝ ΙΙ ΜΑΕ	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
NIGRINUS LIMITED	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
ΑΕΠ ΕΠΑΓΓΕΛΜΑΤΙΚΩΝ ΑΚΙΝΗΤΩΝ ΙΙΙ ΜΟΝΟΠΡΟΣΩΠΗ Α.Ε	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
A.G. Star Gisama Investments Ltd	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
Alpha Έρευνα Αγοράς Μ.Α.Ε.	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
ABINVEST ΙΙ Μ.Α.Ε.	Full consolidation	x					<i>Other Financial corporations other than Credit Institutions</i>
ΑΡΕ COMMERCIAL PROPERTY Α.Ε.	Equity method				x		<i>Other Financial corporations other than Credit Institutions</i>
ΑΡΕ INVESTMENT PROPERTY Α.Ε	Equity method				x		<i>Other Financial corporations other than Credit Institutions</i>
ALPHA TANEΟ Α.Κ.Ε.Σ.	Equity method				x		<i>Other Financial corporations other than Credit Institutions</i>



Rosequeens Properties Ltd.	Equity method						Other Financial corporations other than Credit Institutions
Panarae Saturn LP	Equity method						Other Financial corporations other than Credit Institutions
ALPHA INVESTMENT PROPERTY COMMERCIAL	Equity method						Non-Financial Corporations
ALPHA INVESTMENT PROPERTY ELEONA A.E.	Equity method						Non-Financial Corporations
OLGANOS A.E.	Equity method						Non-Financial Corporations
AEDEP Thessalias and Steras Ellados	Equity method						Non-Financial Corporations
A.L.C. Novelle Investments Ltd	Equity method						Other Financial corporations other than Credit Institutions
Banking Information Systems A.E.	Equity method						Non-Financial Corporations
Propindex A.E.D.A.	Equity method						Non-Financial Corporations
Perigenis Business Properties Societe Anonyme	Equity method						Non-Financial Corporations
CEPAL HELLAS HOLDINGS S.A.	Equity method						Non-Financial Corporations
Nexi Πληρωμών Ελλάς Α.Ε	Equity method						Non-Financial Corporations
Zero Energy Buildings Ανώνυμη Εταιρία Ενεργειακών Υπηρεσιών	Equity method						Non-Financial Corporations
Alpha Compass DAC	Equity method						Other Financial corporations other than Credit Institutions
ALPHA BANK ROMANIA S.A.	Equity method						Credit Institutions
SKYLINE MON.A.E	Equity method						Other Financial corporations other than Credit Institutions

							<i>Credit Institutions</i>
Unicredit Bank S.A.	Equity method			x			
Toorbee Travel Services Ltd	Equity method			x			<i>Non-Financial Corporations</i>
Reoco Solar AE	Equity method			x			<i>Non-Financial Corporations</i>

18.4 Appendix IV – Terms and conditions of Tier 2 instruments

Template 61: EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments

		a
		Qualitative or quantitative information - Free format
1	Issuer	Alpha Services and Holdings S.A.
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	XS2307437629
2a	Public or private placement	public
3	Governing law(s) of the instrument	English law, except for status, subordination, waiver of set-off, acknowledgement of Statutory Loss Absorption Powers and provisions, relating to Noteholders Agent (Greek law)
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
<i>Regulatory treatment</i>		
4	Current treatment taking into account, where applicable, transitional CRR rules	Tier 2 Capital
5	Post-transitional CRR rules	Tier 2 Capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Debt instrument-Art.62 CRR
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 500.000.000
9	Nominal amount of instrument	EUR 500.000.000
EU-9a	Issue price	100 per cent. of the Aggregate Nominal Amount
EU-9b	Redemption price	100 per cent. of their nominal amount
10	Accounting classification	Liability - amortised cost
11	Original date of issuance	11 March 2021
12	Perpetual or dated	dated
13	Original maturity date	11 June 2031
14	Issuer call subject to prior supervisory approval	applicable
15	Optional call date, contingent call dates and redemption amount	The Issuer may redeem all (but not some only) of the Notes on any date from and including 11 March 2026 to and including the Reset Date (11 June 2026) at par together with any accrued and unpaid interest thereon, subject to certain conditions (including but not limited to prior regulatory approval (if required at that time))
16	Subsequent call dates, if applicable	As above
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Fixed coupon
18	Coupon rate and any related index	From (and including) the Issue Date to (but excluding) 11 June 2026 (Year 5,25): Fixed rate of 5.500% p.a. The Reset Date is 11 June 2026. From (and including) the Reset Date to (but excluding) the Maturity Date at the rate per annum equal to the Reset Rate of Interest (Reset Reference Rate plus reset margin). Reset Reference Rate is the then prevailing 5-year mid-swap rate (Reuters screen "ICESWAP2/EURSFIXA") and reset margin is 5.823%. Coupon is payable annually in each case, in arrear on 11 June in each year from (and including) 11 June 2021 (short first interest period) to (and including) the Maturity Date.
19	Existence of a dividend stopper	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory
21	Existence of step up or other incentive to redeem	No step up or other incentive to redeem
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A
25	If convertible, fully or partially	N/A
26	If convertible, conversion rate	N/A
27	If convertible, mandatory or optional conversion	N/A
28	If convertible, specify instrument type convertible into	N/A
29	If convertible, specify issuer of instrument it converts into	N/A
30	Write-down features	No
31	If write-down, write-down trigger(s)	N/A
32	If write-down, full or partial	N/A
33	If write-down, permanent or temporary	N/A
34	If temporary write-down, description of write-up mechanism	N/A
34a	Type of subordination (only for eligible liabilities)	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Direct, unsecured, subordinated obligations ranking pari passu without any preference among themselves. Subordinated to Senior Creditors of the Issuer (including subordinated creditors whose claims rank, or are expressed to rank, in priority to claims of holders of the Notes).
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://www.bourse.lu/security/XS2307437629/332689

(1) Insert 'N/A' if the question is not applicable



		a
		Qualitative or quantitative information - Free format
1	Issuer	Alpha Services and Holdings S.A.
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	XS2835739660
2a	Public or private placement	public
3	Governing law(s) of the instrument	English law, except for status, subordination, waiver of set-off, acknowledgement of Statutory Loss Absorption Powers and provisions, relating to Noteholders Agent (Greek law)
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A
Regulatory treatment		
4	Current treatment taking into account, where applicable, transitional CRR rules	Tier 2 Capital
5	Post-transitional CRR rules	Tier 2 Capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Debt instrument-Art.62 CRR
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 500.000.000
9	Nominal amount of instrument	EUR 500.000.000
EU-9a	Issue price	100 per cent. of the Aggregate Nominal Amount
EU-9b	Redemption price	100 per cent. of their nominal amount
10	Accounting classification	Liability
11	Original date of issuance	13 June 2024
12	Perpetual or dated	dated
13	Original maturity date	13 September 2034
14	Issuer call subject to prior supervisory approval	applicable
15	Optional call date, contingent call dates and redemption amount	The issuer has two call options: (1) On any date from (and including) 13 June 2029 (being the fifth anniversary of the Issue Date) to (and including) 13 September 2029; and (2) At any time if 75% or more of the principal amount of the Notes has been redeemed or purchased and cancelled, in each case at par together with any accrued and unpaid interest thereon, subject to certain conditions (including but not limited to prior regulatory approval (if required at that time)).
16	Subsequent call dates, if applicable	As above
Coupons / dividends		
17	Fixed or floating dividend/coupon	Fixed coupon
18	Coupon rate and any related index	From (and including) the Issue Date to (but excluding) 13 September 2029 (Year 5): 6.000 per cent. per annum payable annually in arrear on each Interest Payment Date Initial coupon rate was determined by reference to the interpolated 5.25-year Mid-Swap rate prevailing as at the pricing date (4 June 2024), plus a spread of 327 bps. The Reset Date is 13 September 2029. Reset Reference Rate is the then prevailing 5-year mid-swap rate (Reuters screen "ICESWAP2") and reset margin is 3.27%, payable annually in arrear on each Interest Payment Date from (and including) 13 February 2030 to (and including) the Maturity Date.
19	Existence of a dividend stopper	N/A
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory
21	Existence of step up or other incentive to redeem	No step up or other incentive to redeem
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A
25	If convertible, fully or partially	N/A
26	If convertible, conversion rate	N/A
27	If convertible, mandatory or optional conversion	N/A
28	If convertible, specify instrument type convertible into	N/A
29	If convertible, specify issuer of instrument it converts into	N/A
30	Write-down features	No
31	If write-down, write-down trigger(s)	N/A
32	If write-down, full or partial	N/A
33	If write-down, permanent or temporary	N/A
34	If temporary write-down, description of write-up mechanism	N/A
34a	Type of subordination (only for eligible liabilities)	N/A
EU-34b	Ranking of the instrument in normal insolvency proceedings	N/A
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Direct, unsecured, subordinated obligations ranking pari passu without any preference among themselves. Subordinated to Senior Creditors of the Issuer (including subordinated creditors whose claims rank, or are expressed to rank, in priority to claims of holders of the Notes).
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://www.luxse.com/security/XS2835739660/404689

(1) Insert 'N/A' if the question is not applicable

18.5 Appendix V – Own Funds structure

Template 62: EU CC1 - Composition of regulatory own funds as of 31.12.2024

(Amounts in millions of Euro)

		a	a	b
		31.12.2024	30.06.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves				
1	Capital instruments and the related share premium accounts	5,466	5,466	(a)
2	Retained earnings	1,462	1,477	(b)
3	Accumulated other comprehensive income (and other reserves)	(92)	(149)	(c)
EU-3a	Funds for general banking risk	-	-	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1			
5	Minority interests (amount allowed in consolidated CET1)	-	0	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	358	202	(b)
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	7,195	6,996	
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	(4)	(6)	
8	Intangible assets (net of related tax liability) (negative amount)	(412)	(427)	(d)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(2)	(4)	(e)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	172	186	(c)
12	Negative amounts resulting from the calculation of expected loss amounts	-	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	-	
15	Defined-benefit pension fund assets (negative amount)			
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	(85)	(76)	(a)



		a	a	b
		31.12.2024	30.06.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	(88)	(72)	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-	
EU-20c	of which: securitisation positions (negative amount)	(88)	(72)	
EU-20d	of which: free deliveries (negative amount)	-	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(1,703)	(1,721)	(e)
22	Amount exceeding the 17,65% threshold (negative amount)	-	-	(e,g)
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	-	(g)
25	of which: deferred tax assets arising from temporary differences	-	-	(e)
EU-25a	Losses for the current financial year (negative amount)	-	-	(b)
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	-	
27a	Other regulatory adjustments	(151)	(87)	

		a	a	b
		31.12.2024	30.06.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(2,274)	(2,209)	
29	Common Equity Tier 1 (CET1) capital	4,921	4,787	
Additional Tier 1 (AT1) capital: instruments				
30	Capital instruments and the related share premium accounts			
31	of which: classified as equity under applicable accounting standards			
32	of which: classified as liabilities under applicable accounting standards			
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1 as described in Article 486(3) CRR	-	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1			
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1			
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties			
35	of which: instruments issued by subsidiaries subject to phase out			
36	Additional Tier 1 (AT1) capital before regulatory adjustments	700	400	
Additional Tier 1 (AT1) capital: regulatory adjustments				
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)			
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)			

		a	a	b
		31.12.2024	30.06.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
42a	Other regulatory adjustments to AT1 capital			
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	-	
44	Additional Tier 1 (AT1) capital	700	400	(h)
45	Tier 1 capital (T1 = CET1 + AT1)	5,621	5,187	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	1,011	968	(f)
47	Amount of qualifying items referred to in Article 484 (5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	-	-	
EU-47a	Amount of qualifying items referred to in Article 494a (2) CRR subject to phase out from T2	-	-	
EU-47b	Amount of qualifying items referred to in Article 494b (2) CRR subject to phase out from T2	-	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties			
49	of which: instruments issued by subsidiaries subject to phase out			
50	Credit risk adjustments	-	-	
51	Tier 2 (T2) capital before regulatory adjustments	1,011	968	
Tier 2 (T2) capital: regulatory adjustments				
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)			
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	

		a	a	b
		31.12.2024	30.06.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	-	
EU-56b	Other regulatory adjustments to T2 capital			
57	Total regulatory adjustments to Tier 2 (T2) capital	-	-	
58	Tier 2 (T2) capital	1,011	968	
59	Total capital (TC = T1 + T2)	6,632	6,155	
60	Total Risk exposure amount	30,279	32,387	
Capital ratios and buffers				
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	16.3%	14.8%	
62	Tier 1 (as a percentage of total risk exposure amount)	18.6%	16.0%	
63	Total capital (as a percentage of total risk exposure amount)	21.9%	19.0%	
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	9.88%	9.92%	
65	of which: capital conservation buffer requirement	2.50%	2.50%	
66	of which: countercyclical buffer requirement	0.19%	0.23%	
67	of which: systemic risk buffer requirement	0.00%	0.00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	1.00%	1.00%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.69%	1.69%	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	10.07%	7.77%	
Amounts below the thresholds for deduction (before risk weighting)				
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	72	91	

		a	a	b
		31.12.2024	30.06.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	45	35	
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	678	660	
Applicable caps on the inclusion of provisions in Tier 2				
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)			
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	-	
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)				
80	Current cap on CET1 instruments subject to phase out arrangements	-	-	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-	
82	Current cap on AT1 instruments subject to phase out arrangements	-	-	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-	
84	Current cap on T2 instruments subject to phase out arrangements	-	-	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-	

18.6 Appendix VI – Organizational Chart

