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Introduction

OUR CHAIRMAN



Our Company has accelerated its transformation driven by the Purpose to create a better tomorrow by enabling progress in life and business.

This journey comes with a set of principles, which we are pleased to introduce in this document. What you are about to read is our new Code of Conduct & Ethics, a critical and necessary guide for everyone at Alpha Services and Holdings.

The Code embodies our commitment to upholding the highest standards of integrity, professionalism, accountability and social responsibility. It places a strong emphasis on meritocracy by incorporating elements that focus on nurturing work morale. It sets the scene for a workplace where individuals are recognized and rewarded based on their merits, fostering an environment of fairness and equity. We firmly believe that work ethics are fundamental to our collective success.

The Code establishes a framework applicable to all, from the Board of Directors and executive leadership to each and every colleague, aligning our conduct with our recently redefined Purpose and Values.

The Code contains a comprehensive description of our policies and sets the Company's clear expectations for ethical behavior, sound risk culture and compliance with the applicable regulatory and legislative framework. We must all adhere to these standards in our day-to-day operations, regardless of seniority.

By embracing these principles, we not only enhance our internal operations but also fortify the trust of our stakeholders, including regulators and supervisors.

We kindly request each of you to invest time in thoroughly reviewing the Code of Conduct & Ethics, grasping the essence of its spirit. Your commitment to the Code is pivotal in realizing the Alpha Way. If you have any questions or need additional information, do not hesitate to reach out to the Compliance function.

Thank you for your dedication, passion, and active support in building the New Alpha Services and Holdings. Our strength lies in our people, and together, we will navigate and succeed in this transformation journey.

FINAL CEO



Being part of the Alpha Services and Holdings family is an exciting professional journey as the Bank continues to transform and renew its promise to employees, customers and society. Our new Purpose and Values not only guide all our endeavors, but also serve as a reminder that we must uphold the highest standards of integrity, mutual respect, accountability and ethics, drawing from our heritage as the Bank that customers trust to enable their progress.

To ensure that our Purpose and Values remain at the heart of everything we do, we are pleased to introduce our new Code of Conduct and Ethics. This Code has been developed to support and inform the decisions we make every day. These decisions are not always easy and can have a lasting impact on our business, but we must always do the right thing, even if it is not the easiest path to take.

The Code outlines the fundamental principles that govern our behavior and actions within our Company, in our relationships with our customers, partners, suppliers and the marketplace. It aims to maintain high ethical standards and to ensure compliance with the laws and regulations of the markets, in which we operate. Most importantly, our Code of Conduct & Ethics protects our culture and strengthens our position as a company built on trust and as a team guided by respect and excellence in everything we do.

Every interaction we have with our customers and with each other, every decision or transaction we make, must be guided by our commitment to our core values of excellence, collaboration, empowerment, innovation and results orientation, as well as adherence to the highest ethical standards.

These are essential to maintaining an engaging productive and customer-centric culture and are instrumental in our success. Therefore, I encourage everyone to read and understand the Code, and use it as a guide to ensure alignment with the Company's standards.

I have the utmost confidence in the commitment and integrity of each and every member of our Alpha Services and Holdings family. Together, we will ensure that the company remains an institution driven by its unwavering commitment to enabling progress in life and business for a better tomorrow, creating opportunities for its employees, customers and society.

Thank you all for your dedication, integrity and hard work. I am confident that our collective efforts will shape the success of our journey in this new era.

Vassilios Psaltis



TOGETHER, OUR PURPOSE AND VALUES CONSTITUTE OUR NORTH STAR

Our Purpose is the reason our Company exists; it describes our societal role supporting our growth ambitions.

Our Values provide us with the everyday guidance that will help us implement our strategy effectively. They help us work better and make change happen.

REGARDLESS OF SENIORITY
LEVELS AND JOB DESCRIPTIONS,
WE ALL SHARE THE DESIRE FOR A
BETTER FUTURE, AND WE ASPIRE
TO PLAY AN ACTIVE ROLE IN
BUILDING IT: A MORE SUSTAINABLE
WORLD IN WHICH BUSINESSES
GROW, ECONOMIES ARE STABLE,
SOCIETY BECOMES FAIRER, OUR
ENVIRONMENT IS PRESERVED,
AND QUALITY OF LIFE IMPROVES
FOR ALL.

OUR POSE ENABLING PROGRESS IN LIFE AND BUSINESS FOR A BETTER TOMORROW.

WE ARE an ethical, trusted Company relied upon for our financial expertise, strength, and stability, and known for over 140 years of positive contribution to the Economy and Society.

Why - our reason to exist:

OUR CUSTOMER PROMISE

WE INTEGRATE FINANCE SEAMLESSLY INTO OUR CUSTOMERS' LIVES

How - what is our promise to customers

Understanding the critical importance of customer experience in growing our business, we created our Client Promise which defines how we want customers to feel when they interact with us. Our customer promise keeps us focused on delivering an excellent customer experience:

PERSONALISED

Understanding our Customers and their life and business needs in depth, and designing the whole experience around them.

EMPOWERING

Building their financial capability with expert advice and a comprehensive suite of advanced, powerful products, services, and digital tools. **CONVENIENT**

Dealing with us is always easy, fast, effortless, and pleasant for our customers – whenever, wherever and however they wish.

FACILITATING

Connecting them to innovative services and providers.

OUR VAILES

Our five Values combine our strengths with new aspirational behaviors, that will help us build a human and dynamic culture. They provide us with the essential guidance on how to behave, make big strategic decisions and implement our strategy effectively.

EXCELLENCE

WE ARE ALPHA:
WE SET THE STANDARDS
TO WHICH OTHERS ASPIRE

COLLABORATION

ACT AS ONE TEAM:
AS INDIVIDUALS WE ARE STRONG,
AS ONE TEAM WE ARE EXCEPTIONAL

EMPOWERMENT

UNLEASH POTENTIAL:
WE SEE THE POTENTIAL IN EVERYONE
AND COMMIT TO HELPING THEM THRIVE.

INNOVATION

CREATE VALUE:
WE TURN BETTER INTO BEST
AND NEW INTO NOW.

DELIVERY

BE AGILE:
WHEN SOMETHING NEEDS DOING,
WE MAKE IT HAPPEN FAST.

Together, our Purpose and Values work as our compass. They remind us of who we are, why we exist, what we come to work for every day, and how we want to feel while doing our jobs. The expectations for the conduct and behavior of colleagues as representatives of the Bank are set out in our Code of Conduct and Ethics which is totally aligned with our Purpose and Values.



The Code of Conduct & Ethics (herein after referred to as "the Code") outlines the principles that Alpha Services and Holdings (the Company) stands for, aiming to provide our colleagues with ample guidance on conducting business in an ethical manner. The Group applies best practices which foster effective Corporate Governance and appropriate individual behavior, under a framework which promotes the highest level of ethics.

WHO THE CODE CONCERNS

The Code applies to all persons linked with Alpha Services and Holdings / Alpha Bank and its Subsidiaries through an employment contract and Board Members as well as individuals or legal entities connected to the Group or Group companies through a formal agreement e.g., contractors, consultants etc. (hereinafter, jointly, the "Colleagues").

We recognize the significance of the role that each one of us plays in ensuring the day-to-day ethical operation of the Company. Acknowledging this responsibility, we outline our generic commitments both as individuals and leaders, in the context of our relationship with our colleagues, partners, suppliers, customers and all our stakeholders.

As individuals, we commit to upholding ethical standards in our daily activities. Recognizing that leaders (including Chiefs, Directors, Managers, Team Leaders) play a pivotal role in setting the tone for ethical behaviour, acting as a role model, and promoting a culture where ethical standards prevail in all aspects, it is understood that they bear additional responsibilities for the effective implementation of the Code.

By articulating these commitments, we aim to foster a culture of integrity, transparency, and accountability, essential for the sustained success and reputation of our Company.

GUIDING PRINCIPLES WHEN USING THE CODE

If we find yourselves in a situation where we are uncertain about he most appropriate behavior, a series of criteria are recommended to be explored in accordance with the Code. These are indicative questions to ask and answer in every situation that might arise.

Does it comply with our policies and procedures?

Is it aligned with our values?

Is it aligned with our risk culture?

Is it aligned with our long-term goals?

Are you comfortable justifying this action to your colleagues, managers, and family?

Does it set a good example to other colleagues or people we know?

Would we feel comfortable if this decision was made public?

Acting in the chosen way, are we sure it could not cause damage in any way, including reputational, to the Bank or its stakeholders?

IF THE ANSWER TO ANY OF THESE QUESTIONS IS 'NO' OR 'MAYBE', WE MUST PURSUE A DIFFERENT COURSE OF ACTION.
IF WE HAVE DOUBTS OR CONCERNS, WE MAY CONTACT THE COMPLIANCE FUNCTION.

FAILING TO FOLLOW THE CODE

Failure to act in accordance with the Code of Conduct & Ethics, or breaches therein, may cause severe consequences for Alpha Services and Holdings and our colleagues. For colleagues, it can result in disciplinary procedures and even legal action or criminal prosecution.



Compliance with the egulatory and legisl ramework



Operating in a highly regulated environment, we take all necessary measures to follow the respective compliance and legislative framework. We are committed to cultivating a compliance culture among all colleagues by ensuring that we are safeguarding information, transactions and market practices, as well as preventing situations that may result in conflict.

MONEY LAUNDERING AND FINANCING OF TERRORISM

We recognize that safeguarding against financial crime and remaining compliant with Anti Money Laundering/ Combating the Financing of Terrorism (AML/ CFT) regulations is necessary for the integrity and trustworthiness of our Company.

We take all necessary measures to comply with the applicable regulatory and legislative framework regarding the prevention and suppression of money laundering/financing of terrorism to protect the Company and our legitimate customers.

The Anti-Money Laundering Policy as well as the relevant procedure is available on our website:

https://www.alpha.gr/-/media/AlphaGr/Files/Files-achive/About-AlphaBank/POLICYAMLEG.pdf

ANTI-BRIBERY AND CORRUPTION

We are committed to zero tolerance for corruption and bribery and to conducting business under the highest ethical standards, as an essential element of the responsibility towards our Customers and Shareholders for the protection of the reputation and long-term success of our business.

Our principles are reflected in the Anti-Bribery and Corruption Policy, which is in alignment with applicable laws and European best practices.

The Antibribery and Corruption Framework is available on our website: alphabank-anti-bribery-and-corruption-framework.pdf

GENERAL DATA PROTECTION REGULATION

At Alpha Services and Holdings we recognize the importance of responsibly managing and securing the data of our customers, colleagues, and other stakeholders' data. We consistently apply the General Data Protection Regulation (GDPR) concerning the protection of Individuals against unauthorized processing of their Personal Data.

To achieve this task, we have endorsed a Policy and methodology, which is also applied in other jurisdictions where the Group operates.

Information regarding the Protection of Personal Data is available on our website: <u>GDPR (alpha.gr)</u>

PREVENTION OF MARKET ABUSE

Recognizing the importance of safeguarding capital markets integrity, investor protection and investor confidence, we have established the Market Abuse Prevention Policy and Procedures which aim at ensuring that we are compliant with the applicable regulatory framework governing the prevention of insider dealing, unlawful disclosure of Inside Information and market manipulation.

CONFLICT OF INTEREST

Operating in a demanding working environment, conflicts of interest are common challenges that require proficient handling to maintain objectivity and to support ethical standards.

A conflict of interest may arise when the pursuit of one interest could compromise the impartiality and objectivity required in serving another. These conflicts can arise during routine tasks, such as making credit decisions, providing investment advice, or participating in cross-selling activities.

We are responsible for identifying and managing conflict of Interests on an ongoing basis.

We recognize the importance of prevention of situations resulting in cases of Conflict of Interest (CoI) that would impact our objectivity and we have established a solid framework to timely address business conduct and practices that may give rise to actual or potential conflict of interest.

RELATED PARTIES TRANSACTIONS

Transactions of those Parties defined as "Related", must be evaluated, appropriately approved, and properly disclosed. The Policy on Related Parties Transactions sets several principles and internal processes aiming at mitigating the "Transactions" risk, in cases where the "personal" or "private" interests of the "Related Parties" may conflict with the interests of the Group.



WITH A VIEW TO PROMOTING SUSTAINABLE DEVELOPMENT, WE ARE COMMITTED TO OPERATING RESPONSIBLY, TAKING DUE ACCOUNT OF THE ECONOMIC, SOCIAL AND ENVIRONMENTAL PARAMETERS OF OUR ACTIVITIES. TO THIS END, WE PROMOTE COMMUNICATION AND COOPERATION, AND WE EXPECT ALL STAKEHOLDERS INVOLVED IN OUR OPERATIONS TO COMPLY WITH THE PROVISIONS OF OUR CODE.

OUR COLLEAGUES

We recognize the value of our colleagues, and we aim to ensure an effective work environment to allow them to contribute more efficiently to everyday operation. We respect human rights and we ensure meritocracy. We provide training, development and advancement opportunities, based on overall performance.

DIVERSITY, EQUITY AND INCLUSION (DE&I)

The Alpha Bank Group is committed to fostering and promoting an inclusive culture that embraces human difference and unlocks potential for all.

The Groupthat values diversity is committed to creating an environment that values diversity and treats Colleagues with respect, deprived of discrimination on the grounds of age, gender, race, nationality, religion, family status,

physical or mobility impairments or any other characteristics. Diversity, equity, and inclusion are practiced throughout our organization, involving all stakeholders.

We approach diversity, equity and inclusion focusing on the different needs of each stakeholder group, utilizing our strategy consisting of the 5 Diversity Equity and Inclusion focus pillars:

Gender Diversity

Financial Inclusion

LGBTQ+ other minorities inclusion

WE DO NOT TOLERATE DISCRIMINATION, HARASSMENT, OR ANY FORM OF MISCONDUCT AGAINST STAKEHOLDERS.

WELLBEING AT WORK

At Alpha Services and Holdings, we understand that the sustainable growth of our organization rests upon a working environment that promotes the health and wellbeing of our Colleagues.

The Company, as a responsible employer, is committed to investing in initiatives that ensure every individual has equal access to healthcare services and resources by providing colleagues and their families access to services that include professional health advice and psychological support.

We are also implementing Occupational Health and Safety programs designed to ensure a secure work environment. On this front, the Company not only complies with the applicable laws, but also ensures the provision of additional benefits and programs.

PREVENTING HARASSMENT AND RETALIATION

We are committed to fostering a work environment that is free of any kind of discrimination and violence, with the aim of ensuring a workplace where respect for human dignity is predominant. The Company expresses its strong commitment to prohibiting all forms of violence and harassment occurring in the course of work, whether directly related to or resulting from it, including instances within the family environment, gender and sexual violence and harassment.

The Company is determined to address any allegations or complaints related to violence and harassment, demonstrating zero tolerance for such behaviors. Confidentiality and respect for human dignity are core principles in handling such cases. Our Company safeguards the well-being of any Colleague who might report incidents, ensuring protection against negative impacts such as retaliation or any other form of discrimination.

CONTINUOUS LEARNING AND DEVELOPMENT

Alpha Services and Holdings firmly believes that "its strongest asset is the high quality of its human resources". Therefore, our Company invests in the lifelong learning and development of its Employees, providing continuous training and learning opportunities of its Employees.

This includes training programs, functional Academies, new projects involvement, mentoring (including reverse mentoring), on-the job training, coaching, etc.

PROFESSIONAL ETHICS

We are committed to safeguarding the Company's reputation by behaving responsibly and according to the principles of our Code.

POLITICAL ENGAGEMENT

The Company respects the right of our Colleagues to engage in personal political activity and participate in public life. Personal political beliefs are not subject to monitoring or scrutiny by the Company. However, such political involvement should be performed in a lawful and legitimate manner and we should take necessary actions to avoid causing disruptions in the overall positive workingenvironment and effectively address any conflicts of interest that may arise in accordance with the respective Company Policy.

GANBLING

We are expected to uphold professional conduct in both personal and business interactions, aligning with the Company's principles and to not participate in gambling.

WHISTLEBLOWING

We are committed to maintaining the highest level of ethics and professional behavior, adopting a zero tolerance approach towards unlawful or unethical actions which might negatively affect our reputation and credibility.

Ensuring an environment of trust and safety for Colleagues and all stakeholders, we encourage reporting, in good faith, illegal acts, serious offences, irregularities, or patterns of such that may come to your attention.

To this end, we encourage Colleagues to address their concern by reaching out to Compliance.

More information on the Whistleblowing Policy is available on our website: Whistleblowing-Policy-and-Procedures.pdf (alphaholdings.gr)

OUR CUSTOMERS

We place Customers at the center of our activities. Our main concern is to serve the individual and business needs of our Customers, by providing high quality services, and establishing relationships of trust and respect. We integrate finance seamlessly into our Customers' lives.

TRANSPARENCY

At Alpha Services and Holdings, transparency in promoting its services throughout the business relationship with Customers, is of our utmost importance.

To this end we have several Policies in place ensuring the provision of transparency in our transaction with Customers, whereas explicit and sufficient information, regarding offered services and products, is provided regardless of the distribution channels. Moreover, we regularly assess compliance with the respective regulations and high service standards.

DEALING WITH COMPLAINTS

With the aim of diligently resolving complaints and measuring Customer satisfaction, we have adopted a Group Customer Service Policy for Complaints and Requests. We handle complaints and requests through a central system, and we are committed to respond timely and comprehensively to all matters communicated by our Customers.

Our process for managing Customer Complaints can be found at the following link: Customer support | ALPHA BANK

OUR EXTERNAL STAKEHOLDERS

Special attention is attached to the identification, measurement and management of the undertaken risk, to the compliance with the applicable legal and regulatory framework, to the provision of transparency and of full, accurate and truthful information to our Stakeholders.

OUR SHAREHOLDERS

We promote the long-term interests of our shareholders

FOCUSING ON:

Creating return for their investment.

Providing full disclosure regarding transparency requirements of the applicable regulatory framework including the Group's financial performance and useful information on Shareholders' General Meetings and material corporate actions, while promptly disseminating inside information.

Providing explicit and accurate information to facilitate their shareholding rights.

Implementing best practices in Corporate Governance.

OUR COMMUNITY

WE UNDERTAKE

the commitment to contribute actively, through targeted actions, to the progress of Society and growth of the Economy. We prioritize the promotion of human rights, diversity, health, education and culture.

WE MEET NEEDS

in the areas of health and education, through Corporate Responsibility initiatives. Driven by our long-term efforts to showcase the cultural heritage of Greece, we design and launch initiatives that facilitate equal access to culture and the arts for our citizens with disabilities and other limitations.

WE PROMOTE

financial and digital literacy through educational programs. We implement workshops and seminars for Customers and businesses to promote a better business landscape in Greece.

WE HAVE BEEN PLANNING

and carrying out volunteer activities for our Colleagues, aiming to meet social and environmental objectives. The willingness of our Colleagues to give back to society lies at the center of our efforts. Through initiatives and programs, we can inspire them and build a culture of solidarity and contribution to society.

Information regarding our commitments towards the community is available on our website Giving Back to Society | ALPHA SERVICES AND HOLDINGS (alphaholdings.gr)

THE ENVIRONMENT

We adopt responsible environmental behaviour. Promoting sustainable development, we are committed to operating responsibly, taking due account of the economic, social, and environmental parameters of our operation.

WE RECOGNIZE

that the growth of the Economy depends directly on the sustainability of the ecosystem. We acknowledge the responsibility to actively contribute to the protection of the environment and we implement an Environmental Policy, in order to reduce our ecological footprint.

WE ACTIVELY

contribute to protecting the environment, mitigating climate change and preserving natural resources, looking to a sustainable future. Ecological awareness is promoted among Colleagues and a commitment is made to the environmentally responsible operation of the Branches.

WE EXPECT

our Suppliers to comply with the applicable legal requirements for the environment, demonstrating continuous qualitative and quantitative improvement in their performance regarding environmental protection matters.

Information about supporting an environmentally sustainable economy is available on our website: https://www.alphaholdings.gr/en/esg-and-sustainability/environment

OUR SUPPLIERS

OF GOODS AND SERVICES

We apply Corporate Responsibility principles across the entire range of our activities and seek to ensure that our Suppliers and Partners also comply with the values and business principles that govern our operation. To this end, we have adopted the Suppliers Code of Conduct which sets out the terms of cooperation and the evaluation criteria for our Suppliers in matters of corporate social responsibility, with the aim of broadening the definition and systematic application of social and environmental criteria in their procurement procedures.

The Suppliers Code of Conduct is available on our website: suppliers-code-of-conduct.pdf (alphaholdings.gr)

OUR COMPETITORS

We fully respect competition law and refrain from anti-competitive practices. We are not involved in anti-competitive agreements, and we deal in good faith with our trading partners, including competitors and suppliers. If we are in doubt, we take all necessary advice from our Risk, Compliance and Legal experts, before engaging in any activity.



WE ARE RESPONSIBLE FOR SAFEGUARDING AND PROTECTING THE COMPANY'S PHYSICAL AND INTELLECTUAL PROPERTY. ALL TANGIBLE AND INTANGIBLE ASSETS OF THE COMPANY MAY BE USED ONLY FOR APPROVED PURPOSES AND IN ACCORDANCE WITH OUR POLICIES AND PROCEDURES.



The Company envisions a work environment that is suitable for its activities and provided services, as well as safe and healthy for all its Colleagues, visitors, contractors, and associates. In this context, the Company through Alpha Supporting Services sustains an Occupational Health & Safety (OH&S) Management System.

Information on Health and Safety is available on our website: OH&S POLICY.DOC (alpha.gr)



THE CODE IS REVIEWED EVERY 3 YEARS OR EARLIER IF DEEMED NECESSARY. THE COMPLIANCE AND HUMAN RESOURCES FUNCTIONS ARE RESPONSIBLE FOR MONITORING THE IMPLEMENTATION OF THE CODE AS WELL AS REVISING IT. THE CODE IS APPROVED BY THE BOARD OF DIRECTORS THROUGH THE CORPORATE GOVERNANCE, SUSTAINABILITY AND NOMINATIONS COMMITTEE (THE CGSNC). THE AUDIT COMMITTEE ENSURES ADHERENCE TO AND COMPLIANCE WITH THE CODE.

THE CODE IS AVAILABLE THROUGH THE WEBSITE OF THE COMPANY IN THE GREEK AND ENGLISH LANGUAGES.



THIS CODE SETS OUT OUR EXPECTATIONS FOR THE CONDUCT AND BEHAVIOR OF COLLEAGUES AS REPRESENTATIVES OF THE GROUP, IN LINE WITH OUR PURPOSE AND VALUES.

IT STANDS AS A TESTAMENT TO OUR UNWAVERING DEDICATION TO ETHICAL PRACTICES, INTEGRITY AND RESPONSIBLE BEHAVIOR WITHIN BUSINESS RELATIONSHIPS, WORK ACTIVITIES AND EVERYDAY BEHAVIOR.

IT WORKS AS A GUIDE FOR ALL ACTIONS AND DECISIONS WE MAKE, FOSTERING TRUST AMONG OUR STAKEHOLDERS, ENSURING COMPLIANCE WITH LAWS AND REGULATIONS, AND UPHOLDING THE HIGHEST STANDARDS OF CONDUCT.

BY ADHERING TO THESE PRINCIPLES, WE NOT ONLY PRESERVE THE REPUTATION AND SUCCESS OF ALPHA SERVICES AND HOLDINGS, BUT ALSO CONTRIBUTE TO A POSITIVE IMPACT ON THE COMMUNITY AND THE SOCIETY AT LARGE.

SOURCES



THE WHISTLEBLOWING POLICY:

whistleblowing-policy-and-procedures.pdf (alphaholdings.gr)

THE ANTI-MONEY LAUNDERING POLICY:

https://www.alpha.gr/-/media/AlphaGr/Files/Files-archive/AboutAlphaBank/POLICYAMLEG.pdf

THE ANTIBRIBERY AND CORRUPTION FRAMEWORK:

alphabank-anti-bribery-and-corruption-framework.pdf

PROTECTION OF PERSONAL DATA:

GDPR (alpha.gr)

INFORMATION REGARDING OUR COMMITMENTS TOWARDS THE COMMUNITY:

Giving Back to Society | ALPHA SERVICES AND HOLDINGS (alphaholdings.gr)

INFORMATION REGARDING CORPORATE RESPONSIBILITY POLICY:

Κώδικες και Πολιτικές | ALPHA SERVICES AND HOLDINGS (alphaholdings.gr)

Πολιτική Εταιρικής Υπευθυνότητας | ΑLPHA BANK

THE SUPPLIERS CODE OF CONDUCT:

suppliers-code-of-conduct.pdf (alpha.gr)

INFORMATION ON HEALTH AND SAFETY:

OH&S POLICY.DOC (alpha.gr)

CUSTOMER COMPLAINTS

Customer support | ALPHA BANK