

2023

Principles for Responsible Banking

4th Report and
Self-Assessment Template

UN
environment
programme

finance
initiative

Principles for
Responsible Banking



ALPHA
SERVICES AND HOLDINGS

Reporting and Self-Assessment Template



Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

1.1 Business model

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank's portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

Response

The Alpha Services and Holdings Group is one of the leading financial Groups in Greece. It is present in South-eastern Europe via the Group Companies that operate in Cyprus and Romania. The Group is also present in the United Kingdom through its London Branch and the Group Company, Alpha Bank London Ltd and in Luxembourg through its Luxembourg Branch.

Alpha Bank S.A (The "Bank" or "Alpha Bank") provides products and services in the following operating segments:

- Retail Banking, including loans, deposits products and bancassurance services.
- Wholesale Banking, including small business and corporate, shipping finance, leasing and factoring activities.
- Investment Banking and Treasury Management, including personal and private banking, corporate and structured finance, treasury and brokerages services; and
- Other activities such as real estate management, venture capital and equity financing.

Links and references (incl.

<https://www.alphaholdings.gr/-/media/AlphaHoldings/Files/apotelesmata/FY2023/Group-Holdco-31122023-ENG060324Disclaimer.pdf>,
p. 9, 11-12, 286-288, 350

1.2 Strategy alignment

Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?

☒ Yes

☐ No

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?

☒ UN Guiding Principles on Business and Human Rights

☒ International Labour Organization fundamental conventions

☒ UN Global Compact

☒ UN Declaration on the Rights of Indigenous Peoples

☒ Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: climate related regulatory frameworks of EBA and ECB

☐ Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones:

☐ None of the above

Response

Alpha Bank updated its Sustainability Strategy in the previous financial year (2022), based around 3 pillars:

1. Support an Environmentally Sustainable Economy,
2. Foster Healthy Economies and Societal Progress,
3. Ensure Robust and Transparent Governance.

As part of this strategy and for the purpose of implementing the Principles, Alpha Bank had reviewed its contribution to society's goals in reference to the SDGs, Paris Agreement and relevant regional frameworks such as the European Union Action Plan on Sustainable Finance and Greece's national strategy for

Links and references

[Sustainability Report 2023](#)
(p. 32-38)

sustainable development. The analysis of the Bank's activities, using the tools provided by UNEP-FI and the GRI Materiality Analysis, concluded that the most significant impacts relate to the following six areas (of the Impact Radar) and society's goals:

- **Provide an Inclusive Work environment/ Support equal access to Healthcare, Education, Culture and Heritage - aligning with SDG 10** – Alpha Bank respects and defends the diversity of its Employees (specifically with regard to age, gender, race, nationality, religion, disability/special ability, sexual orientation) and treats all employees with respect. In this context, the Bank has a commitment to the management of human rights, which are described in its Corporate Responsibility Policy and Code of Ethics. Additionally, a Diversity Policy is implemented to ensure clarity for all on the standards set. Finally, the Bank executes targeted CSR initiatives in order to enhance equal and inclusive access to education, cultural events and healthcare services.
- **Waste - aligning with SDG 11 – “Sustainable cities” and SDG 12 – “Responsible consumption and production”**. The portfolio of Alpha Bank shows a significant association with sectors potentially impacting the circular economy development, particularly the management of waste. Therefore, the Bank could achieve a significant impact by aligning its strategy towards SDG 11, for example by reducing the adverse impact of cities through the financing of waste management activities (Goal 11.6) and towards SDG 12, for example by reducing waste generation through prevention, reduction, recycling and reuse (Goal 12.5). This strategy would also support the European Circular Economy Action Plan of 2020.
- **Reduction of waste generation and promotion of the principles of the circular economy - aligning with SDG 12**- Alpha Bank focuses on responsible consumption and production, through the rational management of the waste it generates, applying the environmental motto “reduce, reuse, recycle”.
- **Climate change -, aligning with SDG 13 – “Climate action”**. The portfolio of Alpha Bank shows a significant association with sectors having a significant impact on climate change. Climate change is also identified as the defining challenge of the decade. The Bank has a role to play in fighting climate change through aligning its strategy towards SDG 13 and the Paris Agreement with the development of a green offering and the reduction of its own and financed emissions to NetZero.

- **Protecting the local habitats and species -aligning with SDG 15-** The Bank follows strict procedures, screening processes and policies that filter out investments in activities with an adverse impact on local fauna and flora.
- **Enhancing the implementation of regulations governing the Bank's operation and reduction of the impact of potential risks from the Bank's operation – aligning with SDG 16-** Alpha Bank supports the development of effective, responsible and transparent institutions at all levels. As part of its continuous effort to consistently meet the expectations of its stakeholders, the Bank has introduced procedures to ensure the strict application of the laws, regulations and decisions of relevant Authorities, applicable to the financial sector. The Group has a firm position towards corruption and bribery and has established a framework of relevant policies and control mechanisms to combat such risks. In order to protect personal data and avoid breaches, Alpha Bank applies appropriate best practices, which are updated on a regular basis, in line with national and international regulations. The Group further considers meeting the needs of its customers a top priority and in this context, consistently strives to provide high-quality services to all clients, respecting their legal interests and human rights.

In 2023, the Bank revisited the Materiality Analysis performed in the previous financial year (2022), re-identified and re-assessed its material impact areas. The material impact areas resulted from the abovementioned analysis, even though grouped differently had no differences to the previously reported material impact areas.

Moreover, in 2023 the Bank's subsidiary company in Cyprus, developed its Sustainability Strategy, aligning with the Group's Sustainability Strategy. The development of Cyprus' Sustainability strategy also considered the results of the PRB impact analysis performed for the subsidiary company's portfolio.



Principle 2: Impact and Target Setting

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly¹ and fulfil the following requirements/elements (a-d)²:

a) Scope: What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

Response

a)

In October 2022, a dedicated portfolio alignment analysis, in accordance with the UNEP FI Principles for Responsible Banking (PRB) Impact Analysis, using the Portfolio Impact Analysis Tool for Banks (version 3) has been conducted. Through the analysis the Bank identified its **financed impacts (i.e. impacts from the Bank's portfolio)**, and the areas with the most significant impact, with the following steps:

1. Review of the Bank's portfolio composition
2. Understand the context and what the most relevant challenges and priorities in the countries/regions where the Bank operates are
3. Run an analysis to identify the most significant positive and negative impacts of the bank's products and services (not internal operational impacts).

The Analysis focused in Alpha Bank's Greece own operation as this accounts for about 90% of the Group's assets.

Links and references

[Sustainability Report 2023 \(p.38-39\)](#)

[3rd Report and Self-Assessment Template \(2022\) of Alpha Services & Holdings](#)

Information about the PRB tool used for mapping portfolio impact is publicly available on the PRB's [website](#).

The PRB Guidance describes reporting on the PRB, including the impact assessment <https://www.unepfi.org/industr>

¹ That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

² Further guidance can be found in the [Interactive Guidance on impact analysis and target setting](#).

<p>Scope: Institutional & Consumer banking portfolio</p> <p>Geographic location: Greece</p> <p>Excluded from scope:</p> <ul style="list-style-type: none"> • Investment banking portfolio • Group subsidiaries <p>Reason for exclusion:</p> <p>Data provision was not available. It should be noted that corresponding initiatives were being implemented on a Group level as well and are expected to be reported in the following PRB Report.</p> <p>Finally, appropriate methods were also planned for the presentation of the investment portfolio. The previous analysis has not been conducted again for Alpha Bank Greece in 2023, but it has been conducted for its subsidiary in Cyprus. More information on the PRB analysis performed in 2022, is available in the 3rd Report and Self-Assessment Template (2022)' of Alpha Services & Holdings.</p> <p>Specifically, in 2023, the Bank performed a dedicated portfolio alignment analysis for its subsidiary in Cyprus in accordance with the UNEP FI Principles for Responsible Banking (PRB) Impact Analysis, using the Portfolio Impact Analysis Tool for Banks (version 3), following the same procedure. The aim of the analysis was to inform the subsidiary's sustainability strategy and support the alignment with the Group's sustainability strategy.</p> <p>Scope: Institutional & Consumer banking portfolio</p> <p>Geographic location: Cyprus</p> <p>Excluded from scope:</p> <ul style="list-style-type: none"> • other Group subsidiaries <p>Reason for exclusion:</p> <p>Data provision was not available. Finally, appropriate methods are also planned for the presentation of the investment portfolio on the Group level. It is noted that no investment banking portfolio is in place for the subsidiary in Cyprus.</p>	<p><u>ies/banking/principles-for-responsible-banking-guidance-document</u></p>
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b) Portfolio composition: Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition your portfolio globally and per geographical scope

- i) by sectors & industries³ for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or
- ii) by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

Response

Institutional Banking Scope- Cyprus:

- The PRB Impact Analysis Institutional Banking Module has been utilized in a way that covers "a mix of Business and Corporate Banking" which comprises the following Business Lines: Retail Professionals and Small Businesses and Corporate and SME. These business lines constitute Alpha Bank Cyprus's Institutional Banking representing 57.38% of Alpha Bank's total business activity.
- The analysis has been performed by using NACE industry classification and drawn outstanding amount as an indicator, since it "generates the most accurate impact profile as this reflects funds actually disbursed", according to the PRB Impact Analysis Guidance.
- Top 50 sectors with the highest exposure drawn outstanding amount have been selected, taking into consideration exposure to climate sensitive sectors
- Total portfolio exposure € mil 445.65 & PRB analysis exposure € mil 427.96 (96% of total portfolio) (see Table 2 exposure)

Links and references
Information about the PRB tool used for mapping portfolio impact is publicly available on the PRB's [website](#).

³ 'Key sectors' relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.

Table 1	Business lines		
Indicator	Retail Professionals and Small Businesses	Corporate and SME	Total
Total drawn outstanding loans for each type of Business Line (in € mil):	27.54	418.11	445.65
% of institutional banking	6%	94%	100%
Portion of the bank's overall business represented per Business Line (as gross income, in € mil)	4.67	25.62	30.29
% of institutional banking	15%	85%	100%

Table 2		Business segments	
Indicator	Institutional Banking	Consumer Banking	
Geographic scope	Cyprus		
Size of Business segment	445,651,517.93 (€)	596,911,982.83 (€) of drawn outstanding loans (credit) 1,488,193,503.55 (€) of current accounts & savings	
Proportion of the bank's overall business activity represented per Business segment (as gross income, in € mil)	57.38%	42.62%	
Industry classification	NACE		
Choice of indicators	Drawn outstanding loans	Number of customers	

Table 3			
Impact	Exposure €	Exposure %	# of sectors
Key positive (top 25)	19,757,646.35	5%	3
Key negative (top 25)	71,821,103.61	17%	3
Key positive and negative (top 25)	228,120,805.13	53%	8
Non-key sectors according to PRB, but included in CPRS perimeter (1-6)	39,311,757.02	9%	2
Non-key sectors according to PRB, included in CPRS perimeter, but not included in CPRS perimeter (1-6)	63,223,619.78	15%	9
Both key and CPRS (1-6 classified) sectors (bottom 25)	5,721,245.21	1%	25
Total	427,956,177.11	100.0%	50
Total portfolio exposure	445,651,517.93		
Table exposure (% of total portfolio)	427,956,177.11	96.0%	50

Corporate portfolio	
Sector	Proportion of total portfolio (€ 445,651,517.93)
41.1 - Development of building projects	24.98%
H50.2 - Sea and coastal freight water transport	12.23%
I55.1 - Hotels and similar accommodation	8.15%
L68.2 - Rental and operating of own or leased real estate	7.99%
D35.1 - Electric power generation, transmission and distribution	5.82%
L68.3 - Real estate activities on a fee or contract basis	4.86%
C27.3 - Manufacture of wiring and wiring devices	3.27%
C10.7 - Manufacture of bakery and farinaceous products	3.24%
K64.2 - Activities of holding companies	3.20%
G47.3 - Retail sale of automotive fuel in specialised stores	2.90%

G46.4 - Wholesale of household goods	2.72%	
C21.1 - Manufacture of basic pharmaceutical products	2.14%	
T98.0 - Undifferentiated goods- and services-producing activities of private households for own use	2.12%	
G46.5 - Wholesale of information and communication equipment	2.10%	
C10.6 - Manufacture of grain mill products, starches and starch products	1.38%	
M69.2 - Accounting, bookkeeping and auditing activities; tax consultancy	1.19%	
Other	7.73%	
Total	96.03%	
<p>Consumer Banking Scope- Cyprus:</p> <ul style="list-style-type: none"> • 7 types of products provided by Alpha Bank Cyprus to total amount (drawn outstanding loans) of € mil 596.91 and € mil 1,488.19 of amount of current accounts & savings • The number of retail clients provided may include clients who possess more than one product • The clients captured are only first holders and not all holders of these retail products • Percentages of client types (based on income, gender, age and location) were applied on to the number of clients for each product category 		

# of types of products	Products added into the Tool	No of clients	Amount (in €)
1	64.421 Savings accounts	82,374	895,819,389.22 €
2	64.422 Certificates of deposit	16,637	592,374,114.33 €
Total		N/A*	1,488,193,503.55 €
3	64.431 Credit cards	12,044	6,392,124.47 €
4	64.432 Consumer loans & overdraft	81,944	58,107,323.54 €
5	64.434 Home loans /mortgages	10,329	523,259,830.08 €
6	64.435 Vehicle related loans	897	7,185,343.28 €
7	64.436 Education related loans	345	1,967,361.46 €
Total		N/A*	596,911,982.83 €

c) Context: What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate?⁴ Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

This step aims to put your bank's portfolio impacts into the context of society's needs.

Country needs' scores metrics amendments

For assessing the context of society's needs in Cyprus, the UNEP FI Context Module (PRB Tool) was used. The sources provided in the Context Module were reviewed, and metrics, values have been updated in cases where needed in order to ensure that assessments are relevant and updated for Cyprus. The following table presents the metrics and the scores of the country needs used for all impact topics and areas.

*Links and references
Additional information exist in
the following tables*

Impact area	Impact topic	Metric(s)	PRB Tool's country need score FOR IMPACT TOPIC	Updated country need score FOR IMPACT TOPIC
Integrity & security of person	Conflict	(New source/metric) Presence of armed conflict	1	2
	Modern slavery	Victims of modern slavery per 1000 population*	3	2
	Child labor	Children involved in child labor (% of population aged 5 to 14)	N/A	N/A
	Data privacy	Level of data protection laws	1	1

⁴ Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

	Natural disasters	Risk of humanitarian crises and disasters (as a function of hazards and exposures, vulnerability, lack of coping capacity)**	1	1	
Health & safety	-	Life expectancy at birth	1	1	
		Healthy life expectancy at birth	1	1	
Availability, accessibility, affordability, quality of resources & services	Water	MDG 7.5 Freshwater withdrawal as % of total renewable water resources (%)	4	4	
		Proportion of population using safely managed drinking water services **	1	1	
	Food	Prevalence of undernourishment in the total population	1	1	
		Adult Obesity (BMI $\geq 30\text{kg/m}^2$)	2	2	

		Food security (composite index: availability, affordability, quality & safety+risk adjustment)	N/A	N/A
	Energy	Proportion of population with access to electricity	2	2
Impact area	Impact topic	Metric(s)	PRB Tool's country need score FOR IMPACT TOPIC	Updated country need score FOR IMPACT TOPIC
Availability, accessibility, affordability, quality of resources & services	Housing	Proportion of urban population living in slums*	N/A	1
		(New source/metric) Homeless as % of total population*	N/A	2
		House Price to Income (growth from 2015)	1	1
		Housing overcrowding among low-income	1	1

	Healthcare & sanitation	Universal health coverage (UHC) index of service coverage	2	2
		GHS Index Score	3	3
	Education	Mean years of schooling (composite index: mean years of schooling of adults 1 and expected years of schooling of children)		1
		Literacy rate as % of population aged 15-24**	1	1
	Mobility	Global Sustainable Mobility Index (GSMI) Score	1	1
		(New source/metric) Congestion level (as a function of hours lost to traffic)*	N/A	2
	Information	Freedom of press	3	3
	Connectivity	Proportion of population using the internet	1	1
		Population covered by at least a 4G mobile network (%)**	1	1

	Culture & heritage	Total expenditure per capita spent on cultural and natural heritage, public (PPP, constant 2017 United States dollars)	N/A	N/A
	Finance	Financial institution account, income, poorest 40% (% ages 15+)	1	1
		Saved at a financial institution (% age 15+)	2	2
Livelihood	Employment	Unemployment rate**	2	2
	Wages	Gross national income (GNI) per capita	1	1
	Social protection	Population covered by at least one social protection benefit (excluding health)	2	2
Equality & justice	Gender equality	Gender inequality	1	1
	Ethnic/racial equality	(New source/metric) Number of xenophobic and racist hate crimes*	N/A	1
	Age discrimination	Prevalence of ageist attitudes*	1	4

	Other vulnerable groups	(New source/metric) Disability employment gap by level of activity limitation and sex*	N/A	3	
Impact area	Impact topic	Metric(s)	PRB Tool's country need score FOR IMPACT TOPIC	Updated country need score FOR IMPACT TOPIC	
Strong institutions, peace & stability	Rule of law	Rule of law	1	1	
		Corruption	2	2	
	Civil liberties	Civil liberties**	1	1	
Healthy economies	Sector diversity	Economic Complexity Index (ECI)**	2	2	
	Flourishing MSMEs	Ease of doing business score**	1	1	
Infrastructure	-	Highest score taken from "Water", Energy, Mobility, Connectivity"	4	4	
Socio-economic convergence	-	Social mobility	2	2	
		Gini coefficient	2	2	

Impact area	Impact topic	Metric(s)	PRB Tool's country need score FOR IMPACT TOPIC	Updated country need score FOR IMPACT TOPIC
Climate stability	-	Climate risk based on the extent to which countries and regions have been affected by impacts of weather-related loss events (storms, floods, heat waves etc.)	1	1
		CO2 emissions (metric tons per capita)**	3	3
Biodiversity & healthy ecosystems	Waterbodies	Proportion of water bodies with good ambient water quality	2	2
	Air	Modeled annual mean PM2.5	2	2
		Air Quality Index (AQI)**	2	2
	Soil	(New source) Proportion of land that is degraded over total land area, (%)*	N/A	3

	Species	Red List Index of Species Survival	1	1
	Habitat	Vegetation loss since 2004	2	2
Circularity	Resource intensity	Electricity consumption per capita (MWh/capita)*	4	3
		Water withdrawals per capita, in cubic metres per year	2	2
		Material Footprint (RMC) per capita	4	4
	Waste	Annual municipal solid waste per capita	3	3
		Recycling rate	3	3

Furthermore, the following table presents the specific updates made in sources, metrics, values and scores for Cyprus. Also, employees of the subsidiary company in Cyprus, provided their feedback for regional challenges and priorities in certain cases.

Impact area	Impact topic	Metric (Old/New, if applicable)	Updates on metric country need score (old/new)	Reason for update / Effect on IMPACT TOPIC	Old Value/ New Value	Source
Integrity & security of person	Conflict	Presence of armed conflict/ Political and security situation	1/2	Updated source / Increased country need	1/New source's context	Crisis Watch of the International Crisis Group
	Modern slavery	Victims of modern slavery per 1000 population	3/2	Updated metric value/ Decrease in need score	8/4.22	UN Global SDG Database
	Natural disasters	Risk of humanitarian crises and disasters (as a function of hazards and exposures, vulnerability, lack of coping capacity)	1/1	Updated metric value/ No effect in need score	3/2.6	INFORM-Global Risk Index

Availability, accessibility, affordability, quality of resources & services	Water	Proportion of population using safely managed drinking water services	1/1	Updated metric value/ No effect in need score	100%/99.8%	Sustainable Development Report 2022
	Housing	Proportion of urban population living in slums	N/A/1	Updated metric value/ Value was given in need score	N/A/0%	Sustainable Development Report 2022
		Homeless as % of total population/New source's context	N/A/2	Updated metric value/ Value was given in need score	N/A/New source's context	ESPN Thematic Report on National strategies to fight homelessness and housing exclusion, Sept 2019
	Education	Literacy rate as % of population aged 15-24	1/1	Updated metric value/ No effect	99.8%/99.9%	Sustainable Development Report (original data: UNESCO)
	Mobility	Congestion level (as a function of hours lost to	N/A/2	Updated source / No baseline source or	N/A/140	Traffic ranking by country, Numbeo

	traffic)/Inefficiency index			score / Increased country need		
	Connectivity	Population covered by at least a 4G mobile network (%)	1/1	Updated metric value/ No effect	99.9%/100%	ITU - Digital Development Dashboard
Impact area	Impact topic	Metric (old/new, if applicable)	Updates on metric country need score (old/new)	Reason for update / Effect on IMPACT TOPIC	Old Value/ New Value	Source
Likelihood	Employment	Unemployment rate	2/2	Updated value in source / No effect	5.7/6.8	ILO - ILOSTAT database
Equality & justice	Ethnic/racial equality	N/A/Number of xenophobic and racist hate crimes	N/A/ 1	Updated source / Value was given in need score	N/A/41	OSCE- Organization for Security and Co-operation in Europe
	Age discrimination	Prevalence of ageist attitudes	1/4	Updated value in source/Increa	Low/High	The Lancet - Figure Countries classified as low,

				se in need score		moderate, or high in ageist attitudes towards older people
	Other vulnerable groups	N/A/Disability employment gap by level of activity limitation and sex	N/A/3	Updated source / Value was given in need score	N/A/25.7 0%	Eurostat- Disability employment gap by level of activity limitation and sex
Strong institutions, peace & stability	Civil liberties	Civil liberties	1/1	Updated value/No effect	0.81/0.77	World Bank
Healthy economies	Sector diversity	Economic Complexity Index (ECI)	2/2	Updated year in source / No effect	0.42/0.38	Harvard Growth Lab - Country & Product Complexity Rankings
	Flourishing MSMEs	Ease of doing business score	1/1	Updated value/No effect	73.4/73	Flourishing MSMEs
Climate Stability	-	CO ₂ emissions (metric tons per capita)	3/3	Updated value/No effect	6.7/6.1	IEA

Biodiversity & healthy ecosystems	Air	Air Quality Index (AQI)	2/2	Updated value/No effect	14.8/15.6	Sustainable Development Report 2022
	Soil	Proportion of degraded land	N/A/3	Updated source / No metric score was given in previous version / Value was given in need score	N/A/13.1	Proportion of land that is degraded over total land area, (%), UNECE
Circularity	Resource intensity	Electricity consumption per capita (MWh/capita)	4/3	Updated score	5.3/5.3	IEA Atlas of Energy

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)⁵? Please disclose.

Response

It is noted that for Alpha Bank Greece based on the impact analysis performed in the previous financial year (2022), and by taking into consideration the country needs in Greece, GRI materiality analysis results, stakeholder needs and expectations, regulatory framework and corporate priorities, the two prioritized impact areas are:

- 1) **Climate:** climate stability
- 2) **Financial health and inclusion:** Finance, Gender equality, Age discrimination, Employment

These prioritized impact areas were still identified as material ones in the materiality analysis performed in 2023.

GRI Materiality Analysis Results- Positive Impacts & Negative Impacts

Priority Impact Area ⁶	Material Impacts 2023	+	-
Climate	Climate Stability		
	<ul style="list-style-type: none"> Impact to climate mitigation, through financial products/services 		
	<ul style="list-style-type: none"> Impact to climate mitigation, through own operations (including CSR) and supply 		

Links and references

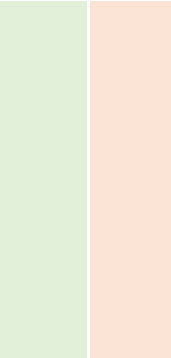
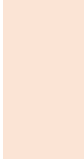
[Sustainability Report 2023](#) The identification of the material impact areas are presented on p. 37-39, 48-49.

⁵ To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.

⁶ It is noted that for the priority impact area 'Compliance', specific 2023 material impacts have not been identified

	chain activities (GHG emissions from own operations and supply chain)		
	<ul style="list-style-type: none"> Impact to climate adaptation, through own operations (including CSR) and supply chain activities 		
	<ul style="list-style-type: none"> <u>Potential Impact to climate adaptation, through financial products/services</u> 		
Biodiversity	Biodiversity, Pollution prevention and control		
	<ul style="list-style-type: none"> Impact to water and marine resources, through financial products/services 		
	<ul style="list-style-type: none"> Impact to biodiversity and ecosystems, through financial products/services 		
	<ul style="list-style-type: none"> Impact to pollution prevention and control, through financial products/services 		
Circularity	Circularity		
	<ul style="list-style-type: none"> Impact to circularity (resources & waste), through financial products/services 		
Financial health & inclusion	Access to Finance		
	<ul style="list-style-type: none"> Impact to customers, through financial access and inclusion (i.e., remote 		

Health, safety & well-being	locations, elderly, youth, women, physical accessibility)			
	Employment			
	<ul style="list-style-type: none"> Impact to employees, through employment practices for own workforce and supply chain (secure employment, working time, adequate wages, social dialogue, freedom of association, collective bargaining, work-life balance, health and safety) 			
	Socio-economic value creation through financial products/services			
Culture & Heritage	<ul style="list-style-type: none"> Impact to customers and broader society/economy, through financial products/services for socioeconomic value (i.e., induced employment, access to housing, education, mobility, energy, healthcare, diversity & inclusion, innovation, culture and heritage, infrastructure, food, water) 			
	Cultural Heritage			
	<ul style="list-style-type: none"> Impact to local and broader community, through CSR programs for social value (i.e., education, culture and heritage) 			

Business Ethics	Employment, Equal treatment and opportunities for all (own workforce & workers in the value chain)		
Data Privacy	Data privacy, Connectivity, Information		
<p>The list of material impact areas corresponds to material topics</p> <p>¹ It should be mentioned that the list of the prioritized impact areas compared to the previous reporting period has no differences, even though in some cases they have been grouped differently.</p> <p>¹ The underlined text refers to potential impact</p> <p>Based on the portfolio alignment analysis for the subsidiary company in Cyprus which 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), the prioritized impact areas selected were:</p> <ol style="list-style-type: none"> 1) Climate: climate stability 2) Financial health and inclusion: Finance, Employment 			

d) For these (min. two prioritized impact areas): Performance measurement: Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts?

Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context.

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health & inclusion as your most significant impact areas, please also refer to the applicable indicators in the [Annex](#). If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.

The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.

Response

1. Institutional banking portfolio

In the following table is the total universe of prioritized positive and negative impacts.

POSITIVE Impact areas	Impact topics	Proportion of portfolio	NEGATIVE Impact areas	Impact topics	Proportion of portfolio
Livelihood	Employment, Wages, Social protection	96.03%	Health & safety	Health & safety	93.91%
Availability, accessibility, affordability,	Water, Food, Energy, Housing, Healthcare &	94.39%	Circularity	Resource intensity, Waste	92.46%

quality of resources & services	sanitation, Education, Mobility, Connectivity, Culture & heritage, Finance		Livelihood	Employment, Wages, Social protection	88.09%
Healthy economies	Flourishing MSMEs	84.11%	Biodiversity & healthy ecosystems	Waterbodies, Air, Soil, Species, Habitat	84.98%
Infrastructure	Infrastructure	38.55%	Climate stability	Climate stability	79.66%
Circularity	Resource intensity, Waste	36.20%	Availability, accessibility, affordability, quality of resources & services	Water, Food, Energy, Housing, Mobility, Culture & heritage	51.28%
Health & safety	Health & safety	34.10%	Integrity & security of person	Conflict, Modern slavery, Child labour, Natural disasters	39.65%
Climate stability	Climate stability	33.28%	Equality & justice	Gender equality, Ethnic/racial equality, Other vulnerable groups	30.11%
Biodiversity & healthy ecosystems	Waterbodies, Air, Soil, Species, Habitat	7.53%	Strong institutions,	Rule of law	17.86%
Equality & justice	Other vulnerable groups	0.02%			
Integrity & security of person	N/A	0.00%			

Strong institutions, peace & stability	N/A	0.00%	peace & stability		
Socio-economic convergence	N/A	0.00%	Healthy economies	Flourishing MSMEs	0.62%
			Infrastructure	N/A	0.00%
			Socio-economic convergence	N/A	0.00%

Below are the most significant positive and negative impacts and the corresponding sectors:

a) Positive Impacts Contributing Sectors

Institutional Banking		Impact areas	Impact topics	Associated SDGs	Contributing sectors (top 5 by proportion of portfolio per impact area)
	POSITIVE	Livelihood	Employment, Wages, Social protection	SDGs 1, 8, 10	41.1 Development of building projects (24.98%) 50.2 Sea and coastal freight water transport (12.23%) 55.1 Hotels and similar accommodation (8.15%)

55.1 Hotels and similar accommodation (8.15%)

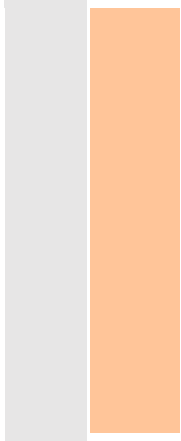
68.2 Rental and operating of own or leased real estate (7.99%)

68.3 Real estate activities on a fee or contract basis (4.86%)

b) Negative Impacts Contributing Sectors

		Impact areas	Impact topics	Associated SDGs	Contributing sectors (top 5 by proportion of portfolio per impact area)
Institutional Banking	NEGATIVE	Health & safety	Health & safety	SDG 3	<div>41.1 Development of building projects (24.98%)</div> <div>50.2 Sea and coastal freight water transport (12.23%)</div> <div>55.1 Hotels and similar accommodation (8.15%)</div> <div>68.2 Rental and operating of own or leased real estate (7.99%)</div>

					68.2 Rental and operating of own or leased real estate (7.99%)	
					68.3 Real estate activities on a fee or contract basis (4.86%)	
	Biodiversity & healthy ecosystems	Waterbodies, Air, Soil, Species, Habitat	SDGs 6, 11, 12, 14, 15		41.1 Development of building projects (24.98%)	
					50.2 Sea and coastal freight water transport (12.23%)	
					55.1 Hotels and similar accommodation (8.15%)	
					68.2 Rental and operating of own or leased real estate (7.99%)	
	Climate stability	Climate stability	SDGs 13		35.1 Electric power generation, transmission and distribution (5.82%)	
					41.1 Development of building projects (24.98%)	
					50.2 Sea and coastal freight water transport (12.23%)	

	<hr/> <div> <div>68.2 Rental and operating of own or leased real estate (7.99%)</div> <div>35.1 Electric power generation, transmission and distribution (5.82%)</div> <div>68.3 Real estate activities on a fee or contract basis (4.86%)</div> </div> <hr/>	
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2. Consumer banking Contributing Sectors

		Impact areas	Associated Impact topics	Associated SDGs	Contributing sectors (not only key sectors incl.)	% of portfolio (consumers)	% of portfolio (Credit: drawn outstanding loans 596,911,982.83€)	% of portfolio (Current accounts & savings: amount 1,488,193,503.55€)
Consumer Banking	POSITIVE	Availability, accessibility, affordability, quality of resources & services	Finance, Housing, Mobility, Education	SDGs 8,9,11,4	64.421 Savings accounts			
					64.422 Certificates of deposit			
					64.431 Credit cards			
					64.432 Consumer loans & overdraft	100.00%	100%	100%
					64.434 Home loans/mortgages			
					64.435 Vehicle related loans			
					64.436 Education related loans			

					64.431 Credit cards					
					64.432 Consumer loans & overdraft					
		Socio-economic convergence	Socio-economic convergence	SDGs 10,17	64.434 Home loans/mortgages	51.60%	100%	0%		
					64.435 Vehicle related loans					
					64.436 Education related loans					
		Climate stability	Climate stability	SDGs 13	64.434 Home loans/mortgages	5.49%	88.86%	0%		
		Circularity	Resource intensity	SDGs 12	64.435 Vehicle related loans					
		Availability, accessibility, affordability, quality of resources & services	Finance	SDGs 9,9	64.431 Credit cards					
					64.432 Consumer loans & overdraft	51.60%	100%	0%		
					64.434 Home loans/mortgages					
					64.435 Vehicle related loans					

			64.436 Education related loans	
			<p>Climate: In Alpha Bank Cyprus, Performance measurement has been conducted related to the Group's targets (New financing volumes (disbursements) to renewable energy projects throughout the year (total amount in million Euro) and (Launch new sustainability-based mortgage and consumer loan products and credit cards)), as described below:</p> <ol style="list-style-type: none"> 1) Allocate EUR 100MN to new Sustainable Financing by 2026, including EUR 30MN to Renewable Energy Investments: Sustainable financing in EUR 2) Launch new sustainability based Mortgage, Credit Cards & Consumer Loans products: New sustainable products <p>Financial health & inclusion: Performance measurement has been finalized and KPIs have been established to measure the performance related to the Group's targets (Support financial inclusion through educational programs addressed to teachers, students and people over 55), as described below:</p> <ol style="list-style-type: none"> 1) Leverage social contribution through dedicated activities in line with Group principles: Execution of CSR Strategy 	

Self-assessment summary:

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?⁷

- Scope: Yes ☒, In progress ☐, No ☐
- Portfolio composition: Yes ☒, In progress ☐, No ☐
- Context: Yes ☒, In progress ☐, No ☐
- Performance measurement: Yes ☒, In progress ☐, No ☐

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

Climate: *Climate stability,*

Financial health and inclusion: *Finance, employment*

How recent is the data used for and disclosed in the impact analysis?

☐ Up to 6 months prior to publication ☐ Up to 12 months prior to publication ☒ Up to 18 months prior to publication ☐ longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: *(optional)*

⁷ You can respond “Yes” to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.

2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets⁸ have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a) Alignment: which international, regional or national policy frameworks to align your bank's portfolio with⁹ have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

Based on the most recent Impact analysis, conducted in October 2022, the Bank has proceeded to targeting setting, aligned with the overall ESG Strategy and the Bank's operating model. The methodology applied to identify the updated material impacts is in accordance with the revised Global Reporting Initiative Standards (GRI) and the Principles of Responsible Banking (PRB) of the United Nations - Environment Program Finance Initiative (UNEP FI). Additionally, the Bank's contribution to the SDGs was taken into consideration along with Paris Climate Agreement and relevant regional frameworks such as the European Union Action Plan on Sustainable Finance and Greece's national strategy for sustainable development. The updated targets and commitments have been established in 2022. Small refinements of these targets have also been made in 2023, which aim to increase further the positive impacts of the Bank, while reducing the negative ones. These are presented in detail in Sustainability report 2023, in the section 2.3.2 Sustainability Strategy.

Links and references
[Sustainability Report 2023](#)
(p. 30-40)

⁸ Operational targets (relating to for example water consumption in office buildings, gender equality on the bank's management board or business-trip related greenhouse gas emissions) are not in scope of the PRB.

⁹ Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank's targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.

b) Baseline: Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the [Annex](#) of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex. Please include the relevant indicators using the indicator code in the following table:

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Climate change</i>	<i>A.1.1</i>	<i>The Bank is, currently at an advanced state of detailed measurement of its Scope 3 financed emissions across asset classes and sectors, following the Global Greenhouse Gas (GHG) Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials (PCAF) .This measurement results identified business loans as the major asset class in driving the Bank's financed emissions and Scope 1 financed emissions as the main GHG emissions exposure by its counterparties. The Bank monitors performance separately at sector level and is in the process of climate targeting for important sectors in line with the NZBA.</i>
	<i>A.3.1</i>	<i>In 2023 the operationalization of the Bankou's Sustainable Finance Framework, resulted in an acceleration of the sustainable disbursements, which reached EUR 0.8 billion, exceeding the initial expectations for the year.</i>

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
	<i>B.2.2.</i>	<i>Customers embraced Alpha Bank's online solutions, depicted through KPIs. Indicatively: The e-Banking registered Customers increased by 11%. 1 in 3 Customers decided to register to e-Banking remotely. The number and the value of transactions via e-Banking increased by 11% and 10% respectively, compared to 2022.</i>

		<p>68% of all consumer loans were submitted via digital channels</p> <p>55% of active retail and business customers actively use the bank's digital tools</p>
	B.1.3	<p><i>IQonomy is a social responsibility initiative designed to strengthen financial literacy and advocate for a circular economy, with the overarching objective of tackling financial exclusion and fostering sustainable growth. The program is implemented in collaboration with ActionAid Hellas, the NGO SciCo – Science Communication and is endorsed by the Ministry of Education. Additionally, in collaboration with Anatolia College, the "Alpha Females for VentureGarden" emphasizes, on female entrepreneurship and is addressed to women who wish to develop their own business idea and/or develop their already existing business</i></p>
	C.2.1	<p><i>In 2023, "Alphabet of Economics" (IQonomy) educated 228 teachers and 2,235 students. Since 2022, the program has reached a total of 581 teachers and 4,738 students across Greece.</i></p>
<p><i>Response</i></p> <p><i>Baseline year for the updated targets: 2022</i></p>		<p><i>Links and references</i></p> <p><i>Sustainability report 2023</i> (p. 32-38)</p>
<p>c) SMART targets (incl. key performance indicators (KPIs)¹⁰): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.</p>		
<p><i>In the context of the revamped Sustainability strategy, the following targets have been set. It should be noted that the Sustainability Strategy has been defined on the basis of the key areas on which the Group has material actual and potential impacts in order to align with the Bank's business plan for 2023-2025 and allocate resources appropriately to ensure achievement of its stated objectives</i></p>		<p><i>Links and references</i></p> <p><i>Sustainability report 2023</i> (p. 32-38)</p>

¹⁰ Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.

A) To support Climate-related objectives:

- Allocate € 3 bn to new Sustainable Financings by 2025 (Target has been updated in 2023 as “Allocate Euro 4.4 billion to new Sustainable Financings, increasing target by 1.1 bn compared to 2023”) **Relevant KPI:** New financing volumes (in €mn)
- Within the total Sustainable Financings, achieve at least Euro 1 billion to Renewable Energy Systems by 2025 (Target has been updated in 2023 as “Within the total Sustainable Financings, achieve at least Euro 2.5 billion to Renewable Energy Systems by 2026”) **Relevant KPI:** New financing volumes (in €mn) (KPI has been updated in 2023 as “New financing volumes (disbursements) to renewable energy projects throughout the year (total amount in million Euro)”)
- Within the total Sustainable Financings, achieve at least Euro 300 million of Retail green loans, including loans to small businesses until 2025. **Relevant KPI:** New financing volumes (in €mn) (KPI has been updated in 2023 “New financing volumes to Retails Green Loans, including loans to small Businesses2 (total amount in Euro million)”)
- Launch new sustainability-based mortgage and consumer loan products and credit cards until 2025 **Relevant KPI:** No. of Products Launched
- Zero financing to new investments in thermal coal mining, upstream oil exploration or coal-fired electricity generation (ongoing as of 2023) **Relevant KPI:** New financing volumes (in €mn)

B) To support Financial Health and Inclusion:

- Increase employment of young people by 20% by 2025 **Relevant KPIs:** 1) Percentage of hirings in the age group of 18-25 2) Percentage of employees in the age group of 18-25

<ul style="list-style-type: none"> • Increase access to people with mobility limitations to 85% of our Branches, by 2025. Relevant KPI: Percentage of branches accessible (ramp or easily accessible) by people with disabilities (%) Furthermore, the following target has been set: • Support financial inclusion through educational programs addressed to teachers, students, women, and people over 55 	
d) Action plan: which actions including milestones have you defined to meet the set targets? Please describe. Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.	
<p>The Bank has developed and implementing an ambitious ESG Workplan with the ultimate objective to effectively manage any ESG related issues and improve its environmental and social impact. As such, specific KPIs and metrics have been set for each one of the targets in order to monitor its progress. These KPIs reflect Alpha Bank's ambition to:</p> <ul style="list-style-type: none"> • To support an environmentally sustainable economy • Foster Healthy economies and societal progress • Ensure a robust and transparent Governance <p>Additionally, the Bank, periodically tries to identify, assess and prioritize the ESG issues which are related to its activities and might impact the Group's operations and/or its Stakeholders, through a materiality analysis process, which is in accordance with the "GRI 3: Material Topics 2021". The materiality analysis performed in 2023 is described in the following steps:</p> <p>1. Step 1: Understand the organization's context</p> <p>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</p>	<p><i>Links and references</i> Sustainability Report 2023 (p. 47-48)</p>

order to identify any additional impacts to people/stakeholders and to the natural environment related to its business model and value chain.

Step 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).

2. Step 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 to 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 taken into account considering how likely is the impact to be realized in the defined time horizon.

3. Step 4: Prioritize the most significant impacts

The prioritization was based on the results of the 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 operations, 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.

Following the abovementioned procedure, the Bank safeguards that any positive or negative, actual or potential impact has been identified and prioritized accordingly.

To mitigate any negative impact, the Bank implements internal controls, systems and policies that are being regularly updated. On top of this, It should be noted that the organization and operation of Alpha Bank is governed by best banking and business practices, which are supported by certifications with recognized international standards (ISO 9001 Quality Management System, ISO 20000 Information Technology Services Management System, ISO 22301 Business Continuity Management System, ISO 27001 Information Security Management System incorporating ISO 27017 (Information Security Controls for Cloud Services) and ISO 27018 (Protection of Personally Identifiable Information on Public Clouds), ISO 27701 (Privacy Information Management), ISO 14001 Environmental Management System and ISO 14064 Greenhouse Gas Emissions Management System, ISO 50001 Energy Management System, ISO 22316 Organizational Resilience, ISO 45001 (Occupational Health and Safety) in critical areas of operation. The certified management systems (ISO) implemented by the Group aim to enable it to better respond to the ever-changing business environment and to the needs of Customers, in full alignment with current legislative and regulatory requirements. In that context, Alpha Bank, commencing 2022 is developing, an Environmental Statement in accordance with the EU Eco-Management and Audit Scheme (EMAS) which has been submitted to the Ministry of Environment and Energy.

Self-assessment summary		
Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your...		
... first area of most significant impact: ... <i>Climate</i>	... second area of most significant impact: ... <i>Financial health & inclusion</i>	(If you are setting targets in more impact areas) ...your third (and subsequent) area(s) of impact: ... (please name it)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No

2.3 Target implementation and monitoring (Key Step 2)

For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only): describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

Performance against the targets set, has been disclosed in the "Response" column of the table with the relevant indicators -section 2.2.

More detailed information on the Bank's 2023 performance can be found in the "Sustainability metrics and targets" section (2.3.3) of the 2023 Sustainability report, the relevant "metrics, targets and performance" sections and the 2023 ESG Databook.

Links and references
[Sustainability Report 2023](#)
(p. 32-38, 138-139)
[ESG Databook](#)



Principle 3: Clients and Customers

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers¹¹ in place to encourage sustainable practices?

- ☐ Yes
- ☒ In progress
- ☐ No

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

- ☐ Yes
- ☒ In progress
- ☐ No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities¹²). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).

Alpha Bank pays great attention to ensuring its Customers' satisfaction and to providing high-quality products and services. The Customer Service Division is in charge of Quality Assurance and is committed to fulfilling these objectives.

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

Links and references

¹¹ A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

¹² Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

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).

Corporate information is classified and protected, according to the Group Cybersecurity and Information Security Framework, which sets out the information security principles, rules and procedures. The Framework is regularly updated to meet the increased requirements arising from the regulatory framework, the operational and technological environment, as well as extraordinary conditions such as those imposed by the Covid-19 pandemic on Bank operations and Customer service.

The Cybersecurity and Information Security Division, under the supervision of the Group Information Security Officer, manages all Cybersecurity issues at Group level. In 2023, the final stage of the Cybersecurity and Information Security three-year Strategic Plan (2021-2023) took place, based on a Cyber Maturity Assessment. This was the final cycle using the Capability Maturity approach, following the successful first and second cycles and the completion of the corresponding previous Strategic Plan for 2018 – 2020. The Cybersecurity posture was evaluated based on the assessment of Cyber capabilities for 32 Technical and Organizational domains/areas and more than 2,400 control objectives (criteria). This process is the main driver and foundation for the strategic projects and initiatives which formed the three-year Strategic Plan for 2021-2023 and constitutes the base upon which the new Strategic Plan and Cyber Maturity Assessment for 2024-2026 will be lean on.

Alpha Bank applies the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council), more commonly known as GDPR, which concerns the protection of Individuals with regard to the processing of Personal Data.

Fully respecting the rights and freedoms of Data Subjects, the Bank collects, records, uses, notifies and, in general, processes personal data of Individuals in the context of its business activity, in full compliance with applicable laws, to guarantee their protection. It has also appointed a Group Data Protection Officer, who informs the Management and the Audit Committee of the Board of Directors about the Group's level of compliance with the applicable legislation.

To inform Individuals about the processing of Personal Data carried out in each case by the competent Units of the Bank or by external third parties processing data on its behalf, the Bank has prepared the document entitled "Notification on the Processing of Personal Data", which is provided upon collection of their Personal

Data. This document is posted at a central point on the Bank's website and serves as a set point of information for all relevant details that Individuals need to know as regards personal data processing, such as the purpose of processing, the sources and recipients of data, the storage period, their rights and how to exercise them and the contact persons at the Bank's competent Services.

In addition to the above general information, Natural Persons are also provided with specific information on personal data processing, also for products and services provided via alternative Digital Networks in the context of the Bank's digital transformation.

Furthermore, the Bank applies a set of coordinated actions in order to further establish personal data protection. These include, but are not limited to:

Review of the Register of Processing Activities (RoPA), kept by the Bank and Group Entities, which includes all operations, that involves personal data processing and update of the Record of Processing Activities with the addition of the new processing flows and the update/modification of the existing ones in the relative GRC Platform – (Operational Risk, Cyber Security) RoPA module in accordance with the instructions of the Group Data Protection Officer. Ongoing Process for Group Entities.

- Assessing the impact on Personal Data processing flows of potentially high risk for the freedoms and rights of Natural Persons and development of action plans for applying technical and organizational measures in order to mitigate risks.
- Developing the appropriate infrastructure for collecting and efficiently managing consent to data processing, as well as for withdrawing consent.
- Update of the Employees' Privacy Notice in accordance with the requirements arising from the General Data Protection Regulation. Ongoing process for Group Entities.
- Adoption of Key Risk Indicators (KRIs) for monitoring the Organization's level of compliance with the GDPR and definition of Key Performance Indicators (KPIs) for assessing the effectiveness of the Personal Data Protection Framework.
- Training of Divisions and Group Entities regarding issues related to the implementation of the General Data Protection Regulation.

3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services , information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

Alpha Bank continuously promote responsible practices among its customers and clients by:

- ✓ raising awareness and incentivising more sustainable choices; and
- ✓ improving its products and services to address its customers' banking needs in a modern and responsible manner.

For example, Alpha Bank:

- ✓ informs its customers, through events and tailor-made trainings, about investment opportunities in mutual funds that meet ESG criteria.
- ✓ has developed services and products for its Retail Banking clients and Small/ Medium Enterprises to support their transition towards sustainable activities

Alpha Bank seeks to increase its positive effect on society and the environment, utilising new business opportunities and generating value for all stakeholders. The Bank offers thematic investments with a positive direct or indirect impact on humanity and the environment (Socially Responsible Investing - SRI) as well as on mutual fund choices that also take into account social responsibility and corporate governance with regards to the underlying assets under management (Environmental, Social and Governance - ESG criteria). Aiming to raise awareness regarding ESG and sustainable investments, Alpha Bank organizes informative events and on a regular basis publishes relevant informative material in reports. It supports households and business responsible investment choices and invests in large infrastructure projects and projects that have a positive environmental and social impact. On this basis, Alpha Bank regularly coordinates internal and external (Customer) events focused on the merits of ESG investing.

Links and references

<p>The Bank's Project Finance Unit works on securing financing for investments in projects aiming at benefiting society. In 2023, the Project Finance Unit continued its successful activity, providing financing for new investments in wind farms and solar parks, while it also undertook or participated in new financing arrangements. Since 2016, 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.</p>	
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Principle 4: Stakeholders

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups¹³) you have identified as relevant in relation to the impact analysis and target setting process?

☒ Yes

☐ In progress

☐ No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

The Bank already participates in local stakeholder initiatives to ensure a full understanding of local challenges and further increase its contribution to society's goals, for example by:

- ✓ participating in the Hellenic Network for Corporate Social Responsibility association that aims to promote Corporate Social Responsibility to both the business community and the social environment; and
- ✓ participating in the Sustainable Development Committee of the Hellenic Bank Association that aims to represent the Greek banks and their involvement in Corporate Responsibility and Sustainable Development.

The Bank recognizes as its Stakeholders the natural and/or legal persons who/which, either directly or indirectly, are connected to, and affect or are affected by the Bank's decisions and its operation. Based on the

Links and references

¹³ Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations

relevant laws, its daily operations, the existing policies and procedures and the Group's corporate governance strategy, Alpha Bank has recognized four distinct Stakeholder groups:

- Analysts and Investors
- Employees
- Society
- Customers

It seeks to engage in an ongoing dialogue and collaboration with these Stakeholders, in order to understand and, as far as possible, respond to their expectations, needs, concerns and requests. Investors and Analysts are provided with full and prompt information via specific sections on the website, together with the Financial Statements, the Business Review, the Sustainability Report as well as direct meetings. Furthermore, Alpha Bank pays great attention to ensuring its Customers' satisfaction and to providing high-quality products and services. The Customer Service Division is in charge of Quality Assurance and is committed to fulfilling these objectives. Alpha Bank ensures effective communication with Employees, by establishing the role of Human Resources Business Partners that serve as a first point of contact for employees and Visits by Human Resources Unit Executives to Bank Units and Branches. Finally, the Bank is often involved in a dialogue and in consultations with Official sector authorities, both locally and at European level. The Bank supports public administration services, local organizations, foundations and it communicates with representatives of local communities on a regular basis.

Alpha Bank, periodically, tries to identify, assess and prioritize the ESG 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". 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



Principle 5: Governance & Culture

We will implement our commitment to these Principles through effective governance and a culture of responsible banking

5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

- ☒ Yes
☐ In progress
☐ No

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

Response

For the purpose of implementing the Principles, Alpha Bank identified that its current practices could better align with industry best practice and UNEP-FI's guidelines in some areas regarding:

- ✓ the overall responsibility for sustainability that should be allocated at committee and board level;
 - ✓ the oversight of sustainability matters that should be underpinned by adequate training programmes.
- The Board of Directors and its Committees have oversight of all issues with the Corporate Governance, Sustainability and Nominations Committee having overall ownership of the Sustainability agenda, including the implementation of the Principles.

[Sustainability Report 2023](#)
(p. 16-24)

<https://www.alphaholdings.gr/-/media/AlphaHoldings/Files/apotelesmata/FY2023/Group-Holdco-31122023-ENG060324Disclaimer.pdf>
(p. 37-38)
[Remuneration Report 2022](#)

<p>The comprehensive ESG Governance Structure that has been developed at a Group level, demonstrates the Group's strong commitment to Sustainability issues. It should be noted that the Governance, Sustainability and Nominations Committee supports the Board of Directors in overseeing the Sustainable Development processes and operations. The Committee has a central role in ESG direction setting and oversight. The purpose of the Committee is to strengthen the Bank's long-term commitment in creating value through the ESG objectives and to monitor the effectiveness of Alpha Services and Holdings S.A. to meet its targets and goals in relation to ESG issues. During 2023, the Bank's ESG capability was further developed by the establishment of expert teams with advanced skills in specific areas, such as the Climate & ESG Risk Team in the CRO area under the newly assigned Chief Risk Control Officer and the nomination of a Sustainability Strategy lead in the Strategy and Investments Division.</p>	
<p>5.2 Promoting a culture of responsible banking: Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).</p>	
<p>Alpha Bank also works toward fostering a culture of responsible banking. This can be seen in the incorporation of responsible values throughout the group vision and the identification of responsibilities for sustainability initiatives and training programmes).</p> <p>Effective communication with the Bank's employees to enable them to voice their issues and communicate its culture and principles constantly. Two prime examples of effective communication channels are:</p> <ul style="list-style-type: none"> • Resources Business Partners (HRBPs) who are the immediate contact person for the employees of their assigned Units who can discuss with them any issue (work related or personal) they have and the #stayconnected platform which is a direct communication point with employees. • The Employees are also informed via the monthly online internal newsletter "MAZI" ("Together"), as well as via announcements posted on the Alpha Bank Intranet, whenever any issue arises. <p>Additionally, in 2023, the revamped learning brand of Alpha Bank, ACE #together we grow, was enriched with new content consisting of e- Learnings, classroom trainings and webinars, in cooperation with</p>	<p><i>Links and references</i></p>

<p>consultants selected for their functional expertise and leading learning practices. What is more, existing learning Academies were expanded with new and role-focused learning activities. One of them is the dedicated ESG Academy, in view of further accelerating the establishment of a sustainability related culture in the Bank. Finally, a partnership with two global online learning platforms have been initiated, offering to employees, access to thousands of curated courses on a multitude of topics.</p> <p>The ESG Academy is dedicated to fostering a sustainability culture across the Group guiding employees through the principles that shape stakeholder expectations. These are also the drivers for initiatives that create shared value for all, moving beyond compliance towards meaningful impact (37% of workforce participated while 80% of wholesale banking business employees followed dedicated ESG lessons).</p> <p>Last, the Remuneration Policy that has been established determines variable remuneration. Variable remuneration reflects the annual sustainable and risk-weighted performance as well as performance in excess of that required to fulfil the tasks entrusted. More details in the Annual Report 2023, Sustainability Report 2023 and Remuneration Report 2022.</p>	
<p>5.3 Policies and due diligence processes</p> <p>Does your bank have policies in place that address environmental and social risks within your portfolio?¹⁴ Please describe.</p> <p>Please describe what due diligence processes your banks has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.</p>	
<p><i>Response</i></p> <p>Following the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), the Bank assesses the impending environmental policies, the legal requirements and the guidelines associated with</p>	<p><i>Links and references</i></p>

¹⁴ Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.

the climate, in order to record and efficiently manage related risks. In this context, it has proceeded to the insurance of its infrastructures and buildings, also including its offices, Branches and warehouses, in order to mitigate the physical risks associated with the impact of extreme weather conditions. In addition, such incidents are addressed within the Bank's Business Continuity Management System to ensure the uninterrupted provision of services to Customers and other Stakeholders. Alpha Services and Holdings seeks to improve in terms of measuring, managing and minimizing the risks associated with climate change. In this direction and in view of the double materiality concept, initiated by the latest version of European Sustainability Reporting Standards (ESRSs) adopted by the Commission (2023) 5303 final/31.07.2023), the Bank has already adopted a proactive approach to the management of ESG risks, with particular emphasis on risks arising from climate change as a key component of its Risk Management Strategy. In this direction, the Bank has implemented a Risk materiality assessment and an internal operational risk assessment and has incorporated them into its comprehensive Risk Management Framework. The risk materiality assessment and the internal operational risk assessment will further enable the Bank to proceed with the identification and integration of ESG-related risks and opportunities arising from its external environment, that may cause process disruptions, litigation/liability issues and reputational damage, and may have material financial implications for the Bank.

It should be noted that the materiality risk assessment incorporated the Bank's exposures which are sensitive to ESG factors as a % of total assets / total loan portfolio, while the internal operational risk assessment, focused on the enhancement of internal processes for monitoring and managing ESG factors for its own operations, and supply chain.

On top of this, since 2016, 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 which are available in the Annual Report and the Sustainability report 2023.

<p>All obligors-legal entities are evaluated, assessed and reviewed against the possible environmental or social risks in each stage of the Group's corporate credit procedure. 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, in order 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.</p>	
Self-assessment summary	
<p>Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No</p>	



Principle 6: Transparency & Accountability

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

☒ Yes

Partially

☐ No

If applicable, please include the link or description of the assurance statement.

Response

Yes the 4th self-assessment PRB Report has been assured by Deloitte Certified Public Accountants S.A. Please refer to Annex 2, for the independent assurance report.

Links and references

6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

☒ GRI

☒ SASB

☒ CDP

☐ IFRS Sustainability Disclosure Standards (to be published)

☒ TCFD

☐ Other:

Response

The Sustainability report is based on the GRI Standards and PRB Guidelines, while additional factors taken into consideration in preparing the report include:

- The Principles of Accountability AA1000 Principles Standard (2018) (www.accountability.org), specifically:
- The Athens Stock Exchange ESG Reporting Guide (2022) for listed companies.
- The Sustainability Accounting Standards Board (SASB) framework.

Links and references

<ul style="list-style-type: none"> • The United Nations Sustainable Development Goals. • The Task Force on Climate-related Financial Disclosures - TCFD (The Group published its first separate TCFD Report in 2023), which is also published in a standalone report. 	
6.3 Outlook What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis ¹⁵ , target setting ¹⁶ and governance structure for implementing the PRB)? Please describe briefly.	
<p>As stated above the Bank has developed an ambitious ESG Action plan aiming to integrate sustainability criteria in the Bank's decision-making process including strategy, risk management framework and lending operations. The objective is to enhance management of climate and environmental risks, comply with any regulatory frameworks and pursue the emerging opportunity of sustainable finance. In addition, the Bank is focusing on increasing awareness on ESG and climate risks to its employees, customers and markets, via training plans and, targeted communication and promotion, aiming to leverage the power of its brand to the wider sustainability transition effort.</p> <p>To ensure effective implementation and monitoring of the Principles of Responsible Banking, the Bank aims to proceed to the following:</p> <ul style="list-style-type: none"> - Updated the targets set, to align with the overall ESG Strategy and impact areas as these have been identified by the recent impact analysis (PRB Tool) - Set Medium-Term Climate Strategy Targets (2024-2030) - Further communicate these targets to the Organization, to ensure awareness and commitment across business lines - Allocate ESG Topic owners to further enhance the Bank's ESG capability - Define the Bank's ESG operating model for Climate and Environmental risks management, including responsibilities of 3 lines of defense 	<i>Links and references</i>

¹⁵ For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

¹⁶ For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

6.4 Challenges

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months.

- ☐ Embedding PRB oversight into governance
- ☐ Gaining or maintaining momentum in the bank
- ☐ Getting started: where to start and what to focus on in the beginning
- ☐ Conducting an impact analysis
- ☐ Assessing negative environmental and social impacts
- ☒ Choosing the right performance measurement methodology/ies
- ☒ Setting targets
- ☒ Customer engagement
- ☒ Stakeholder engagement
- ☒ Data availability
- ☒ Data quality
- ☐ Access to resources
- ☐ Reporting
- ☐ Assurance
- ☐ Prioritizing actions internally
- ☐ Other: ...

If desired, you can elaborate on challenges and how you are tackling these:

Annex 1

A set of indicators has been produced for the impact areas of climate mitigation and financial health & inclusion. These indicators will support you in your reporting and in showing progress against PRB implementation. Banks are expected to set targets that address minimum two areas of most significant impact within the first four years after signing the PRB. That means that Banks should ultimately set targets using impact indicators. Acknowledging the fact that banks are in different stages of implementation and on different levels of maturity and therefore might not be able to report on impact from the beginning, a Theory of Change approach has been used to develop the set of indicators below.¹⁷ The Theory of Change shows the **pathway to impact** and considers the relationship between inputs, actions, outputs, and outcomes in order to achieve impact. The Theory of Change for climate mitigation can be found [here](#), the Theory of Change for financial health & inclusion can be found [here](#).

How to use: Both practice (action, outcome and output) and impact performance need to be understood because practice is the conduit for achieving desired impacts (including targets). The Theory of Change allows to identify metrics and set targets which align with a bank's maturity. The indicators below are all connected to a bank's impact and can be considered as steps towards measuring impact. Some of the practice indicators (on the action, output, and outcome levels respectively) are connected to portfolio composition and financial targets¹⁸ (highlighted in green) or to client engagement¹⁹ targets (highlighted in blue), which enable your overall target. If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex to measure your performance and baseline.²⁰ Once you have set the target, you can use the indicators as guidance for your action plan as well as defining Key Performance Indicators (KPIs) which you can then use to measure progress against the set targets.

¹⁷ It is not required from banks to work with the Theory of Change concept internally. In fact, the Theory of Change has been used to structure the requirements of setting SMART targets using relevant indicators.

¹⁸ Financial targets also aim for real economy outcomes but are not directly expressed as such. Instead, they are expressed with financial indicators and metrics, e.g., to redirect flows of lending and investments to sectors, activities or projects aligned with SDGs and/or related to the selected impact area. Banks can also set financial targets related to specific types of customers e.g., low-income customers or female entrepreneurs.

¹⁹ Client engagement targets involve engaging relevant clients and customers to enable your overall target. The purpose of client engagement is to support clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

²⁰ You might not be able to report on all indicators and/or or levels of practice (i.e. from left to right), in which case you should report on all applicable indicators on the respective level of practice no matter if it is an action, output or outcome indicator.

- ➔ **For Signatories of the Net-Zero Banking Alliance:** please report on the climate targets set as required in the [Guidelines for Climate Target Setting](#). As a member of the Alliance, you are required to publish first 2030 targets for priority sectors within 18 months and further sectoral targets within 36 months after signing. You can use the PRB template to disclose the required climate target information if its publication date is in line with the committed NZBA timeframe.
- ➔ **For Signatories of the Collective Commitment to Financial Health & Inclusion:** please report on financial health and/or financial inclusion targets set as required in the [Financial Health and Inclusion Commitment Statement](#). As a signatory to the Commitment, you have agreed to set a SMART ambitious target within 18 months after signing. To facilitate your process, please refer to the [Guidance on Target Setting for Financial Health and Inclusion](#) and the [Core Indicators](#) to measure financial health and inclusion. Keep in mind that signatories of the Commitment are encouraged to measure as many indicators as possible from the Core Set or their equivalent to be able to set a SMART impact driven target.

Impact area	Practice ²¹ (pathway to impact)									Impact ²²		
	1. Action indicators			2. Output indicators			3. Outcome indicators			4. Impact indicators		
	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics
A. Climate change mitigation	A.1.1	Climate strategy: Does your bank have a climate strategy in place?	Yes / In progress / No	A.2.1	Client engagement process: Is your bank in an engagement process with clients regarding their strategy towards a low(er)-carbon business model (<i>for business clients</i>), or towards low(er)-carbon	Yes / Setting it up / No; <i>If yes:</i> Please specify for which clients (types of clients, sectors, geography, number of clients etc.)	A.3.1	Financial volume of green assets/low-carbon technologies: How much does your bank lend to/invest in green assets / loans and low-carbon activities and technologies?	bln/mn USD or local currency, and/or % of portfolio; <i>please specify</i> the definition of green assets and low-carbon technologies used	A.4.1	Reduction of GHG emissions: how much have the GHG emissions financed been reduced?	% over time; baseline and tracking GHG emissions in kg of CO ₂ e (or applicable metrics) ²³

²¹ Practice: the bank's portfolio composition in terms of key sectors, its client engagement, and its relevant policies and processes, and, if applicable, its advocacy practices

²² Impact: the actual impact of the bank's portfolio

²³ If possible and/or necessary, please contextualize the progress: Greenhouse gas emissions might even increase initially because the scope of measurements is extended and financed emissions from a growing proportion of the portfolio are measured, emission factors are updated etc. Emission reductions made by the clients should over time lead to a decrease in GHG emissions financed.

		Paris climate goals has your bank used?			
	A.1.3	Policy and process for client relationships: has your bank put in place rules and processes for client relationships (both new clients and existing clients), to work together towards the goal of transitioning the clients' activities and business model?	Yes / In progress / No	A.2.3 Sector-specific emission intensity (per clients' physical outputs or per financial performance): What is the emission intensity within the relevant sector?	Please specify which sector (<i>depending on the sector and/or chosen metric</i>): kg of CO ₂ e/ kWh, CO ₂ e / m ² ; kg of CO ₂ e/USD invested, or kg of CO ₂ e/revenue or profit

	<p>A.1.4 Portfolio analysis: Has your bank analyzed (parts of) its lending and/or investment portfolio in terms of financed emissions (Scope 3, category 15); technology mix or carbon-intensive sectors in the portfolio?</p>	<p>Yes / In progress / No;</p> <p><i>If yes:</i> please specify which parts of the lending and investment portfolio you have analyzed</p>	<p>A.2.4 Proportion of financed emissions covered by a decarbonization target: What proportion of your bank's financed emissions is covered by a decarbonization target, i.e. stem from clients with a transition plan in place?</p>	<p>% (denominator: <i>financed emissions in scope of the target set</i>)</p>		
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B. Financial health	A.1.5	Business opportunities and financial products: Has your bank developed financial products tailored to support clients' and customers' reduction in GHG emissions (such as energy efficient mortgages, green loans, green bonds, green securitisations etc.)?	Yes / In progress / No; Please specify which ones, and what financial volume and/or % of the portfolio they account for									
	B.1.1	# of products and services in	Internal data based. Measures how many	B.2.1	# of individuals supported with	Based on internal data. Measures	B.3.1	% of individuals with a good and/or very	Assessment based. Measures the	B.4.1	% of customers with a high level of	Survey and/or transactional data based. Measures the

		the portfolio with a focus on financial health	of the products and services in the portfolio have a financial health focus. We deem a product or service to have this focus when it facilitates decision making and supports financial health increase based on our definition of financial health. This covers products and services embedded		dedicated and effective financial and/or digital education initiatives	the number of users (customers and non customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs, training videos, articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many		good level of financial skills	percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals benefitting from the bank's financial education initiatives.		financial health	percentage of customers with a high level of financial health according to the score chosen by the financial institution.
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with nudges to simplify decision making, round-up, high yield savings accounts, easy investment tools, etc.

cases a prioritized group). Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage

					that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users.					
	B.1.2 *	% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health	Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health.							
	B.2.2 *	% of customers actively using the online/mobile banking platform/tools			Transactional data based. Measures the percentage of customers logging in, at least once a month, to one of the following digital platforms (measure those applicable for your					
	B.3.2	% of customers who use the bank's services to create a financial action plan with the bank								
	B.4.2	% of customers for which spending exceeded 90% of inflows for more than 6 months last year								Survey and/or transactional data based. Measures the percentage of customers with a transaction account and/or savings/investment accounts for which spending exceeded 90% of inflows for more than 6

Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger skills, and thus, any individual that is supported with the initiative will achieve the desired results. Relevant employees are those

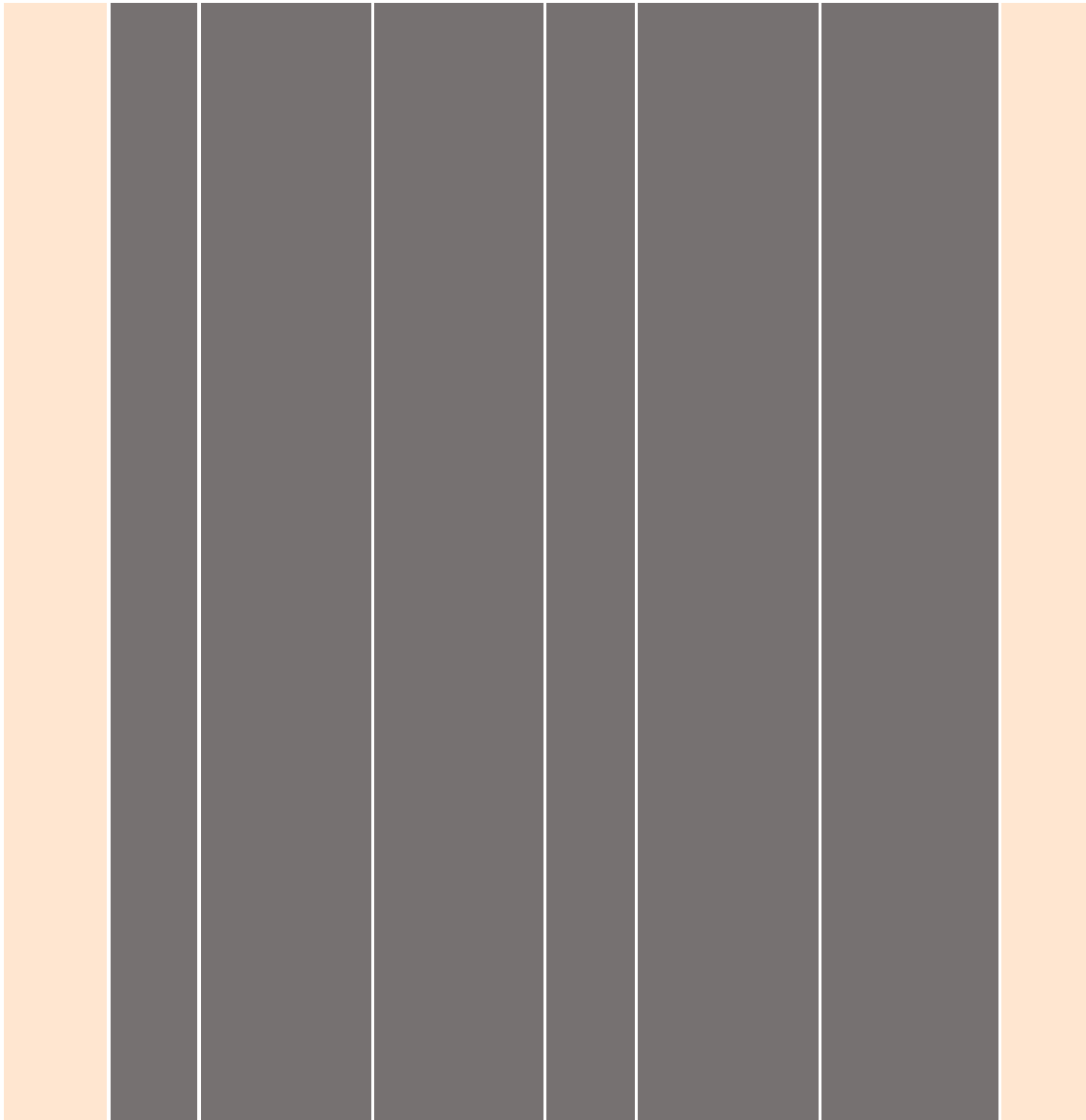
bank): Online internet banking and/or mobile phone banking and/or digital tools (including financial health tools)

that helps the customer build financial resilience. It is done "with the bank" if the bank can visualize, through the transactions of the customer, the results of the plan.

months in the year within the reporting period compared to the total of customers within PRB scope. Focus on main financial institution customers.

		generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.						s but more than 1/3 of the year (banks may deviate if proper reasons are provided) denotes regularity and a precursor to lower financial health		mean not feeling worried about their financial situation.		
							B.3.4	% of customers with a non-performing loan	Transactional data based. Measures the percentage of customers with past-due loans ("past due" defined by policies at each bank) compared to the total amount of	B.4.4	% of customers with products connected to long-term saving and investment plans	Transactional and/or survey data based. Measures the percentage of customers with products connected to long-term saving and investment plans. "Long-term" will depend on each bank's definition.

								customers with loans in the bank's lending portfolio.				
							B.3.5	% of customers showing an increase or stable amounts in savings, deposit and/or investment account balances, quarter on quarter.	Transactional data based. Measures the percentage of customers showing an increase or stable amounts in savings and/or deposit AND/OR investment accounts balances, quarter on quarter.	B.4.5	% of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense	Survey based data. Measures the percentage of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense. We consider a major unexpected expense, one that the customer hadn't planned for and would require them to spend more than



what they have available for secondary expenses in their monthly budget or 1/20th of the country's Gross National Income (banks may deviate if proper reasons are provided). A good example is: unforeseen medical bills, large appliance malfunctioning, car repair, etc. Survey based using the question: "If a major unexpected expense arises, how can you cover it right now?"

												and give the multiple choice options of insurance, emergency funds, loan, credit card, family/friends, etc.
C. Financial Inclusion	C.1.1*	# of products and services in the portfolio with a focus on financial inclusion	Internal data based. Measures how many of the products and services in the portfolio have a financial inclusion focus. We deem a product or service to have this focus when its design facilitates the access	C.2.1	# of individuals supported with dedicated and effective financial and/or digital education initiatives	Based on internal data. Measures the number of users (customers and non customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs, training videos,	C.3.1*	% of individuals with a good and/or very good level of financial skills	Assessment based. Measures the percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals	C.4.1	% of customers with 2 or more active financial products, from different categories, with the bank	Transactional data based. Measures the percentage of customers with 2 or more active financial products, from different categories, with the bank. By active we mean there's at least one usage per month. By category we mean credit/debt, savings/deposit/payment,

and usage by the prioritized customer. For example, no-fee savings account, low interest microloan, offline access or sim-based banking apps, etc

articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many cases a prioritized group). Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any

benefitting from the bank's financial education initiatives.

insurance, investment, etc. Once a target has been set for this indicator, we encourage banks to ensure responsible selling policies or other initiatives so that the target doesn't become a toxic incentive.

	C.1.2 *	% of relevant employees supported with	Based on internal data. Measures the		individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users.				
	C.2.2	% of customers with effective access to a							
	C.3.2	% of customers supported with dedicated							
		Transactional data based. Where dedicated customer							

		effective training on financial inclusion, responsible credit and/or financial health	percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of		basic banking product	of customers with effective access to a basic banking product. By effective we mean the usage beyond first access. Basic banking products vary by bank. Good examples are: checking accounts, payment accounts, credit cards, saving accounts, deposit accounts, e-money accounts, etc.		customer journey/advisory services	journey/advisory services are in place for prioritized groups, this indicator measures the percentage of customers using such services. Depending on size of bank, either number or percentage can be the unit of measure.			
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		inclusion targets	partnerships currently active to achieve financial health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.		per month. Once the bank sets a target, this indicator can become a KPI to measure the percentage of new customers from the prioritized groups, per month.		platform/tools	customers logging in, at least once a month, to one of the following digital platforms (measure those applicable for your bank): Online internet banking and/or mobile phone banking and/or digital tools (including financial health tools, if applicable).			
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Annex 2

ISAE 3000 (Revised) independent limited Assurance Report to the Management of Alpha Bank’s 4th Report and Self-assessment Template under the United Nations Environment Program Finance Initiative Principles for Responsible Banking (“PRB”) Framework for the period from 01 January 2023 to 31 December 2023”.

Our unmodified assurance conclusion

Based on our procedures described in this Assurance Report, and evidence we have obtained, nothing has come to our attention that causes us to believe that the Selected Information (shown below in sections ‘Scope of our work and ‘Our approach’) of the Principles for Responsible Banking – 4th Report and Self-Assessment Template (the “PRB Report and Self-Assessment Template”) for the period from 01 January 2023 to 31 December 2023, has not been prepared, in all material respects, in accordance with the basis of reporting defined by the Management as set out in pages 5-51 & 59-60 of the PRB Report and Self-Assessment Template .

Scope of our work

The requirements for the preparation and publishing of Selected Information within a Reporting and Self-Assessment Template in respect of the Principles for Responsible Banking “PRB” Framework are established by the Guidance for banks (February 2021) and Reporting and Self-Assessment Template (September 2022) (“guidance”) published by the United Nations Environment Program Finance Initiative (“UNEP FI”). The guidance requires the Management of Alpha Bank S.A. (the “Bank”) to obtain an Assurance Report (limited assurance) on the following discrete elements of the entity’s PRB Report and Self-Assessment Template:

- Principle 2.1: Impact analysis.
- Principle 2.2: Target setting.
- Principle 2.3: Target implementation and Monitoring and,
- Principle 5.1: Governance Structure for Implementation of the Principles

The Selected Information for the Bank is presented on pages 5-51 & 59-60 of PRB Report and Self-Assessment Template for the period from 01 January 2023 to 31 December 2023.

The guidance requires the Bank to publish other information within its Report and Self-Assessment Template. This other information is not the subject of this Assurance Report.

Basis of our assurance conclusion

Alpha Bank S.A. engaged us to perform an independent limited assurance engagement in accordance with the International Standard on Assurance Engagements 3000 (Revised) Assurance Engagements Other than Audits or Reviews of Historical Financial Information ("ISAE 3000 (Revised)"), issued by the International Auditing and Assurance Standards Board ("IAASB").

Our independence and management of quality

We conduct our engagement in accordance with the International Ethics Standards Board of Accountants "International Code of Ethics for Professional Accountants (including International Independence Standards)" (IESBA Code), the related provisions of L. 4449/2017 as amended and currently in force and Regulation (EU) 537/2014.

Our audit firm applies the International Standard on Quality Management (ISQM) 1, "Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements" and accordingly, maintains a comprehensive system of quality management including documented policies and procedures regarding compliance and ethical requirements, professional standards and applicable legal and regulatory requirements.

Inherent limitations of the Selected Information

Inherent limitations exist in all assurance engagements. The basis of reporting, the nature of the Selected Information, and absence of consistent external standards allow for different, but acceptable, measurement methodologies to be adopted which may result in

variances between entities. The adopted measurement methodologies may also impact comparability of the Selected Information reported by different organisations and from year to year within an organisation as methodologies develop.

Where, under the scope of our engagement, financial information was used from the Annual Report 2023 and other published information of the Bank our work was limited to check the accuracy of the transfer of the relevant information to the selected responses.

Any internal control structure, no matter how effective, cannot eliminate the possibility that fraud, errors or irregularities may occur and remain undetected and because we use selective testing in our engagement, we cannot guarantee that errors or irregularities, if present, will be detected.

We do not provide any assurance relating to future performance, such as estimates, expectations or targets, or their achievability.

Our assurance services were limited to the English version of the selected responses. In the event of any inconsistency between the English and Greek versions, as far as our conclusions are concerned, the English version of the selected responses prevails.

Our assurance procedures did not include testing the Information Technology systems from which data was extracted and aggregated by Alpha or third parties for the selected responses.

Management Responsibilities

The Management of the Bank is also responsible for:

- Selecting and establishing the basis of reporting.
- Preparing, measuring, presenting and reporting the Selected Information in accordance with the basis of reporting.
- Publishing the basis of reporting publicly in advance of, or at the same time as, the publication of the Selected Information.
- Designing, implementing, and maintaining internal processes and controls over information relevant to the preparation of the Selected Information to ensure that they are free from material misstatement, including whether due to fraud or error.
- Providing sufficient access and making available all necessary records, correspondence, information and explanations to allow the successful completion of our independent limited assurance engagement.

Confirming to us through written representations that they have provided us with all information relevant to our engagement of which they are aware, and that the measurement or evaluation of the underlying subject matter against the basis of reporting, including that all relevant matters, are reflected in the Selected Information.

Deloitte's responsibilities

Deloitte is responsible for:

- Planning and performing procedures to obtain sufficient appropriate evidence in order to express an independent limited assurance conclusion on the Selected Information.
- Communicating matters that may be relevant to the Selected Information to the appropriate party including identified or suspected non-compliance with laws and regulations, fraud or suspected fraud, and bias in the preparation of the Selected Information.
- Reporting our conclusion in the form of an independent limited Assurance Report to the Management.

Our approach

We planned our engagement in accordance with ISAE 3000 (Revised) and designed procedures to obtain sufficient appropriate evidence to express an independent limited assurance conclusion on the Selected Information in line with ISAE 3000 (Revised). Our procedures were informed by the Guidance for assurance providers – Providing limited assurance for report - Version 2 (October 2022) published by UNEP FI in November 2022. However, we have performed the procedures as outlined in 'the work we performed' section below which do not necessarily obtain the confidence level as outlined by UNEP FI's Guidance for assurance providers, but what is normally obtained by a practitioner in a limited assurance engagement under ISAE 3000 (Revised).

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the description of activities undertaken in respect of the Selected Information is likely to arise. The assessment of what is material is a

matter of professional judgement and includes consideration of both the amount (quantity) and the nature (quality) of misstatements. The procedures we performed were based on our professional judgment.

As this is a limited assurance engagement, the nature, timing and extent of evidence-gathering procedures was more limited than for a reasonable assurance engagement, and therefore substantially less assurance is obtained than in a reasonable assurance engagement.

The work we performed

In carrying out our limited assurance engagement on the description of activities undertaken in respect of the Selected Information, we performed the following procedures to obtain sufficient appropriate evidence in order to express our independent limited assurance conclusion on the Selected Information:

- We planned our procedures which were informed by the Guidance for assurance providers – Providing limited assurance for report - Version 2 (October 2022) published by UNEP FI in November 2022, considering the Bank's stage of implementation of the Principles for Responsible Banking.
- We conducted interviews with process owners and internal stakeholders to understand the processes and control activities for measuring, reporting, and presenting information in the Bank's PRB Report and Self -assessment Template, in accordance with the basis of reporting.
- We made inquiries with process owners and internal stakeholders, obtained and reviewed supporting evidence to assess whether disclosures within the Selected Information in the Bank's PRB Report and Self -Assessment Template reflect the Bank's assessment of the stage of implementation of the Principles.
- In respect of Principle 2.1 (Impact analysis), based on inquiries made and information obtained and reviewed, we checked that the Bank's business areas and scope are clearly described. We reconciled portfolio composition to management information and checked that challenges and priorities have been analysed, including the rationale for business areas where the analysis was not performed. We also checked that the Bank has disclosed the method for determining its impact areas and has selected what was determined as the two most significant areas of impact. For the two impact areas where performance has been measured (Climate & Financial health and inclusion)we reconciled to published information referenced in the response and to

supporting management information. Finally, we checked to supporting evidence, including to meeting minutes, that the stated governance process was followed.

- In respect of Principle 2.2 (Target setting), based on inquiries made and information obtained and reviewed, we checked that the Bank sets targets for both of its significant impact areas (Climate & Financial health and inclusion) and that the targets are linked to those impact areas. We checked that the Bank has identified frameworks to align with and explained how targets contribute to relevant goals. Further, for the impact areas where targets have been set (Climate & Financial health and inclusion), we checked that the targets are Specific, Measurable, Relevant and Time-bound.
- In respect of Principle 2.3 (Target implementation and monitoring), based on inquiries made with process owners and internal stakeholders, we obtained and reviewed supporting evidence to assess whether disclosures within the selected responses in the Bank's PRB Report and Self -Assessment Template reflect the Bank's assessment of the stage of implementation of the Principle .
- In respect of Principle 5.1 (Governance Structure for Implementation of the Principles), based on inquiries made and information obtained and reviewed, we checked consistency to supporting evidence, including organisation charts and meeting minutes with that of the disclosures of the Bank's governance structure for implementation of the Principles. We checked that there is oversight over the implementation and monitoring and that the structure is in line with existing governance structures as defined by the Bank. Further, we checked that the Board of Directors obtained information on the Bank's stage of implementation of the Principles for Responsible Banking on an annual basis.

Use of this Assurance Report

This Assurance Report is made solely to the Management of those matters we have agreed to state to them in this report and for no other purpose.

Without assuming or accepting any responsibility or liability in respect of this report to any party other than the Bank and the Management of the Bank, we acknowledge that the Management of the Bank may choose to make this report available to the UNEP FI Secretariat and publicly available for others wishing to have access to it, which does not and will not affect or extend for any purpose or on any basis our responsibilities. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Bank and the Management of the Bank as a body, for our work, for this report, or for the conclusions we have formed.



The basis of reporting were designed for the purposes of the Bank preparing and publishing a Reporting and Self-Assessment Template under the UNEP FI Principles for Responsible Banking (“PRB”) Framework, and as a result the Selected Information may not be suitable for another purpose.

Athens, 28 June 2024

The Certified Public Accountant

Dimitris Katsibokis

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