Alpha Services and Holdings S.A

Pillar III Disclosures

Report for June 30, 2024

ALPHA SERVICES AND HOLDINGS

Contents

List of Abbreviations

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

Abbreviation	Definition
ICS	Internal Control System
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.

2 Pillar III Disclosures Overview

2.1 Background

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 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.

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 is in preparation 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) will start 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, these 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 at the beginning of 2024.

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 run 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 ion 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 finalised by the end of this year, together new framework for the business indicator for operational risk that was consulted in parallel.

The EBA will publish on Q4 2024 a technical package, including DPM, validation rules and taxonomy, that shall be used by large and other institutions to submit this information to the EBA Pillar 3 data hub.

Later in 2024, the EBA will complement these ITS with the CRR 3 disclosure requirements that are not directly linked to Basel III implementation, in particular the extension of the disclosure requirements on ESG risks to all institutions in accordance with the proportionality principle, and new disclosure requirements on shadow banking.

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.

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.

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:
    - Capital conservation buffer stands at 2.5%.
    - Capital buffers as provided by the Bank of Greece through its Executive Committee Acts as follows:

      - countercyclical capital buffer, equal to “zero percent” (0%) for the first and second quarter of 2024.

      - other systemically important institutions (O-SII) buffer, which stands at 1.00% for 2024.

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 Q2 2024 it was required to meet the minimum limit for consolidated Overall Capital Requirements (OCR), of at least 14.73%. OCR includes for Q2 2024 the CCB Capital Buffer of 2.5%, the O-SII buffer of 1% and the CCyB of 0.23%, 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

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 recapitalisation 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.
- On July 19, 2023 the EBA published a Guidelines for institutions and resolution authorities on setting the framework for the determination and assessment of the Overall Recovery Capacity (ORC).

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").

On 22 April 2024, Alpha Bank S.A., received a communication letter from the European Single Resolution Board including its decision for the minimum requirement for own funds and eligible liabilities (MREL). According to the decision, from 1 January 2026 the consolidated "fully loaded" MREL will be set at 24.26% of the TREA and 5.91% of the LRE. The MREL, expressed as a percentage of risk-weighted assets, does not include the Combined Buffer Requirement (CBR), which stands at 3.73% effective 30 June 2024.In addition, the interim binding MREL target to be met on 1 January 2024 was set at 22.54 % of total RWAs, including a CBR of 3.73%.

On June 30, 2024, the Bank's MREL ratio stood at 25.79%, which is well above the interim non-binding target of 22.54% of the Total Risk Exposure Amount (TREA) (effective 01.01.2024). The ratio includes the profit of the financial reporting period that ended on 30 June 2024 post a provision for dividend payout. The final MREL ratio minimum requirement is updated annually by the SRB.

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. €0.9bn was recorded in 2023, out of which €0.7bn reduction stemmed from the result of NPE from transactions and €0.2bn was due to negative organic formation. The Group's total NPE portfolio as of Q4 2023 amounted to c. €2.2bn with a corresponding NPE ratio of 6.0%.

In March 2024 the Bank submitted an updated NPE Business Plan covering the period 2024-2026.

Based on that, the NPE ratio for 2024 is estimated at c. 5% with further reduction to be achieved in the following years.

In H1 2024, the bank reported a further NPE reduction driven by both organic & in-organic actions, reaching an NPE stock of €1.7bn with a corresponding NPE ratio below 5%. Continuous management of the remaining NPE portfolio is expected to further reduce NPEs by the end of the year, significantly outperforming the submitted NPE plan target.

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.

Subject to the evolving environment and possible favorable appetite from investors, certain in-organic actions could be brought forward (i.e. earlier than the scheduled time of completion in the NPE Plan)

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 30.06.2024 amounted to Euro 5.1billion.

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 2022-2023 as per below:

Completed NPE Transactions - 2022:

- 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

Completed NPE Transactions - 2023:

- 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 – common securitization by the 4 Greek systemic banks of an SME portfolio of Euro 1.2 billion GBV (Alpha Bank’s share of GBV at Euro 0.4 billion) that has been assigned by all systemic banks for management to DoValue
- Project Andros – disposal of NPE Leasing portfolio of Euro 0.24 billion GBV
- Project Gaia – Portfolio of mainly secured mortgage Non-Performing Loans, of Euro 0.5 billion GBV
- Single ticket exposures Non-Performing Loans of Large Corporate Entities, of aggregate Euro 0.1 billion GBV
- Project Gaia II – Portfolio of mainly secured Small Businesses, Mortgage and SME NPE exposures, of Euro 0.4 billion GBV
- Non-Performing Loans of Cypriot exposures of aggregate Euro 0.1 billion GBV

As of 2023 year end the Group NPE ratio stands at 6.0% pro forma for the completion of the above transactions and it is expected to be reduced further mainly as a result of organic actions.

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") and to be completed within Q1 2025.
    - ➢ a perimeter of Euro 0.4 billion mainly comprised of mainly secured Small Businesses, Mortgage and SME NPE exposures ("GAIA II") to be completed within 2025.

Additionally, the Bank has initiated the sale of a perimeter of Euro 0.1 billion comprised of Cypriot mainly secured NPE portfolio exposures ("SKY II") and has been working on completing the relevant steps to execute the transaction. The transaction is envisaged to be completed within Q1 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.

Following the above, the capital adequacy ratios are well and above all the regulatory capital requirements and are expected to be further enhanced, due to the completion of a new synthetic Securitization scheduled at H2 2024.

Lastly, 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%.

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. Some important changes are introduced, notably the integration of the upcoming Capital Requirements Regulation (CRR3), set to be 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. 68 banks from the EU and Norway, including 54 from the euro area, will participate in the exercise, thus covering 75% of the EU banking sector. The expanded geographical reach and incorporation of proportionality features aim to boost efficiency while ensuring the relevance and transparency of the results.

3 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.

Dividends/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. According to the capital accretive plan for 2024-2026 and the fulfilment of the management targets, Alpha Holdings has the aspiration for a dividend distribution for the following years 2024-2026.

Main elements impacting Asset Quality, Capital and Liquidity

- The NPE stock declined by €0.5bn q/q, leaving NPEs at €1.7bn at the end of Q2 2024. The reduction mainly reflects an acceleration of the NPE plan with the classification to the Held for Sale perimeter of selected non-performing portfolios, in view of their expected disposal.
- The Group's NPE cash coverage increased to 47% at the end of Q2, while total coverage including collateral increased to 120%. The Group NPL coverage ratio reached 89%, while total coverage including collateral stood at 155%.
- The Group's CET 1 Capital base stood at €4.8bn, resulting in a CET1 ratio of 14.9%, or 14.8% post dividend accrual of 12bps, up by 16bps q/q, including the profit of the financial reporting period that ended on 30 June 2024.The reported CET1 ratio includes a distribution accrual of 36bps, calculated on 2024 profits according to dividend policy.
- The Group's Loan to Deposit Ratio stands at 74% while the Liquidity Coverage Ratio (LCR) increased to 192% vs. 184% in the previous quarter, exceeding regulatory thresholds and management targets.
- The Group's TLTRO funding remained stable at €4bn at the end of Q2. The Bank's blended funding cost stood at 151bps in the quarter, up from 144bps in Q1 2024, mainly attributable to higher volumes of wholesale funding.

3.1 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 30.06.2024, Group's CET1 stood at €4.8 billion and the total Regulatory Capital at €6.2 billion, while the total RWAs amounted to €32.4billion resulting in a CET1 ratio of 14.8%, and total Capital Adequacy Ratio of 19.0% mainly due to the Q2 2024 profitability which includes also a provision for the distribution of a total amount of Euro c.39 million and the classification of Gaia I & II transactions as well as Cyprus Loan Portfolio to Held for Sale.

Template 1: Capital Adequacy Ratios (%)(*)

(Amounts in millions of Euro)

	a	b
	30.06.2024	**31.03.2024**
Capital Type		
CET1	4,787	4,712
Tier 1 Capital	5,187	5,112
Tier 2 Capital	968	1,000
Total Regulatory Capital for C.A.R. calculation	6,155	6,112
Risk Weighted Assets	32,387	32,216
Capital Ratios		
CET1 Ratio	**14.8%**	**14.6%**
Tier 1 Ratio	**16.0%**	**15.9%**
Capital Adequacy Ratio (Tier 1 + Tier 2)	**19.0%**	**19.0%**

(*) 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 30 June 2024, the eligible amounts not "relying on future profitability" according to the CRD Directive stood at €2.50 billion.

3.1.1 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 2: EU KM1 - Key metrics template as of 30.06.2024(*)

(Amounts in millions of Euro)

		a	b	c	d	e
		30.06.2024	31.03.2024	31.12.2023	30.09.2023	30.06.2023
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	4,787	4,712	4,639	4,533	4,380
2	Tier 1 capital	5,187	5,112	5,039	4,933	4,780
3	Total capital	6,155	6,112	6,039	5,933	5,780
	Risk-weighted exposure amounts					
4	Total risk-weighted exposure amount	32,387	32,216	32,209	32,808	32,462
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	14.8%	14.6%	14.4%	13.8%	13.5%
6	Tier 1 ratio (%)	16.0%	15.9%	15.6%	15.0%	14.7%
7	Total capital ratio (%)	19.0%	19.0%	18.8%	18.1%	17.8%
	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 (%)	0.23%	0.20%	0.19%	0.11%	0.08%
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 (%)	3.73%	3.70%	3.69%	3.61%	3.58%
EU 11a	Overall capital requirements (%)	14.73%	14.70%	14.69%	14.61%	14.58%
12	CET1 available after meeting the total SREP own funds requirements (%)	7.77%	7.62%			
	Leverage ratio					
13	Leverage ratio total exposure measure	72,637	72,159	71,328	72,212	70,756
14	Leverage ratio	7.1%	7.1%	7.1%	6.8%	6.8%

		a	b	c	d	e
		30.06.2024	**31.03.2024**	**31.12.2023**	**30.09.2023**	**30.06.2023**
	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)	15,672	15,614	15,055	14,261	
EU 16a	Cash outflows - Total weighted value	9,525	9,623	9,671	9,491	
EU 16b	Cash inflows - Total weighted value	1,238	1,189	1,113	1,123	
16	Total net cash outflows (adjusted value)	8,287	8,434	8,558	8,368	
17	Liquidity coverage ratio (%) (adjusted values) (**)	189.0%	185.0%	176.0%	170.0%	
17a	Liquidity coverage ratio (%)	192.3%	183.7%			
	Net Stable Funding Ratio					
18	Total available stable funding	53,152	53,535			
19	Total required stable funding	41,752	41,961			
20	NSFR ratio (%)	127.3%	127.6%			

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

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

3.2 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:

tTo 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 extents 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 3: 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
	30.06.2024	**31.03.2024**	**31.12.2023**	**30.09.2023**	**30.06.2023**
Available capital (amounts)					
Common Equity Tier 1 (CET1) capital	4,787	4,712	4,639	4,533	4,380
CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	4,787	4,712	4,599	4,494	4,340
CET1 capital as if the temporary treatment of unrealized gains and losses measured at fair value through OCI (other comprehensive income)I in accordance with Article 468 of the CRR had not been applied					
Tier 1 capital	5,187	5,112	5,039	4,933	4,780
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5,187	5,112	4,999	4,894	4,740
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	6,155	6,112	6,039	5,933	5,780
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6,155	6,112	5,999	5,894	5,740
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	32,387	32,216	32,209	32,808	32,462
Total Risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	32,387	32,216	32,209	32,808	32,462

Capital ratios					
Common Equity Tier 1 ratio (%)	14.8%	14.6%	14.4%	13.8%	13.5%
CET1 ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.8%	14.6%	14.3%	13.7%	13.4%
CET1 ratio (%) as if the temporary treatment of unrealized gains and losses measured at fair value through OCI (other comprehensive income)I in accordance with Article 468 of the CRR had not been applied					
Tier 1 ratio (%)	16.0%	15.9%	15.6%	15.0%	14.7%
Tier 1 ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.0%	15.9%	15.5%	14.9%	14.6%
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 (%)	19.0%	19.0%	18.8%	18.1%	17.8%
Total ratio (%) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.0%	19.0%	18.6%	18.0%	17.7%
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	72,637	72,159	71,328	72,212	70,756
Leverage ratio	7.1%	7.1%	7.1%	6.8%	6.8%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.1%	7.1%	7.0%	6.8%	6.7%
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					

(*) 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 4: Own Funds Structure [(*)]

(Amounts in millions of Euro)

	30.06.2024	31.03.2024
Share capital	682	682
Share premium	4,784	4,784
Own Shares	(15)	(13)
Retained Earnings and Other Reserves	1,452	1,461
o/w FVOCI reserves	(10)	(8)
Period results	202	134
Common equity tier 1 capital before regulatory adjustments 1-5	**7,105**	**7,047**
1.PVA	(6)	(6)
2.Intangible assets	(427)	(440)
3.DTA amortization	(1,726)	(1,716)
4.Irrevocable payment commitment	(30)	(30)
5.Other Adjustments	(130)	(143)
Total regulatory adjustments to common equity tier 1	**(2,318)**	**(2,335)**
Common equity tier 1 capital (CET1) (1)	**4,787**	**4,712**
Additional Tier I instruments	400	400
Additional Tier I before regulatory adjustments	**400**	**400**
Additional Tier I	**400**	**400**
Tier I Capital (CET1 + AT1)	**5,187**	**5,112**
Subordinated loan	968	1,000
Tier II capital before regulatory adjustments	**968**	**1,000**
Tier II capital	**968**	**1,000**
Total Capital (TC = Tier I + Tier II)	**6,155**	**6,112**
Total RWA	**32,387**	**32,216**
Common equity tier 1 Ratio	**14.8%**	**14.6%**
Tier I Ratio	**16.0%**	**15.9%**
Capital Adequacy Ratio (Tier I + Tier II)	**19.0%**	**19.0%**

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

3.3 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 5a: 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	
6	Investment securities	-	-	
	- Measured at fair value through other comprehensive income	1,299	1,299	
	- Measured at amortised 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*				

		a	b	c
		Balance sheet as in published financial statements	**Under regulatory scope of consolidation**	**Reference**
		30.06.2024		
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	
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 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**	

Template 5b: EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements as of 31.12.2023

(Amounts in millions of Euro)

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		31.12.2023		
Assets - *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	
2	Due from banks	1,722	1,460	
3	Trading securities	33	33	
4	Derivative financial assets	1,819	1,819	
5	Loans and advances to customers	36,161	35,425	
6	Reinsurance contract assets		-	
7	Investment securities	-	-	
	- Measured at fair value through other comprehensive income	1,369	1,369	
	- Measured at amortised cost	14,490	14,466	
	- Measured at fair value through profit or loss	159	159	
8	Investments in associates and joint ventures	100	181	(g)
9	Investment property	301	301	
10	Property, plant and equipment	501	500	
11	Goodwill and other intangible assets	467	460	(d)
12	Deferred tax assets	4,978	5,162	(e)
13	Other assets	945	754	
14	Assets classified as held for sale	6,399	5,414	
15	**Total assets**	**73,663**	**71,722**	
Liabilities - *Breakdown by liability classes according to the balance sheet in the published financial statements*				
1	Due to banks	7,093	7,093	
2	Derivative financial liabilities	2,004	2,004	
3	Due to customers	48,449	48,325	
4	Insurance contract liabilities		-	
5	Debt securities in issue and other borrowed funds	2,920	3,210	(f)
6	Liabilities for current income tax and other taxes	27	27	
7	Deferred tax liabilities	25	26	(e)
8	Employee defined benefit obligations	24	24	

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		31.12.2023		
9	Other liabilities	896	795	
10	Provisions	120	120	
11	Liabilities related to assets classified as held for sale	4,782	3,819	
12	**Total liabilities**	**66,340**	**65,443**	
Equity				
1	Share Capital	682	682	(a)
2	Share premium	4,783	4,783	(a)
3	Other equity instruments	400	400	(h)
4	Special Reserve from Share Capital Decrease		-	
5	Reserves	-111	-158	(c)
6	Amounts directly recognized in equity and associated with assets classified as held for sale	-64	-	
7	Retained earnings	1,626	1,554	(b)
8	Treasury shares	-11	-11	(a)
9	Non-controlling interests	18	18	
10	**Total equity**	**7,323**	**7,279**	

3.4 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 6: EU OV1 – Overview of risk weighted exposure amounts as of 30.06.2024 (*)

(Amounts in millions of Euro)

		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		a	b	c
		30.06.2024	31.03.2024	30.06.2024
1	**Credit risk (excluding CCR)**	**27,682**	**27,479**	**2,215**
2	Of which the standardised approach	27,682	27,479	2,215
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**	**239**	**262**	**19**
7	Of which the standardised approach	164	184	13
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	6	4	0
EU 8b	Of which credit valuation adjustment - CVA	51	60	4
9	Of which other CCR	19	13	2
15	**Settlement risk**			
16	**Securitisation exposures in the non-trading book (after the cap)**	**711**	**744**	**57**
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	258	245	21
19	Of which SEC-SA approach	454	499	36
EU 19a	Of which 1250%/ deduction	-	-	-
20	**Position, foreign exchange and commodities risks (Market risk)**	**416**	**392**	**33**
21	Of which the standardised approach	67	47	5
22	Of which IMA	348	345	28
EU 22a	**Large exposures**	**-**	**-**	**-**
23	**Operational risk**	**3,339**	**3,339**	**267**

EU 23a	Of which basic indicator approach	-	-	-
EU 23b	Of which standardised approach	3,339	3,339	267
EU 23c	Of which advanced measurement approach	-	-	-
24	**Amounts below the thresholds for deduction (subject to 250% risk weight)** (for information)	**1,737**	**1,736**	**139**
29	**Total**	**32,387**	**32,216**	**2,591**

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

The 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 € 12 million as of June 30, 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 €107 million as of June 30, 2024, and, in accordance with ECB guidelines, were classified as non-performing exposures (NPE) and accordingly as Stage 3 loans.

3.5 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%.

Key drivers of the raise of the CCyB requirements, is the increase of the respective rates in Cyprus (1%) where the Group has exposures due to its subsidiary. Additionally, increase where observed in Ireland (1.5%), Netherlands (2%) and France (1%).

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

Template 7a: 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	Cyprus	1,062					1,062	57			57	709	3%	2.00%
12	United Kingdom	1,002					1,002	51			51	638	3%	1.00%
13	Ireland	242					242	16			16	194	1%	2.00%
14	France	213					213	14			14	180	1%	1.50%
15	Netherlands	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%	

Template 7b: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer as of 31.12.2023

(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	3,439					3,439	154			154	1,926	8%	1.00%
11	Cyprus	963					963	50			50	620	3%	0.50%
12	United Kingdom	941					941	51			51	636	3%	2.00%
13	Ireland	180					180	12			12	151	1%	1.00%
14	France	173					173	11			11	141	1%	0.50%
15	Netherlands	172					172	10			10	120	1%	1.00%
16	Luxemburg	119					119	7			7	93	0%	0.50%
17	other	26,954		41	39,170	4,883	71,048	1,483	30	58	1,571	19,640	84%	
18	Total	32,942		41	39,170	4,883	77,035	1,778	30	58	1,866	23,327	100%	

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

Template 8a: EU CCyB2 - Amount of institution-specific countercyclical capital buffer as of 30.06.2024

(Amounts in millions of Euro)

		a
		30.06.2024
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

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

Template 8b: EU CCyB2 - Amount of institution-specific countercyclical capital buffer as of 31.12.2023

(Amounts in millions of Euro)

		a
		31.12.2023
1	Total risk exposure amount	32,209
2	Institution specific countercyclical capital buffer rate	0.19%
3	Institution specific countercyclical capital buffer requirement	61.0

4 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 30.06.2024 on consolidated basis was 7.14%, according to the transitional definition of Tier 1 capital, exceeding by 2.38x 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 9a: 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**

Template 9b: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures as of 31.12.2023

(Amounts in millions of Euro)

		a
		Applicable amount
1	Total assets as per published financial statements	73,663
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(941)
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	(331)
9	Adjustment for securities financing transactions (SFTs)	26
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	1,956
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	(3,044)
13	**Total exposure measure**	**71,328**

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

Template 10: EU LR2 - LRCom: Leverage ratio common disclosure as of 30.06.2024

(Amounts in millions of Euro)

		CRR leverage ratio exposures	
		a	b
		30.06.2024	31.12.2023
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	71,069	70,655
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	0	14
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(692)	(904)
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-

		CRR leverage ratio exposures	
		a	b
		30.06.2024	**31.12.2023**
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(2,225)	(2,201)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**68,152**	**67,563**
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	1,327	1,332
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	172	190
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**	**1,499**	**1,521**
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	699	263
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)		
16	Counterparty credit risk exposure for SFT assets	42	26
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**	**741**	**289**
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	10,390	10,430
20	(Adjustments for conversion to credit equivalent amounts)	(8,145)	(8,475)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22	**Off-balance sheet exposures**	**2,245**	**1,956**
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
		30.06.2024	31.12.2023
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**	5,187	5,039
24	**Total exposure measure**	**72,637**	**71,328**
	Leverage ratio		
25	Leverage ratio	7.14%	7.06%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	7.14%	7.06%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	7.14%	7.06%
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

Template 11a: 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

Template 11b: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 31.12.2023

(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:**	69,764
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	69,764
EU-4	Covered bonds	39
EU-5	Exposures treated as sovereigns	22,595
EU-6	Exposures to regional governments, MDB, international organisations and PSE **not** treated as sovereigns	425
EU-7	Institutions	2,023
EU-8	Secured by mortgages of immovable properties	12,787
EU-9	Retail exposures	3,559
EU-10	Corporate	12,863
EU-11	Exposures in default	1,505
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	13,969

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.

5 Credit Risk

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 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.

Template 12a: 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 12b: EU CR1-A: Maturity of exposures 31.12.2023

(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	76	6,495	16,578	13,012	-	36,161
2	Debt securities	-	1,846	6,158	7,801	-	15,805
3	**Total**	**76**	**8,341**	**22,736**	**20,813**	**-**	**51,966**

Template 13a: 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	c	e	f
		Gross carrying amount		Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which defaulted		
010	Agriculture, forestry and fishing	196	12	(4)	-
020	Mining and quarrying	23	5	(1)	-
030	Manufacturing	3,452	172	(89)	-
040	Electricity, gas, steam and air conditioning supply	2,811	1	(1)	-
050	Water supply	31	1	(0)	-
060	Construction	850	36	(17)	-
070	Wholesale and retail trade	3,285	224	(112)	-
080	Transport and storage	4,156	44	(15)	-
090	Accommodation and food service activities	2,953	54	(17)	-
100	Information and communication	345	3	(2)	-
110	Financial and insurance activities	-	-	-	-
120	Real estate activities	1,626	19	(4)	-
130	Professional, scientific and technical activities	346	8	(4)	-
140	Administrative and support service activities	364	14	(7)	-
150	Public administration and defense, compulsory social security	3	0	(0)	-
160	Education	96	1	(1)	-
170	Human health services and social work activities	147	3	(2)	-
180	Arts, entertainment and recreation	86	5	(2)	-
190	Other services	45	36	(37)	-
200	**Total**	**20,816**	**638**	**(316)**	**-**

Template 13b: EU CQ5: Credit quality of loans and advances to non-financial corporations by industry as of 31.12.2023

(Amounts in millions of Euro)

		a	c	e	f
		Gross carrying amount		Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which defaulted		
010	Agriculture, forestry and fishing	288	19	(6)	-
020	Mining and quarrying	37	7	(2)	-
030	Manufacturing	3,597	234	(114)	-
040	Electricity, gas, steam and air conditioning supply	2,760	1	(1)	-
050	Water supply	30	1	(0)	-
060	Construction	862	55	(23)	-
070	Wholesale and retail trade	3,528	339	(148)	-
080	Transport and storage	4,288	64	(28)	-
090	Accommodation and food service activities	2,864	92	(30)	-
100	Information and communication	349	6	(3)	-
110	Financial and insurance activities	-	-	-	-
120	Real estate activities	1,639	20	(5)	-
130	Professional, scientific and technical activities	264	14	(7)	-
140	Administrative and support service activities	303	18	(9)	-
150	Public administration and defense, compulsory social security	3	0	(0)	-
160	Education	85	4	(1)	-
170	Human health services and social work activities	153	7	(4)	-
180	Arts, entertainment and recreation	72	11	(5)	-
190	Other services	84	45	(64)	-
200	**Total**	**21,207**	**937**	**(451)**	**-**

The tables below present the credit quality of the Group's exposures broken down by significant geographical area as of 30.06.2024 and 31.12.2023.

Template 14a: EU CQ4: Quality of non-performing exposures by geography as of 30.06.2024

(Amounts in millions of Euro)

		a	c	e	f	g
		Gross carrying/nominal amount		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 defaulted			
010	***On-balance-sheet exposures***	***54,317***	***1,784***	***(807)***		***(7)***
020	*Greece*	34,769	1,693	(755)		(5)
030	*United Kingdom*	1,355	21	(12)		-
040	*Romania*	391	2	(2)		(2)
050	*Cyprus*	1,501	22	(16)		-
070	*Other countries*	16,300	46	(21)		-
080	***Off-balance-sheet exposures***	***9,575***	***252***		***25***	
090	*Greece*	9,066	249		22	
100	*United Kingdom*	68	0		0	
110	*Romania*	10	0		0	
120	*Cyprus*	182	2		3	
140	*Other countries*	249	0		0	
150	**Total**	**63,892**	**2,036**	**(807)**	**25**	**(7)**

Template 14b: EU CQ4: Quality of non-performing exposures by geography as of 31.12.2023

(Amounts in millions of Euro)

		a	c	e	f	g
		Gross carrying/nominal amount		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 defaulted			
010	***On-balance-sheet exposures***	***53,223***	***2,316***	***(1,001)***		***(15)***
020	*Greece*	34,860	2,151	(918)		(5)
030	*United Kingdom*	1,131	41	(22)		-
040	*Romania*	380	3	(1)		(11)
050	*Cyprus*	1,428	61	(26)		-
070	*Other countries*	15,424	60	(32)		-
080	***Off-balance-sheet exposures***	***9,573***	***265***		***29***	
090	*Greece*	9,161	260		25	
100	*United Kingdom*	60	0		0	
110	*Romania*	0	0		0	
120	*Cyprus*	173	5		4	
140	*Other countries*	178	0		0	
150	**Total**	**62,796**	**2,581**	**(1,001)**	**29**	**(15)**

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

Template 15a: 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			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	Of which impaired				
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	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	1	0	0	0	(0)	(0)	0	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	0	0	0	0	(0)	(0)	0	-
060	*Non-financial corporations*	487	322	322	322	(21)	(86)	594	210
070	*Households*	1,762	667	667	667	(74)	(152)	1,940	442
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 15b: EU CQ1: Credit quality of forborne exposures as of 31.12.2023

(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			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	Of which impaired				
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	2,412	1,497	1,497	1,497	(105)	(365)	2,971	972
020	*Central banks*	-	-	-	-	-	-	-	-
030	*General governments*	1	0	0	0	(0)	(0)	0	-
040	*Credit institutions*	-	-	-	-	-	-	-	-
050	*Other financial corporations*	0	1	1	1	(0)	(0)	0	0
060	*Non-financial corporations*	605	558	558	558	(23)	(161)	835	341
070	*Households*	1,806	937	937	937	(81)	(203)	2,135	631
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	1	0	0	0	0	-	0	0
100	**Total**	**2,413**	**1,497**	**1,497**	**1,497**	**(105)**	**(365)**	**2,971**	**972**

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Template 16a: 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	4,846	4,846	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	35,570	35,446	124	1,778	814	128	151	121	194	69	301	1,778
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	35	35	-	1	-	-	-	-	0	-	0	1
040	*Credit institutions*	736	736	-	70	-	-	-	-	-	-	70	70
050	*Other financial corporations*	6,350	6,350	-	0	0	-	0	0	0	-	0	0
060	*Non-financial corporations*	20,178	20,111	67	638	315	29	33	32	49	25	155	638
070	*Of which SMEs*	8,032	7,995	37	535	217	29	33	32	48	24	152	535
080	*Households*	8,271	8,214	57	1,069	499	100	117	90	145	43	75	1,069
090	Debt securities	16,963	16,963	-	6	-	-	-	6	-	-	-	6
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	13,258	13,258	-	-	-	-	-	-	-	-	-	-
120	*Credit institutions*	1,741	1,741	-	-	-	-	-	-	-	-	-	-
130	*Other financial corporations*	719	719	-	-	-	-	-	-	-	-	-	-
140	*Non-financial corporations*	1,246	1,246	-	6	-	-	-	6	-	-	-	6
150	Off-balance-sheet exposures	9,323			252								252
160	*Central banks*	-			-								-
170	*General governments*	194			-								-
180	*Credit institutions*	870			-								-
190	*Other financial corporations*	531			0								0
200	*Non-financial corporations*	6,175			251								251
210	*Households*	1,553			0								0
220	**Total**	**66,702**	**57,255**	**124**	**2,036**	**814**	**128**	**151**	**128**	**194**	**69**	**301**	**2,036**

Template 16b: EU CQ3: Credit quality of performing and non-performing exposures by past due days as of 31.12.2023

(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	5,187	5,187	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	35,097	34,989	108	2,309	1,092	144	153	208	273	75	365	2,309
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	36	36	-	1	-	-	-	-	0	-	0	1
040	*Credit institutions*	263	263	-	70	-	-	-	-	-	-	70	70
050	*Other financial corporations*	6,281	6,281	0	1	0	0	0	1	0	-	0	1
060	*Non-financial corporations*	20,270	20,232	38	937	398	39	52	91	103	31	223	937
070	*Of which SMEs*	7,938	7,900	38	822	299	39	52	90	95	30	218	822
080	*Households*	8,246	8,177	69	1,301	694	105	102	116	169	44	72	1,301
090	Debt securities	15,811	15,811	-	6	-	-	6	-	-	-	-	6
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	12,622	12,622	-	-	-	-	-	-	-	-	-	-
120	*Credit institutions*	1,483	1,483	-	-	-	-	-	-	-	-	-	-
130	*Other financial corporations*	487	487	-	-	-	-	-	-	-	-	-	-
140	*Non-financial corporations*	1,219	1,219	-	6	-	-	6	-	-	-	-	6
150	Off-balance-sheet exposures	9,308			265								265
160	*Central banks*	-			-								-
170	*General governments*	191			-								-
180	*Credit institutions*	762			-								-
190	*Other financial corporations*	576			0								0
200	*Non-financial corporations*	6,273			264								264
210	*Households*	1,505			0								0
220	**Total**	**65,402**	**55,986**	**108**	**2,581**	**1,092**	**144**	**160**	**208**	**273**	**75**	**365**	**2,581**

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Template 17a: 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	4,846	4,846	-	-	-	-	(0)	(0)	-	-	-	-		-	-
010	Loans and advances	35,570	30,405	3,757	1,778	-	1,468	(215)	(54)	(130)	(572)	-	(481)	(1,631)	26,546	1,057
030	*General governments*	35	34	1	1	-	1	(0)	(0)	(0)	(1)	-	(1)	(1)	19	0
040	*Credit institutions*	736	736	-	70	-	70	(0)	(0)	-	(70)	-	(70)	-	-	-
050	*Other financial corporations*	6,350	5,801	9	0	-	0	(1)	(1)	(0)	(0)	-	(0)	(4)	5,282	0
060	*Non-financial corporations*	20,178	18,533	1,438	638	-	532	(85)	(42)	(38)	(231)	-	(185)	(933)	14,748	361
070	*Of which SMEs*	8,032	6,980	982	535	-	446	(45)	(5)	(35)	(198)	-	(155)	(783)	5,571	295
080	*Households*	8,271	5,302	2,309	1,069	-	865	(129)	(11)	(91)	(270)	-	(225)	(693)	6,497	696
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*	194	193	1	-	-	-	(0)	-	(0)	-	-	-		0	-
180	*Credit institutions*	870	870	0	-	-	-	(0)	(0)	(0)	-	-	-		-	-
190	*Other financial corporations*	531	530	1	0	-	0	(0)	(0)	(0)	(0)	-	(0)		13	-
200	*Non-financial corporations*	6,175	6,014	160	251	-	251	(2)	(0)	(1)	(23)	-	(23)		814	34
210	*Households*	1,553	1,493	60	0	-	0	(0)	(0)	(0)	(0)	-	(0)		26	0
220	**Total**	**66,702**	**61,299**	**3,980**	**2,036**	**-**	**1,726**	**(234)**	**(71)**	**(131)**	**(599)**	**-**	**(508)**	**(1,631)**	**27,399**	**1,090**

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Template 17b: EU CR1: Performing and non-performing exposures and related provisions as of 31.12.2023

(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	5,187	5,187	-	-	-	-	(0)	(0)	-	-	-	-		-	-
010	Loans and advances	35,097	29,695	3,766	2,309	-	1,868	(232)	(64)	(135)	(749)	-	(609)	(1,927)	27,022	1,343
020	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	*General governments*	36	36	1	1	-	1	(0)	(0)	(0)	(1)	-	(1)	(1)	21	0
040	*Credit institutions*	263	263	-	70	-	70	(0)	(0)	-	(70)	-	(70)	-	-	-
050	*Other financial corporations*	6,281	5,748	3	1	-	1	(1)	(1)	(0)	(1)	-	(1)	(5)	5,352	0
060	*Non-financial corporations*	20,270	18,362	1,444	937	-	764	(95)	(52)	(38)	(356)	-	(274)	(1,215)	15,235	502
070	*Of which SMEs*	7,938	6,836	1,027	822	-	671	(43)	(5)	(34)	(316)	-	(241)	(1,046)	5,556	430
080	*Households*	8,246	5,287	2,317	1,301	-	1,032	(136)	(11)	(97)	(322)	-	(263)	(707)	6,414	841
090	Debt securities	15,811	15,797	-	6	-	6	(16)	(16)	-	(4)	-	(4)	(4)	-	-
100	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	*General governments*	12,622	12,622	-	-	-	-	(10)	(10)	-	-	-	-	-	-	-
120	*Credit institutions*	1,483	1,480	-	-	-	-	(3)	(3)	-	-	-	-	-	-	-
130	*Other financial corporations*	487	477	-	-	-	-	(0)	(0)	-	-	-	-	-	-	-
140	*Non-financial corporations*	1,219	1,218	-	6	-	6	(2)	(2)	-	(4)	-	(4)	(4)	-	-
150	Off-balance-sheet exposures	9,308	9,058	247	265	-	265	(2)	(1)	(1)	(27)	-	(27)		922	37
160	*Central banks*	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	*General governments*	191	190	1	-	-	-	(0)	-	(0)	-	-	-		0	-
180	*Credit institutions*	762	762	0	-	-	-	(1)	(1)	(0)	-	-	-		-	-
190	*Other financial corporations*	576	575	1	0	-	0	(0)	(0)	(0)	(0)	-	(0)		13	-
200	*Non-financial corporations*	6,273	6,083	188	264	-	264	(2)	(0)	(1)	(27)	-	(27)		884	37
210	*Households*	1,505	1,449	56	0	-	0	(0)	(0)	(0)	(0)	-	(0)		24	0
220	**Total**	**65,402**	**59,737**	**4,012**	**2,581**	**-**	**2,139**	**(251)**	**(81)**	**(137)**	**(780)**	**-**	**(640)**	**(1,931)**	**27,944**	**1,381**

Template 18a: EU CR2: Changes in the stock of non-performing loans and advances as of 30.06.2024

(Amounts in millions of Euro)

		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	2,309
020	Inflows to non-performing portfolios	500
030	Outflows from non-performing portfolios	(1,031)
040	Outflows due to write-offs	(76)
050	Outflow due to other situations	(955)
060	**Final stock of non-performing loans and advances**	1,778

Template 18b: EU CR2: Changes in the stock of non-performing loans and advances as of 31.12.2023

(Amounts in millions of Euro)

		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	3,186
020	Inflows to non-performing portfolios	967
030	Outflows from non-performing portfolios	(1,844)
040	Outflows due to write-offs	(215)
050	Outflow due to other situations	(1,629)
060	**Final stock of non-performing loans and advances**	2,309

Template 19a 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	p	q
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**	

Template 19b EU CR5 – standardised approach as of 31.12.2023

(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	p	q
1	Central governments or central banks	22,361	-	16	467	8	-	-	-	-	2,579	-	642	-	-	-	26,073	
2	Regional government or local authorities	-	-	-	-	17	-	10	-	-	-	-	-	-	-	-	27	
3	Public sector entities	646	-	-	-	0	-	-	-	-	236	-	-	-	-	-	882	
4	Multilateral development banks	695	-	-	-	-	-	-	-	-	-	-	-	-	-	-	695	
5	International organisations	340	-	-	-	-	-	-	-	-	-	-	-	-	-	-	340	
6	Institutions	0	-	-	-	917	-	640	-	-	500	-	-	-	-	-	2,057	
7	Corporates	-	-	-	-	123	-	2,386	-	-	9,523	403	-	-	-	-	12,436	
8	Retail exposures	-	-	-	-	-	-	-	-	2,854	-	-	-	-	-	-	2,854	
9	Exposures secured by mortgages on immovable property	-	-	-	-	-	6,939	4,055	-	671	848	0	-	-	-	-	12,513	
10	Exposures in default	-	-	-	-	-	-	-	-	-	1,227	213	-	-	-	-	1,440	
11	Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	116	-	-	-	-	116	
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	-	-	-	-	-	-	-	-	20	-	-	-	-	-	20	
15	Equity exposures	-	-	-	-	-	-	-	-	-	424	-	41	-	-	-	465	
16	Other items	651	-	-	-	-	-	-	-	-	2,220	-	-	-	-	-	2,871	
17	**TOTAL**	**24,694**	**-**	**16**	**506**	**1,065**	**6,939**	**7,091**	**-**	**3,525**	**17,577**	**732**	**683**	**-**	**-**	**-**	**62,828**	

5.1 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.

5.1.1 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 specialisation. 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.

5.1.2 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 20a: 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	c	d	e
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	*Of which non-performing exposures*	728	1,057	851	206	-
EU-5	*Of which defaulted*	728	1,057			

Template 20b: EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques as of 31.12.2023

(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	13,246	28,366	20,468	7,897	-
2	Debt securities	15,817	-	-	-	
3	**Total**	**29,063**	**28,366**	**20,468**	**7,897**	**-**
4	*Of which non-performing exposures*	972	1,343	1,232	111	-
EU-5	*Of which defaulted*	972	1,343			

Template 21a: 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%**

Template 21b: EU CR4 – standardised approach – Credit risk exposure and CRM effects as of 31.12.2023

(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	20,441	190	26,072	0	4,232	16.23%
2	Regional government or local authorities	27	1	27	0	8	31.25%
3	Public sector entities	399	3	881	1	236	26.80%
4	Multilateral development banks	114	0	695	0	-	0.00%
5	International organisations	340	-	340	-	-	0.00%
6	Institutions	2,023	815	2,025	33	1,003	48.76%
7	Corporates	12,863	5,848	11,345	1,090	10,268	82.57%
8	Retail	3,559	3,201	2,633	221	1,971	69.03%
9	Secured by mortgages on immovable property	12,787	99	12,486	28	5,354	42.79%
10	Exposures in default	1,505	239	1,411	29	1,546	107.39%
11	Exposures associated with particularly high risk	142	-	116	-	175	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	20	-	20	-	20	99.02%
15	Equity	465	-	465	-	527	113.34%
16	Other items	2,871	-	2,871	-	2,220	77.33%
17	**TOTAL**	**57,593**	**10,396**	**61,426**	**1,402**	**27,565**	**43.87%**

Template 22a: 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	*Residential immovable property*	233	(26)
040	*Commercial Immovable property*	560	(160)
050	*Movable property (auto, shipping, etc.)*	0	-
060	*Equity and debt instruments*	9	(2)
070	*Other collateral*	-	-
080	**Total**	**836**	**(197)**

Template 22b: EU CQ7: Collateral obtained by taking possession and execution processes as of 31.12.2023

(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)	38	(12)
020	Other than PP&E	838	(200)
030	*Residential immovable property*	244	(28)
040	*Commercial Immovable property*	579	(165)
050	*Movable property (auto, shipping, etc.)*	0	-
060	*Equity and debt instruments*	15	(6)
070	*Other collateral*	-	-
080	**Total**	**876**	**(212)**

6 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 expos

Template 23a: 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	*Of which securities financing transactions netting sets*			-		-	-	-	-
2b	*Of which derivatives and long settlement transactions netting sets*			-		-	-	-	-
2c	*Of which from contractual cross-product netting sets*			-		-	-	-	-
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**

Template 23b: EU CCR1 – Analysis of CCR by approach as of 31.12.2023

(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)	107	136		1.4	1,128	339	339	190
2	IMM (for derivatives and SFTs)			-		-	-	-	-
2a	*Of which securities financing transactions netting sets*			-		-	-	-	-
2b	*Of which derivatives and long settlement transactions netting sets*			-		-	-	-	-
2c	*Of which from contractual cross-product netting sets*			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					1,382	26	26	14
5	VaR for SFTs					-	-	-	-
6	**Total**					**2,510**	**365**	**365**	**203**

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 24a: 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**

Template 24b: EU CCR2 – Transactions subject to own funds requirements for CVA risk as of 31.12.2023

(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	121	70
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-
5	**Total transactions subject to own funds requirements for CVA risk**	**121**	**70**

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

Template 25a: 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 present the Group's exposures to central counterparties (CCPs) and related capital requirements.

Template 25b: EU CCR8 – Exposures to CCPs as of 31.12.2023

(Amounts in millions of Euro)

		a	b
		Exposure value	RWEA
1	**Exposures to QCCPs (total)**		**5**
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	270	5
3	(i) OTC derivatives	270	5
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	46	-
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 30.06.2024 and 31.12.2023

Template 26a: EU CCR3 – Standardized approach – CCR exposures by regulatory portfolio and risk as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
	Exposure classes	**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	-	-	-	-	-	-	-	-	-	-	-	-
11	**Total exposure value**	**97**	**290**	**-**	**-**	**43**	**107**	**-**	**10**	**124**	**10**	**10**	**681**

Template 26b: EU CCR3 – Standardized approach – CCR exposures by regulatory portfolio and risk as of 31.12.2023

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l
	Exposure classes	**Risk weight**											**Total exposure value**
		0%	**2%**	**4%**	**10%**	**20%**	**50%**	**70%**	**75%**	**100%**	**150%**	**Others**	
1	Central governments or central banks	26	-	-	-	-	-	-	-	-	-		26
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	89	270	-	-	41	88	-	-	5	-	-	494
7	Corporates	-	-	-	-	-	27	-	-	137	11	-	175
8	Retail	-	-	-	-	-	-	-	13	-	-	-	13
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-		-	0		-	0
11	**Total exposure value**	**116**	**270**	**-**	**-**	**41**	**115**		**13**	**142**	**11**	**11**	**708**

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 30.06.2024 and 31.12.2023

Template 27a: EU CCR5 – Composition of collateral for CCR exposures 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
	Collateral type	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**

Template 27b: EU CCR5 – Composition of collateral for CCR exposures 31.12.2023

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
	Collateral type	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	220	462	394	299	-	-	-	447
2	Cash – other currencies	2	-	0	-	-	-	-	-
3	Domestic sovereign debt	-	-	-	400	-	98	-	117
4	Other sovereign debt	-	-	-	-	-	59	-	-
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	103	-	79
7	Equity securities	-	-	-	-	-	-	-	47
8	Other collateral	-	-	-	-	-	1,122	-	598
9	**Total**	**222**	**462**	**394**	**699**	**-**	**1,382**	**-**	**1,288**

7 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.

7.1 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 is expected to run for 12 months, until December 2024. 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 €2bn on the senior tranches of securitisations.

Investment in securitisation positions

On June 30th, 2024, the Group held investments in collateralized loan obligations ("CLOs") with a total carrying amount of € 694 mn.

7.2 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 three synthetic securitisations which are comprised of performing corporate/SME exposures (Aurora, Blue and Tokyo) as well as another one based on performing shipping exposures (Project Compass). Bank retains at least 5% of each of the securitised exposures in compliance with the retention rule laid down by the supervisory regulations.

Aurora, Compass and Blue 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.

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). 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).

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 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.

As the Financial Guarantee in Tokyo guarantees the losses that refer to the First Loss Tranche, this means that losses in the portfolio are covered from the first EUR up until the entire commitment amount is consumed. Based on Regulation (EU) 2401/2017, the Bank applies the SEC-SA method to calculate the capital requirements for synthetic securitisations. In accordance with article 247 of Regulation (EU) 2017/2041 and given that 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 of Regulation (EU) 2401/2017.

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 28a: 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					STS	Non-STS			STS	Non-STS		
			of which SRT		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	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Template 28b: EU-SEC1 - Securitisation exposures in the non-trading book as of 31.12.2023

(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		of which SRT		STS	Non-STS			STS	Non-STS		
1	**Total exposures**	**-**	**-**	**5,351**	**2**	**4,405**	**4,405**	**9,756**	**-**	**-**	**-**	**-**	**-**	**476**	**-**	**476**
2	Retail (total)	-	-	4,376	1	-	-	4,376	-	-	-	-	-	11	-	11
3	residential mortgage	-	-	3,682	1	-	-	3,682	-	-	-	-	-	11	-	11
4	credit card	-	-	693	-	-	-	693	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	976	1	4,405	4,405	5,381	-	-	-	-	-	466	-	466
8	loans to corporates	-	-	501	1	4,405	4,405	4,906	-	-	-	-	-	466	-	466
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	lease and receivables	-	-	475	-	-	-	475	-	-	-	-	-	-	-	-
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 29a: 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 29b: EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor as of 31.12.2023

(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**	**4,329**	**-**	**-**	**5**	**73**	**-**	**-**	**4,407**	**-**	**-**	**-**	**517**	**-**	**-**	**-**	**41**	**-**
2	Traditional transactions	-	-	-	2	-	-	-	2	-	-	-	19	-	-	-	2	-
3	Securitisation	-	-	-	2	-	-	-	2	-	-	-	19	-	-	-	2	-
4	Retail underlying	-	-	-	1	-	-	-	1	-	-	-	13	-	-	-	1	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	1	-	-	-	1	-	-	-	6	-	-	-	0	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	4,329	-	-	3	73	-	-	4,405	-	-	-	498	-	-	-	40	-
10	Securitisation	4,329	-	-	3	73	-	-	4,405	-	-	-	498	-	-	-	40	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	4,329	-	-	3	73	-	-	4,405	-	-	-	498	-	-	-	40	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Template 30a: 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	-		-	-	-		-				-				-		

Template 30b: EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor as of 31.12.2023

(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**	**466**		**0.5**	**10**	**-**		**476**				**209**				**17**		
2	Traditional securitisation	466		0.5	10	-		476				209				17		
3	Securitisation	466		0.5	10	-		476				209				17		
4	Retail underlying	-		0.5	10	-		11				116				9		
5	Of which STS	-		-	-	-		-				-				-		
6	Wholesale	466		-	-	-		466				93				7		
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 31a: 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	-	-	-

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Template 31b: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments 31.12.2023

(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**	**23,891**	**13,889**	**387**
2	Retail (total)	14,980	10,904	270
3	residential mortgage	14,287	10,894	268
4	credit card	693	10	2
5	other retail exposures	-	-	-
6	re-securitisation	-	-	-
7	Wholesale (total)	8,911	2,985	116
8	loans to corporates	8,436	2,973	116
9	commercial mortgage	-	-	-
10	lease and receivables	475	12	0
11	other wholesale	-	-	-
12	re-securitisation	-	-	-

8 Market Risk

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.

8.1 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 stress period, after the recent review, remains unchanged (26/09/2012 – 25/09/2013). The selection of the stress period is based on the assessment of the most volatile period in recent history.

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 30.06.2024 are displayed in the following table:

Template 32a: 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

Template 32b: EU MR2-A - Market risk under the internal Model Approach (IMA) as of 31.12.2023

(Amounts in millions of Euro)

		a	b
		RWAs	Own funds requirements
1	**VaR** (higher of values a and b)	96	8
(a)	Previous day's VaR (VaRt-1)		3
(b)	Multiplication factor (mc) x average of previous 60 working days (VaRavg)		8
2	**SVaR** (higher of values a and b)	164	13
(a)	Latest available SVaR (SVaRt-1))		5
(b)	Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		13
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**	**260**	**21**

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

Template 33a: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 30.06.2024

(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**	126	219	-	-	-	345	28
1a	*Regulatory adjustment [(1)]*	*68*	*150*	-	-	-	*218*	*17*
1b	*RWAs at the previous quarter-end (end of the day)*	*58*	*69*	-	-	-	*127*	*10*
2	Movement in risk levels	(3)	(6)	-	-	-	(9)	(1)
3	Model updates/changes	-	-	-	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-	-
6	Foreign exchange movements	-	-	-	-	-	-	-
7	Other	8	-	-	-	-	8	1
8a	*RWAs at the end of the disclosure period (end of the day)*	63	63	-	-	-	126	10
8b	*Regulatory adjustment [(1)]*	72	150	-	-	-	222	18
8	**RWAs at the end of the disclosure period**	136	213	-	-	-	348	28

Template 33b: EU MR2-B - RWA flow statements of market risk exposures under the IMA as of 31.12.2023

(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**	96	164	-	-	-	260	21
1a	*Regulatory adjustment* [(1)]	*61*	*105*	-	-	-	*166*	*13*
1b	*RWAs at the previous quarter-end (end of the day)*	*35*	*59*	-	-	-	*94*	*8*
2	Movement in risk levels	25	10	-	-	-	35	3
3	Model updates/changes	-	-	-	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-	-
6	Foreign exchange movements	-	-	-	-	-	-	-
7	Other	(2)	-	-	-	-	(2)	(0)
8a	*RWAs at the end of the disclosure period (end of the day)*	58	69	-	-	-	127	10
8b	*Regulatory adjustment* [(1)]	68	150	-	-	-	218	17
8	**RWAs at the end of the disclosure period**	126	219	-	-	-	345	28

[(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 34a: EU MR3 - IMA values for trading portfolios as of 30.06.2024

(Amounts in millions of Euro)

		a
		30.06.2024
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	-

Template 34b: EU MR3 - IMA values for trading portfolios as of 31.12.2023

(Amounts in millions of Euro)

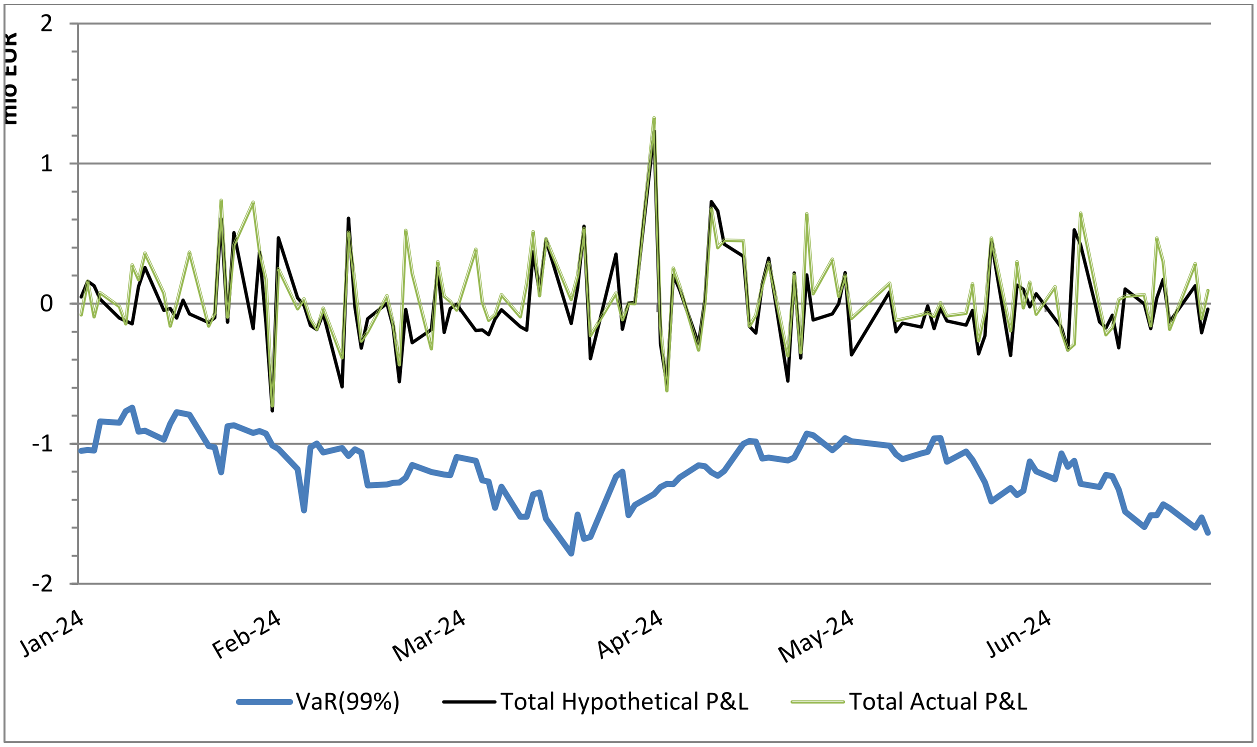
		a
		31.12.2023
VaR (10 day 99%)		
1	Maximum value	4
2	Average value	2
3	Minimum value	1
4	Period end	3
SVaR (10 day 99%)		
5	Maximum value	6
6	Average value	4
7	Minimum value	3
8	Period end	5
IRC (99.9%)		
9	Maximum value	-
10	Average value	-
11	Minimum value	-
12	Period end	-
Comprehensive risk measure (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 35: 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 the first semester of 2024 no overshootings were observed on both actual and hypothetical Backtesting.

8.2 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 36a: 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**

Template 36b: EU MR1 - Market risk under the standardised approach as of 31.12.2023

(Amounts in millions of Euro)

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	1
2	Equity risk (general and specific)	32
3	Foreign exchange risk	8
4	Commodity risk	-
	Options	
5	Simplified approach	-
6	Delta-plus approach	-
7	Scenario approach	-
8	Securitisation (specific risk)	-
9	**Total**	**41**

9 Interest Rate Risk in the Banking Book

9.1 Definition

The latest EBA Guidelines on IRRBB were released in October 2022 and where effective in 2023, they were applied in December 2023.Overall, the Guidelines maintain continuity with the previous ones, though they introduced, some new elements such asprudent behavioral assumption on non-maturity deposits from non-financial counterparties.

Additionally the Guidelines include specific chapters on the identification , assessment and monitoring of Credit spread risk from non-trading book activities (CSRBB). CSRBB refers tothe risk driven by changes of the market price for credit risk, for liquidity and for potentially other characteristics of credit-risky instruments, which is 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.

In the context of the measurement of the impact of IRRBB and CSRBB under internal systems, interest income, interest expenses and market value changes should be considered. This ensures a comprehensive assessment of the impact of all interest rate and credit spread sensitive items. Furthermore, in this context, a five-year cap on weighted average repricing maturity is introduced for certain retail and wholesale deposits without a specified maturity. This behavioral assumption targets prudent treatment of these deposits which prove to be a material item in the calculation of the impact of changes of interest rates.

According to the guidelines, IRRBB should be treated as an important risk and IRRBB exposure needs to be identified and managed since it affects both economic value and net interest income plus market value changes.

Moreover, CSRBB exposures should identify and ensure that are adequately assessed, monitored, and controlled both under economic value and net interest income measures plus market value changes.

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).

9.2 Interest Rate Risk Framework

Alpha Group 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 foreign exchange risks in the Banking Book, in a consistent manner across the GroupIn 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).Furthermore, currently Alpha Bank is in Category 1 under the SREP Guidelines in terms of level of sophistication in risk measures.

Interest rate risk management for the Banking Book is performed on a monthly basis and according to Asset and Liability Management Policies & Procedures which have been adopted at Group level.

Interest rate and Foreign Exchange risk management for the Banking Book is performed through effective and timely identification and the estimation of their effects on Alpha Group's earnings and economic value.

9.3 Interest Rate Risk Identification and Assessment

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.

9.4 Interest Rate Risk Statement

Market Risk Control and ALM Division are responsible for interest rate risk measurement. The main measure of Interest Rate risk is Interest Rate Risk Gap for each currency which represents the repricing schedule showing assets, liabilities and off balance sheet exposures by time band according to their maturity (for fixed rate instruments), or next reprice date (for adjustable/floating rate instruments).

The measures that the institution uses to gauge its sensitivity to IRRBB are calculated monthly. Specifically:

- Changes in expected earnings (ΔNII):

The earnings-based measure used for IRRBB purposes is the change in Net Interest Income (ΔNII), which is defined as the maximum reduction in NII plus market value changes of instruments under the regulatory & internal interest rate shocks used for IRRBB measurement purposes over a period of 1-year versus the base scenario.

- Changes in economic value of equity (ΔEVE).

The economic value-based measure used for IRRBB purposes is the change in Economic Value of Equity (ΔEVE), which is defined as the maximum decrease of the banking book's economic value under the regulatory & internal interest rate shocks used for IRRBB measurement purposes versus the base scenario. The change in economic value of equity (ΔEVE) is defined as the change in fair value of assets caused by a change in interest rates, minus the change in fair Value of liabilities caused by the same change in interest rates.

- DV01 by time tenor

The DV01 specifies the sensitivity by time bucket of the banking book portfolio if the interest rate changes by 1 basis point (0.01%)

Interest Rate Risk Stress Scenarios

The stress tests which are performed by Market Risk Control 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, Market Risk Controlperforms six 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 parallel and non-parallel interest rate shocks for internal purposes:

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.

9.5 Interest Rate Risk Monitoring

Alpha Bank has adopted an adequate, timely and accurate information system in order 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 foreign exchange 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.

Market Risk Control consolidate the information received from countries' local Risk Management Units and communicate a summary report to Group ALCO.

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.

9.6 Interest Rate Risk management and mitigation strategies

The Bank is managing 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 Committee (ALCo), 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).

The ALCo presentation includes 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.

9.7 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 business-as-usual assumptions. 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.

As of 30.06.2024, the average repricing maturity of the total NMDs (including non-core) is c. 2.2 years and for the core part is c. 3.2 years . The NMDs longest repricing maturity is 7 years (average repricing maturity 3.5 years). The NMDs passthrough is on average at the level of 35%.

The magnitude of the optionality risk (loan prepayments and fixed term deposits early withdrawals) is considered immaterial for the Bank.. Moreover, the duration of time deposits which is approximately 0,6y and as well as the penalty are the main drivers of the immaterial impact of early withdrawals.

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

9.8 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 37a: EU-IRRBB1 - Interest rate risks of non-trading book activities as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d
Supervisory shock scenarios		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	Steepener	(63)	(184)		
4	Flattener	(124)	80		
5	Short rates up	(282)	(48)		
6	Short rates down	56	(127)		

Template 37b: EU-IRRBB1 - Interest rate risks of non-trading book activities as of 31.12.2023

(Amounts in millions of Euro)

		a	b	c	d
Supervisory shock scenarios		Changes of the economic value of equity		Changes of the net interest income	
		Current period	Last period	Current period	Last period
1	Parallel up	(341)	306	(10)	62
2	Parallel down	212	(295)	(273)	(196)
3	Steepener	(184)	(6)		
4	Flattener	80	59		
5	Short rates up	(48)	98		
6	Short rates down	(127)	(94)		

10 Liquidity Risk

10.1 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.

10.2 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.

10.3 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 restrain, 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.

10.4 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.

10.5 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.

10.6 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

10.7 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).

10.8 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 June 2024 the HQLA buffer stood at EUR 15.7 billion and the Group LCR stood at 192%.

The following table provides a breakdown of the LCR as of 30 June 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 38: EU LIQ1 - Quantitative information of LCR as of 30.06.2024

(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)	**30.06.2024**	**31.03.2024**	**31.12.2023**	**30.09.2023**	**30.06.2024**	**31.03.2024**	**31.12.2023**	**30.09.2023**
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	**Total high-quality liquid assets (HQLA)**					**15,672**	**15,614**	**15,055**	**14,261**
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	38,242	37,998	37,656	37,516	2,244	2,256	2,278	2,340
3	*Stable deposits*	20,096	20,189	20,277	20,585	1,005	1,009	1,014	1,029
4	*Less stable deposits*	10,404	10,458	10,586	11,002	1,238	1,246	1,263	1,310
5	Unsecured wholesale funding	12,220	12,409	12,329	11,919	5,663	5,669	5,577	5,302
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	286	292	320	322	71	73	80	80
7	*Non-operational deposits (all counterparties)*	11,908	12,107	11,956	11,544	5,566	5,586	5,443	5,168
8	*Unsecured debt*	26	10	53	53	26	10	53	53

9	*Secured wholesale funding*					28	21	17	3
10	Additional requirements	1,344	1,365	1,391	1,421	579	556	544	540
11	*Outflows related to derivative exposures and other collateral requirements*	497	470	455	449	497	470	455	449
12	*Outflows related to loss of funding on debt products*	-	-	-	-	-	-	-	-
13	*Credit and liquidity facilities*	848	895	936	972	82	86	89	91
14	Other contractual funding obligations	319	407	521	631	319	400	502	602
15	Other contingent funding obligations	9,676	9,531	9,324	9,056	693	721	753	705
16	**TOTAL CASH OUTFLOWS**					**9,525**	**9,623**	**9,671**	**9,491**
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	64	33	17	-	14	7	7	-
18	Inflows from fully performing exposures	1,744	1,638	1,438	1,335	1,186	1,085	904	784
19	Other cash inflows	146	207	316	457	38	97	202	339
20	**TOTAL CASH INFLOWS**	**1,955**	**1,878**	**1,771**	**1,793**	**1,238**	**1,189**	**1,113**	**1,123**
EU-20c	*Inflows subject to 75% cap*	1,955	1,878	1,771	1,793	1,238	1,189	1,113	1,123
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					15,672	15,614	15,055	14,261
22	**TOTAL NET CASH OUTFLOWS**					**8,287**	**8,434**	**8,558**	**8,368**
23	LIQUIDITY COVERAGE RATIO					189%	185%	176%	170%

10.9 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 39a: EU LIQ2: Net Stable Funding Ratio as of 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e
		Unweighted value by residual maturity				**Weighted value**
		No maturity	**< 6 months**	**6 months to < 1yr**	**≥ 1yr**	
Available stable funding (ASF) Items						
1	Capital items and instruments	**7,555**	**-**	**-**	**1,097**	**8,652**
2	*Own funds*	7,555	-	-	1,097	8,652
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		35,642	2,985	**178**	**36,122**
5	*Stable deposits*		22,315	1,281	80	22,496
6	*Less stable deposits*		13,327	1,704	98	13,625
7	Wholesale funding:		**19,286**	**386**	**2,641**	**8,355**
8	*Operational deposits*		287	-	-	143
9	*Other wholesale funding*		18,999	386	2,641	8,212
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**115**	**1,225**	**-**	**24**	**24**
12	*NSFR derivative liabilities*	115				

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
13	*All other liabilities and capital instruments not included in the above categories*		1,225	-	24	24
14	**Total available stable funding (ASF)**					**53,152**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**351**
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:		**4,594**	**2,424**	**33,858**	**30,320**
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*		613	8	246	311
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3,506	2,134	18,775	23,659
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		176	155	2,487	6,074
22	*Performing residential mortgages, of which:*		258	191	7,548	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		209	163	6,316	-
24	*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*		217	92	7,289	6,350
25	Interdependent assets		-	-	-	-
26	Other assets:		**2,277**	**48**	**9,603**	**10,338**
27	*Physical traded commodities*				-	-
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	209	177
29	*NSFR derivative assets*		-			-
30	*NSFR derivative liabilities before deduction of variation margin posted*		863			43
31	*All other assets not included in the above categories*		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%**

Template 39b: EU LIQ2: Net Stable Funding Ratio as of 31.12.2023

(Amounts in millions of Euro)

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	**7,261**	**-**	**-**	**980**	**8,240**
2	*Own funds*	7,261	-	-	980	8,240
3	*Other capital instruments*		-	-	-	-
4	Retail deposits		**35,333**	**2,374**	**981**	**36,100**
5	*Stable deposits*		22,645	997	404	22,863
6	*Less stable deposits*		12,689	1,377	577	13,236
7	Wholesale funding:		**15,055**	**4,631**	**2,324**	**10,357**
8	*Operational deposits*		441	-	-	221
9	*Other wholesale funding*		14,614	4,631	2,324	10,137
10	Interdependent liabilities		**-**	**-**	**-**	**-**
11	Other liabilities:	**-**	**1,111**	**-**	**24**	**24**
12	*NSFR derivative liabilities*	-				
13	*All other liabilities and capital instruments not included in the above categories*		1,111	-	24	24
14	**Total available stable funding (ASF)**					**54,722**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**328**
16	Deposits held at other financial institutions for operational purposes		**-**	**-**	**-**	**-**
17	Performing loans and securities:		**4,420**	**2,479**	**34,029**	**30,384**
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*		755	4	188	266
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		3,375	2,073	19,001	23,847
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		167	159	2,555	6,016
22	*Performing residential mortgages, of which:*		237	195	7,615	-
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		193	164	6,175	-
24	*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*		53	207	7,225	6,271
25	Interdependent assets		**-**	**-**	**-**	**-**
26	Other assets:		**2,515**	**14**	**10,634**	**10,509**
27	*Physical traded commodities*				-	-

		a	b	c	d	e
		Unweighted value by residual maturity				**Weighted value**
		No maturity	**< 6 months**	**6 months to < 1yr**	**≥ 1yr**	
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*		-	-	188	160
29	*NSFR derivative assets*		225			225
30	*NSFR derivative liabilities before deduction of variation margin posted*		964			48
31	*All other assets not included in the above categories*		1,327	14	9,446	10,076
32	Off-balance sheet items		**339**	**1,052**	**4,489**	**756**
33	**Total RSF**					**41,977**
34	**Net Stable Funding Ratio (%)**					**130%**

11 Environmental,Social and Governance (ESG) Risks

11.1 ESG Strategy and Governance

11.1.1 Environmental Risk

Business Strategy and Processes

Alpha Services and Holdings, assesses periodically 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 materiality analysis serves to identify the actual and potential impacts on the economy, environment, and people, including impacts on human rights, across the organization's activities and business relationships. Impacts can be negative or positive, long term or short term.

Following the recommendations of 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 action plan, submitted to ECB in May 2021, presenting how the climate and environmental risk assessment will be incorporated in its operations and in the risk management process. Implementation of the plan began in June 2021, it was continued throughout 2022-2023 and was enhanced taking into consideration the requirements of the Climate Stress Test exercise and the feedback provided by the Single Supervisory Mechanism (SSM) in the context of the Thematic Review. Leveraging on the work already performed in 2022 the Bank has proceeded with targeted implementations during 2023 in accordance Group's ESG plan commitments. 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 TCFD (Task Force on Climate-related Financial Disclosures) and Sustainability Reports 2022, that are available at the website of Alpha Services and Holdings.

Strategic Plan and GRI Materiality Assessment

Alpha Bank S.A. 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 is achieved through a materiality analysis process, in line with the GRI recommendations for materiality analysis by utilizing the UNEPFI PRB Tool for Banks to understand the positive and negative socio-economic, environmental, and social impacts of its portfolio.

b) Introduced environmental, social and governance KPIs (such as % of disbursements to RES over total disbursements to Energy sector, ii) gross disbursements aligned with Sustainable Finance Framework, iii) Green asset ratio, etc.), which are monitored on a quarterly and annual basis to take corrective action when needed.

c) Is in the process of developing science-based sector specific targets for its financed emissions, in alignment with the Paris Agreement Climate goals and the commitment to be Net Zero by 2050.

d) Is in the process of incorporating the decarbonization targets into its 3-year Business Plan.

This year, the Group revisited the Materiality Analysis performed in the previous financial year, re-identified and re-assessed the topics, with the consultation of internal stakeholders and experts, through the following process:

1. **Understand the organization's context**
   The Bank reviewed the list of identified impacts to people/stakeholders and to the natural environment through its own operations, supply chain and financial products/services of the previous financial year. It also reviewed the content of media, peers & sustainability standards in order to identify any additional impacts to people/stakeholders and to the natural environment related to its business model and value chain.

2. **Identify actual and potential impacts**
   Actual impacts, either positive or negative, to the natural environment and people, including impacts on human rights, across the organization's activities and business relationships were re-validated taking into consideration new impacts identified through peers' and standards' review. Potential impacts were re-identified with the consultation of internal stakeholders and experts. The new list of identified impacts included in-house impacts across the Bank's operations and its supply chain, and financed impacts (i.e. impacts associated with Bank's financial products and services).

3. **Assess the significance of the impacts**
   The re-assessment of impacts was based on a qualitative analysis by the Bank's ESG Working Group, through a dedicated electronic survey (e-survey) tool. Impacts were assessed in accordance with their severity/significance for the short-term, mid-term and long-term time horizon and, in case of any additional potential impacts, their probability of occurrence was considered based on how likely the impact may be realized in the defined time horizon.

4. **Prioritize the most significant impacts**
   The prioritization was based on the results of an e-survey assessment, via which the significance of the impacts was determined, and thresholds set to determine which positive and negative impacts will be material for the organization's strategy and disclosures. The final list of material impact areas was debated by a dedicated working group, comprised of executives from Governance & Sustainability Division, Strategy & Investments, Digital, Transformation Office, Climate & ESG Risk and HR, was validated by a discussion at the Group Sustainability Committee and approved by the Board of Directors.

The material impact areas in the context of the environment, whether potentially positive or negative, for 2023 identified and prioritized are the following:

- **Climate Stability** (impacts through specific financial products/services that address climate change, and through energy reduction and efficiency initiatives in the Bank's supply chain and operations).

- **Circularity** (Impacts created through operational activities that affect the efficient use of limited, non-renewable natural and renewable natural resources and/or are focused on waste management and the ability to manage waste).
- **Biodiversity** (air, soil, waterbodies, species and habitats) (Impacts created through financial products/services to certain sectors and operational activities that create air pollutants (e.g. NOx, SOx, PM, VOCs), that affect the composition of soil and its ability to deliver ecosystem services, the quality and quantity of surface water and groundwater, the ability to maintain species and/or the ability to protect, restore and promote sustainable ecosystems and habitats).

Based on the analysis and impact areas, 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 equity and corporate bonds, business loans and unlisted equity, project finance, commercial real estate, mortgages, motor vehicle loans, sovereign debt), to enable the identification of climate-related transition risks and opportunities, setting and implementing climate targets and financing transitions in different sectors of the economy.

The Group progressed with the identification of its most significant impact areas/topics which are associated with the portfolio of its subsidiary company in Cyprus. The impact analysis was performed 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.

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

Specifically, the **Bank's Strategic Plan** aims to incorporate the following commitments to support an environmentally sustainable economy:

- Support Bank's customers' decarbonization
- Align portfolio emissions to meet the Paris 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 consider both financing and own operations described below:

Support an environmentally sustainable economy			
Commitments	**Targets[1]**	**Target Date**	**KPIs**
Support Bank's 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 1.4 billion compared to 2023-2025 target announcement	2026	New financing volumes (in Euro million)
	Within the total Sustainable Financings, achieve Euro 2.6 billion to Renewable Energy Systems	2026	New financing volumes (in Euro million)
	Within the total Sustainable Financings, achieve at least Euro 300 million of Retail green loans, including loans to small businesses	2026	New financing volumes (in Euro million)
	Launch new sustainability-based mortgage and consumer loan products and credit cards	2025	No. 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 own operations	Reduction of Bank's operating footprint and setting Net-Zero targets	2024	Set target Year for Carbon Neutral Operations and interim targets
	Reduction of Scope 1 and 2 GHG emissions by 20%	2025	Scope 1 and 2 emissions (tCO_2e)
	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	On going	Percentage of electrical power used that is derived from non-renewable energy sources *(Alpha Bank)*

Support an environmentally sustainable economy			
Commitments	Targets[1]	Target Date	KPIs
	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 Bank's operations and its supply chain the Group also applies, among other measures, internal management systems certified with ISO (14001, 14064, 45001, 22301, and 22316)[1], that cover all its operations and employees.

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 the waste management. Indicatively, the Bank recycles paper, batteries, light bulbs, printer consumables, electric and electronic equipment, and donates old office equipment. The Group has implemented adequate Environmental Policy and procedures according to the requirements of ISO 14001 Environmental Management System, aiming to improve the management of these issues. The certification of ISO14001 applies to all its activities and employees, along with the monitoring and reporting of its GHG emissions following ISO14064 requirements, verified by TUV AUSTRIA. Through these procedures, the Bank identifies and assesses known and potential environmental risks and opportunities in a more formal and detailed manner. Furthermore, the Bank has established a holistic ESG training program, as well as organizes, supports, and participates in environmental actions to cultivate the ecological conscience of its Employees and their families and to improve the quality of the environment.

The above-mentioned 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. In that context, Alpha Bank, commencing 2021 (with data of 2020) is also continuously developing, a voluntary Environmental Statement in accordance with the EU Eco-Management and Audit Scheme (EMAS) which is validated by TUV Austria and is submitted to the Ministry of Environment and Energy for review and registration, allowing its publishing. On 20/03/2023 the Ministry of Environment and Energy decided the registration of Alpha Bank S.A. in the EU EMAS system, along with the registration of the respective Environmental Statement 2021 (with data of 2020), with registration number EL-000118. Both Environmental Statements for 2023 and 2022 (with data of 2022 and 2021 respectively) have been also submitted to the above-mentioned Ministry and are still pending for registration.

[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)

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 ensure the long-term value of its investors, supporting the objectives of the Paris Climate Agreement.

Through the structured collection, management, and application of relevant sustainability data, for each customer's loans and investments, the Bank assesses the quality of its assets. Moreover, these data constitute the basis for target setting and directed actions to improve the Group's sustainability KPIs, in line with the evolving requirements of investors, regulators, markets and society.

Sustainable Finance

Alpha Services and Holdings has developed and published its Sustainable Finance Framework (SFF or framework) to raise awareness on the commitment to sustainable finance and to 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 credentials in lending activities and stipulates the decision and classification process that we implement to classify our financial products and services as sustainable. It also serves as a guide during the development of sustainable financing products with specific green or social use of proceeds. 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

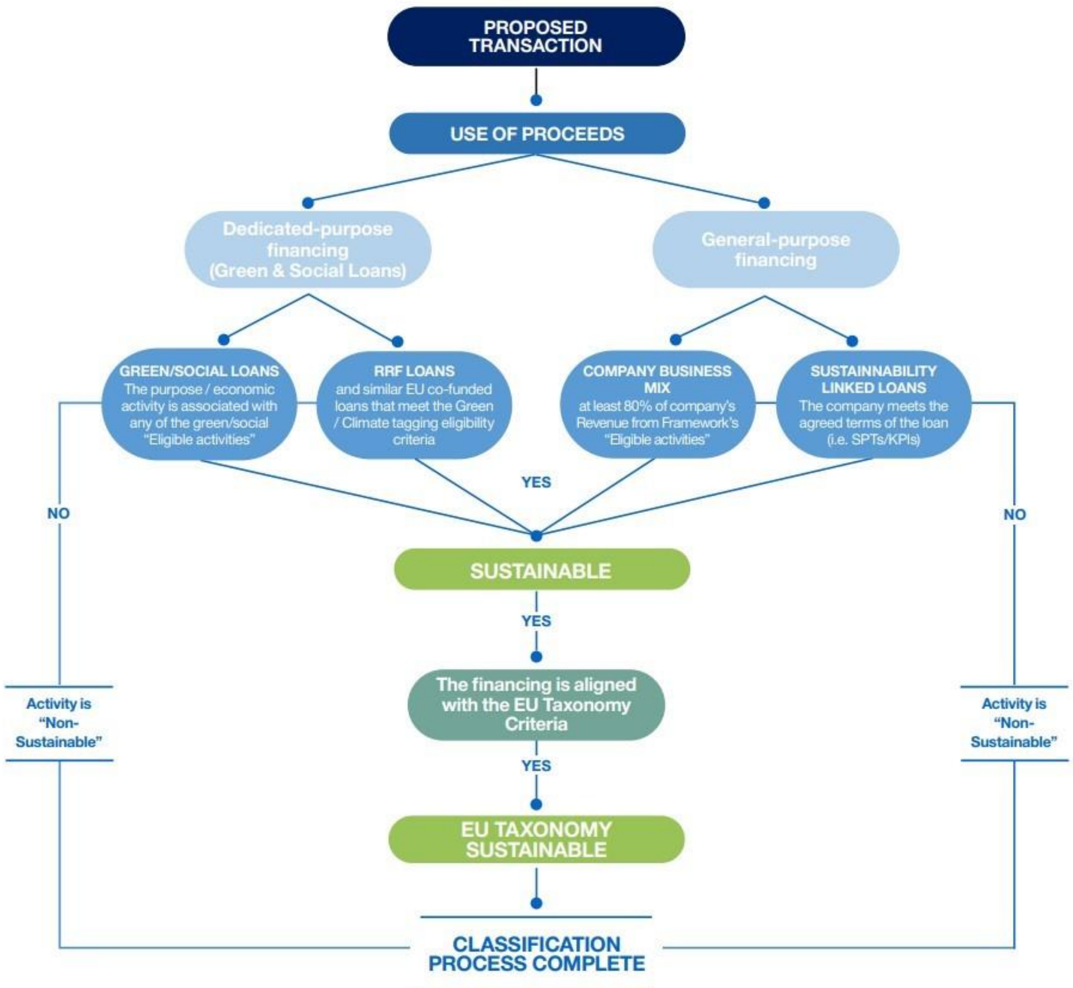
- **Green/Social Loans**: The funds are 100% directed towards a project/investment listed under the eligible green/social criteria.
- **Recovery and Resilience Facility** (RRF financing).

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 activities' categorization purposes. 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 on December 2023 it was issued the revised "C*limate related, environmental, social and governance risk management policy on group's business lending*" as well as the revised Wholesale Banking Credit Manual.

The ESG assessments performed as part of the 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

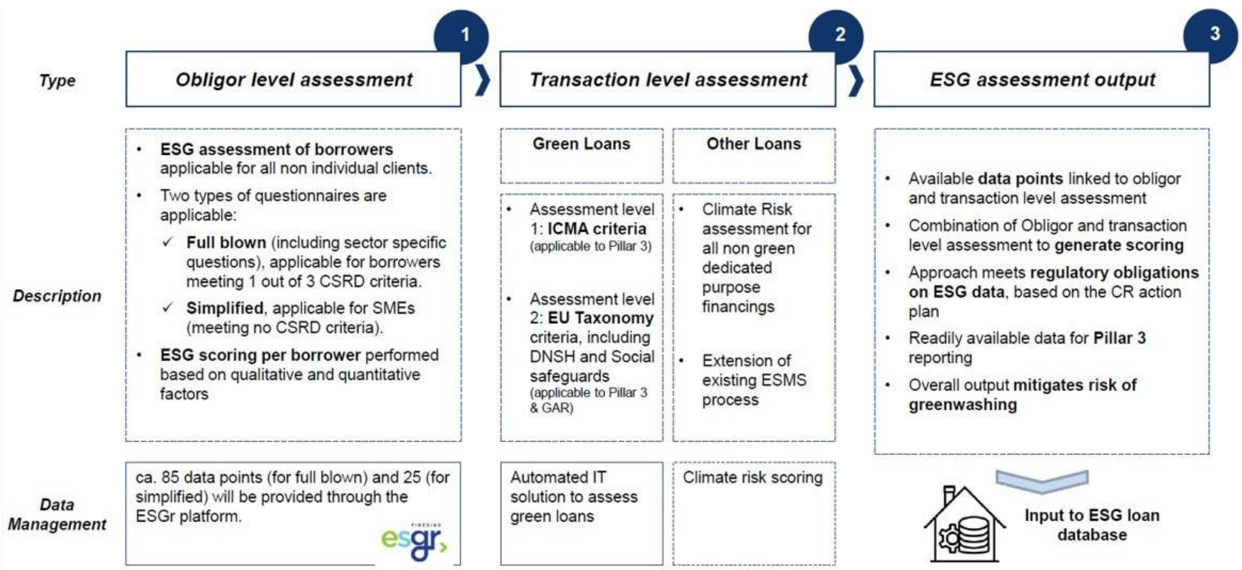
(iv) integration of the ESG assessments into the credit approval process.

Environmental, Social and Governance Risk in the client base and credit decisions

Alpha Services and Holdings, has implemented assessment processes for ESG including Social risks 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 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 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 in 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 and 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.

The cornerstone of Alpha Services and Holdings' Sustainable Finance Strategy includes the design of specific financial products to enable its customers' transition to low-carbon business models and carbon-reduction / climate defense technologies.

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 and renovation of a house classified at least under energy efficiency performance class B.

- Purchase of electric/hybrid cars, bicycles, motorcycles, and private charging points.

- Purchase and installation of home equipment, such as photovoltaic and solar panels, heat pumps, or natural gas boilers 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 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 **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 of 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 impacting reforestation. Through the collaboration with “Reforest Action” and the Forest Research Institute, almost 56 thousand trees have been planted, which translates to 8.4 thousand tons of CO_2 stored and 168 thousand natural shelters for wild animals created. This action is particularly important for Greece not only for the environment but also for the residents of the affected areas by the wildfires since the reforestation prevents severe floods. The above initiative of Alpha Bank is of great significance because it raises Customers’ awareness on environmental issues and at the same time has 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 activities[2] that the Group does not finance is provided. From 1.1.2024 the Bank will apply 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 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**: The bank in progress of setting targets for the Financed Emissions of its portfolio, in line with the goals of the Paris Agreement (containing global temperature rise to 1.5C and no more than 2C), as well as EU Law, Regulation and Policy (fit-for-55, EU Green Deal). The aim of this strategy is to align all material elements of the loan and (on balance sheet) investment portfolio with the a Science-Based 1.5C pathway, based on the IEA NZE Scenario, adapted to the bank's portfolio composition and national characteristics as they apply. The target setting process follows a phased approach prioritizing sectors, on the basis of (a) materiality in terms of Financed Emissions, (b) availability of a methodology to reduce emissions in the sector and set 1.5C based targets (c) data availability and quality in terms of published figures by the bank's client base (d) materiality of exposures. The 1st set of sectors for which targets will be set are Power Generation, Oil & Gas, Iron & Steel and Cement. These sectors constitute over 60% of the Financed Emissions of the bank that are in scope for target setting. The metrics selected for targets are Carbon Intensity metrics for all of the above sectors, with the exception of Oil & Gas for which absolute emissions will be used. The targets will be disclosed before the end of 2024.

- **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.

[2] More details are presented in the 2022 Sustainability report and Climate related (TCFD) reports.

- **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.
- **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).

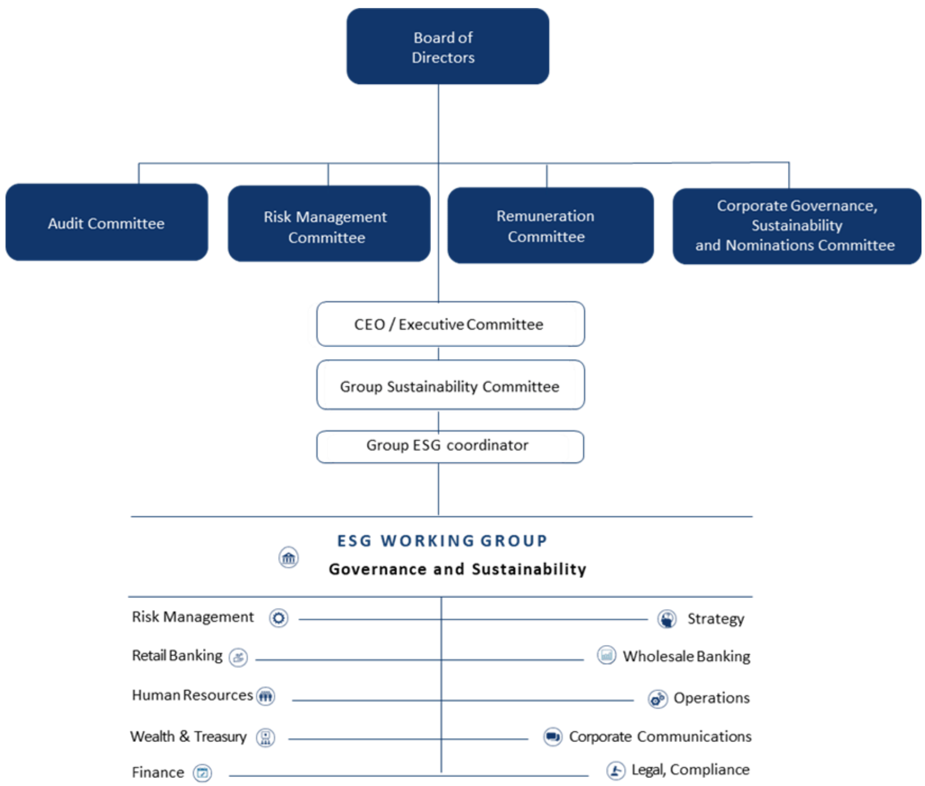
For the purpose of implementing the Principles for Responsible Banking, Alpha Services and Holdings has already submitted three self- assessment reports. It should be noted that at end of 2022, a new dedicated portfolio alignment analysis was conducted, in accordance with the UNEP FI Principles for Responsible Banking (PRB) Impact Analysis, using the Portfolio Impact Analysis Tool for Banks (version 3). 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 23 environmental, economic, and social areas defined by the UNEP FI PRB. The results of the analysis were used to define the Group's Sustainability Strategy.

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 August 2023, the company submitted its 2022 PRI Assessment report in which it reported on its responsible investment activities throughout the year 2022.

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 also 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/responsible Board Committee with respect to all sustainability/ESG issues and promotes respective communications and feedback from all the BoD 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 Sustainability Report and Non-Financial Information reporting, including sustainability and ESG disclosures.

The BoD, through the Risk Management Committee, receives regular reports and communication by the Chief Risk Officer (CRO) and other relevant functions, about the current risk profile, current state of risk culture, utilization against the established risk appetite and limits, limit breaches and mitigation plans.

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 six General Managers as permanent members and 8 additional members at the General Manager or senior executive level. During 2023, the committee met 9 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, the Sustainable Finance Framework operationalization, updated Policy documents, as well as key disclosures and regulatory submissions.

The role of the Group ESG Coordinator was also established, to lead sustainability initiatives and steer operational teams on implementation.

Operational level implementation

At the Operational level, an **ESG Working Group** has been established to implement key initiatives, led by the Group ESG Coordinator, who is also responsible for providing direction to subsidiaries and other units. The 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 Division** (GSD) 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 Division** 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 developed the **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

Our Bank integrates ESG-related considerations into its Remuneration Policy, reflecting our commitment to environmental stewardship and sustainability.Additionally, variable remuneration incorporates criteria linked with climate-related and environmental goals, in alignment with the actions and initiatives that the Bank is developing,including:

- Financial objectives on Sustainable Finance lending volumes
- C&E Risk management framework implementation
- Objectives aiming to improvement the availability of client ESG data
- ESG (including C&E) Risk Training objectives
- Sustainable Finance Training objectives

These criteria are integrated into the broader performance assessment framework to ensure a holistic evaluation of contributions toward the Bank's sustainability objectives. Following the relevant approval at the General Meeting of Shareholders on 27.7.2023, the Remuneration Policy of the Members of the Board of Directors encompasses a culture of inclusion and gender-neutral remuneration provisions and integration of ESG criteria in the Remuneration Framework as per the related legal and regulatory provisions.
The remuneration policy objectives and criteria will be aligned with the bank's strategy for Financed Emissions and the decarbonization of the portfolio, once phase 1 of that work is completed, at the end of 2024

11.1.2 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

GRI Materiality Assessment

Alpha Services and Holdings, periodically, tries to identify, assess and prioritize social issues which are related to its activities and might impact the Group's operations and/or its Stakeholders, through a materiality analysis process, in accordance with the "GRI 3: Material Topics 2021". Through the materiality analysis "the actual and potential impacts on the economy, environment, and people, including impacts on human rights, across the organization's activities and business relationships, are being identified. Impacts can be negative or positive, long term or short term.

The material **social impact areas**, whether potentially positive or negative, for 2023 identified and prioritized are the following:

- **Finance** (Impacts created through specific financial products/services and operational initiatives that improve accessibility to the use of financial services).
- **Health, Safety and well-being** (Impacts created through specific financial products/services that affect the ability of stakeholders to live in a state of complete physical, mental and social well-being and stakeholders' accessibility to quality essential healthcare services).
- **Employment** (impacts created through specific financial products/services and operational activities that improve stakeholders' accessibility to productive work in conditions of freedom, equity, security and human dignity).
- **Gender Equality** (impacts created through operational activities and initiatives that improve stakeholders' ability to live free from gender inequality).

- **Age Discrimination** (impacts created through specific financial products/services and operational activities that improve stakeholders' ability to live free from ageism).
- **Culture and Heritage** (impacts created through specific financial products/services and CSR initiatives that improve stakeholders' ability to access and participate in cultural life, to enjoy the arts and to share in scientific advancement and its benefits).
- **Data Privacy** (impacts of operational activities that affect stakeholders' accessibility to the right of personal privacy (Issues of non-compliance).

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 targets and commitments of Alpha Bank are presented in the following table:

Foster Healthy Economies and Societal Progress			
Commitments	**Targets[1]**	**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 years	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 (%)
Provide an inclusive and safe work environment	Provide a safe and inclusive work environment	Annual	Number of injuries in the workplace (number of Employees)
	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 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 Labour Conventions of the International Labour 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, Alpha adopted a modern framework against bullying and harassment at the workplace in 2022.

A framework of interventions has been developed in 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, placing women in the drivers' seat, through the role of mentor for new joiners and young colleagues, both male and female. An important example of the empowerment initiatives implemented within 2023 is the second phase of "Trading Alpha Brains" (TAB) mentoring program, involving Mentors and Mentees working in teams and developing implementable business ideas.

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 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. The ESG Academy aims to cover the following thematic areas:

- Horizontal Awareness:
  - 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 & Operating Model
  - Risk Management Framework
  - Sustainable Finance Framework
  - Business & Strategic Planning around ESG
- . Technical capabilities for ESG:
  - Sustainable Finance Framework Operationalization
  - Loan Origination Process
  - ESG scoring & modeling
  - Data Governance and Processes

During 2023, 37% of workforce participated in training organized by the ESG Academy, while 80% of wholesale banking business employees followed dedicated ESG lessons specializing on the understanding of the ESG landscape, the sustainable finance framework 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 & Opportunities. A dedicated training was carried out 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 & 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 to its customers two issues of Social Bonds within the year. Social Bonds are defined bonds 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 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 and financing approach, as explained in the "Responsible Investments and Financing" section of the Non-Financial Report 2023 (p. 35-74).

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 includes more than 2000 employees from the following companies:

- Alpha Bank S.A. (Sectors/Activities certified: Information Technology and Back Office Operations, Treasury Management, Cyber Security & Information Security, Organization)
- Alpha Leasing Single Member S.A. (all activities)
- Alpha Supporting Services S.A. (all activities)
- Alpha Finance Investment Services Single Member S.A. (all activities).

Health and Safety

Alpha Bank was also certified in 2022 with an Occupational Health and Safety Management System in accordance with ISO 45001:2018, 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.

Occupation 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, during 2023 the Corporate Governance, Sustainability and Nominations Committee reviewed the material impact areas identified through the Global Reporting Initiative (GRI) materiality analysis and the respective targets associated with the social impact areas that have been identified and was informed on the ESG Workplan, the timeline for key disclosures and reviewed performance of the bank 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.

During 2023 the Audit Committee, among others:

- Monitored the procedure followed for the drafting of the Non-Financial Report and the Sustainability Report for the year 2022, was updated on the materiality analysis process and reviewed the relevant Limited Assurance Reports by an External Auditor.
- Was informed of the proposal of the Company for the Sustainability Report Redesign, based on a holistic approach, aiming to address multiple disclosure requirements and associated data needs across key ESG dimensions.
- Was informed on the Task Force on Climate-related Financial Disclosures (TCFD) report.

The Remuneration Committee, during 2023, 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 Strategy Working Group is responsible for the implementation of the materiality analysis (as described in the "Strategic Plan and GRI Materiality Assessment" section of this report) and the assessment and prioritization of the impact areas and topics (environmental and social), identified.

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 ESG 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 Division 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.

Bank’s Governance and Sustainability Division, drives the ESG agenda and ensures internal adoption of best practice across the Group.

11.1.3 Governance Risk

Regarding the governance arrangements of Alpha Services and Holdings, including Committees, see also the governance as described in the respective environmental and social risk sections.

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 CPRS[3] 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.

[3] 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 are 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)

Governance assessment is common across sectors and captures the decision-making process and roles & responsibilities regarding Environmental and Social factors.

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 is 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.

11.2 ESG Risk Management Framework

11.2.1 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 2022 the Bank has proceeded with targeted implementations during 2023 in accordance with Group's ESG plan commitments, which will continue to be applicable in 2024.

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, in 2023 the following activities were 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 environmental-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 environmental risk aspects.

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

C&E risks: Definition, Identification and Materiality Assessment

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 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 non-financial 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 CO_2.
    - 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;
- behavioural 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.[4]

In alignment with the relevant external guidance across different sources[5], Alpha Bank has incorporated ESG factors as drivers of existing financial and non-financial risk categories (e.g. credit risk, operational risk, market risk, liquidity risk etc.) in its risk management framework. The table below provides an indicative illustration of the way existing risk types could be affected by Climate and Environmental drivers:

[4] 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.

[5] 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."*

<table>
<tr><th colspan="5">Indicative impact of Climate related and Environmental risk drivers</th></tr>
<tr><th rowspan="2">Risk Type</th><th colspan="2">Transition</th><th colspan="2">Physical</th></tr>
<tr><th>Climate related</th><th>Environmental</th><th>Climate related</th><th>Environmental</th></tr>
<tr><td>Credit risk</td><td colspan="2">- 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).</td><td colspan="2">- 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).</td></tr>
<tr><td>Market risk</td><td colspan="2">- 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).</td><td colspan="2">- 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).</td></tr>
<tr><td>Liquidity risk</td><td colspan="2">- 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.:
  - 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.</td><td colspan="2">- 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.
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- Deposits and credit lines are drawn down by counterparties.</td></tr>
</table>

Indicative impact of Climate related and Environmental risk drivers				
Risk Type	Transition		Physical	
	Climate related	Environmental	Climate related	Environmental
Operational risk	- 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.		- 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	- Failure to account for rising ESG factors, having as key drivers the potential shift in consumer preferences, behavioral/ 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).		-	
Reputational risk	- 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.		-	

The Bank has incorporated ESG risks in its regular risk identification process. In the context of annual review of ESG materiality assessment, the Bank takes into account several factors, covering both financial materiality (e.g. exposures sensitive to Transition Risk factors as a % of total assets / 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 addition, the Bank is gradually integrating such risks into its Risk Appetite Framework, using as input the materiality assessment results, in order to evaluate the need for introducing new qualitative statements and/or quantitative indicators, as needed.

A summary of the materiality outcome of Climate factors on traditional risk types across the different time horizons examined is presented in the table below, where materially affected risk types per type horizon are marked.

Risk Type	Transition			Physical		
	2024	2030	2050	2024	2030	2050
Credit risk	√	√	√	√	√	√
Market risk						
Liquidity risk						
Operational risk (incl. Legal)		√	√		√	√
Business & Strategic risk	√	√	√			
Reputational risk		√	√		√	√

A more extensive summary of the incorporation of ESG factors in the materiality assessment process for key risk types, is outlined below. In detail:

- Credit Risk – Transition Risk: 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.

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.

Transition Risks were estimated in different time horizons, aligned with ESRS recommendations: (a) for the short-term time horizon: one year (2024); (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.

Beyond the materiality assessment conducted in its NFC 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. 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. The Bank's retail portfolio is materially affected by ESG factors, due to its considerable size. 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. 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. The update of physical risk assessment uses a more granular approach 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.

The following activities have been performed in order to obtain results at a more granular and detailed risk level:

1) a 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 20 subsectors in terms of outstanding gross carrying amount as of 31.12.2023 compared to current approach (1st level of NACE).

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.

It is 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 (2024) / 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, the insurance of real estate assets taken as collaterals against fire and earthquake is mandatory and from 1.1.2024 the insurance against flood risk will be compulsory for new loan originations.

- 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 (e.g. damages to assets due to increased frequency of acute events) and to transition risk (e.g. offer of green products and practices avoiding greenwashing risk that may result in fines or lawsuits). 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. Especially regarding legal risk, 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.

More specifically, the already implemented enhancements are related to the following:

- Risk Taxonomy: The Bank has updated 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.
- Pillar II Operational Risk Capital related to ESG factors: For Pillar 2 Capital calculation purposes, 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.
  - Flagged ESG Risk-related operational risk events and RCSA risks accordingly.

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. 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)), 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 both from 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. The equity and fund's portfolio are particularly immaterial compared to the portfolio's total size thus is not considered in the materiality analysis. However, it is closely monitored to assess its sensitivity to climate & ESG risks.

- Liquidity risk: there seems to be no material effect from climate – related and other ESG factors. The liquidity risk materiality assessment is driven by asset risk and the composition of the buffer, mainly consisting of sovereign rather than corporate bonds, which are considered to be immaterially impacted by ESG factors, as described above in the market risk section. On the funding side, the manifestation of climate risks that would hamper the capacity of the Bank to draw funds in the wholesale market or potentially increase the volatility of customer deposits, may be considered as not quite plausible in the medium term. In addition, the bank has not observed abnormal patterns of deposit behavior within its retail portfolios, indicating a high degree of stability and predictability. Retail customers tend to maintain their deposits with the bank over extended periods, even in regions that may have been affected by C&E events and no liquidity stress due to retail withdrawals is observed. Furthermore, the geographical distribution of the Branch Network ensures that there is minimal likelihood the Bank to experience horizontal retail deposit outflows due to events triggered by Climate & ESG considerations.
- 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, ESG 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 Group has developed the Reputational Risk Policy to effectively manage its reputational risk exposures, including reputational risk exposures stemming from ESG factors. In this context, the processes that may arise are presented below:

- By financing Obligors who are involved in Controversial Activities. This reputational risk exposure is assessed and is taken into account in the Credit Approval process.
- By initiating new activities, such as Bond Issuing, Investment Banking activities, Public Offerings, Outsourcing Arrangements, new Suppliers, new partners or step-ins, new investors or new services / fees charges to the Bank's clientele.
- From existing activities, such as Obligors (regular review), existing Outsourcing Activities (annual review), existing Suppliers, etc.

To mitigate reputational risk, the Bank has designed a robust process that involves identifying and assessing the potential participation of its Obligors in controversial activities.

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, particularly on transition (e.g. via allegations and/or negative publicity for greenwashing) and physical risks (e.g. via negative publicity from unavailability of services due to extreme physical events). 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: 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. Moreover, the Bank performed an analysis in the context of the economic perspective, to quantify the risk of achieving a lower than expected market share in new sustainable financings (with respective impact this would have in the form of forgone interest rate income). Additionally, in the context of the normative perspective the overall lower growth that has been assumed under the alternative scenarios incorporates, also, the revenue impact from the ESG perspective of Business/ Strategic risk.
- Other Environmental & Social Risks: With respect to other environmental factors, from an inherent risk perspective, the Bank considers these to be material, due to the size and sectoral allocation of its Non-Financial Corporate Loans portfolio. In particular for water stress and soil erosion the Bank has performed a more elaborate approach, based on relevant scientific research, in the context of its established framework for assessing materiality of physical risk factors.

The materiality of environmental factors performed from an inherent risk perspective based on the outcome of the materiality assessment, that examines both the "inside-out" and "outside-in" impact, and the UNEP FI tool methodology that examines the "inside-out" negative impact of environmental and social factors.

- Regarding ESG materiality assessment methodology as stated previously, the Bank has developed a more comprehensive and granular ESG assessment across environmental and social factors, as well as climate-related matters for obligors within the Non-Financial Corporates (NFC) perimeter. The Bank has considered several available sustainability standards and guidelines, as well as guidelines and methodologies from ESG rating agencies, as a reference to determine which are the material ESG factors per economic sector. These references, indicatively included:
    - The Sustainability Accounting Standards Board (SASB) materiality map[6]
    - The Global Reporting Initiative (GRI) Standards[7]
    - The S&P Global Sustainability Yearbook 2021[8]
    - The Fitch Ratings Sector Specific Topics
    - The MSCI materiality map[9]

Apart from the above, for certain sectors and based on availability, the following sector specific standards and guidelines were also used. Indicatively:

- ATHEX ESG guide[10]
- GRESB Real Estate Reference guide[11]
- EPRA Sustainability Best Practices Recommendations Guidelines[12]

[6] https://www.sasb.org/standards/materiality-map/

[7] https://www.globalreporting.org/

[8] https://www.spglobal.com/esg/csa/yearbook/files/spglobal_sustainability-yearbook-2021.pdf

[9] 'https://www.msci.com/our-solutions/esg-investing/esg-ratings/materiality-map

[10] https://www.athexgroup.gr/documents/10180/5665122/ENG-ESG+REPORTING+GUIDE/28a9a0e5-f72c-4084-9047-503717f2f3ff

[11]http://documents.gresb.com.s3-website.eu-central-amazonaws.com/generated_files/infrastructure/2021/asset/assessment/complete.html#performance-water

[12] https://www.epra.com/application/files/7415/0306/4407/EPRA_BPR_Guidelines_2017.pdf

- In addition to the above methodology, the Bank, in order to enhance the relationship between specific activities/ NACE codes with negative impact on social & environmental factors, 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 sol, 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: water, air, soil, biodiversity, materials and waste in its portfolio per sector, taking into consideration the relevant impact topics.

Figure: The Impact Radar

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 & Due Diligence process: 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 Obligors 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.

Environmental risks are already covered by strict regulations with future policy changes expected to be incremental in terms of requirements. The Bank is monitoring relevant developments and in case of increase in risk of a specific environmental factor (e.g. biodiversity), will re-assess materiality under longer-term horizons.

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.

Incorporation of C&E risk in Risk Management Framework

The Group has already incorporated in its Risk Appetite Framework (RAF) a set of quantitative indicators and qualitative commitments regarding climate risks.

The Group integrated climate risks into its overall risk management framework. In terms of quantitative indicators, the Bank has defined several C&E indicators designed to improve the sustainability of the portfolio and mitigate potential exposure to risk and are incorporated in Risk Appetite Framework as supporting elements. Additionally, limits have been established in part of the existing C&E indicators. The indicators cover the area of business planning and green financing, collateral vulnerability to physical and transition risk, financial activity vulnerability to physical risk and sustainable investing.

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

Regarding Credit Risk, the disorderly transition scenario and the flood & drought risk shocks from the 2021 Climate Risk EU Wide Stress Testing exercise have been leveraged for the transition and physical risk respectively. The existing credit risk models are used to estimate impact on risk parameters (e.g. through sector models for risk parameters affected by transition risk or through impact on collaterals for physical risk) and thus additional impairment that is incorporated within the results of the Adverse scenario. These are examined as stand-alone climate scenarios.

For the Economic perspective, the Bank estimates the impact from climate scenarios in a similar fashion as in the Normative perspective (selection of scenario, use of relevant credit risk models to calculate impact), adopting the 1-year impact (2024) 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.

Regarding the impact of climate risks on business & strategic risk, the Bank performed an analysis in the context of the economic perspective, to quantify the risk of obtaining a lower-than-expected market share in new sustainable financings (with respective impact this would have in the form of forgone interest income).

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:

- Initial data collection regarding ESG related information of the obligor.
- Identifying ESG-related data needs, leveraging the data that will be collected for the borrower's assessment and supplementing it with additional information, where needed.

- 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. ESG models will be assessed with additional qualitative criteria.
- Identifying enhancements or additions to the current set of models used for risk parameter estimation and prediction, in order to integrate ESG risks.

Additionally, the Bank has developed innovative scorecards, simplified and advanced (cross sector and sectorial), for environmental risks, providing differentiation by industry and depending on the size of the company (e.g. turnover) as well as scorecards for governance and social risks. These scorecards have been developed and calibrated during 2023.

Environmental Risk Management Policy on Legal Entities 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 strict compliance of the principles of an environmentally and socially responsible credit facility are also examined, as those are defined in the "Group Environmental and Social Risk Management Policy on Legal Entities Lending" which is in place since 2016.

The main purpose of the E&S Risk Management Policy is to provide the appropriate guidance, roles, perimeter, conditions, credit rules and tools in order to identify, manage, avoid, minimize, offset the risks arising from the business operations of the clients-Legal Entities that may be connected with a damage to the environment, or with any direct threat of such a damage, having as a result a negative impact on the business operations and financial results of the Bank and the Group.

Key principles and requirements:

- Definition of critical sectors that are especially connected with potential Environmental risks.
- Industry specific Exclusion List, i.e., a list of industries that the Group does not finance.
- Industry sectors connected with Environmental risks considered as critical, albeit at different levels and therefore classified accordingly to High, Medium and Low risk categories.
- Compliance to the applicable national environmental and social regulations and international standards.
- Environmental Due Diligence Process conducted by E&S consultants, in order to identify the potential Environmental risks and impacts and specify the appropriate measures for their management.
- Monitor the ongoing Obligor's/ Project's E&S performance.
- Integrate E&S Risk Assessment and Monitoring Procedures into the existing Risk Management Procedures.
- Managing Obligor's/Project's Non-Compliance with the Environmental and Social Risk Policy Rules and Standards.
- Annual Environmental and Social Performance Report to stakeholders (EBRD).

In 2024, enhanced credit assessment process is in place according to the "Climate related, Environmental, Social and Governance Risk Management Policy on Group's Business Lending" incorporating additional dimensions of climate related and governance risks. 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.
  - 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.
- 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.
- The consideration of the “Climate Policy Relevant Sectors'” classification instead of the “EBRD Environmental and Social Risk Categorization List – Revised 2014” classification 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 Environmental and Social (E&S) requirements. The Group aims to finance its counterparties’ green/sustainable transition both in the short-and in the long-term. In this respect the Bank collaborates with High-Risk Obligors to develop an action plan outlining a timeframe and appropriate mitigation measures, while in the case of new lending investment nature Medium and High-Risk transactions an on-site visit is conducted by specialists.

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. 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:

- Increase client engagement to gather real data and depend less on proxies.
- Improve ICAAP quantitative methodologies.
- Improve scenario analysis capabilities and stress testing capabilities.
- Expansion of regular monitoring
- C&E responsibilities regarding compliance business area
- Improvements concerning the RAF limits and thresholds
- Enhance Bank’s ESG Materiality Assessment framework

11.2.2 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.

Environmental and Social Risk Management Policy on Legal Entities 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 strict compliance of the principles of socially responsible credit facility are also examined, as those are defined in the “Group Environmental and Social Risk Management Policy on Legal Entities Lending” which is in place since 2016.

Key principles and requirements:

- Definition of critical sectors that are especially connected with potential Social risks.
- Industry specific Exclusion List, i.e., a list of industries that the Group does not finance.
- Industry sectors connected with Social risks considered as critical, albeit at different levels and therefore classified accordingly to High, Medium and Low risk categories.
- Compliance to the applicable national social regulations and international standards.
- Social Due Diligence Process conducted by E&S consultants, in order to identify the potential social risks and impacts and specify the appropriate measures for their management.
- Monitor the ongoing Obligor’s/ Project’s E&S performance.
- Integrate E&S Risk Assessment and Monitoring Procedures into the existing Risk Management Procedures.
- Managing Obligor’s/Project’s Non-Compliance with the Environmental and Social Risk Policy Rules and Standards.
- Annual Environmental and Social Performance Report to stakeholders (EBRD).

In 2024, enhanced credit assessment process is in place according to the "Climate related, Environmental, Social and Governance Risk Management Policy on Group’s Business Lending" incorporating additional dimensions of climate related and governance risks. 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.

  - 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.
- 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 consideration of the "Climate Policy Relevant Sectors'" classification instead of the "EBRD Environmental and Social Risk Categorization List – Revised 2014" classification 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 Environmental and Social (E&S) requirements. The Group aims to finance its counterparties' green/sustainable transition both in the short-and in the long-term. In this respect the Bank collaborates with High-Risk Obligors to develop an action plan outlining a timeframe and appropriate mitigation measures, while in the case of new lending investment nature Medium and High-Risk transactions an on-site visit is conducted by specialists.

Social Risk Materiality Assessment

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).

Additionally, 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 ex ante environmental and/or social risks within its portfolio. Up to now the Bank has not identified material sensitivity to other environmental factors, from a residual risk perspective.

Social Risks Integration in Risk Appetite Framework

The Group integrated social risks into its overall risk management framework. In terms of quantitative indicators, the Bank has defined several Social indicators designed to mitigate potential exposure to risk and are incorporated in Risk Appetite Framework as supporting elements.

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)).

11.2.3 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.

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)).

11.3 Quantitative Disclosures on Climate change transition,Physical Risks and Mitigating actions

11.3.1 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, which is also applied within the ICAAP framework and reporting. This approach involves considering several factors, the definition of CPRS, NZBA and LTS sensitive perimeters, 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 haven't 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.

Climate Change Mitigation (CCM)

It is noted that the exposures that qualify as environmentally sustainable are financing activities that contribute or enable the environmental objective of climate change mitigation in accordance with Articles 10 and 16 of Regulation (EU) 2020/852, as disclosed in template 7 of Annex XXXIX to this Regulation.

Other Financial Corporations (Sector K)

Exposures towards Other Financial Corporations in Sector K have been included for the first time in the current submission of 30.06.2024, as per 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 industry classification is currently based on the client's NACE code. In the future, certain holding companies and SPV's may have a different NACE code as it will be based on the subsidiary or parent benefitting from the financing.

Additionally, the Bank also 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 40a: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 30.06.2024

(Amounts in millions of Euro)

	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 which 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**						
1	**Exposures towards sectors that highly contribute to climate change***	20,339	1,879	1,142	1,315	574	(267)	(34)	(208)	13,085,820	4,060,136	18%	13,914	3,260	2,318	847	5
2	A - Agriculture, forestry and fishing	196	-	-	30	12	(4)	(1)	(3)	166,166	35,746	0%	168	8	8	11	4
3	B - Mining and quarrying	32	0	-	2	5	(1)	(0)	(1)	19,247	13,600	36%	26	3	1	2	5
4	*B.05 - Mining of coal and lignite*	0	0	-	-	0	(0)	-	(0)	-	-	0%	0	-	-	-	1
5	*B.06 - Extraction of crude petroleum and natural gas*	0	0	-	0	0	(0)	-	(0)	-	-	0%	0	-	-	-	1
6	*B.07 - Mining of metal ores*	10	-	-	0	0	(0)	(0)	(0)	14,755	13,506	95%	10	0	-	-	4
7	*B.08 - Other mining and quarrying*	19	-	-	2	4	(1)	(0)	(1)	3,222	67	0%	14	1	1	2	6
8	*B.09 - Mining support service activities*	4	0	-	-	0	(0)	-	(0)	1,270	27	0%	2	2	0	-	5
9	C - Manufacturing	3,978	416	88	239	179	(93)	(6)	(85)	2,383,170	1,128,864	34%	2,936	850	115	77	4
10	*C.10 - Manufacture of food products*	1,064	-	0	75	37	(19)	(1)	(17)	475,815	265,824	11%	786	250	12	15	4
11	*C.11 - Manufacture of beverages*	155	-	-	6	3	(1)	(0)	(1)	31,818	18,625	33%	141	9	1	3	3

	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 which 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**						
12	*C.12 - Manufacture of tobacco products*	19	-	-	1	-	(0)	(0)	-	5,078	2,568	43%	17	1	1	-	1
13	*C.13 - Manufacture of textiles*	58	-	2	17	10	(5)	(0)	(5)	14,123	9,258	7%	44	7	5	3	5
14	*C.14 - Manufacture of wearing apparel*	63	-	-	10	30	(15)	(0)	(15)	3,323	2,331	8%	47	6	3	7	6
15	*C.15 - Manufacture of leather and related products*	12	-	-	2	3	(1)	(0)	(1)	478	230	0%	9	1	1	2	6
16	*C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials*	25	-	-	7	10	(6)	(0)	(6)	1,348	607	0%	16	1	3	5	9
17	*C.17 - Manufacture of pulp, paper and paperboard*	136	-	-	12	6	(4)	(0)	(4)	12,456	4,562	0%	97	27	9	3	4
18	*C.18 - Printing and service activities related to printing*	27	-	-	5	1	(1)	(0)	(0)	3,869	1,230	0%	23	2	1	2	4
19	*C.19 - Manufacture of coke oven products*	421	416	5	0	0	(0)	(0)	(0)	341,174	144,927	99%	370	51	-	0	2
20	*C.20 - Production of chemicals*	209	-	8	4	13	(6)	(0)	(5)	63,614	23,671	9%	154	16	38	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)			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 which 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						
21	*C.21 - Manufacture of pharmaceutical preparations*	166	-	-	0	1	(0)	(0)	(0)	9,557	4,712	6%	149	14	3	-	2
22	*C.22 - Manufacture of rubber products*	173	-	2	4	20	(10)	(0)	(10)	71,493	49,441	5%	150	19	2	2	3
23	*C.23 - Manufacture of other non-metallic mineral products*	152	-	3	23	10	(5)	(1)	(4)	542,722	82,225	57%	132	6	5	10	4
24	*C.24 - Manufacture of basic metals*	450	-	19	2	3	(1)	(0)	(1)	413,705	177,327	38%	239	207	2	1	4
25	*C.25 - Manufacture of fabricated metal products, except machinery and equipment*	158	-	7	19	9	(4)	(1)	(3)	40,962	17,993	0%	116	23	9	10	5
26	*C.26 - Manufacture of computer, electronic and optical products*	72	-	-	1	1	(0)	(0)	(0)	5,152	3,111	34%	54	16	2	0	4
27	*C.27 - Manufacture of electrical equipment*	359	-	34	3	2	(1)	(0)	(1)	228,238	207,690	88%	192	163	3	1	4
28	*C.28 - Manufacture of machinery and equipment n.e.c.*	82	-	-	26	9	(6)	(0)	(5)	35,882	33,141	33%	75	1	3	3	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)**			**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 which 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**						
29	*C.29 - Manufacture of motor vehicles, trailers and semi-trailers*	79	-	8	1	1	(0)	(0)	(0)	77,616	76,823	86%	61	17	0	1	2
30	*C.30 - Manufacture of other transport equipment*	24	-	-	1	1	(1)	(0)	(0)	1,324	709	0%	16	6	1	2	5
31	*C.31 - Manufacture of furniture*	39	-	-	11	6	(4)	(0)	(4)	1,347	708	0%	24	4	7	4	8
32	*C.32 - Other manufacturing*	24	-	-	6	4	(2)	(0)	(2)	773	406	0%	16	3	3	3	7
33	*C.33 - Repair and installation of machinery and equipment*	10	-	-	2	0	(0)	(0)	(0)	1,303	745	0%	8	0	2	1	6
34	D - Electricity, gas, steam and air conditioning supply	3,072	1,112	992	9	1	(2)	(0)	(0)	1,914,077	786,845	46%	1,927	633	483	29	6
35	*D35.1 - Electric power generation, transmission and distribution*	3,010	1,051	992	9	0	(2)	(0)	(0)	1,812,119	726,766	45%	1,926	573	483	29	6
36	*D35.11 - Production of electricity*	2,028	1,014	928	8	0	(1)	(0)	(0)	1,345,382	324,532	54%	1,187	362	471	9	6
37	*D35.2 - Manufacture of gas; distribution of gaseous fuels through mains*	60	60	0	0	0	(0)	(0)	(0)	99,888	59,552	99%	1	59	0	-	9
38	*D35.3 - Steam and air conditioning supply*	1	-	0	0	0	(0)	(0)	(0)	2,070	527	0%	1	0	-	-	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)**			**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 which 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**						
39	E - Water supply; sewerage, waste management and remediation activities	57	-	11	1	1	(0)	(0)	(0)	119,532	18,802	49%	54	1	1	0	3
40	F - Construction	864	-	23	200	36	(17)	(3)	(13)	176,863	144,597	14%	525	112	187	39	7
41	*F.41 - Construction of buildings*	377	-	0	117	10	(5)	(2)	(3)	24,922	20,253	0%	269	48	55	5	6
42	*F.42 - Civil engineering*	384	-	23	58	15	(6)	(1)	(5)	114,949	94,288	28%	188	51	122	23	7
43	*F.43 - Specialised construction activities*	103	-	0	25	11	(6)	(1)	(5)	36,992	30,056	0%	68	13	10	12	7
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,295	351	13	381	224	(112)	(16)	(79)	1,020,949	658,243	5%	2,478	348	297	172	5
45	H - Transportation and storage	4,209	0	11	60	44	(15)	(1)	(14)	7,004,633	1,079,787	12%	3,158	237	368	446	6
46	*H.49 - Land transport and transport via pipelines*	86	0	-	18	3	(2)	(1)	(1)	56,485	9,005	0%	57	15	7	6	6
47	*H.50 - Water transport*	2,953	-	-	37	23	(5)	(0)	(5)	6,705,487	972,752	1%	2,811	142	0	1	3
48	*H.51 - Air transport*	191	-	-	0	0	(0)	(0)	(0)	26,390	6,220	86%	7	-	184	-	13
49	*H.52 - Warehousing and support activities for transportation*	956	-	11	5	17	(8)	(0)	(7)	215,624	91,472	33%	282	64	171	439	13
50	*H.53 - Postal and courier activities*	23	-	-	0	0	(0)	(0)	(0)	647	338	0%	1	16	5	0	8
51	I - Accommodation and food service activities	2,962	-	0	253	54	(17)	(5)	(11)	231,212	161,876	0%	1,495	729	675	63	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 which 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						
52	L - Real estate activities	1,675	-	4	139	19	(4)	(1)	(3)	49,971	31,776	4%	1,145	339	182	8	5
53	**Exposures towards sectors other than those that highly contribute to climate change***	3,334	-	90	132	72	(57)	(4)	(27)				2,274	558	279	223	2
54	K - Financial and insurance activities	1,569	-	76	9	0	(1)	(0)	(0)				856	393	167	153	11
55	Exposures to other sectors (NACE codes J, M - U)	1,765	-	13	123	71	(56)	(4)	(27)				1,418	165	112	70	5
56	TOTAL	23,673	1,879	1,231	1,448	645	(323)	(38)	(236)	13,085,820	4,060,136	18%	16,188	3,819	2,596	1,070	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 1893/2006

Template 40b: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 31.12.2023

(Amounts in millions of Euro)

	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 which 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**						
1	**Exposures towards sectors that highly contribute to climate change***	20,906	1,989	1,210	1,327	839	(364)	(34)	(319)	35,075,294	28,189,117	*21%*	*13,008*	*4,467*	*2,382*	*1,049*	*6*
2	A - Agriculture, forestry and fishing	288	-	-	31	19	(6)	(1)	(5)	363,943	76,938	*0%*	250	12	12	14	4
3	B - Mining and quarrying	46	-	-	12	7	(2)	-	(2)	15,477	695	*25%*	37	5	1	3	5
4	*B.05 - Mining of coal and lignite*	-	-	-	-	-	-	-	-	61	7	*0%*	-	-	-	-	1
5	*B.06 - Extraction of crude petroleum and natural gas*	-	-	-	-	-	-	-	-	2	-	*0%*	-	-	-	-	1
6	*B.07 - Mining of metal ores*	*11*	-	-	-	-	-	-	-	5,661	16	*92%*	10	-	-	-	5
7	*B.08 - Other mining and quarrying*	*31*	-	-	*12*	*6*	*(1)*	-	*(1)*	8,587	648	*0%*	25	1	1	3	5
8	*B.09 - Mining support service activities*	*4*	-	-	-	-	-	-	-	1,166	24	*0%*	1	3	-	-	6
9	C - Manufacturing	4,142	526	114	224	241	(119)	(6)	(110)	25,461,182	24,252,370	*35%*	3,192	695	153	103	4
10	*C.10 - Manufacture of food products*	1,111	-	-	50	54	(25)	(1)	(24)	470,637	256,487	*21%*	916	162	14	20	4

ALPHA SERVICES AND HOLDINGS

	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 which 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**						
11	*C.11 - Manufacture of beverages*	160	-	-	5	10	(4)	-	(4)	28,625	14,926	*19%*	138	12	6	3	3
12	*C.12 - Manufacture of tobacco products*	20	-	-	1	-	-	-	-	4,986	2,392	*0%*	19	1	1	-	2
13	*C.13 - Manufacture of textiles*	60	-	4	17	9	(5)	-	(5)	4,820	1,238	*23%*	42	3	11	4	6
14	*C.14 - Manufacture of wearing apparel*	74	-	-	15	36	(19)	-	(18)	2,045	974	*5%*	49	9	6	10	7
15	*C.15 - Manufacture of leather and related products*	13	-	-	3	3	(1)	-	(1)	530	254	*0%*	9	1	2	2	7
16	*C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials*	31	-	-	6	14	(7)	-	(7)	1,561	703	*0%*	18	1	4	7	10
17	*C.17 - Manufacture of pulp, paper and paperboard*	*158*	-	-	*14*	*14*	*(8)*	-	*(8)*	14,429	5,364	*6%*	110	34	10	4	4
18	*C.18 - Printing and service activities related to printing*	*32*	-	-	*6*	*4*	*(1)*	-	*(1)*	3,961	1,283	*11%*	27	2	1	2	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)**			**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 which 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**						
19	*C.19 - Manufacture of coke oven products*	*526*	*526*	*3*	*-*	*-*	*-*	*-*	*-*	296,693	95,016	*99%*	472	53	-	-	2
20	*C.20 - Production of chemicals*	*210*	*-*	*5*	*4*	*5*	*(3)*	*-*	*(2)*	56,559	18,075	*7%*	156	17	37	1	5
21	*C.21 - Manufacture of pharmaceutical preparations*	*173*	*-*	*-*	*10*	*1*	*(1)*	*(1)*	*-*	9,810	4,767	*2%*	154	16	3	-	3
22	*C.22 - Manufacture of rubber products*	*171*	*-*	*4*	*5*	*23*	*(11)*	*-*	*(11)*	68,081	46,270	*12%*	139	27	2	3	4
23	*C.23 - Manufacture of other non-metallic mineral products*	*145*	*-*	*3*	*17*	*14*	*(6)*	*(1)*	*(5)*	216,578	32,167	*33%*	109	18	6	11	5
24	*C.24 - Manufacture of basic metals*	*438*	*-*	*21*	*4*	*2*	*(1)*	*-*	*(1)*	438,973	88,601	*40%*	169	252	16	2	5
25	*C.25 - Manufacture of fabricated metal products, except machinery and equipment*	*164*	*-*	*1*	*16*	*18*	*(7)*	*(1)*	*(6)*	39,482	17,358	*0%*	115	15	20	15	6
26	*C.26 - Manufacture of computer, electronic and optical products*	*72*	*-*	*-*	*1*	*1*	*-*	*-*	*-*	5,431	3,376	*46%*	60	11	1	-	4
27	*C.27 - Manufacture of electrical equipment*	*304*	*-*	*65*	*3*	*3*	*(2)*	*-*	*(2)*	23,515,052	23,488,702	*58%*	279	20	2	2	3

	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 which 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**						
28	*C.28 - Manufacture of machinery and equipment n.e.c.*	*77*	*-*	*-*	*26*	*10*	*(5)*	*-*	*(5)*	255,026	149,428	*66%*	61	10	3	3	5
29	*C.29 - Manufacture of motor vehicles, trailers and semi-trailers*	*101*	*-*	*8*	*1*	*2*	*(1)*	*-*	*(1)*	22,771	22,209	*76%*	85	14	1	1	2
30	*C.30 - Manufacture of other transport equipment*	*28*	*-*	*-*	*2*	*3*	*(1)*	*-*	*(1)*	1,453	778	*0%*	19	6	1	2	6
31	*C.31 - Manufacture of furniture*	*39*	*-*	*-*	*11*	*11*	*(7)*	*-*	*(6)*	1,335	702	*0%*	25	5	3	5	8
32	*C.32 - Other manufacturing*	*25*	*-*	*-*	*7*	*5*	*(2)*	*-*	*(2)*	892	469	*0%*	15	4	2	4	8
33	*C.33 - Repair and installation of machinery and equipment*	*11*	*-*	*-*	*1*	*1*	*-*	*-*	*-*	1,452	831	*0%*	7	1	2	1	6
34	D - Electricity, gas, steam and air conditioning supply	3,012	1,048	1,053	8	1	(2)	-	-	1,991,675	1,013,149	*41%*	1,234	1,251	494	33	7
35	*D35.1 - Electric power generation, transmission and distribution*	2,951	988	1,053	8	-	(2)	-	-	1,982,882	1,009,642	*40%*	1,233	1,191	494	33	6
36	*D35.11 - Production of electricity*	*1,932*	*948*	*992*	*7*	*-*	*(1)*	*-*	*-*	1,338,529	449,781	*55%*	1,027	396	490	19	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 which 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						
37	*D35.2 - Manufacture of gas; distribution of gaseous fuels through mains*	*60*	*60*	-	-	-	-	-	-	6,699	2,974	*99%*	1	59	-	-	10
38	*D35.3 - Steam and air conditioning supply*	*1*	-	-	-	-	-	-	-	2,094	533	*0%*	1	-	-	-	5
39	E - Water supply; sewerage, waste management and remediation activities	54	-	10	2	1	-	-	-	91,205	8,467	*18%*	45	6	2	-	3
40	F - Construction	876	-	13	204	55	(23)	(3)	(19)	167,521	137,584	*22%*	459	172	197	47	8
41	*F.41 - Construction of buildings*	*385*	-	-	*117*	*15*	*(6)*	*(2)*	*(4)*	26,381	21,716	*2%*	218	105	54	8	7
42	*F.42 - Civil engineering*	*380*	-	*13*	*62*	*22*	*(9)*	*(1)*	*(7)*	104,385	86,007	*45%*	172	53	131	25	9
43	*F.43 - Specialised construction activities*	*111*	-	-	*25*	*19*	*(9)*	*(1)*	*(8)*	36,755	29,861	*0%*	69	15	12	14	8
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,528	414	7	390	339	(148)	(15)	(129)	1,234,501	847,683	*7%*	2,470	501	341	216	6
45	H - Transportation and storage	4,338	1	8	81	64	(29)	(1)	(27)	5,310,342	1,652,580	*17%*	3,027	484	372	454	7
46	*H.49 - Land transport and transport via pipelines*	*102*	*1*	-	*14*	*11*	*(5)*	-	*(4)*	68,593	10,935	*0%*	56	15	24	7	8
47	*H.50 - Water transport*	*3,069*	-	*1*	*60*	*32*	*(13)*	-	*(13)*	5,047,578	1,547,396	*1%*	2,720	348	1	1	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)**			**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 which 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**						
48	*H.51 - Air transport*	*192*	-	-	-	-	-	-	-	38,966	7,282	*88%*	4	-	189	-	14
49	*H.52 - Warehousing and support activities for transportation*	*952*	-	*7*	*6*	*21*	*(10)*	-	*(10)*	154,417	86,555	*36%*	246	105	154	446	14
50	*H.53 - Postal and courier activities*	*23*	-	-	-	*1*	-	-	-	788	412	*0%*	2	16	5	1	9
51	I - Accommodation and food service activities	2,873	-	-	217	92	(30)	(6)	(23)	213,343	170,128	*0%*	1,168	958	666	81	8
52	L - Real estate activities	1,750	-	5	159	20	(5)	(1)	(4)	226,105	29,523	*26%*	1,125	382	144	99	6
53	**Exposures towards sectors other than those that highly contribute to climate change***	1,609	-	7	117	105	(93)	(4)	(41)	-	-	*0%*	*1,156*	*268*	*117*	*67*	*5*
54	K - Financial and insurance activities	-	-	-	-	-	-	-	-	-	-	*0%*	-	-	-	-	-
55	Exposures to other sectors (NACE codes J, M - U)	1,609	-	7	117	105	(93)	(4)	(41)	-	-	*0%*	1,156	268	117	67	5
56	TOTAL	22,515	1,989	1,217	1,444	943	(457)	(38)	(360)	35,075,294	28,189,117	*21%*	14,165	4,735	2,499	1,116	6

11.3.2 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 carried out 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 in the current submission (30.06.2024) as a result of the respective guidelines provided by the regulator.. In all submissions, the exposures collateralised by other collateral types 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 carrying out 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.

ALPHA SERVICES AND HOLDINGS

Template 41a: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 30.06.2024

(Amounts in millions of Euro)

		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/m² 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/m² of collateral) estimated**
1	**Total EU area**	11,115	501	4,180	2,492	2,353	416	924	162	52	54	74	57	29	69	10,619	98%
2	Of which Loans collateralised by commercial immovable property	4,369	8	454	580	2,001	355	895	48	17	19	11	16	2	10	4,247	98%
3	Of which Loans collateralised by residential immovable property	6,584	491	3,654	1,868	331	52	16	114	35	34	50	33	21	46	6,252	97%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	162	1	72	44	22	9	13	0	0	2	13	8	6	14	119	100%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	10,370	417	3,978	2,408	2,283	397	888								10,370	100%
6	**Total non-EU area**	442	186	185	4	-	-	-	1	53	132	117	61	7	4	66	0%
7	Of which Loans collateralised by commercial immovable property	171	91	61	4	-	-	-	1	32	58	28	31	1	4	15	0%
8	Of which Loans collateralised by residential immovable property	271	95	124	0	-	-	-	-	21	74	89	30	6	0	51	0%

		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/m² 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/m² of collateral) estimated**
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	-	-	-	-	-	-	-								-	0%

Template 41b: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 31.12.2023

(Amounts in millions of Euro)

		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/m² 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/m² of collateral) estimated**
1	**Total EU area**	11,398	496	4,214	2,697	2,447	371	910	145	32	38	53	41	21	47	11,021	98%
2	Of which Loans collateralised by commercial immovable property	4,561	17	398	730	2,088	311	888	44	3	15	10	14	2	9	4,464	97%
3	Of which Loans collateralised by residential immovable property	6,696	478	3,756	1,929	341	51	9	101	29	21	30	18	12	24	6,460	98%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	140	1	60	38	18	9	13	-	-	2	14	8	7	13	97	100%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	10,758	428	4,052	2,636	2,401	359	881								10,758	100%
6	**Total non-EU area**	393	148	194	12	-	-	-	-	40	108	125	62	6	12	39	0%
7	Of which Loans collateralised by commercial immovable property	173	66	77	12	-	-	-	-	22	43	42	34	1	12	18	0%
8	Of which Loans collateralised by residential immovable property	220	82	117	-	-	-	-	-	17	65	84	28	5	-	21	0%

		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/m² 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/m² of collateral) estimated**
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	-	-	-	-	-	-	-								-	0%

11.3.3 Banking book – Climate change transition risk: Alignment metrics

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.

In this context, the Bank is working towards setting a first-round of net zero targets and publicly disclose them in Q4 2024. 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 has 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. Financed emissions calculations include clients' Scope 1, Scope 2 and Scope 3 emissions, where data allows.

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 transport. Alpha Bank has proceeded in prioritising the 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 has prioritised setting targets for Power Generation, Oil & Gas, Cement, Iron and Steel sectors, which will be published by the end of Q4 2024, while for the remaining material sectors, targets will be published in a 2nd wave, during 2025.

It is noted that 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.

The methodology of target setting will be based on the IEA NZE2050 scenario and targets will be set for the period 2030 to 2050.

In addition, the Bank has 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.

At the same time, the Bank is introducing 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. Output regarding transition plans and potential financing needs for selected top clients will be incorporated into the target setting process.

Template 42: Banking book - Climate change transition risk: Alignment metrics 30.06.2024

(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	1,929.50	N/A			
2	Fossil fuel combustion	192	374.85	N/A			
3	Automotive		-				
4	Aviation		-				
5	Maritime transport		-				
6	Cement, clinker and lime production	2351	90.30	N/A			
7	Iron and steel, coke, and metal ore production	241	97.81	N/A			
8	Chemicals		-				
9	… potential additions relavant to the business model of the institution		-				

*** PiT distance to 2030 NZE2050 scenario in % (for each metric)

11.3.4 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 43a : Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms 30.06.2024

(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	18.96	0.08%	0	2.3	2

*For counterparties among the top 20 carbon emitting companies in the world

Template 43b : Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms 31.12.2023

(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	26.37	0.05%	0	1.8	2

11.3.5 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")[13] and the Invest EU methodology ("Technical guidance on the climate proofing of infrastructure in the period 2021-2027")[14]. 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. This update uses a more granular approach, building upon the initial methodology employed in the previous analysis, incorporating specific enhancements (e.g., in terms of granularity of assessment) depending on the portfolio that is under examination. The approach continues to examine 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 order to achieve a more granular and detailed risk level analysis, the Bank proceeded with:

[13] ECB 2022-Good practices for climate related and environmental risk management:Observations from the 2022 thematic review-link

[14] Commission Notice — Technical guidance on the climate proofing of infrastructure in the period 2021-2027 – link

1) The development of Sensitivity analysis for physical risks with the highest exposure on a country level for the five climate hazards (Heat stress, Water stress, Heatwaves, Droughts & Floods), at the more granular level of top 20 subsectors (NACE 2 level) in terms of Bank's outstanding gross carrying amount as of 30.06.2024 while the existing approach (sensitivity applied at 1st level NACE code) has been used for the remaining exposures. The sensitivity has been assessed in three different time-horizons in alignment with the ESRS recommendations: (a) for the short-term time horizon: one year (2024); (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 due to their alignment with scientific pathways and in line with the Energy and Climate National Plan and the Greek Climate Law. The sensitivity of each sub-sector is measured via a 3-level score of ‘High’, ‘Medium’ or ‘Low’ for each climate hazard.

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 results in a vulnerability assessment at NUTS 3 level, which allows to assess materiality, in a more granular level in terms of the location of collaterals. The final assessment outcome is presented in terms of High/Medium/Low exposure levels using relevant hazard metrics averaged to provide the results resolution of location data of the Bank under 3 defined time horizons (short – 2024 / medium – 2030 / long – 2050).

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.

4. Plans for enhanced disclosure

Following the evolution and possible future updates of the regulatory guidelines the Bank may perform further enhancements to the methodology used for performing physical risk assessment to the portfolio that meets specific criteria, in order to ensure a more granular identification of such vulnerability, if necessary.

Template 44a: Banking book - Climate change physical risk: Exposures subject to physical risk 30.06.2024

(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 weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
1	A - Agriculture, forestry and fishing	196	168	8	8	11	4	-	-	195	30	12	(4)	(1)	(3)
2	B - Mining and quarrying	32	17	3	1	2	5	-	20	3	2	5	(1)	(0)	(1)
3	C - Manufacturing	3,978	-	-	-	-	-	-	-	-	-	-	-	-	-
4	D - Electricity, gas, steam and air conditioning supply	3,072	558	211	1	-	6	-	770	-	1	0	(0)	(0)	-
5	E - Water supply; sewerage, waste management and remediation activities	57	28	1	1	0	3	-	1	30	1	1	(0)	(0)	(0)
6	F - Construction	864	100	0	0	-	5	-	100	-	99	0	(1)	(1)	(0)

	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 weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,295	-	-	-	-	-	-	-	-	-	-	-	-	-
8	H - Transportation and storage	4,209	-	-	-	-	-	-	-	-	-	-	-	-	-
9	L - Real estate activities	1,675	48	4	-	-	3	53	-	-	11	-	(0)	-	-
10	Loans collateralised by residential immovable property	7,083	98	66	181	256	18	298	254	49	178	69	(48)	(24)	(21)
11	Loans collateralised by commercial immovable property	6,833	389	207	198	85	9	285	595	0	142	43	(10)	(3)	(6)
12	Repossessed colalterals	216	-	-	-	21	21	11	10	0	-	-	-	-	-
13	Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Template 44b: Banking book - Climate change physical risk: Exposures subject to physical risk 31.12.2023

(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 weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
1	A - Agriculture, forestry and fishing	288	249	12	12	14	4	-	-	287	30	19	(6)	(1)	(5)
2	B - Mining and quarrying	46	35	7	1	3	5	-	43	3	12	7	(2)	-	(2)
3	C - Manufacturing	4,142	-	-	-	-	-	-	-	-	-	-	-	-	-
4	D - Electricity, gas, steam and air conditioning supply	3,012	33	795	4	-	6	-	832	-	1	-	-	-	-
5	E - Water supply; sewerage, waste management and remediation activities	54	45	6	2	-	3	-	1	53	2	1	-	-	-
6	F - Construction	876	31	77	2	-	5	-	110	-	102	4	(3)	(1)	(1)

	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 weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,528	-	-	-	-	-	-	-	-	-	-	-	-	-
8	H - Transportation and storage	4,338	-	-	-	-	-	-	-	-	-	-	-	-	-
9	L - Real estate activities	1,750	47	4	-	-	3	51	-	-	12	-	-	-	-
10	Loans collateralised by residential immovable property	7,136	80	66	187	269	19	304	255	45	156	95	(35)	(5)	(24)
11	Loans collateralised by commercial immovable property	7,271	217	392	197	98	10	291	600	12	111	67	(47)	(30)	(15)
12	Repossessed colalterals	191	-	-	-	20	21	11	10	-	-	-	(1)	-	-

	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 weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
13	Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

11.3.6 Summary of GAR KPIs

Overview of methodology and applicable standards

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.

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.

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.

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.

Summary of GAR KPIs

The gross carrying amount of total covered assets amounted to EUR 54,679 mln as of30.06.2024 . The eligibility ratio relevant to climate change mitigation and climate change adaptation is 18.8% based on turnover. The total GAR based on turnover is 2.45% of total covered assets as of 30.06.2024. 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).

Template 45a: Summary of GAR KPIs 30.06.2024

(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	2.44%	0.01%	2.45%	22.51%
GAR flow	1.76%	0.00%	1.77%	20.42%

* % of assets covered by the KPI over banks´ total assets

Template 45b: Summary of GAR KPIs 31.12.2023

(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	2.14%	0.01%	2.15%	23.08%
GAR flow	6.37%	0.02%	6.39%	27.64%

11.3.7 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. Specialized lending of €1 billion, includes mainly loans to Renewable Energy sources (i.e., solar and wind parks):

Template 46a: Mitigating actions: Assets for the calculation of GAR 30.06.2024

(Amounts in millions of Euro)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		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)**				
Million EUR		**Total gross carrying amount**		**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	15,979	9,633	1,335	1,002	31	116	24	8	0	0	7	9,657	1,342	1,002	31	123
2	**Financial corporations**	1,796	451	180	69	1	6	0	0	0	0	0	451	180	69	1	6
3	Credit institutions	1,674	361	103	0	0	0	0	0	0	0	0	361	103	0	0	0
4	Loans and advances	341	89	3	0	0	0	0	0	0	0	0	89	3	0	0	0
5	Debt securities, including UoP	1,329	271	100	0	0	0	0	0	0	0	0	271	100	0	0	0
6	Equity instruments	4	1	0		0	0	0	0	0	0	0	1	0		0	0
7	Other financial corporations	121	90	76	69	1	6	0	0	0	0	0	90	76	69	1	6
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
11	Equity instruments	0	0	0		0	0	0	0		0	0	0	0		0	0
12	of which management companies	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	3	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
15	Equity instruments	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
17	Loans and advances	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
19	Equity instruments	0	0	0		0	0	0	0		0	0	0	0		0	0
20	**Non-financial corporations (subject to NFRD disclosure obligations)**	4,844	2,017	1,155	933	30	109	24	8	0	0	7	2,041	1,163	933	30	116
21	Loans and advances	3,818	1,748	1,055	933	16	58	17	7	0	0	6	1,765	1,062	933	16	64
22	Debt securities, including UoP	1,014	268	100	0	14	52	7	1	0	0	1	276	101	0	14	52
23	Equity instruments	12	1	0		0	0	0	0		0	0	1	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	Of which enabling
24	**Households**	9,340	7,165	0	0	0	0						7,165	0	0	0	0
25	of which loans collateralised by residential immovable property	7,083	7,083	0	0	0	0						7,083	0	0	0	0
26	of which building renovation loans	547	547	0	0	0	0						547	0	0	0	0
27	of which motor vehicle loans	82	82	0	0	0	0						82	0	0	0	0
28	**Local governments financing**	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
30	Other local governments financing	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	608	608	0	0	0	0	0	0	0	0	0	608	0	0	0	0
32	**TOTAL GAR ASSETS**	16,587	10,241	1,335	1,002	31	116	24	8	0	0	7	10,265	1,342	1,002	31	123
	Assets excluded from the numerator for GAR calculation (covered in the denominator)																
33	**EU Non-financial corporations (not subject to NFRD disclosure obligations)**	13,881															
34	Loans and advances	13,721															
35	Debt securities	137															
36	Equity instruments	23															
37	**Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)**	3,379															
38	Loans and advances	3,278															
39	Debt securities	101															
40	Equity instruments	0															
41	Derivatives	107															
42	On demand interbank loans	994															
43	Cash and cash-related assets	376															
44	Other assets (e.g. Goodwill, commodities etc.)	19,356															
45	**TOTAL ASSETS IN THE DENOMINATOR (GAR)**	54,680															

		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
	Other assets excluded from both the numerator and denominator for GAR calculation																
46	Sovereigns	13,293															
47	Central banks exposure	3,852															
48	Trading book	1,859.6															
49	**TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR**	19,004															
50	**TOTAL ASSETS**	73,684															

Template 46b: Mitigating actions: Assets for the calculation of GAR 31.12.2023

(Amounts in millions of Euro)

		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
	GAR - Covered assets in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,275	9,274	1,234	1,005	22	129	375	5	0		0	9,649	1,239	1,005	22	129
2	**Financial corporations**	1,665	339	17	0	4	1	30	1	0		0	369	18	0	4	1
3	Credit institutions	1,519	309	0	0	0	0	0	0	0		0	309	0	0	0	0
4	Loans and advances	263	52	0	0	0	0	0	0	0		0	52	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	Of which enabling
5	Debt securities, including UoP	1,248	256	0	0	0	0	0	0	0		0	256	0	0	0	0
6	Equity instruments	8	1	0		0	0	0	0			0	1	0		0	0
7	Other financial corporations	145	30	17	0	4	1	30	1	0		0	60	18	0	4	1
8	of which investment firms	6	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
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0
11	Equity instruments	6	0	0		0	0	0	0			0	0	0		0	0
12	of which management companies	12	0	0	0	0	0	0	0	0		0	0	0	0	0	0
13	Loans and advances	12	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
15	Equity instruments	0	0	0		0	0	0	0			0	0	0		0	0
16	of which insurance undertakings	4	1	0	0	0	0	0	0	0		0	1	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0
18	Debt securities, including UoP	4	1	0	0	0	0	0	0	0		0	1	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0			0	0	0		0	0
20	**Non-financial corporations (subject to NFRD disclosure obligations)**	5,027	1,525	1,217	1,005	18	128	345	4	0		0	1,871	1,221	1,005	18	128
21	Loans and advances	4,010	1,373	1,148	1,005	10	92	230	1	0		0	1,603	1,148	1,005	10	92
22	Debt securities, including UoP	1,000	148	69	0	8	36	111	3	0		0	259	72	0	8	36
23	Equity instruments	16	4	0		0	0	4	0			0	8	0		0	0
24	**Households**	9,547	7,409	0	0	0	0						7,409	0	0	0	0
25	of which loans collateralised by residential immovable property	7,335	7,335	0	0	0	0						7,335	0	0	0	0
26	of which building renovation loans	650	650	0	0	0	0						650	0	0	0	0
27	of which motor vehicle loans	74	74	0	0	0	0						74	0	0	0	0
28	**Local governments financing**	37	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
30	Other local governments financing	37	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	819	819	0	0	0	0	0	0	0		0	819	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	Of which enabling
32	**TOTAL GAR ASSETS**	17,095	10,093	1,234	1,005	22	129	375	5	0		0	10,468	1,239	1,005	22	129
	Assets excluded from the numerator for GAR calculation (covered in the denominator)																
33	**EU Non-financial corporations (not subject to NFRD disclosure obligations)**	14,223															
34	Loans and advances	14,029															
35	Debt securities	128															
36	Equity instruments	66															
37	**Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)**	3,265															
38	Loans and advances	3,168															
39	Debt securities	97															
40	Equity instruments	0															
41	Derivatives	1,819															
42	On demand interbank loans	1,460															
43	Cash and cash-related assets	492															
44	Other assets (e.g. Goodwill, commodities etc.)	19,301															
45	**TOTAL ASSETS IN THE DENOMINATOR (GAR)**	57,655															
	Other assets excluded from both the numerator and denominator for GAR calculation																
46	Sovereigns	12,641															
47	Central banks exposure	3,727															
48	Trading book	33															
49	**TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR**	16,401															
50	**TOTAL ASSETS**	74,055															

11.3.8 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 47a: GAR% 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	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**				
	% (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 adaptation**	**Of which enabling**			**Of which specialised lending**	**Of which transitional/adaptation**	**Of which enabling**	
1	**GAR**	18.73%	2.44%	1.83%	0.06%	0.21%	0.04%	0.01%	0.00%	0.00%	0.01%	18.77%	2.45%	1.83%	0.06%	0.22%	22.51%	11.10%	1.76%	0.89%	0.21%	0.42%	0.06%	0.00%	0.00%	0.00%	0.00%	11.15%	1.77%	0.89%	0.00%	0.42%	20.42%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	17.62%	2.44%	1.83%	0.06%	0.21%	0.04%	0.01%	0.00%	0.00%	0.01%	17.66%	2.45%	1.83%	0.06%	0.22%	21.69%	11.10%	1.76%	0.89%	0.21%	0.42%	0.06%	0.00%	0.00%	0.00%	0.00%	11.15%	1.77%	0.89%	0.00%	0.42%	20.42%
3	Financial corporations	0.82%	0.33%	0.13%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.82%	0.33%	0.13%	0.00%	0.01%	2.44%	1.35%	0.30%	0.00%	0.00%	0.20%	0.00%	0.00%	0.00%	0.00%	0.00%	1.35%	0.30%	0.00%	0.00%	0.20%	8.33%
4	Credit institutions	0.66%	0.19%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.66%	0.19%	0.00%	0.00%	0.00%	2.27%	0.98%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.98%	0.10%	0.00%	0.00%	0.00%	7.27%
5	Other financial corporations	0.16%	0.14%	0.13%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.16%	0.14%	0.13%	0.00%	0.01%	0.16%	0.38%	0.20%	0.00%	0.00%	0.20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.38%	0.20%	0.00%	0.00%	0.20%	1.05%
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%	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%	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 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 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 adaptation	Of which enabling			Of which specialised lending	Of which transitional/adaptation	Of which enabling	
8	of which insurance undertakings	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%	0.01%	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	3.69%	2.11%	1.71%	0.06%	0.20%	0.04%	0.01%	0.00%	0.00%	0.01%	3.73%	2.13%	1.71%	0.06%	0.21%	6.57%	4.32%	1.46%	0.89%	0.21%	0.22%	0.06%	0.00%	0.00%	0.00%	0.00%	4.38%	1.47%	0.89%	0.00%	0.22%	6.67%
10	Households	13.10%	0.00%	0.00%	0.00%	0.00%						13.10%	0.00%	0.00%	0.00%	0.00%	12.68%	5.42%	0.00%	0.00%	0.00%	0.00%						5.42%	0.00%	0.00%	0.00%	0.00%	5.42%
11	of which loans collateralised by residential immovable property	12.95%	0.00%	0.00%	0.00%	0.00%						12.95%	0.00%	0.00%	0.00%	0.00%	9.61%	4.75%	0.00%	0.00%	0.00%	0.00%						4.75%	0.00%	0.00%	0.00%	0.00%	4.75%
12	of which building renovation loans	1.00%	0.00%	0.00%	0.00%	0.00%						1.00%	0.00%	0.00%	0.00%	0.00%	0.74%	0.09%	0.00%	0.00%	0.00%	0.00%						0.09%	0.00%	0.00%	0.00%	0.00%	0.09%
13	of which motor vehicle loans	0.15%	0.00%	0.00%	0.00%	0.00%						0.15%	0.00%	0.00%	0.00%	0.00%	0.11%	0.67%	0.00%	0.00%	0.00%	0.00%						0.67%	0.00%	0.00%	0.00%	0.00%	0.67%

		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**				
	% (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 adaptation**	**Of which enabling**			**Of which specialised lending**	**Of which transitional/adaptation**	**Of which enabling**	
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 governments 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%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Collateral obtained by taking possession: residential and commercial immovable properties	1.11%	0.00%	0.00%	0.00%	0.00%						1.11%	0.00%	0.00%	0.00%	0.00%	0.82%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Template 47b: GAR% 31.12.2023

(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**			
	% (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 adaptation**	**Of which enabling**			**Of which specialised lending**	**Of which transitional/adaptation**	**Of which enabling**	
1	**GAR**	17.51%	2.14%	1.74%	0.04%	0.22%	0.65%	0.01%	0.00%	0.00%	0.00%	18.16%	2.15%	1.74%	0.04%	0.22%	23.08%	7.56%	6.37%	5.63%	0.03%	0.38%	0.45%	0.02%	0.00%	0.00%	0.00%	8.02%	6.39%	5.63%	0.03%	0.38%	27.64%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16.08%	2.14%	1.74%	0.04%	0.22%	0.65%	0.01%	0.00%	0.00%	0.00%	16.74%	2.15%	1.74%	0.04%	0.22%	21.98%	7.56%	6.37%	5.63%	0.03%	0.38%	0.45%	0.02%	0.00%	0.00%	0.00%	8.02%	6.39%	5.63%	0.03%	0.38%	27.64%
3	Financial corporations	0.59%	0.03%	0.00%	0.01%	0.00%	0.05%	0.00%	0.00%	0.00%	0.00%	0.64%	0.03%	0.00%	0.01%	0.00%	2.25%	0.72%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.72%	0.00%	0.00%	0.00%	0.00%	4.86%
4	Credit institutions	0.54%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.54%	0.00%	0.00%	0.00%	0.00%	2.05%	0.72%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.72%	0.00%	0.00%	0.00%	0.00%	4.61%
5	Other financial corporations	0.05%	0.03%	0.00%	0.01%	0.00%	0.05%	0.00%	0.00%	0.00%	0.00%	0.10%	0.03%	0.00%	0.01%	0.00%	0.20%	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%	0.24%
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%	0.01%	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%	0.08%
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%	0.02%	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%	0.16%

		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**				
	% (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 adaptation**	**Of which enabling**			**Of which specialised lending**	**Of which transitional/adaptation**	**Of which enabling**	
8	of which insurance undertakings	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%	0.01%	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	2.65%	2.11%	1.74%	0.03%	0.22%	0.60%	0.01%	0.00%	0.00%	0.00%	3.24%	2.12%	1.74%	0.03%	0.22%	6.79%	6.84%	6.37%	5.63%	0.03%	0.38%	0.45%	0.02%	0.00%	0.00%	0.00%	7.30%	6.39%	5.63%	0.03%	0.38%	22.78%
10	Households	12.85%	0.00%	0.00%	0.00%	0.00%						12.85%	0.00%	0.00%	0.00%	0.00%	12.89%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	of which loans collateralised by residential immovable property	12.72%	0.00%	0.00%	0.00%	0.00%						12.72%	0.00%	0.00%	0.00%	0.00%	9.90%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12	of which building renovation loans	1.13%	0.00%	0.00%	0.00%	0.00%						1.13%	0.00%	0.00%	0.00%	0.00%	0.88%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	of which motor vehicle loans	0.13%	0.00%	0.00%	0.00%	0.00%						0.13%	0.00%	0.00%	0.00%	0.00%	0.10%	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
		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**					
			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**	**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**	**Proportion of total new assets covered**
14	Local government financing	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	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 governments 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%	0.05%	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	1.42%	0.00%	0.00%	0.00%	0.00%						1.42%	0.00%	0.00%	0.00%	0.00%	1.11%	0.00%	0.00%	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

11.3.9 Other climate change mitigating actions that are not covered in the EU Taxonomy

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.

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.

Template 48a: Other climate change mitigating actions that are not covered in the EU Taxonomy 30.06.2024

(Amounts in millions of Euro)

	a	b	c	d	e	f
	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	202.773572	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. 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. 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.
2		Non-financial corporations	181.39	Yes	No	
3		Of which Loans collateralised by commercial immovable property	0			
4		Households	0			
5		Of which Loans collateralised by residential immovable property	0			
6		Of which building renovation loans	0			
7		Other counterparties	0			
8	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	10	Yes	No	
9		Non-financial corporations	988.98	Yes	No	
10		Of which Loans collateralised by commercial immovable property	449.41	Yes	No	
11		Households	76.03			
12		Of which Loans collateralised by residential immovable property	57.14			
13		Of which building renovation loans	0.25			
14		Other counterparties				

Template 48b: Other climate change mitigating actions that are not covered in the EU Taxonomy 31.12.2023

(Amounts in millions of Euro)

	a	b	c	d	e	f
	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	-			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. 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. 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.
2		Non-financial corporations	216.40	Yes	No	
3		Of which Loans collateralised by commercial immovable property	-			
4		Households	-			
5		Of which Loans collateralised by residential immovable property	-			
6		Of which building renovation loans	-			
7		Other counterparties	-			
8	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	-			
9		Non-financial corporations	873.71	Yes	No	
10		Of which Loans collateralised by commercial immovable property	247.44	Yes	No	
11		Households	104.56	Yes	No	
12		Of which Loans collateralised by residential immovable property	84.06	Yes	No	
13		Of which building renovation loans	24.29	Yes	No	
14		Other counterparties	-			

12 Appendix – Own Funds structure

Template 49: EU CC1 - Composition of regulatory own funds as of 30.06.2024

(Amounts in millions of Euro)

		a	a	b
		30.06.2024	31.12.2023	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	5,465	(a)
2	Retained earnings	1,477	958	(b)
3	Accumulated other comprehensive income (and other reserves)	(149)	(147)	(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	0	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	202	474	(b)
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**6,996**	**6,749**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	(6)	(6)	
8	Intangible assets (net of related tax liability) (negative amount)	(427)	(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)	(4)	(9)	(e)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	186	194	(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)	(76)*	(11)	(a)

		a	a	b
		30.06.2024	**31.12.2023**	**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	(72)	(73)	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-	
EU-20c	of which: securitisation positions (negative amount)	(72)	(73)	
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)	(1,721)	(1,730)	(e)
22	Amount exceeding the 17,65% threshold (negative amount)	-	-	(e)
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	-	-	(e)
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	(87)	(49)	

		a	a	b
		30.06.2024	31.12.2023	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)**	**(2,209)**	**(2,110)**	
29	**Common Equity Tier 1 (CET1) capital**	**4,787**	**4,639**	
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	-	-	(g)
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**	**400**	**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)			
42a	Other regulatory adjustments to AT1 capital			

		a	a	b
		30.06.2024	31.12.2023	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**-**	**-**	
44	**Additional Tier 1 (AT1) capital**	**400**	**400**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**5,187**	**5,039**	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	968	1,000	(h)
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	-	-	(g)
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**	**968**	**1,000**	
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 goldings 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
		30.06.2024	31.12.2023	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	968	1,000	
59	**Total capital (TC = T1 + T2)**	**6,155**	**6,039**	
60	**Total Risk exposure amount**	**32,387**	**32,209**	
Capital ratios and buffers				
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	14.8%	14.4%	
62	Tier 1 (as a percentage of total risk exposure amount)	16.0%	15.6%	
63	Total capital (as a percentage of total risk exposure amount)	19.0%	18.8%	
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)	9.92%	9.88%	
65	of which: capital conservation buffer requirement	2.50%	2.50%	
66	of which: countercyclical buffer requirement	0.23%	0.19%	
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)**	7.77%	7.39%	
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)	91	84	

		a	a	b
		30.06.2024	**31.12.2023**	**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)	35	41	
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)	660	642	
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)	-	-	

*including €61 mln as a regulatory reduction according to CRR for the acquisition by the Company of own existing common, registered dematerialized shares, with voting rights, pursuant to provisions of article 49 of law 4548/2018, which was approved by the Annual General Meeting of of Shareholders held on 27.7.2023 in order to complete the Share Buyback program of € 61 million.