



Principles for Responsible Banking

5th Reporting and Self-Assessment

SEPTEMBER 2024

PIRAEUS FINANCIAL HOLDINGS S.A. REPORT

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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.

Alignment

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.

Piraeus Financial Holdings Profile

Piraeus Financial Holdings S.A. is a financial holdings company, listed on the Athens Stock Exchange, and the parent company of the banking institution "Piraeus Bank S.A."

The key subsidiary of Piraeus Financial Holdings S.A. is Piraeus Bank S.A., it is headquartered in Athens, generates 99% of the Group's revenues.

The Piraeus Financial Holdings Group has a systemic position in the Greek banking market in terms of total assets, which amount to €76.5 billion as at 31 December 2023.

The Group holds the most extensive footprint in Greece with 378 Branches (plus another 16 Branches in two countries abroad) and a wide customer base of 6.0 million active customers. As at 31 December 2023, the Group's headcount totalled 8,053 FTE.

Corporate Profile | Piraeus Financial Holdings (piraeusholdings.gr)

2023 Annual Financial Report

At a glance

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 Organisation 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: Pillar III Disclosures, EU Non-Financial Reporting Directive (Greek Law 4403/2016), EU Taxonomy (Regulation EU 2020/852 of the European Parliament and of the Council), Sustainable Finance Disclosure Regulation (SFDR), Task Force on Climate-Related Financial Disclosures (TCFD), Disclosures for the Science – Based Targets initiative (SBTi)**
- ✓ **Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: as above**
- *None of the above*

Sustainability Policies and Strategies

Piraeus Group has a longstanding commitment to promoting sustainability within its operations and for its clients and society at large. With a robust governance structure, the knowledge and the culture built over the past years, Piraeus has incorporated climate-related, environmental, and social risks into its decisions and is leveraging on the opportunities that arise from the EU, supervisory and national legislation, and targets. For this purpose, the Group has already integrated a set of ESG related Short-Term (STIs) and Long-Term Incentives (LTIs) in line with its business plan, covering also in some cases, risk-related aspects.

Sustainability & Business Report 2023, pages: 78-89

Sustainable Development Policy of Piraeus Group

Piraeus alignment with the TCFD Recommendations

2023 Pillar III Report p. 71-104

FY.23 Corporate Presentation pages: 53, 76-79

Piraeus' alignment with the Principles for Responsible Banking

Sustainable Development Policy

Piraeus' Sustainable Development Policy reflects the Group's intentions for business strategies and targets that meet the UN Sustainable Development Goals and the Paris Agreement, by also aligning its operations with the UNEP FI Principles for Responsible Banking.

It echoes the Group's overall approach to sustainable development and sets the strategic directions to support, promote, and finance sustainability. In 2024, the Policy will be updated to align with the new EU sustainability regulations.

As part of its sustainability strategy, Piraeus Group promotes Responsible and Sustainable Banking by adopting ESG criteria and has embarked on its Energy Transition Project that will support its customers in moving to a low-carbon economy. Piraeus Group aspires to become net zero by 2050 at the latest and has defined intermediate science-based targets (by 2030).

Commitment to UN Principles for Responsible Banking

Piraeus Bank was instrumental in developing the UN Principles for Responsible Banking, which aim to align the activities of banks with the 17 UN Sustainable Development Goals and the Paris Climate Agreement. Piraeus Group adheres to the Principles for Responsible Banking by how it:

- engages with customers and stakeholders;
- measures impacts and sets targets for climate and social issues;
- discloses progress with transparency and accountability; and
- sets its ESG governance and management structures.

Participating in Sustainability Initiatives

To conduct its business in an environmentally and socially sound manner the Group adheres to sustainability standards and principles with transparency.

United Nations Sustainable Development Goals (SDGs)

Piraeus Group supports the UN SDGs, pledging to make a substantial contribution to the global efforts for achieving them.



Paris Pledge for Action

Piraeus Group has pledged to support the Paris Climate Agreement and is a signatory to the Business Coalition Statement on Climate in 2015.

United Nations Global Compact

Piraeus Group is a UN Global Compact active participant since 2004, promoting its ten principles regarding human and labor rights, environmental protection, and anti-corruption.

United in the Business of a Better World

Piraeus Group is a signatory to the UN Declaration United in the Business of a Better World, a common statement from business leaders for cooperation beyond borders, where all public and private bodies prove their responsible operation with transparency.

Women's Empowerment Principles

Piraeus Group is the first bank in Greece to sign the Women's Empowerment Principles of the UN Global Compact and UN Women Principles and is committed to strengthening and promoting gender equality in the workplace.

Caring for Climate

Piraeus Group is a signatory to the United Nations Global Compact Statement Caring for Climate: The Business Leadership Platform, which provides a framework for businesses to advance practical solutions and raise public awareness on Climate Change issues.

United Nations Environment Programme Finance Initiative (UNEP FI)

Piraeus Group is a member of the United Nations Environment Programme Finance Initiative (UNEP FI) since 2007, currently serves on the banking Board, and is committed to environmental protection, social responsibility, and sustainable development in its business decisions.

Principles for Responsible Banking (UNEP FI)

Piraeus Group has signed the Principles for Responsible Banking (PRB) and was the only Greek bank that participated in their development. The PRB aim to align banks' operations with the UN Sustainable Development Goals and the Paris Climate Agreement.

The Group also participates in various UNEP FI working groups, such as the Impact Assessment and the Financial Health & Inclusion.

UNEP FI Commitment to Financial Health & Inclusion

Piraeus Group has signed the Commitment, aiming to drive positive outcomes for individuals, entrepreneurs, and the wider economy, leaving no one behind.

UNEP FI Leadership Council

The CEO of Piraeus Group is one of the 19 leaders of banks and insurance companies from around the world who participate in the UNEP FI Leadership Council, an international advisory body created in 2021, aiming to shape the strategy of the financial sector so that the goals of sustainable development are met.

Principles for Responsible Investment

Piraeus Asset Management and Iolcus Investments, both subsidiaries of Piraeus Group, are signatories to the Principles for Responsible Investment (PRI), a global initiative for the adoption and implementation by investors of Environmental, Social, and Governance (ESG) principles.

Science-Based Targets initiative

Piraeus has committed to the Science Based Targets initiative (SBTi). The SBTi suggests methodological tools for measuring carbon emissions and setting targets for their

reduction, both from the Bank's operational and financing activities. Piraeus Group has submitted its targets to the SBTi and has published its carbon reduction commitments.

TCFD Recommendations

The recommendations for the disclosure of financial climate-related information were launched in 2017 by the Financial Stability Board task force and propose the voluntary disclosure of detailed information on climate change management in four pillars: Governance, Strategy, Risk Management, and Metrics and Targets. Piraeus published its fourth TCFD report in 2023.

Finance for Biodiversity Pledge

Piraeus Group has signed the global Finance for Biodiversity Pledge in order to set goals and strengthen the business activities that protect and enhance the natural environment, reversing the rate of biodiversity loss.

EU Business@Biodiversity Platform (EU B@B Platform)

Piraeus Group actively participates in the EU Business@Biodiversity Platform, a forum for ongoing strategic dialogue on the interconnection of business with biodiversity and natural capital.

CSR HELLAS

Since 2007, Piraeus Group is a full member of CSR Hellas (Hellenic Network for Corporate Social Responsibility) and participates in initiatives aiming to promote the corporate responsibility of Greek businesses.

Hellenic Bank Association – ESG, Sustainable Finance, and Corporate Governance Committee

Piraeus Bank is a member of the ESG, Sustainable Finance and Corporate Governance Committee of the Hellenic Bank Association, with active participation in the integration of sustainability in the Greek banking sector.

EMAS

Piraeus Group's Environmental Management System is certified under the European EMAS regulation (Eco-Management Audit Scheme) and ISO 14001:2015, for all the Bank's Branches and administration buildings, since 2011.

Exploring biodiversity challenges

Following the signing of the global Finance for Biodiversity Pledge –to set targets by 2024 for supporting business activities that protect and enhance the natural environment and reverse biodiversity loss– Piraeus Group participates in a wide variety of global initiatives for nature and biodiversity risks.

Specifically, the Group participates in: the UNEP FI Biodiversity target working Group to develop expertise in setting biodiversity targets, the Partnership for Biodiversity Accounting Financials (PBAF) to develop principles and standards for biodiversity assessment, the EU Business and Biodiversity Platform to exchange expertise on strategic approaches toward biodiversity and to contribute to the formulation of European

biodiversity strategies and the Finance for Biodiversity Foundation (FfBF) to exchange expertise on biodiversity risk methodologies and tools. In the last two initiatives, Piraeus Group is a member of the respective Advisory Boards. Additionally, Piraeus follows the Taskforce on Nature-related Financial Disclosures (TNFD), a global framework for disclosures on biodiversity-related risks and has committed as an Early Adopter to report accordingly for the financial year 2025. Piraeus also follows the Science-Based Targets Network (SBTN) equipping companies with guidance to set science-based targets for biodiversity.

Acquiring knowledge from its involvement, Piraeus Group has developed a methodology (the PHYSIS toolkit), based on existing databases and using the Biodiversity Footprint Financial Institutions (BFFI) measurement approach to assess impacts of its financing on biodiversity. In 2023, Piraeus completed its first assessment of impacts of business portfolios on terrestrial ecosystems, freshwater ecosystems, and marine ecosystems. The output is expressed in Potentially Disappeared Fraction (PDF) of species per km² per year. Additionally, the biodiversity loss avoided for 2022 was estimated from RES projects of the electricity production sector. In 2024 the second impact assessment will be conducted for the financial year 2023 and, additionally, clients' dependencies on biodiversity will be estimated based on the ENCORE tool.

Disclosures in accordance with the EU Taxonomy Regulation

Pursuant to the disclosure obligations of article 8 of the EU Taxonomy Regulation (EU Regulation 2020/852), as supplemented by the Commission Delegated Regulation (EU) 2021/2178, in February 2024, Piraeus disclosed the EU Taxonomy Alignment ratios for the financial year 2023. For wholesale customers, disclosed ratios were calculated based on their official Taxonomy alignment disclosures according to revenues and capex. Piraeus' turnover based alignment ratio stood at 0.90%, whilst capex-based alignment ratio stood at 2.91%.

EU Taxonomy alignment KPIs				
EU Taxonomy alignment (as proportion of Group's covered assets, %) 31/12/2023	Taxonomy aligned based on turnover € million	GAR % based on turnover	Taxonomy aligned based on CAPEX € million	GAR % based on CAPEX
GAR for credit institutions	-	-	-	-
GAR for other financial undertakings	26	5.57%	143	30.96%
GAR for non-financial undertakings	263	7.50%	1,010	28.79%
GAR for loans collateralized by residential immovable properties	38	0.68%	38	0.68%
GAR for building renovation loans	58	8.89%	58	8.89%
GAR for motor vehicle loans	-	-	-	-
GAR for loans to local governments for house financing and other specialised lending	-	-	-	-
GAR for collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
Total	385	0.90%	1,249	2.91%
Total covered assets	42,965	-	42,965	-
Group's total assets	76,450	-	76,450	-

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.

Impact and Target Setting

2.1 Impact Analysis

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.

b. Portfolio composition

Has your bank considered the composition of its portfolio (in %) in the analysis?

Please provide proportional composition of 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.

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](#).

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

Scope of the Analysis

Following its commitment to the UN Principles of Responsible Banking, Piraeus is conducting on an annual basis an impact analysis, estimating positive and negative contributions that its financing has on the sustainable development of Greece, i.e., on the natural environment, social and socio-economic pillars.

Sustainability & Business Report 2023, pages: 90-99

The key subsidiary of Piraeus Financial Holdings S.A. is Piraeus Bank S.A., and it is headquartered in Athens Greece, generating 99% of the Group’s revenues, hence, the impact analysis concerns Greece.

Portfolio Composition

Piraeus Bank Portfolio Cartography	
Consumer Banking	
Provision of products and services to individuals and professionals without NACE CODES	100% of the Bank’s Consumer portfolio was analysed, regarding Current accounts & savings and Credit cards & loans, in the product categories suggested by the Module
Institutional Banking	
Business Banking	
Provision of products and services to local businesses and the state and professionals with NACE CODES: Public and Non-profit Organisations, Small Business, SMEs, Micro, Small and Medium-sized Enterprises-MSMEs, Agricultural, SME Recovery clients, professionals	62% of the Bank’s business portfolio was analyzed, i.e., the 50 most highly financed sectors (NACE CODES)
Corporate Banking	
Provision of products and services to larger clients with NACE CODES: Corporates, Multinationals, Sovereigns, Financial Institutions, Shipping, Tourism sector (hotels), Interbank loans	94% of the Bank’s corporate portfolio was analyzed, i.e., the 50 most highly financed sectors (NACE CODES)
Investment Banking	
Provision of access to capital markets & raising of capital on capital markets and related services: bonds and equity with NACE CODES	98% of the Bank’s investment portfolio was analyzed, i.e., the 23 most highly financed sectors (NACE CODES)

Impact Analysis results

Overall, the financing activities of Piraeus Bank have strong positive contributions to the sustainable development and the healthy economy of Greece. The Bank is supporting the financial inclusion and well-being of the people in the country through the provision of retail products in the categories of “Current accounts and savings” and “Credit cards and loans”. The financing of businesses supports the economy of the country and positively affects crucial social topics such as employment, wages, and social protection, while the support that the Bank provides to SMEs is strongly associated with positive impacts on the topics of Finance, Sector diversity and Flourishing MSMEs.

Certain key sectors such as the production of electricity, construction, agriculture, and manufacturing are associated with GHG emissions and are resource and waste intensive, thus their financing may be linked to high energy demands and water consumption.

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

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

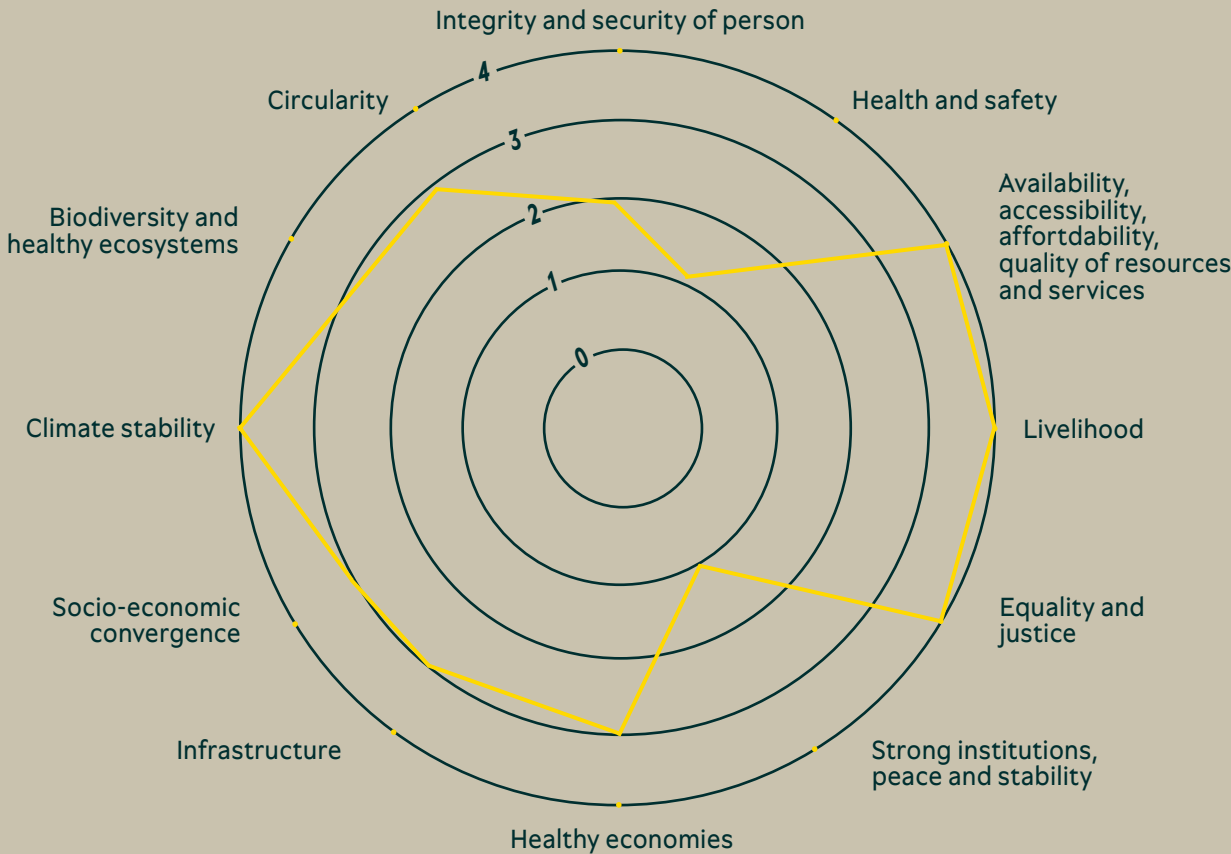
Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

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

The methodology provides a “Context Analysis” for each country, that highlights the most material sustainability issues, where peoples’ needs are high, and actions need to be taken. For the case of Greece, the Context Module considered the national priorities, strategies, and trends, as well as the country needs, concluding to the impact areas as shown in the diagram above.

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The Most Significant Sustainability Issues In Greece



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 prioritise to pursue your target setting strategy (see 2.2)?⁵

Please disclose.

⁵ To prioritise 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.

Impact Analysis results per analysed portfolio*

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Consumer Banking

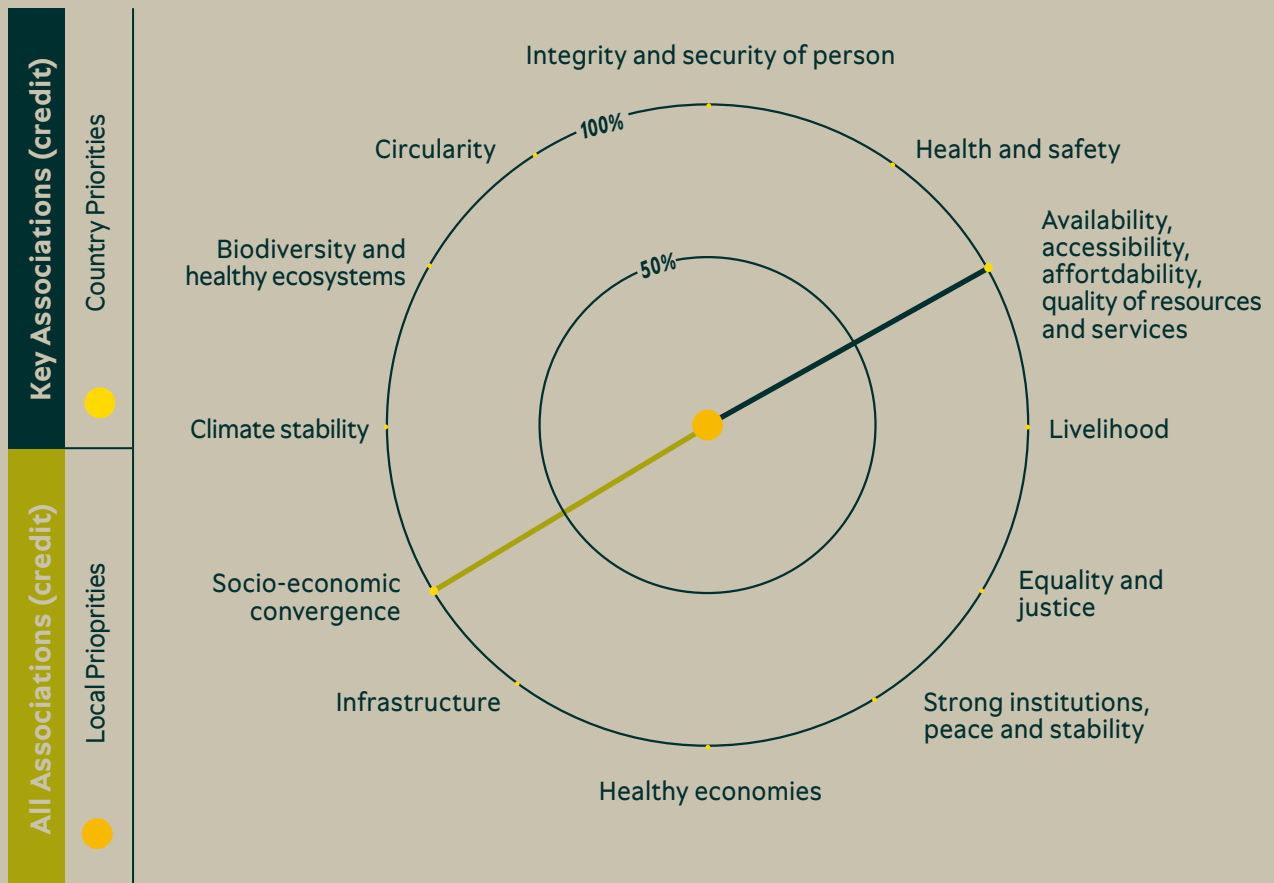
According to the analysis, Piraeus has positive impacts on the society of Greece, through the banking operations that fall under the categories of "Current accounts and savings" and "Credit cards and loans". The strong positive impacts are observed in the area of "Availability, accessibility, affordability, quality of resources and services", and on the topics of Finance, Housing, Education, Mobility, Flourishing MSMEs and Socio-economic Convergence, which are also of great significance for the people in Greece. In addition to that, the Bank is supporting vulnerable groups of the population, such as small farmers, with products targeted to rural populations and with microcredit products.

For these results, the Model considers the high percentage of customers who maintain current and savings accounts and therefore the important role the Bank plays in enhancing accessibility to banking services. Through these products the Bank is supporting the financial well-being of people in Greece.

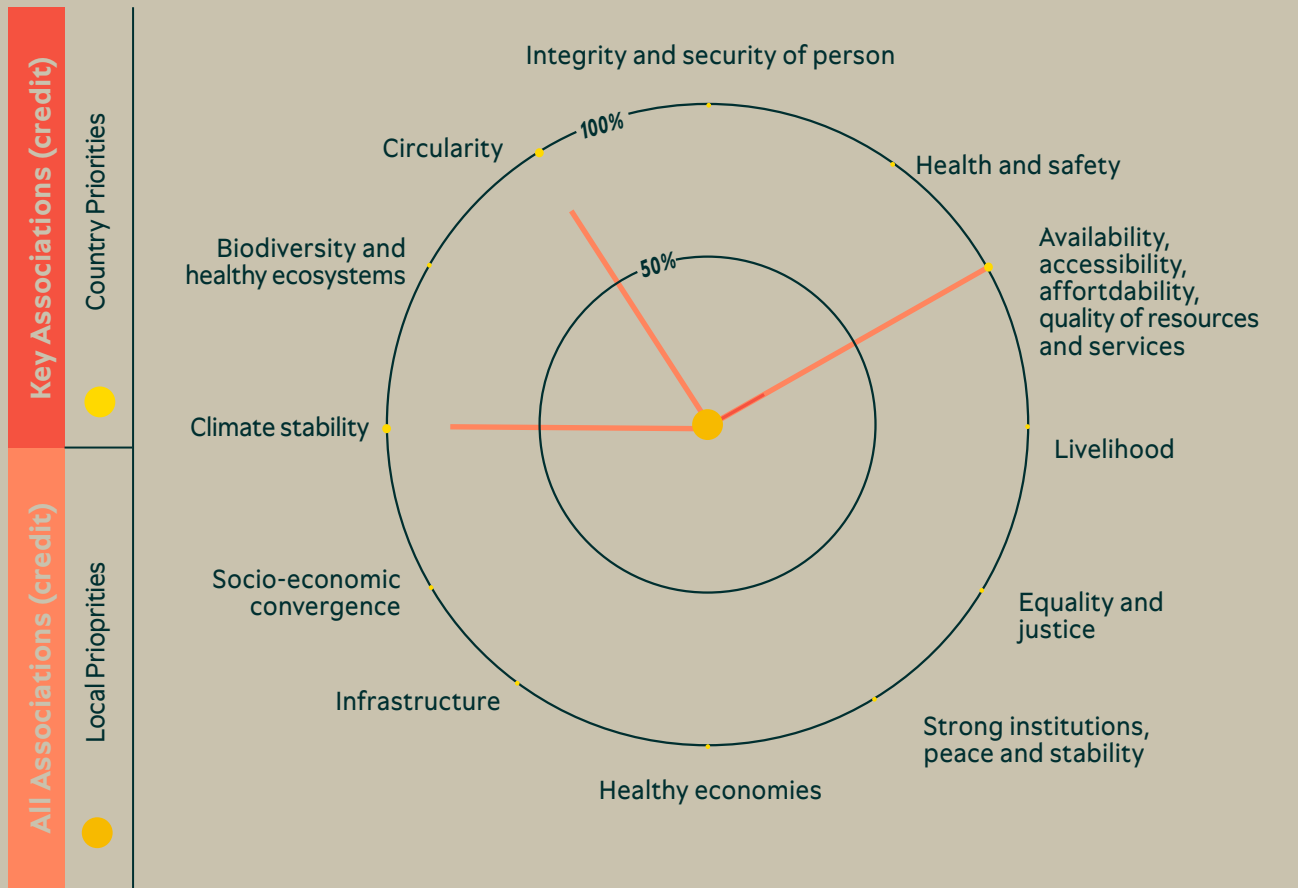
The methodology suggests that possible negative impacts may also emerge from the products of consumer portfolio, due to the risk of debt overburden on Greek households.

* In the diagrams that follow the dots do not represent a value. They only show if an impact area is a priority in the country/locations (based on data in the Context Module).

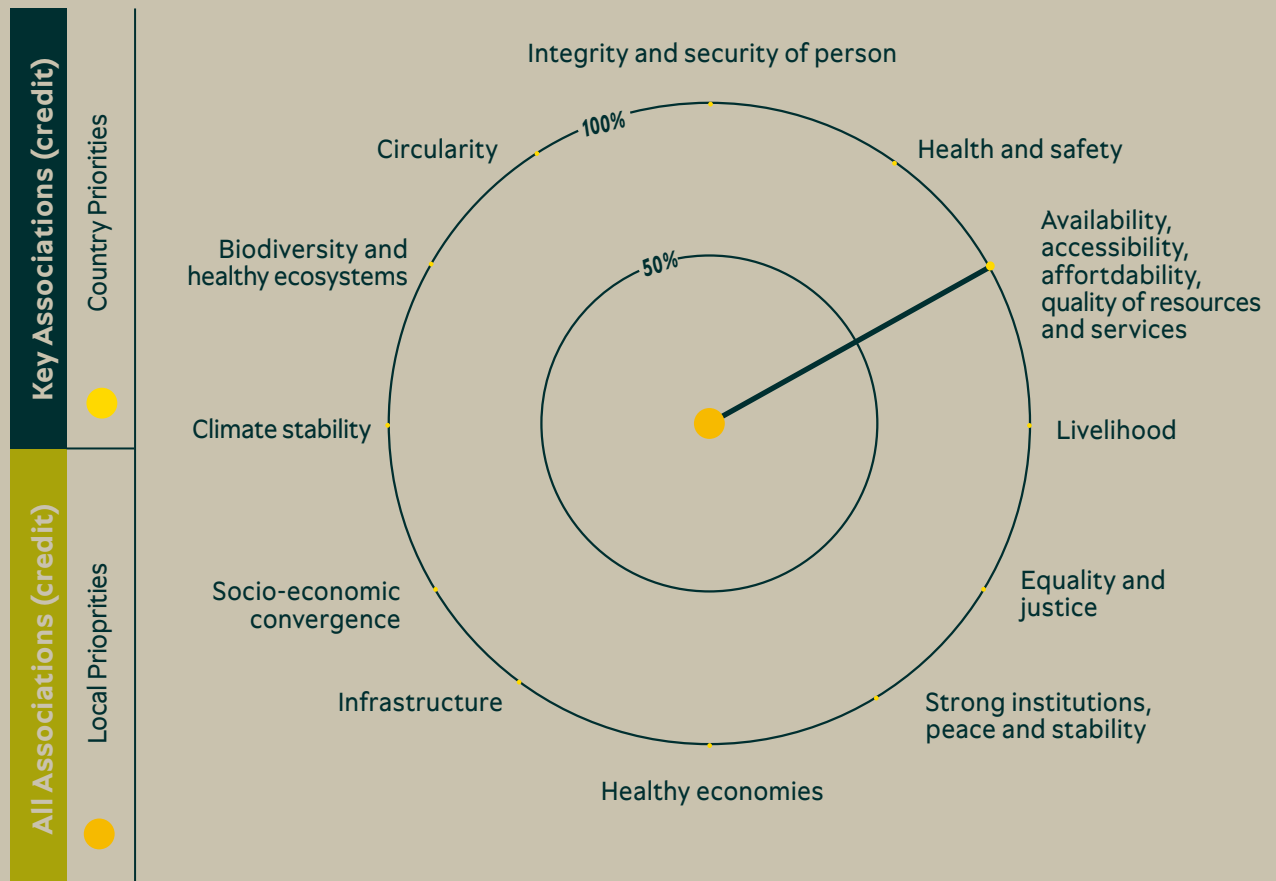
Consumer Banking - Positive impacts (Credit)



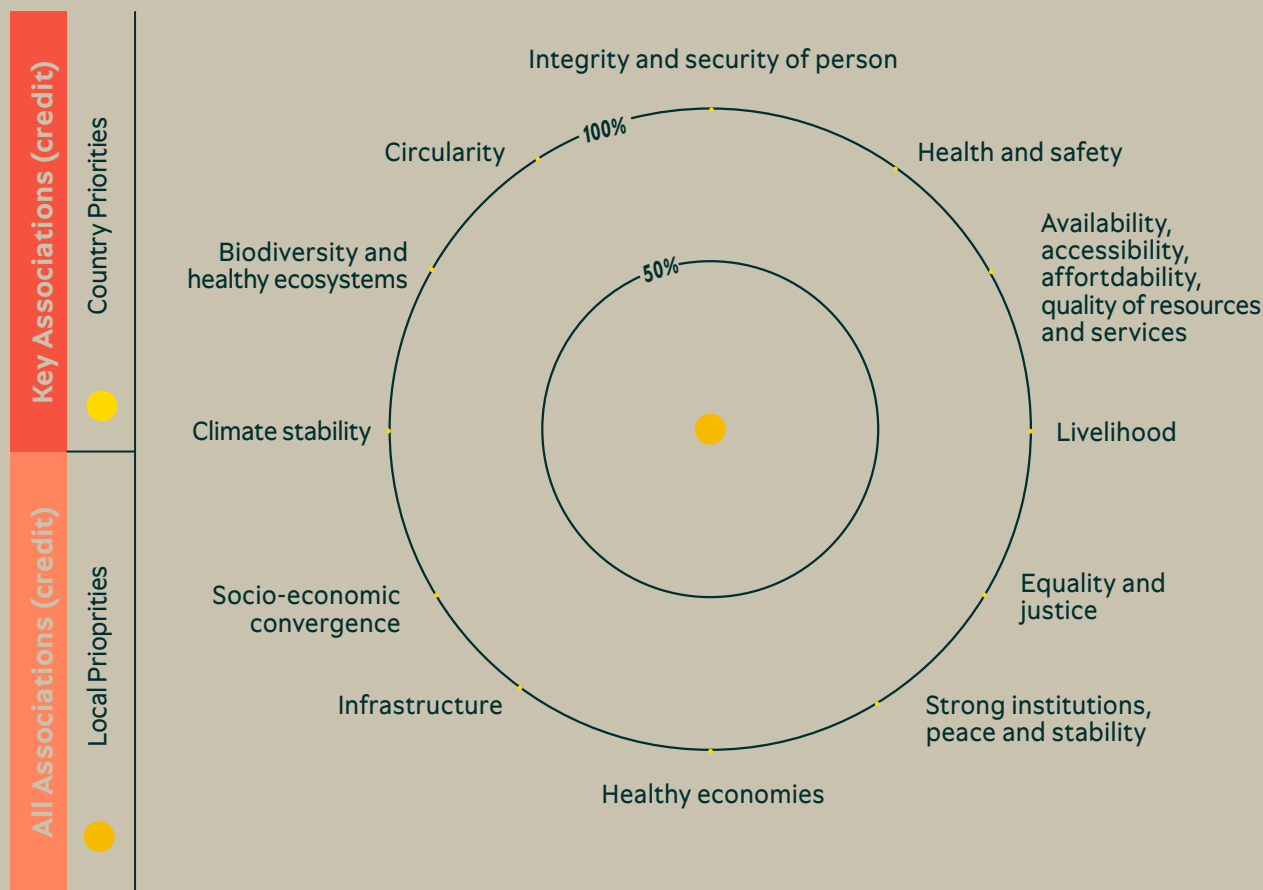
Consumer Banking - Negative impacts (Credit)



Consumer Banking - Positive impacts (Current accounts and savings)



Consumer Banking - Negative impacts (Current accounts and savings)



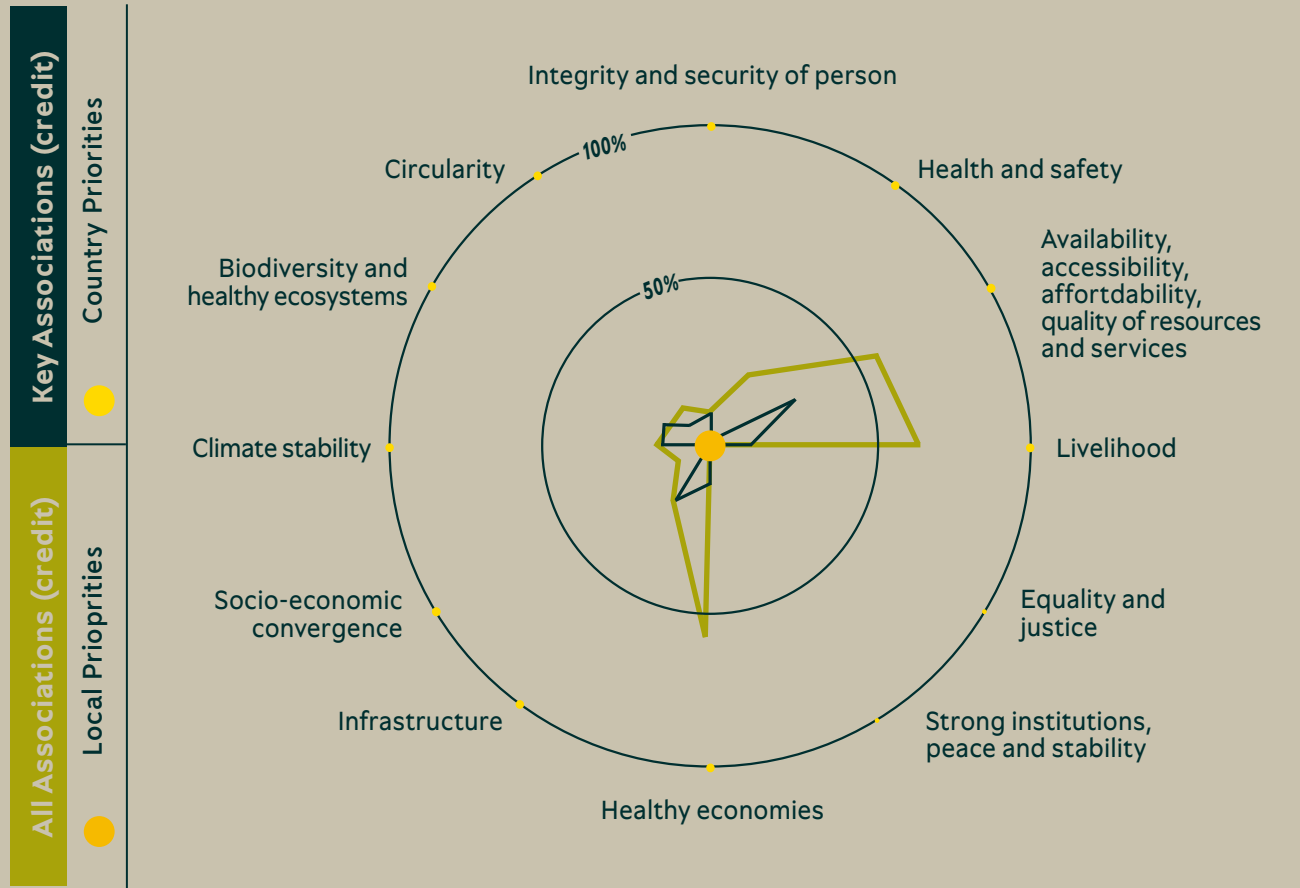
Business Banking

According to the analysis, the entire Piraeus' business portfolio that was analysed (62%) has positive impacts on the society of Greece and the area of "Livelihood", which is also significant for the needs of the country, and more specifically on the topics of Employment, Wages and Social Protection.

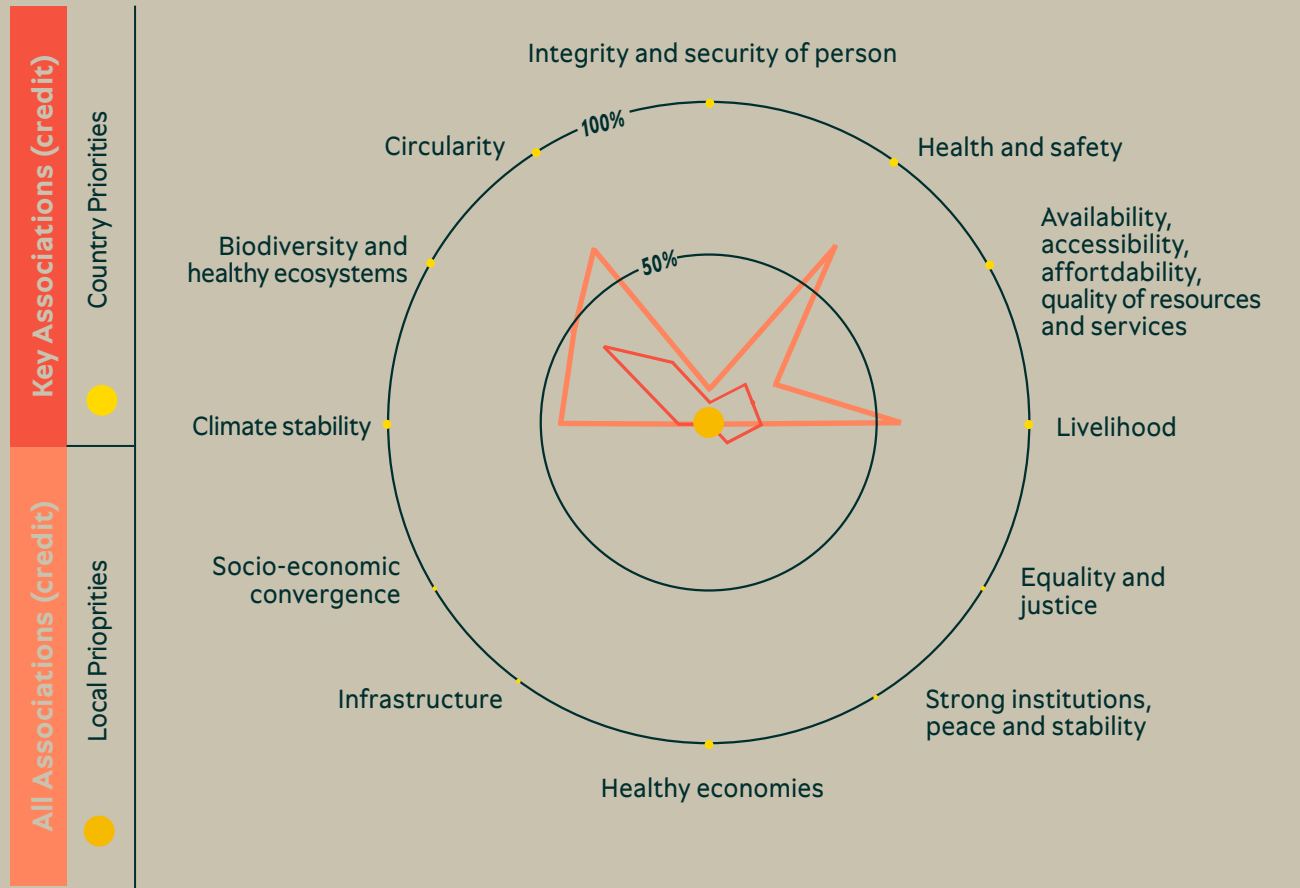
Positive impacts are also observed in the area of "Availability, accessibility, affordability, quality of resources and services", and on the topics of Food, Energy, Housing, Healthcare & Sanitation, Education, Mobility, Culture and Heritage, and Finance, which are also of great significance for the people in Greece. The financing of SMEs has positive contribution to the "Healthy economy" of the country, while the areas of "Infrastructure" and "Climate stability" also benefit from the activities financed in the Business Banking portfolio.

The most financed sector of the business banking portfolio "Hotels and similar accommodation" has positive impacts on supporting Flourishing MSMEs, Wages, Employment, Culture & Heritage, and Health & Safety while negative impacts may be observed mainly in the area of "Biodiversity and healthy ecosystems" and specifically on Waterbodies, and secondly on Soil, Species and Waste. The topics of Wages, Social Protection and Health & Safety may also be affected, due to the possibility of inadequate wages and lack of social benefits such as health insurance and maternity leave.

Business Banking - Positive impacts (impact areas)



Business Banking - Negative impacts (impact areas)

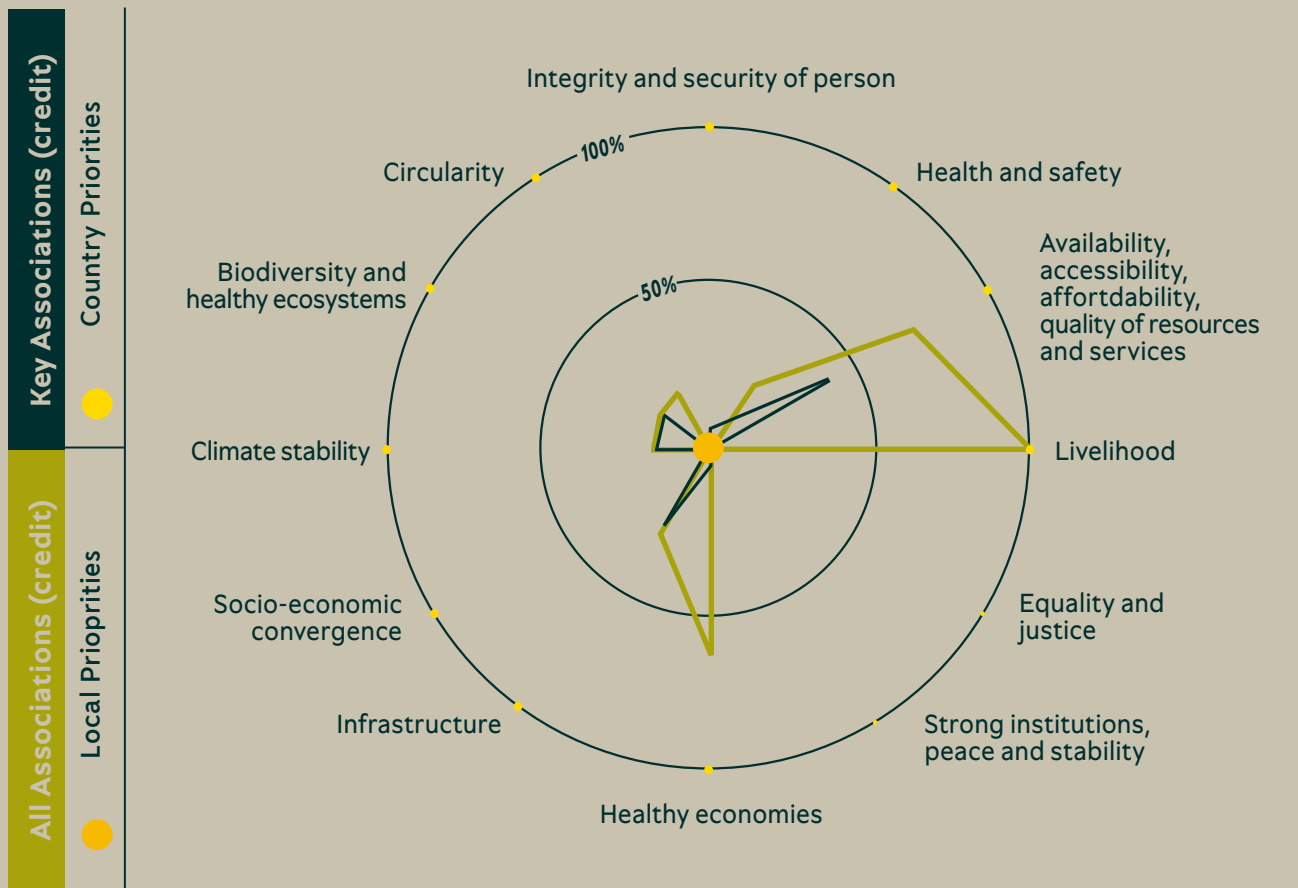


Corporate Banking

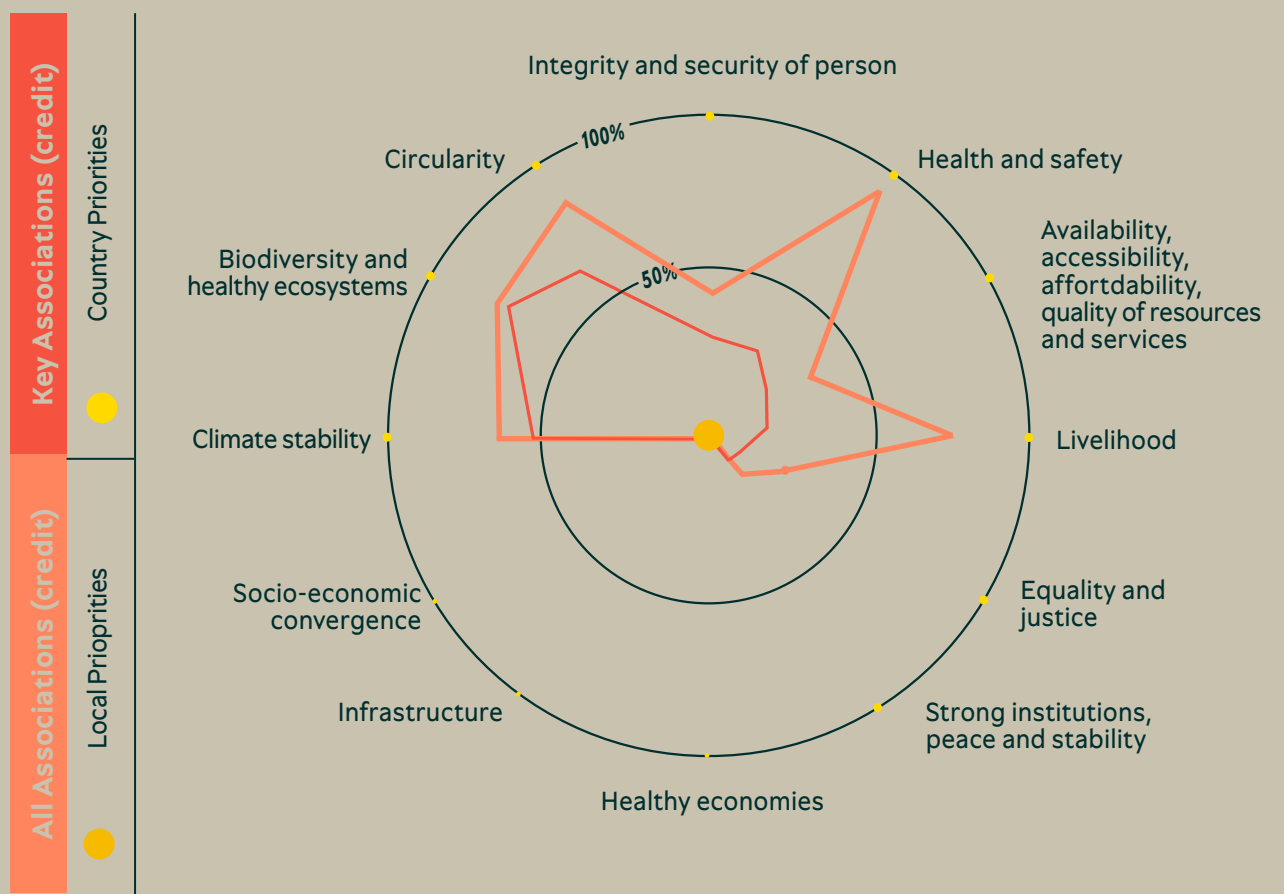
According to the impact analysis, the financing of corporations, i.e., the entire corporate portfolio that was analysed (94%), has positive impacts on the “Livelihood” of the country, supporting the topics of Wages and Employment. The area of “Availability, accessibility, affordability, quality of resources and services” and mainly the topic of Energy is strengthened by the corporate financing, as well as the topics of Food, Housing, and Education. The financing of sectors related to electricity and construction further support the infrastructure of the country, while the financing of corporations within the sectors related to retail trade constitute an integral part and an enabler of the flourishing of MSMEs.

The methodology of the Tool suggests that negative impacts may be associated with the financing of corporations, mainly deriving from the working conditions and the pollution related issues linked to certain sectors. The environmental pillar and the areas of “Climate stability”, “Biodiversity and healthy ecosystems” and “Circularity” may be negatively affected by the financing of sectors such as the manufacturing of foods, refined petroleum products, pharmaceutical preparations, cement, aluminum and copper production, water and air transport, electricity, and certain real estate activities.

Corporate Banking - Positive impacts (impact areas)



Corporate Banking - Negative impacts (impact areas)

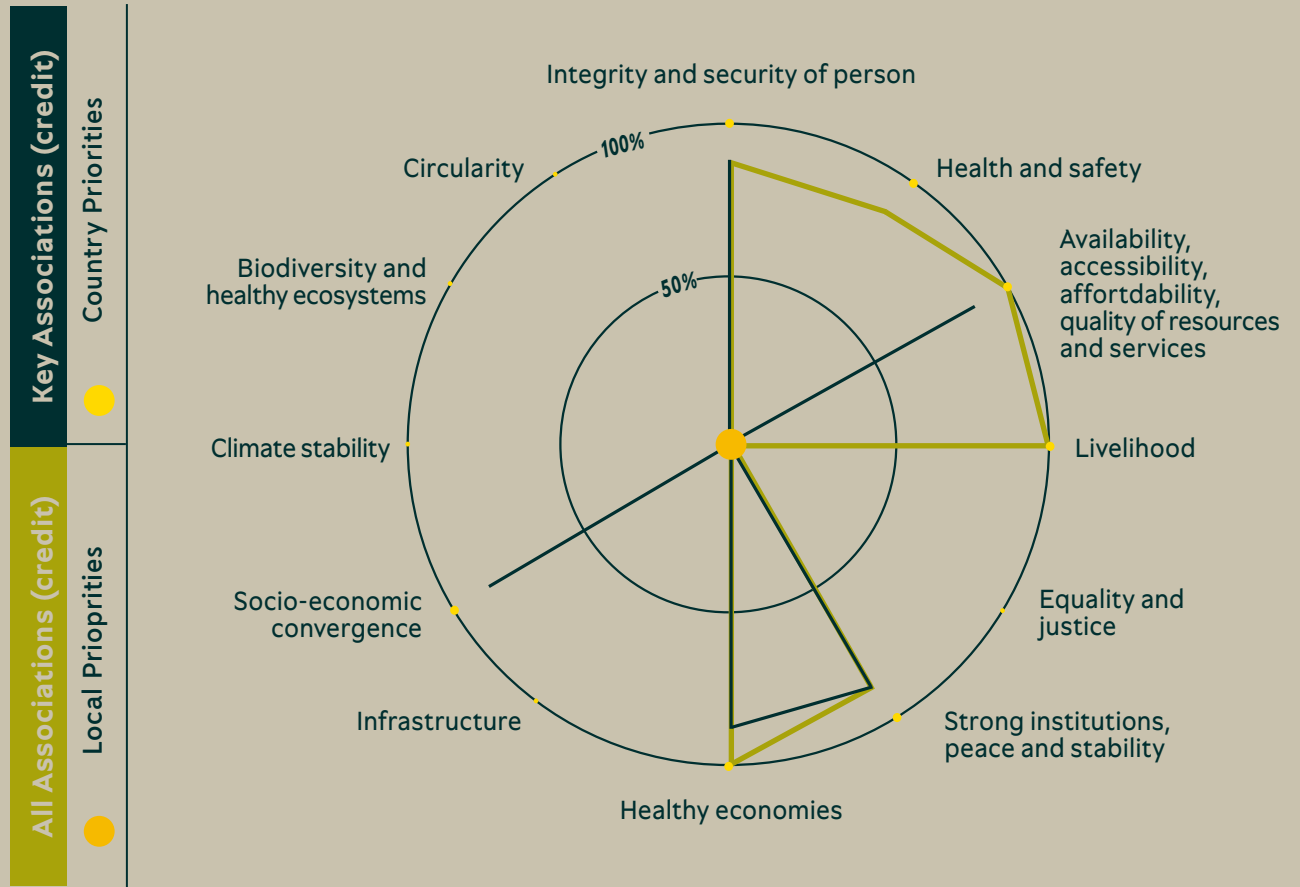


Investment Banking

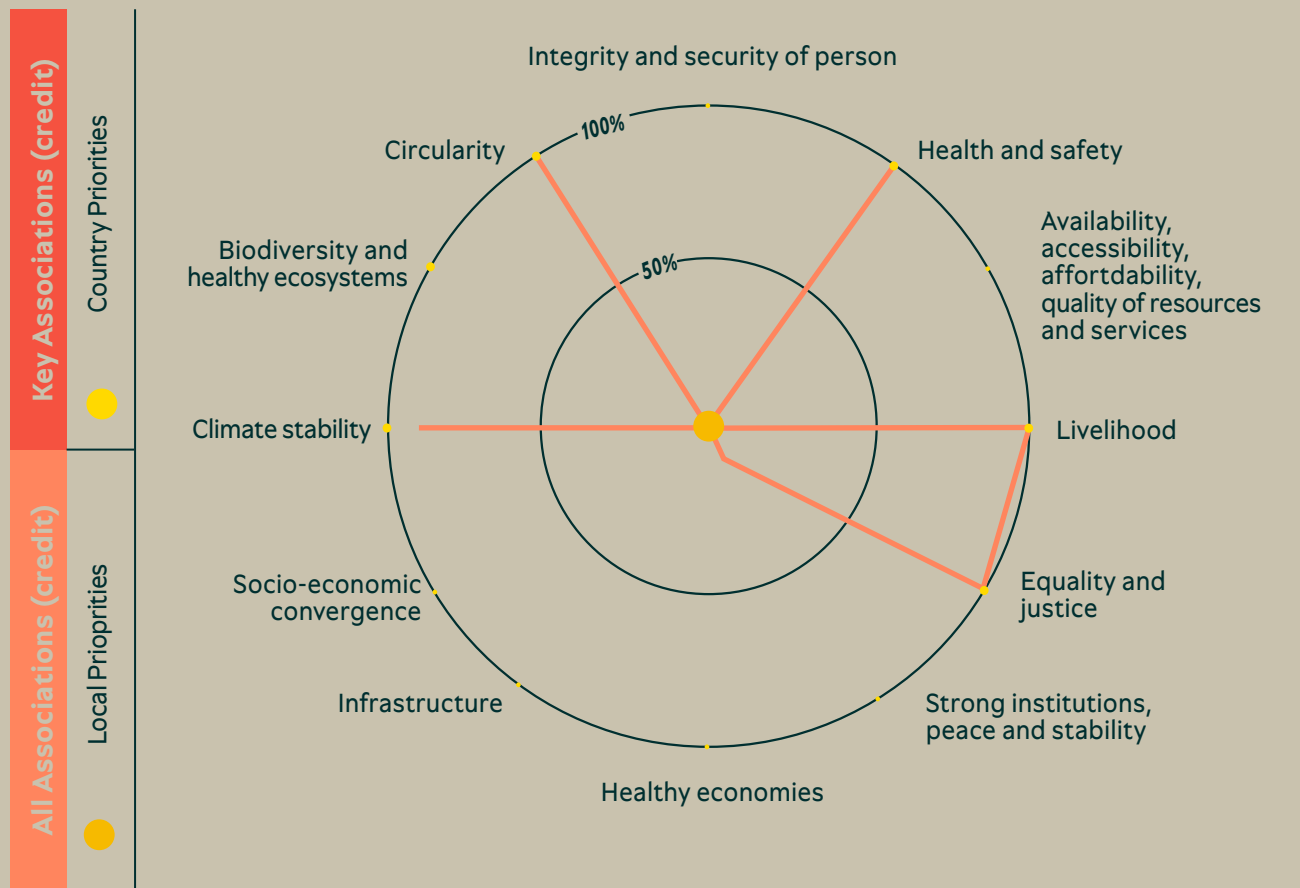
The sector of General public administration activities is the most financed in the investment banking portfolio, including 86% of the portfolio analysed. According to the methodology, this sector is strongly associated with positive impacts in the areas of: "Integrity and security of person", "Finance", "Strong Institutions, peace and stability", "Healthy economies" and "Socio-economic convergence", since governments are key players in such matters, contributing to economic convergence and securing access to justice, while enabling the economic activity of the country.

Potential negative impacts may be linked to less than 1,5% of the analysed portfolio.

Investment Banking - Positive impacts (impact areas)



Investment Banking - Negative impacts (impact areas)



d. For these (min. two prioritised 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.

Focusing on Climate and Financial Inclusion (prioritized impact areas)

Sustainability & Business Report 2023, pages: 98-99

SBTi emissions reduction targets

Climate Risk Assessment using the Climabiz Tool

Following the Impact Analysis, the needs in Greece and the strategic priorities of the organisation, Piraeus prioritises the following areas and topics as the most significant:

- Climate Stability
- Financial Health & Inclusion, focusing on Healthy Economies and Flourishing MSMEs

Climate is a strategic priority for Greece and for Piraeus Group

- Climate stability is a global high priority, also highlighted in Europe and in Greece, scoring as a high need for the country in the relevant analysis (Country Context Module).
- Addressing Climate Change is a long-term priority for Piraeus Group. Piraeus Group has started its journey to become net zero by 2050 at the latest and has defined intermediate science-based targets (by 2030). Piraeus aspires to be a market leader in Green Financing and in energy transition among Greek banks, while being the only Greek company in the Financial Times list of EU Climate Leaders for four consecutive years, since 2021.

Piraeus recorded a 74% reduction of own CO₂ emissions in the past 5 years and pursues extensive effort to reduce them even further in line with the Paris Agreement.

Climate is a highlighted area in Piraeus Impact Analysis results

- Significant proportions of the analysed business and corporate portfolio (45.5% and 65.5% respectively) may have potential negative impacts on “Climate stability”, deriving from the financing of key sectors such as Sea and coastal freight water transport, Electricity, Manufacture of refined petroleum products and Construction of roads and pathways. The most financed sector of Piraeus’ corporate portfolio is “Sea and coastal freight water transport”, which may have negative associations to Climate Stability.
- By mitigating potential negative impacts on climate stability, Piraeus can address other potential associated impacts on “Circularity” and “Biodiversity and healthy ecosystems”, where there is also a part of the Bank’s portfolio with potential negative impacts (interlinkages).

Financial Health & Inclusion (Healthy economies and Flourishing MSMEs)

Small Businesses are the backbone of Greek economy

- Healthy Economies is a high priority in Greece, scoring “4” in the Country Context Module, especially for the topic of flourishing MSMEs.
- The issue of Financial Health & Inclusion is a high priority for Piraeus Group, having signed the UNEP-FI Commitment for Financial Health & Inclusion, in the context of the Principles for Responsible Banking. The purpose is to support the most vulnerable people to have opportunities to secure and maintain their standard of living and take steps to improve their financial health, such as long-term financial planning and access to credit and insurance.

Healthy economies and Flourishing MSMEs are highlighted areas in Piraeus Impact Analysis results

- Business portfolio: 53.6% of the business portfolio has positive impacts to “Healthy economies” in Greece, leading with the highly financed sectors of Piraeus’ business portfolio, Hotels and similar accommodation, and Regulation of and contribution to more efficient operation of businesses, while no negative impacts are associated.
- Investment portfolio: 86% of the investment portfolio, derives from financing the key sector “General public administration activities” that is strongly linked to positive impacts on “Healthy economies”, enabling economic activities on the topics of Sector diversity and Flourishing MSMEs.

Piraeus publishes its progress on the Principles for Responsible Banking on an annual basis:

Principles for Responsible Banking | Piraeus Bank <https://www.piraeusbank.gr/en/idiwtes/unesp-fi>

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? ⁶

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 change mitigation	✓	Gender equality
Climate change adaptation		Decent employment
Resource efficiency & circular economy		Water
Biodiversity		Pollution
Financial health & Inclusion	✓	Other: please specify
Human rights		

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)

⁶ 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

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 targets⁷ 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 with⁸ 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.

⁷ 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.

⁸ 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.

Piraeus Group targets

Piraeus has proceeded in setting SMART targets in the two priority impact areas. i.e., Climate, and Financial Health & Inclusion, focusing on the Healthy Economy of Greece and Flourishing MSMEs.

**Sustainability & Business Report 2023,
pages: 34-35, 62-65, 85-86, 98-99, 113-114**

EU 2030 climate targets

Common Agricultural Policy 2023-2027

Greece's CAP Strategic Plan

National Energy and Climate Plan

Climate targets

In line with its Climate Strategy, Piraeus Group submitted interim science-based emission targets to the Science-Based Targets initiative (SBTi) that were validated in December 2022. The targets aim to reduce by 2030 (from 2019 base year) emissions both in operations, lending and investment portfolios accounting for well over 50% of its financed emissions, as part of Piraeus' journey to become net-zero by 2050.

C&E for Climate and Environment

Climate-related and environmental risks are potential adverse effects caused by an organisation's activities to the environment and society, as well as to its long-term viability, reputation, and brand. ESG risks, especially those related to climate, are becoming more and more relevant in the financial sector. These risks have resulted in significant losses in recent years. Subsequently, this has increased the attention of Banks to incorporating ESG risk strategy, monitoring, and measurements into their business models and that of regulators to establishing a sound supervisory framework ensuring that such risks are being well managed. Piraeus Group has in place a Sustainability Strategy to support, through its subsidiary Piraeus Bank, responsible and sustainable banking by applying criteria in its actions regarding the environment, social cohesion, and governance that balance growth and economic performance with social and environmental sustainability. The Strategy is aligned with the Paris Agreement, the UN Sustainable Development Goals (SDGs), and the UN Principles for Responsible Banking (PRB).

Piraeus' Climate targets support the global, regional, and national goals on climate change

Piraeus Group supports UN Sustainable Development Goals and has pledged to support the Paris Climate Agreement.

EU Climate Action

In 2023, the EU adopted a set of Commission proposals to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

Greece's National Energy and Action Plan

The National Energy and Climate Plan (NECP) is Greece's strategic plan for climate and energy issues, setting out a detailed roadmap regarding the attainment of specific energy and climate objectives by 2030. The NECP sets out and describes priorities and policy measures in respect of a wide range of development and economic activities intended to benefit Greek society.

Financial Health & Inclusion targets

Since 2021, Piraeus signed the UNEP-FI Commitment for Financial Health & Inclusion, in the context of the Principles for Responsible Banking. The purpose is to allow the most vulnerable, both individuals and businesses, to have opportunities to secure and maintain their standard of living and take steps to improve their financial health, such as long-term financial planning and access to credit and insurance.

Piraeus Health & Inclusion targets are aligned with regional and national policies and EU Common Agriculture Policy (CAP) 2023-2027

- The EU Common Agriculture Policy (CAP) 2023-2027 provides for several interventions specifically for young farmers. EU countries and Greece, in particular, tailor their measures to national conditions in their CAP Strategic Plans.
- Complementary income support for young farmers (CISYF) is a voluntary scheme under CAP providing enhanced income support to young farmers who are newly

set up for the first time and who are entitled to basic income support.

- More than 65,000 young farmers will benefit from setting-up support in Greece over the period 2023-2027.

Greece's CAP Strategic Plan

- The Greek agricultural sector employs approximately 400,000 people, representing 10% of employment in all sectors. The farm labor force consists mainly of family holdings.
- Unemployment in rural areas remains an issue, especially for young people, in light of the aging population.
- More than 70% of the Greek agricultural area faces natural or other specific constraints (e.g., extreme slopes, low temperatures, dryness of soil, unfavorable soil texture, borderline areas, island regions) which significantly affect farming.
- The Greek CAP Plan focuses on improving competitiveness by promoting innovation and new technologies, fostering young entrepreneurship, and securing a fair income for farmers.

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 prioritised 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, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

Impact area	Indicator code	Response
Climate change mitigation		
Financial Health & Inclusion		

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

Piraeus' baseline year for KPIs

Climate

Piraeus considers 2019 as base year for climate targets.

Financial Health & Inclusion

Piraeus considers 2021 as base year for Financial Health & Inclusion targets.

c. Smart targets [incl. key performance indicators (KPIs)⁹]

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.

⁹ Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.

Climate

Piraeus commits to:

- Become net zero by 2050 the latest, aspiring to be the first bank in Greece to do so. The journey to becoming net zero is just starting with the validation by SBTi of 2030 (with base year 2019) emission targets for its operation and for selected asset classes.
- Reduce its operational emissions (Scope 1 and Scope 2) by 73% by 2030 and to use 100% renewable energy for its Branches and administration buildings.
- Reduce financed emissions (Scope 3) by 50% by 2030 or reduce temperature scores by 2027, within 9 discrete asset classes, while committing to continue financing renewable electricity activities. Overall, the targeted reductions represent over 50% of financed emissions of the Bank's business and investment portfolios.

Sustainability & Business Report 2023, pages: 34-35, 62-65, 85-86, 98-99, 113-114

SBTi emissions reduction targets

Commitment to Financial Health & Inclusion – Summary Report

Climate Risk Assessment using the Climabiz Tool

Science-Based Targets for reducing emissions

In line with its Climate Strategy, Piraeus Group submitted interim science-based emission targets to the Science-Based Targets initiative (SBTi), that were validated in December 2022. The targets aim to reduce by 2030 (with 2019 as the base year) emissions both in operations, lending, and investment portfolios accounting for well over 50% of its financed emissions, as part of Piraeus' journey to become net zero by 2050.

Piraeus adopted the SBTi methodology as science-based targets provide a clearly defined pathway for financial institutions to reduce greenhouse gas (GHG) emissions, helping prevent the worst impacts of climate change and future-proof business growth.

In 2024, Piraeus will review and ramp up its targets by:

- Defining and adopting 1.5 °C pathways.
- Preparing the validation process of net-zero targets.
- Supporting and advising clients in their transition to a low-carbon environment – the Group supports its clients in their own climate transition journeys and focuses on supporting clean technologies economy, leading the market in terms of related commercial strategies.
- Further engaging with large corporates from high-emitting economic sectors concerning the need for implementing emissions reduction targets if required.
- Applying specific measures for the energy transition of its corporate portfolio, according to the existing strategy.
- Achieve positive impact on climate action through financing.
- Focus on sectors that are carbon-intensive, measure whether financing is aligned with target ambition and business decisions, and work with clients to collectively address the effects of climate change.

SBTi Annual Target Progress

Operations	GHG emissions Scope 1 & 2 (tCO _{2eq}) (base year 2019)	GHG emissions Scope 1 & 2 (tCO _{2eq}) (target year 2030)	GHG emissions reduction (%)	Actual GHG emissions (2022)	Actual GHG emissions (2023)	Actual GHG emissions reduction % (2023)	
Direct and indirect GHG emissions from Branches and administrative buildings	7,880	2,136	-73%	2,083	1,238	-84%	✓*
Continue annually sourcing 100% renewable electricity through 2030							
Portfolios under the Sectoral Decarbonisation Approach***	GHG emissions intensity (base year 2019) in kg CO ₂ /m ²	GHG emissions intensity (target year 2030) in kg CO ₂ /m ²	GHG emissions reduction (%) per m ²	Expected GHG emissions intensity (2023) in kg CO ₂ /m ²	Actual GHG emissions intensity (2023) in kg CO ₂ /m ²	Deviation from expected intensity	
Commercial Real Estate Loans in residential buildings managed by companies	34	17	-50%	28	27	-3%	✓
Commercial Real Estate Loans in commercial buildings managed by companies	59	25	-58%	46	34	-26%	✓
Commercial RE investments in residential buildings	33	16	-50%	27	27	0	✓
Commercial RE investments in commercial buildings	71	30	-58%	56	43	-23%	✓
Investments in listed REITS (RE companies)	59	25	-58%	46	42	-11	✓
Investments in bonds issued by companies active in the electricity production	0.66t CO ₂ /MWh	0.34t CO ₂ /MWh	-49%	0.54t CO ₂ /MWh	0.72t CO ₂ /MWh	33%	[]**
Electricity generation sector: continue financing and investing only in renewable electricity activities							✓
Portfolios under the Temperature Rating Method	Portfolio temperature score (base year 2019)	Portfolio temperature score (target year 2027)	Temperature reduction per annum	Actual temperature score for 2022	Expected temperature score for 2023	Actual temperature score for 2023	
Investment in listed stocks	2.83°C	2.42°C	-0.051°C	3.19°C	2.62°C	1.82°C	✓
Long-term (>1 year) loans (for large corporates with >500 employees)	2.85°C	2.43°C	-0.052°C	2.56°C	2.64°C	2.37°C	✓
Investment in corporate bonds of listed companies	1.83°C	1.80°C	-0.004°C	2.26°C	1.81°C	2.59°C	[]

* On track to achieve 2030 target

** Continue working in order to achieve targets

*** The portfolio includes loans from both Piraeus Bank and Piraeus Leasing

GHG Emissions

	2023	2022	2022-2023 Trend
Direct emissions CO _{2,eq} (tonnes) - Scope 1	1,238.41 ¹	2,083.36 ²	-40.6%
Indirect emissions CO _{2,eq} (tonnes) - Scope 2 (location-based) ³	13,629.87 ¹	15,026.83 ²	-9.3%
Indirect emissions CO _{2,eq} (tonnes) - Scope 2 (market-based) ⁴	0.00 ⁵	0.00 ⁶	-
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 1- Purchased goods and services)	10,629.98	17,411.75	-39.0%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 3- Fuel and energy related activities)	4,282.27	4,508.11	-5.0%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 4- Upstream transportation and distribution)	224.40	280.09	-19.9%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 5- Waste generated in operations)	131.64	127.89	2.9%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 6- Business travel)	4,546.35	3,704.90	22.7%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 7- Employee commuting)	6,148.02	7,113.96	-13.6%
Total Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Categories 1-14)	25,961.66	33,146.70	-21.7%
Total emissions CO _{2,eq} (tonnes) - Scope 1, 2 (location-based), Scope 3 (Categories 1-14)	40,829.94 ¹	50,256.89 ²	-18.8%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Equity investments) (financed S1+S2 emissions)	38,267.52	148,265.07	-74.2%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Equity investments)(financed S3 emissions) ⁷	64,158.11	-	-
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Mortgages) (financed S1+S2 emissions)	66,759.06	67,396.74	-0.9%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Commercial Real Estate loans and investments) (financed S1+S2 emissions) ⁸	66,569.42	47,304.60	40.7%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Corporate loans) (financed S1+S2 emissions) ⁹	4,339,832.49	2,882,892.03	50.5%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Corporate loans) (financed S3 emissions)	10,846,866.95 ¹⁰	1,946,507.94 ¹¹	457.2%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- sovereign bonds and loans) (financed S1 emissions) ¹²	2,397,132.22	4,461,448.02	-46.3%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Motor vehicle loans) (financed S1+S2 emissions)	24,917.16	26,771.47	-6.9%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Corporate bonds) (financed S1+S2 emissions)	280,885.22	265,439.50	5.8%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Corporate bonds) (financed S3 emissions) ⁷	406,739.70	-	-
Total Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15) (financed S1+S2 emissions)	7,214,363.09	7,899,517.43	-8.7%
Total Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15) (financed S1+S2+S3 emissions) ¹³	18,532,127.85	9,846,025.37	88.2%

¹ The following Global Warming Potential (GWP) coefficients have been used for the conversion of emissions estimates into the common unit of CO_{2,eq}: 1 for CO₂, 28 for CH₄ and 265 for N₂O.

For details see: Table 1.3 Greece – National Inventory Report 2023.

² The following Global Warming Potential (GWP) coefficients have been used for the conversion of emissions estimates into the common unit of CO_{2,eq}: 1 for CO₂, 28 for CH₄ and 265 for N₂O.

For details see: Table 1.3 Greece – National Inventory Report 2022.

³ Source of data used for the calculation of CO₂, CH₄, N₂O emission estimates: the national GHG inventory and the national energy balance on the final electricity consumption and the electricity consumption of the energy sector in n-2 year (where "n" is the referenced year).

⁴ For data calculation, GOs have been taken into account according to L.4951/2022 and Ministerial Decision YPEN/DAPEEK/81331/3661 (FEK B' 4246/10.08.2022) and cover 100% of total electricity consumption from the grid.

⁵ The Bank has acquired GOs for 35,295 MWh.

⁶ The Bank has acquired GOs for 38,900 MWh.

⁷ The specific indicator was calculated for the first time in 2023.

⁸ CRE investments concern only Piraeus Bank's owned properties. The data regarding CRE Investments is up to 30.09.2022 and 2023 respectively, as, at the time of writing, the data was not available until 31.12 of the referenced year.

⁹ Not including loans provided to CRE companies.

¹⁰ S3 emissions refer to Scope 3 emissions of all counterparties.

¹¹ S3 emissions refer to sectors with required Scope 3 emissions inclusion as defined by the EU TEG and according to PCAF 2022 methodology.

¹² Financed emissions are related only to S1 emissions of the country since, based on PCAF requirements, the approach allows to account for production emissions as defined by UNFCCC national emissions inventory (Scope 1).

¹³ S3 emissions were calculated for the first time in 2023 for equity investments and corporate bonds.

Financial Health & Inclusion

Since 2021, Piraeus signed the UNEP-FI Commitment for Financial Health & Inclusion, in the context of the Principles for Responsible Banking. The purpose is to allow the most vulnerable, both individuals and businesses, to have opportunities to secure and maintain their standard of living and take steps to improve their financial health, such as long-term financial planning and access to credit and insurance.

Piraeus was a member of a report published in July 2023, which consolidated the targets initially set by 20 out of the 34 banks in the Commitment, aiming to shift their portfolios to include vulnerable groups in their markets of operation, advance financial inclusion beyond basic banking products, and enhance the financial resilience and well-being of their customers. According to its first target announced, Piraeus will provide at least 3,000 young farmers with effective access to loans, to start or continue their own farmer business and remain in rural areas. Farmers and the agricultural production are of high priority for Piraeus.

Piraeus Health & Inclusion targets are aligned with regional and national policies and EU Common Agriculture Policy (CAP) 2023-2027

- The EU Common Agriculture Policy (CAP) 2023-2027 provides for several interventions specifically for young farmers. EU countries and Greece, in particular, tailor their measures to national conditions in their CAP Strategic Plans.
- Complementary income support for young farmers (CISYF) is a voluntary scheme under CAP providing enhanced income support to young farmers who are newly set up for the first time and who are entitled to basic income support.
- More than 65,000 young farmers will benefit from setting-up support in Greece over the period 2023-2027.

Greece's CAP Strategic Plan

- The Greek agricultural sector employs approximately 400,000 people, representing 10% of employment in all sectors. The farm labor force consists mainly of family holdings.
- Unemployment in rural areas remains an issue, especially for young people, in light of the aging population.
- More than 70% of the Greek agricultural area faces natural or other specific constraints (e.g., extreme slopes, low temperatures, dryness of soil, unfavorable soil texture, borderline areas, island regions) which significantly affect farming.
- The Greek CAP Plan focuses on improving competitiveness by promoting innovation and new technologies, fostering young entrepreneurship, and securing a fair income for farmers.

Piraeus commitment to support young farmers and MSMEs

In the context of this commitment, Piraeus has established an internal working group, aiming to fully analyze the needs of Greece in the area of Financial Health & Inclusion and to better identify associated impacts from its actions.

Piraeus Bank has disbursed more than €50 million in funding to more than 4,000 young farmers in 2023 in Greek rural areas. Funding enabled young farmers to benefit from competitive financing terms in order to address their specific needs. It covered investment plans (subsidized or not) and liquidity needs with a range of products and services that helped young farmers grow their farm business.

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.

Business Plan 2024-2026

Piraeus Group announced its business plan aspirations for 2024-2026 in February 2024. The Group's strategy is based on its role as a catalyst of growth and innovation for the Greek economy by funding viable investment plans, offering liquidity to businesses, supporting its customers and people, and continuing to generate value for its shareholders. Piraeus Bank has been working hard in the last few years to create a solid, de-risked, and sustainably profitable bank. Building on the successful completion of Project Sunrise in 2021 and the strategic measures taken in 2022 and 2023 to boost Piraeus Bank's profitability profile, the 2024-2026 business plan sets clear strategic goals for the medium term. These measures are aimed at increasing stakeholders' trust in the potential of the Group's franchise, representing a significant progress in the Group's dedication to sustained growth and stability. Besides the financial performance objectives, the Group is actively pursuing new commercial and strategic measures. These measures include a stronger focus on wealth asset management, real estate management, energy transition business development, and exploiting digital ecosystem commercial opportunities. At the same time, the Group is improving its digital offering and value proposition. The Energy Transition Project consists of a specific commercial programme/action plan, which will enable the Group to take a leading role in its clients' transformation in order to build a better and more sustainable economy. The Group will use a structured approach and develop a deep understanding of the particular needs of each sector with priority focus on power generation, real estate/buildings, and agriculture, as well as customised approaches to assist small businesses and individuals. Beyond financial performance, the Group is committed to promoting sustainable banking. The Group is systematically setting up the infrastructure, policies, and strategies that incorporate ESG criteria into its operations. This commitment aligns with the Group's aim to contribute maximally to the targets of the Paris Climate Agreement and the United Nations' Sustainable Development Goals (SDGs).

Moreover, the Group has incorporated several actions related to C&E aspects in its Business Plan, aiming to ensure that its future business model and portfolio will be diversified and aligned with its net-zero strategy. The Group has included its commitment in its Business Plan to develop sustainable products, measuring specific indicators (e.g., sustainable loan disbursements, green asset ratio, % of eligible activities, etc.) and setting relevant targets. In this direction, Piraeus Group presented its updated business plan estimates for the period 2024-2026. The goal for 2030 is to increase its sustainable financing from €2.7 billion to over €10 billion. It also aims to boost its green funding from €0.5 billion to more than €5 billion. Additionally, it expects to raise its sustainable assets under management from €0.3 billion to above €1.5 billion.

Energy Transition

Climate & ESG roadmap and strategy

Greece would need to abate approximately 80 megatons of carbon dioxide equivalent. On this net-zero pathways, abatement occurs in every sector.

It is essential to be able to address the structural challenges of individual sectors and the timing mismatch between investments and returns to facilitate strategic investments in new technologies.

The leading sector would be the power sector. It would mainly decarbonise by replacing lignite, primarily with RES. The proportion of power generated from renewable sources would increase steadily to 97% of the generation mix by 2050. By 2050 the transition to a net-zero economy would have a major impact on every sector.

As the power sector decarbonises, it would more than double its energy output helping other sectors decarbonise.

The truth of the matter is that every sector will follow a different pace – collectively, the power, transport and industry sectors account for nearly 80% of Greece's decarbonisation. Buildings, waste and agriculture would abate 15%.

The power, waste and buildings sectors would advance the fastest with energy sector fully decarbonised and building almost there in 2050. Transport would begin more slowly and accelerate its transition more rapidly in the next decade after 2030.

Agriculture currently emits approximately 8.4 Mt CO₂ approximately 10% of Greek GHG emissions. Two prominent sources are responsible for 80% of agricultural emissions: enteric fermentation causes 44%, while emissions released from soils account for 37%. The remaining 20% of agricultural emissions come from manure and equipment use.

Several challenges stand in the way of agriculture transitioning to a net-zero target. Farmland is geographically fragmented with many small landholders. There are more than approximately 700,000 farmers in Greece averaging 7 hectares. This fragmentation makes it hard to roll out emission reduction initiatives at scale.

Second, it can be difficult to influence farmers to adopt new ways of farming that produce lower emissions. The Greek farming culture typically values continuity and, furthermore, has limited exposure to the science and practices of reducing emissions, and even among farmers who wish to pursue lower emissions.

With the vast majority of agricultural abatement actions likely to cost less than €100 per tCO₂, 70% of abatement efforts in the sector should be cost positive or neutral.

Incentives are needed for the Greek agriculture sector to embrace new sustainable farming practices and tools.

Transition finance is critical to the net-zero transition, driving capital and investment towards reducing emissions in hard-to-abate sectors with credible transition plans. However, challenges to mobilising transition finance remain, including concerns about greenwashing, lack of market standardisation, and risk of carbon lock-in.

Enabling the transition of hard-to-abate sectors requires Piraeus to work closely with

clients to understand their needs and progress on decarbonisation, encourage ambitious transition plans, and help develop strategies and provide solutions for their transition, with approaches tailored by sector and region to address the unique challenges, opportunities, and context of each.

Piraeus has committed to becoming net zero by 2050 the latest and aspires to be the first bank in Greece to do so. The journey to becoming net zero is just starting with the validation by SBTi of 2030 (with base year 2019) emission targets for its operation and for selected asset classes.

Development and Sustainable Banking/Financial Institutions

Piraeus Bank, in alignment with its commitment to sustainability and following the guidelines of the Principles of Responsible Banking, consistently strengthens its product portfolio with a focus on promoting Sustainable Banking. This includes fostering collaborations and initiatives as part of Development Banking. These activities are coordinated by various Bank units and subsidiaries under the guidance and decisive contribution of the specialised Development and Sustainable Banking/Financial Institutions (DSB) Unit. DSB designs products and services to finance and support innovative sustainable ideas, environmentally and socially conscious initiatives, and financial inclusion projects. Additionally, it conducts sustainability assessments and evaluates environmental, social, and climate risks associated with business loans and obligors. The Unit's scope also includes the handling of relations with both the domestic and the international banking community via the dedicated Financial Institutions departments: Financial Institutions Relations and Financial Institutions Analysis. Piraeus Bank Frankfurt Branch, the only Piraeus Bank Branch in Central Europe, operates under the oversight of the Unit, promoting the Bank's business operations abroad.

Among its responsibilities, DSB manages the Bank's relations with international and Greek development institutions, such as the Hellenic Development Bank (HDB), the European Investment Bank (EIB), and the European Investment Fund (EIF). DSB works closely with these institutions to design and implement banking products. Capitalising on these collaborations and driven by Sustainable Finance concerns, DSB created a wide range of financing tools, adapted to the permanent needs of Greek businesses, promoting their investment strategies and, thereby, satisfying their liquidity requirements.

In this context, in 2023, Piraeus Bank:

- Developed specialised products and services, in collaboration with Greek and international development organisations (e.g., guarantee and risk-sharing products) to facilitate the access of businesses to financing.
- Offered direct financing and assistance to support companies in advancing the UN SDGs and in aligning with the objectives of the Paris Agreement on Climate Change, notably by promoting RES investments.
- Continued to incorporate ESG criteria in select loan products, with a focus on enhancing the overall sustainability profile of its corporate clientele.

Finally, DSB served as the primary liaison with the Greek government on issues related to the Recovery and Resilience Facility (RRF), especially its loan component, another key funding programme that has already mobilised new investments.

EIB Agriculture and Bioeconomy

In early 2020, Piraeus Bank engaged in a financing programme of €100 million under the EIB Agriculture and Bioeconomy programme to accelerate the use of new technologies, enhance the quality of agricultural products, and empower Greek agriculture and agribusiness to better serve both domestic and international markets. SMEs in the agricultural sector receive at least 70% of the total amount, and at least 10% of the funds are directed to young farmers' sole proprietorships or legal entities controlled by young farmers.

EQUALL Programme

Being at the centre of the Bank's Corporate Social Responsibility initiatives, is the pioneering EQUALL – For a Society of Equal People programme, which aims to eliminate social inequalities, discrimination, social exclusion, and gender bias experienced by women and other social groups, such as the disabled, vulnerable young people, children, students in remote areas of the country, and refugees. In addition, the programme invests in empowering the younger generation with the necessary skills to achieve their personal and professional goals.

EQUALL initiatives focus on education, training, acquisition and enhancement of skills, creating equal opportunities for all men and women to evolve, develop, and become self-sufficient in respectable and dignified conditions.

Specifically, EQUALL develops initiatives in 4 pillars:

- Gender Equality
- Children Welfare
- New Generation
- Vulnerable Social Groups

Project Future Corporate Responsibility Programme

In 2023 and for another year, Piraeus Bank in partnership with ReGeneration –the largest training and paid employment programme for young graduates in Greece– implemented another cycle of the Project Future corporate responsibility programme.

Project Future is addressed to university graduates up to 29 years of age, with 0 to 3 years of work experience and participation in non-academic activities. It provides free training and specialisation in professional and personal skills, bringing participants into contact with the ReGeneration network –which counts over 2,000 partnered enterprises– so that they can find jobs related to their interests.

After applying to join the programme, candidates are evaluated in two stages: a psychometric skills and personality test in the form of gamification, and behavioural interviews with Greek business executives.

In 2023, the tenth programme cycle was carried out both in person and online, with participants joining from all over Greece. The programme hosted distinguished speakers and carefully selected panellists provided three interactive presentations of special interest: an alumni panel, composed of alumni of previous cycles, an HR panel of HR professionals, and a CEO panel made up of C-Suite executives. Also very useful were

talks given by career advisors, who provided tips and instructions on how to prepare oneself as a job candidate.

Piraeus Bank's goals are to:

- make young people even more competitive in the job market – in spite of their little or no experience– by offering them specialised training courses in key pillars of the Greek market;
- meet the companies' need for finding young talented people who will bring added value to their workforce; and
- make a significant contribution to combating unemployment and enhancing training.

The overall results of the Project Future programme for all ten cycles (October 2018 – February 2024)

5,781 young women and men were trained through Project Future and ReGeneration, developing their professional skills

1,946 of these young women and men attended one of the specialised Project Future training courses

57 academies were held in key business and technology fields

67,700 hours of training in soft and business skills and 178,215 training hours in hard skills were completed

3,304 graduates of Project Future and ReGeneration training courses have found jobs –to date– in the Greek job market

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: Climate	second area of most significant impact: Financial Health & Inclusion	(If you are setting targets in more impact areas) your third (and subsequent) area(s) of impact: ... (please name it)
Alignment	✓ Yes	✓ Yes	Yes
	In progress	In progress	In progress
	No	No	No
Baseline	✓ Yes	✓ Yes	Yes
	In progress	In progress	In progress
	No	No	No
Smart targets	✓ Yes	✓ Yes	Yes
	In progress	In progress	In progress
	No	No	No
Action plan	✓ Yes	✓ Yes	Yes
	In progress	In progress	In progress
	No	No	No

2.3 Target implementation and monitoring

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.

Climate
Financial Health & Inclusion

Sustainability & Business Report 2023,
pages: 34-35, 98-99, 113-114

Climate

Piraeus Bank has a longstanding track record for implementing actions that protect the environment and support sustainable development. In February 2024, along with its business plan targets for the period 2024-2026, Piraeus Group disclosed its Sustainability Roadmap with guidance for 2026 and its aspirations for 2030.

Sustainability Roadmap under formulation to structure the direction of travel			
	2023	2026 guidance	2030 aspiration
Sustainable banking			
Sustainable financing volumes	€2.7bn	>€5.0bn	>€10.0bn
Green funding (deposits and bonds)	€0.5bn	>€1.5bn	>€5.0bn
Sustainable assets under management	€0.3bn	>€0.6bn	>€1.5bn
Clients			
Net promoter score	25%	>26%	>28%
Percentage of digitized services	73%	~80%	~85%
Corporate and SME clients with energy transition plans	10%	>25%	>50%
People			
Average compensation per employee (% of market average)	~80%	~95%	~100%
Training hours per employee per year	43	~60	~60
Gender pay gap (delta between average male/female comp per level)	€3.3mn	€0mn	€0mn
Portfolio decarbonisation			
Green asset ratio - EU taxonomy alignment (turnover/capex)	~1% / ~3%	tbd	tbd
EU taxonomy eligibility (turnover/capex)	~22% / ~24%	~30%	~40%
Mortgages carbon intensity (kgr CO ₂ per m ²)	25	~21	~16
CO ₂ financed emissions (Mt CO ₂)	8	SBTi	SBTi
Governance			
Weight of sustainability in LT variable remuneration	10%	~20%	~20%
Data – actual emissions info (% of total for corporate and SMEs)	33%	>75%	>90%
Data – actual EPC info (% on collateralized value)	8%	>25%	>90%
MSCI ESG rating	A	AA	AAA

SBTi Annual Target Progress

Operations	GHG emissions Scope 1 & 2 (tCO _{2eq}) (base year 2019)	GHG emissions Scope 1 & 2 (tCO _{2eq}) (target year 2030)	GHG emissions reduction (%)	Actual GHG emissions (2022)	Actual GHG emissions (2023)	Actual GHG emissions reduction % (2023)	
Direct and indirect GHG emissions from Branches and administrative buildings	7,880	2,136	-73%	2,083	1,238	-84%	✓*
Continue annually sourcing 100% renewable electricity through 2030							
Portfolios under the Sectoral Decarbonisation Approach***	GHG emissions intensity (base year 2019) in kg CO ₂ /m ²	GHG emissions intensity (target year 2030) in kg CO ₂ /m ²	GHG emissions reduction (%) per m ²	Expected GHG emissions intensity (2023) in kg CO ₂ /m ²	Actual GHG emissions intensity (2023) in kg CO ₂ /m ²	Deviation from expected intensity	
Commercial Real Estate Loans in residential buildings managed by companies	34	17	-50%	28	27	-3%	✓
Commercial Real Estate Loans in commercial buildings managed by companies	59	25	-58%	46	34	-26%	✓
Commercial RE investments in residential buildings	33	16	-50%	27	27	0	✓
Commercial RE investments in commercial buildings	71	30	-58%	56	43	-23%	✓
Investments in listed REITS (RE companies)	59	25	-58%	46	42	-11	✓
Investments in bonds issued by companies active in the electricity production	0.66t CO ₂ /MWh	0.34t CO ₂ /MWh	-49%	0.54t CO ₂ /MWh	0.72t CO ₂ /MWh	33%	[]**
Electricity generation sector: continue financing and investing only in renewable electricity activities							✓
Portfolios under the Temperature Rating Method	Portfolio temperature score (base year 2019)	Portfolio temperature score (target year 2027)	Temperature reduction per annum	Actual temperature score for 2022	Expected temperature score for 2023	Actual temperature score for 2023	
Investment in listed stocks	2.83°C	2.42°C	-0.051°C	3.19°C	2.62°C	1.82°C	✓
Long-term (>1 year) loans (for large corporates with >500 employees)	2.85°C	2.43°C	-0.052°C	2.56°C	2.64°C	2.37°C	✓
Investment in corporate bonds of listed companies	1.83°C	1.80°C	-0.004°C	2.26°C	1.81°C	2.59°C	[]

* On track to achieve 2030 target

** Continue working in order to achieve targets

*** The portfolio includes loans from both Piraeus Bank and Piraeus Leasing

GHG Emissions

	2023	2022	2022-2023 Trend
Direct emissions CO _{2,eq} (tonnes) - Scope 1	1,238.41 ¹	2,083.36 ²	-40.6%
Indirect emissions CO _{2,eq} (tonnes) - Scope 2 (location-based) ³	13,629.87 ¹	15,026.83 ²	-9.3%
Indirect emissions CO _{2,eq} (tonnes) - Scope 2 (market-based) ⁴	0.00 ⁵	0.00 ⁶	-
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 1- Purchased goods and services)	10,629.98	17,411.75	-39.0%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 3- Fuel and energy related activities)	4,282.27	4,508.11	-5.0%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 4- Upstream transportation and distribution)	224.40	280.09	-19.9%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 5- Waste generated in operations)	131.64	127.89	2.9%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 6- Business travel)	4,546.35	3,704.90	22.7%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 7- Employee commuting)	6,148.02	7,113.96	-13.6%
Total Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Categories 1-14)	25,961.66	33,146.70	-21.7%
Total emissions CO _{2,eq} (tonnes) - Scope 1, 2 (location-based), Scope 3 (Categories 1-14)	40,829.94 ¹	50,256.89 ²	-18.8%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Equity investments) (financed S1+S2 emissions)	38,267.52	148,265.07	-74.2%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Equity investments)(financed S3 emissions) ⁷	64,158.11	-	-
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Mortgages) (financed S1+S2 emissions)	66,759.06	67,396.74	-0.9%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Commercial Real Estate loans and investments) (financed S1+S2 emissions) ⁸	66,569.42	47,304.60	40.7%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Corporate loans) (financed S1+S2 emissions) ⁹	4,339,832.49	2,882,892.03	50.5%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Corporate loans) (financed S3 emissions)	10,846,866.95 ¹⁰	1,946,507.94 ¹¹	457.2%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- sovereign bonds and loans) (financed S1 emissions) ¹²	2,397,132.22	4,461,448.02	-46.3%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Motor vehicle loans) (financed S1+S2 emissions)	24,917.16	26,771.47	-6.9%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Corporate bonds) (financed S1+S2 emissions)	280,885.22	265,439.50	5.8%
Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15- Corporate bonds) (financed S3 emissions) ⁷	406,739.70	-	-
Total Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15) (financed S1+S2 emissions)	7,214,363.09	7,899,517.43	-8.7%
Total Indirect emissions CO _{2,eq} (tonnes) - Scope 3 (Category 15) (financed S1+S2+S3 emissions) ¹³	18,532,127.85	9,846,025.37	88.2%

¹ The following Global Warming Potential (GWP) coefficients have been used for the conversion of emissions estimates into the common unit of CO_{2,eq}: 1 for CO₂, 28 for CH₄ and 265 for N₂O.

For details see: Table 1.3 Greece – National Inventory Report 2023.

² The following Global Warming Potential (GWP) coefficients have been used for the conversion of emissions estimates into the common unit of CO_{2,eq}: 1 for CO₂, 28 for CH₄ and 265 for N₂O.

For details see: Table 1.3 Greece – National Inventory Report 2022.

³ Source of data used for the calculation of CO₂, CH₄, N₂O emission estimates: the national GHG inventory and the national energy balance on the final electricity consumption and the electricity consumption of the energy sector in n-2 year (where "n" is the referenced year).

⁴ For data calculation, GOs have been taken into account according to L.4951/2022 and Ministerial Decision YPEN/DAPEEK/81331/3661 (FEK B' 4246/10.08.2022) and cover 100% of total electricity consumption from the grid.

⁵ The Bank has acquired GOs for 35,295 MWh.

⁶ The Bank has acquired GOs for 38,900 MWh.

⁷ The specific indicator was calculated for the first time in 2023.

⁸ CRE investments concern only Piraeus Bank's owned properties. The data regarding CRE Investments is up to 30.09.2022 and 2023 respectively, as, at the time of writing, the data was not available until 31.12 of the referenced year.

⁹ Not including loans provided to CRE companies.

¹⁰ S3 emissions refer to Scope 3 emissions of all counterparties.

¹¹ S3 emissions refer to sectors with required Scope 3 emissions inclusion as defined by the EU TEG and according to PCAF 2022 methodology.

¹² Financed emissions are related only to S1 emissions of the country since, based on PCAF requirements, the approach allows to account for production emissions as defined by UNFCCC national emissions inventory (Scope 1).

¹³ S3 emissions were calculated for the first time in 2023 for equity investments and corporate bonds.

Green Products

Total financing to individuals and companies for sustainability purposes, energy transition, and green investments amounts to €2.69 billion (active loan balances at the end of 2023). Most of the loans have financed renewable energy projects including photovoltaic systems, wind farms, small hydroelectric plants, and biomass/biogas projects. €103 million of these financings have been given to individuals while approximately €2.59 billion to businesses. Green financings constitute 1.3% of Piraeus Bank Group's retail portfolio and 11.4% of the business portfolio.

Piraeus' commitment to support young farmers and MSMEs

In the context of this commitment, Piraeus has established an internal working group, aiming to fully analyze the needs of Greece in the area of Financial Health & Inclusion and to better identify associated impacts from its actions.

Piraeus Bank has disbursed more than €50 million in funding to more than 4,000 young farmers in 2023 in Greek rural areas. Funding enabled young farmers to benefit from competitive financing terms in order to address their specific needs. It covered investment plans (subsidized or not) and liquidity needs with a range of products and services that helped young farmers grow their farm business.

*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.*

Clients and Customers

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers¹⁰ 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 activities).¹¹ 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).

¹⁰ 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.

¹¹ Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

**Piraeus Group Sustainable
Development Policy,
Energy Transition Business,
SFF,
GBF,
SLLF**

**Sustainability & Business Report 2023,
pages: 79, 113-114, 143-144**

Green banking Solutions

Farm Business

Economy

To support its sustainable finance and meet emission reduction targets, Piraeus Group has developed:

- A dedicated Sustainable Finance Framework (SFF) that aims to establish a clear and comprehensive methodology for identifying sustainable financing, facilitating thus the monitoring of the Bank's performance against sustainability-related strategic aspirations and targets. In this context, the following three major categories of sustainable financing are defined:
 - Sustainable financing based on regulatory definitions (i.e., RRF Green Transition Pillar/ Official Sector Programmes that embed EU Taxonomy alignment criteria and EU Taxonomy-aligned financings).
 - Transition finance based on regulatory definitions.
 - Other types of sustainable financing based on internal definitions established by the Bank (e.g., other official sector programmes not aligned with EU Taxonomy, and financings with positive SDG contribution or financings towards ESG pure players).
- A revised Green Bond Framework to include EU Taxonomy-aligned criteria, under which the Group issues green bonds to finance low-carbon economy transition in Greece. The Framework aims to consider, where feasible and at on a best effort basis, eligibility criteria based on the Regulation (EU) on Green Bonds and optional disclosures for bonds marketed as environmentally sustainable and for sustainability-linked bonds.

A Sustainability Linked Loans Framework for loan instruments in which economic characteristics can vary depending on whether the borrower achieves predetermined sustainability performance objectives.

Supporting our clients through their Energy Transition

Piraeus Group has launched its Energy Transition Project as a concrete commercial programme/action plan, which will allow Piraeus to assume a frontrunning role in its clients' transformations to building a better and more sustainable Greek economy. Piraeus will leverage a structured approach and its deep understanding of the specific needs of each sector with priority focus on power generation, real estate/buildings, and agriculture and promote a tailor-made approach to support small businesses and individuals.

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.).

- Piraeus EQUALL 360°
- Piraeus Culture and Creativity 360°

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Piraeus EQUALL 360°

Piraeus Culture and Creativity 360°

Sustainability-linked loans

As part of its strategy for supporting the sustainable development of the Greek economy, in 2023, Piraeus Bank continued providing targeted financing that incorporates performance indicators related to environmental, social, and governance (ESG) issues, actively supporting the connection of growth and economic efficiency with social and environmental sustainability.

Sustainability-linked loans are financial instruments that incentivise corporate clients to achieve agreed targets that improve their ESG performance. These targets must be clear, measurable, material, and aligned with the client's overall sustainability strategy and action plan.

In 2023, taking into account the current ESG regulatory environment and aiming to support corporate clients that set sustainability targets for their operations, Piraeus Bank formulated its Sustainability-linked loans Framework. This framework was created on the basis of the principles of Sustainability-Linked Financing of the Loan Market Association (LMA) and the International Capital Market Association (ICMA), while additional guidance was provided by analysing relevant international standards such as the European Sustainability Reporting Standards (ESRS), the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), the Task Force on Climate Related Financial Disclosures (TCFD), and the United Nations Global Compact (UNGC). The framework describes in detail the appropriate process for the origination of a sustainability-linked loan.

In 2023, Piraeus Bank continued to integrate ESG criteria in the lending process for mid-caps, prompting its customers to achieve measurable targets related to:

- energy efficiency improvements;
- CO₂ emissions reductions;
- efficient water usage;
- reduction and management of manufacturing waste; and
- recycling increases, as well as additional targets focusing on: labour issues, such as increased training and percentage of women employed.

The Bank's objective is to promote the environmental and social responsibility of businesses, supporting their transition path to a model of sustainable development, and leveraging appropriate funding instruments that promote the green transition of Greek society. The reduction of the clientele's business climate risk is also something that the Bank intends to support with targeted green financing. Recent legislative developments and voluntary emission reduction targets set by businesses have also led the Bank to formulate a coherent climate strategy regarding its corporate lending portfolio. As of 31/12/2023, the total amount of signed agreements exceeded €650 million.

Climate Risk Assessment of Piraeus Bank's Business Borrowers

The Bank estimates, through the Climabiz tool, the climate related risks (both physical and transition) of its business borrowers (bottom-up approach) based on their general operational and technical features (i.e. field of activity), for those economic sectors considered to be mostly affected by climate change and translates climate change impact to monetary terms. The calculation methodology is based on the utilisation of three climatic Representative Concentration Pathways (RCP) scenarios of the IPCC (Intergovernmental Panel on Climate Change).

Packages of products and services linked to Corporate Social Responsibility

- Piraeus EQUALL 360°: an integrated proposal of products and services that supports social equality and equal access of women to the business world.
- Piraeus Culture and Creativity 360°: designed during the pandemic (Covid-19) to support businesses in the sector of the arts and culture.

Aiming at the holistic support of the needs of businesses active in selected sectors of the economy, as well as the support of female entrepreneurship, targeted actions were taken to enhance Piraeus Equal 360° and other offerings of product and service packages.

Piraeus EQUALL 360° – For women entrepreneurs

With a view to enhancing social equality and equal access of women to the business world, Piraeus Bank created and offers the Piraeus EQUALL 360° programme, an integrated proposal of products and services with special pricing and privileges exclusively for women entrepreneurs.

In September 2022, Piraeus EQUALL 360° also included women entrepreneurs active in the agricultural sector. Especially for women farmers, whose role, both individually and collectively, is multidimensional and crucial for the development of the agricultural sector and the making of the future, within the framework of Piraeus EQUALL 360°, Piraeus makes good use of opportunities offered for their support.

The package offers women entrepreneurs products and services with special benefits in 4 pillars:

- Developing my Business
- Managing my Business
- Insuring my Business
- Making my Business more competitive

In addition, the specialised products of Agricultural Banking ("Open loan for farmers", "Land and equipment", "Loan to support new/newcoming farmers") were added to the "Developing my business" pillar to cover the annual needs of women's agricultural enterprises and the implementation of investments.

Since its launch in April 2022, over 992 women-owned businesses have already joined and have been included in the package to whom over €9.4 million in funding have been channelled.

Piraeus Culture and Creativity 360°

Piraeus Bank remains firmly committed to supporting art and culture strongly convinced on their vital role in the country's social and economic life. It thus continues to support businesses in all areas of cultural activity and artistic creation holistically, so that they may continue their creative contribution unhindered.

In response to the needs and challenges these businesses face on a daily basis, Piraeus Bank has created Piraeus Culture & Creativity 360° offering a comprehensive range of products and services. Piraeus Culture & Creativity 360° is specifically designed to support businesses active in arts and culture (small and medium sized enterprises that are directly or indirectly linked to the development of cultural products, e.g. cultural and entertainment operators, cultural and entertainment companies, production companies, photographers, advertising agencies, translators, performing arts operators, graphic designers, etc.) to meet the needs and challenges they face on a daily basis, focusing on 4 pillars:

- Developing my business (providing financing and development programmes)
- Managing my business (cash flow management)
- Insuring my business (providing up-to-date coverage)
- Making my business competitive (subscription in loyalty programmes such as yellow business and Shopping in the Neighbourhood –Psonizo sti geitonia)

Since its launch in May 2021 and until 30/12/2022, 208 cultural businesses have acquired the package – the funding channelled to them reaching €3.5 million. Respectively, from 01/01/2023 until 31/12/2023, 317 cultural businesses have acquired the package – the funding channelled to them reaching €7,2 million.

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

Stakeholders

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 groups)¹² 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.

¹²Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organisations.

**Stakeholder Dialogue
Double Materiality Analysis and
Focus Group Discussions
Relationship with Suppliers**

**Sustainability & Business Report 2023,
pages: 38-39, 301-302**

Suppliers Relations

Stakeholder Dialogue

As part of its activities and operations, the Group has set up appropriate channels to encourage constructive dialogue with each of its stakeholders –the frequency of communication is determined by the nature of the relationship with each stakeholder. Systematic stakeholder engagement enables the Group to identify changes in the environment and to better manage the stakeholders' expectations.

The PFH Group was involved in the formulation and adoption of the global Principles for Responsible Banking and treats each and every dialogue with stakeholder as important. Thus, it has been through dialogue that the Group continued also in 2023, as well as 2022, to recognise as the most material topics for stakeholders the following: data protection, new technologies in customer service, providing equal access to banking services, responsible banking, respect for the environment (through financing energy transition of businesses and households), culture (through PIOP and by highlighting the development potential of the country's cultural reserve, as well as by supporting and promoting creative economy in Greece), promoting human rights and combating unconscious biases and stereotypes in the workplace as pillars for sustainable development, supporting the new generation, gender equality, as well as the creation of value in society.

For more details on Piraeus Financial Holdings Group stakeholder dialogue, see:

www.piraeusholdings.gr>Investor Relations>Financial Data>Annual Reports>2024>Stakeholder Dialogue

Stakeholder Engagement for the Materiality Analysis

Piraeus identifies its key stakeholders, i.e., customers, employees, suppliers, investors/shareholders, investment analysts, media, supervisory and regulatory authorities, the investors' community, societal/environmental/cultural bodies, NGOs, with which it maintains ongoing dialogues aspiring to remain responsive to their needs and expectations and to highlight material sustainable development topics. These topics are used to design and activate mechanisms that are aimed at continuously improving its business operations.

Double materiality

In addition to the regular two-way dialogue with each stakeholder group, Piraeus applies the reporting principles of Materiality, Stakeholder Inclusiveness, Sustainability Context and Completeness, in accordance with the GRI Standards, to prioritise its sustainable topics. Piraeus conducts a Materiality Survey and holds focus group discussions to identify material sustainable development topics.

The Double Materiality Survey is based on a structured questionnaire designed to explore the stakeholders' reasonable expectations and interests which, by extension, have an impact on the economy, society, and the environment. These topics arise from the Group's regular communication with its stakeholders and are shaped by current events, prevailing market conditions, existing CSR practices and surveys, and the corporate responsibility indices in which Piraeus is included. Material topics may change over time, as further relative knowledge is being acquired. Piraeus re-assesses their materiality every year as part of preparing its Sustainability & Business Report.

In 2022, Piraeus adopted the GRI Standards 2021 and for the first time applied the Double Materiality in the Materiality Survey which was implemented during Q2 2023, in accordance with the current European framework for the publication of non-financial information. Double Materiality is the combination of impact materiality and financial materiality, namely it defines and assesses sustainability topics that are also important for the economy, society, and the environment and also affect the Group's business value.

Relationship with Suppliers

As part of the Bank's effort to align with ESG principles, the Bank's relevant Units are working together for the gradual integration of ESG criteria into procurement processes. Currently, in cases where it is technically feasible, specific environmental criteria are considered (e.g., environmental certifications). It should be noticed that specific social criteria are already integrated into the supplier selection process. Thus, in procurement tenders, candidate suppliers are requested to provide gender-related information for their business, i.e., the ownership status, the governance structure of the company, and the share of women in managerial positions, as well as their workforce gender breakdown.

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

Governance & Culture

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.

ESG Governance Structure

Piraeus has established a concrete governance structure aligning the guidelines of the six Principles into its everyday operational and business model.

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pages: 80-83, 220, 290-291

Pillar III Disclosures

2023 Remuneration Report

Directors' Remuneration Policy

Piraeus Group Climate & ESG Governance Structure

Piraeus has established a concrete governance structure aligning with the Principles for Responsible Banking into its everyday operational and business model.

Piraeus' Board oversight of climate-related risks and opportunities

Piraeus Group initiated its ESG and climate governance structure since 2022, when it established the Board Ethics & ESG Committee to provide Board-level oversight of strategic climate-related risk and opportunity management.

The Committee is responsible for considering the material ethical, environmental, social and governance issues relevant to Piraeus Group's business activities and for supporting the Group in maintaining its position as a reference leader in ethical and ESG (environment, society, governance) and climate issues. The Committee works closely, also by holding joint sessions, with the other Board Committees for climate and ESG issues which are also related to their mandate. It is furthermore supported in its work by respective management committees of the Group, namely the ESG and Corporate Responsibility Committee of Piraeus Bank. The Committee is headed by a director with international experience in ESG matters.

Chairman of the BOD

The Chairman of the Board of Directors is actively engaged in the environmental and climate agenda of the Group. The Board Chair is -since 2018- the Chairman of the Piraeus Bank Group Cultural Foundation (PIOP), which is one of the main pillars of Piraeus Bank's corporate responsibility. PIOP Foundation has an active contribution to the promotion of Greece's cultural identity. One of PIOP's strategic goals is to link culture with the environment and sustainable development, a goal that is achieved through the creation and management of a Network of thematic technological Museums in the Greek provinces, where the specific nature of the production in the corresponding region is highlighted, focusing on the triptych people-environment-culture.

Chief Executive Officer (CEO)

The CEO of Piraeus Group drives the ESG agenda and is regularly informed and very highly engaged in environmental and climate issues of the Group. The CEO has driven the Group's pledge to decarbonise the Bank's portfolio.

The CEO is currently overseeing the Energy Transition Project, which is a concrete commercial programme/action plan, which will allow Piraeus to assume a frontrunning role in its clients' transformations to build a better and more sustainable Greek economy. It will leverage a structured approach and deep understanding of the specific needs of each sector with priority focus on Power Generation, Real estate/buildings, Agriculture and promote a tailor-made approach to support small businesses and individuals.

Piraeus Group's CEO participates in the UNEP FI Leadership Council, which brings together CEOs and Chairpersons of banks and insurers and is currently involved in one of the three elected UNEP FI governance bodies (Piraeus Financial Holdings currently holds an elected seat on the UNEP FI Banking Board). The Leadership Council meets annually to provide vision and strategic direction to UNEP FI in orienting its role and that of the UN, in shaping, mainstreaming and deepening sustainability integration across the industry. It is designed to further mobilise the financial community to support a sustainable, resilient, and inclusive economy.

Chief Risk Officer (CRO)

The CRO is appointed by the BoD, upon recommendation of the Risk Committee, and his appointment or replacement, following the approval of the Risk Committee, is communicated to the supervisory authorities. The CRO is responsible for the supervision of the Group Risk Management and consequently for the overall management of C&E risks that are integrated in the Risk Management Framework. The CRO is Chair of the Project Proteus Steering Committee (please refer to committees below) and reports directly to the Executive and BoD level Committees.

Chief Credit Officer (CCO)

The Group CCO is responsible for the approval of new credit criteria related to ESG and climate. The Group, under Project Proteus, is currently in the process of integrating specific climate criteria in the established Environmental & Social Management System and the credit due diligence.

Board Committees related to Climate and Environment

Board Ethics & ESG Committee

The Committee is tasked with assessing significant ethical, environmental, social, and governance matters pertinent to the business operations of the Piraeus Group. It aids the Group in upholding its status as a benchmark leader in ethical standards and ESG (Environment, Society, Governance) as well as climate-related concerns.

The objectives of the Board Ethics & ESG Committee are:

- to consider the material ethical, environmental, social, and governance issues relevant to Piraeus Group's business activities; and
- to support the Group in maintaining its position as a leader in ethical and ESG (environment, society, governance) issues.

The Committee is chaired by the Independent Non-Executive Member of the BoD, an expert on ESG issues and climate governance and works closely in coordination with the BoD's Nomination, Remuneration, Audit, Risk and Strategy Committees, in assisting the BoD to meet its ESG responsibilities. Inter alia, the Committee:

- lays the directions and makes recommendations to the BoD and/or relevant Board Committees with regards to the policies and strategies for the management of climate-related, environmental and biodiversity threats, and societal and cultural issues;
- reviews ESG strategy, goals, targets, monitors progress, and makes recommendations to the competent committees and to the Board;
- oversees the delivery of the Group's climate resilience strategy and disclosures relating to market standards, as well as the degree of the Group's alignment with regulatory ESG and climate-related guidance, rules (such as EU Taxonomy, SFDR, ESG sustainability factors within the MiFID framework, et.al.) and expectations;
- supports the Nomination Committee, in the evaluation of the knowledge, competence and experience of the Board Members in ESG risks, in its assessment of the collective suitability of such members and to further arrange the education of the Board Members in relation to all the above; and

- considers the institution's response to the objectives set out under international agreements such as the Paris Agreement (2015), EU environmental-related policies such as the EU Green Deal, local and national policies, as well as the outcomes of well-founded climate-related and environmental assessments and makes recommendations for adoption by the Board of Directors.

Board Risk Committee

The Committee is responsible for advising and supporting the Board of Directors regarding the monitoring of the Group's overall actual and future risk strategy and risk appetite, considering all types of risks (including climate and environmental, social and governance risks), to ensure that they are in line with the business strategy, objectives, corporate culture, and values of the Group and that they are managed effectively. The Committee has responsibility to oversee the implementation of the Group's risk strategy and the corresponding limits set and to review several possible scenarios, including stressed scenarios, to assess how the Group's risk profile would react to external and internal events.

In 2022, the Risk Committee reviewed the Group's Risk & Capital Strategy, including its strategic approach on the front of ESG risks, and opportunities and new ESG-related risk indicators were incorporated in line with Group's ESG action plan.

Remuneration linked to Sustainability

Board Remuneration Committee

The Committee is responsible for ensuring that the Group remuneration policy is consistent with the objectives of the Group's business and risk strategy, including environmental, social and governance risk-related objectives, corporate culture and values and long-term interests of the Group. The Committee has responsibility for aligning executive directors' and senior management's remuneration with strategic priorities, including in relation to climate and sustainability matters.

In 2022, following respective proposal of the Remuneration Committee to the Board of Directors, an amended version of the Directors' Remuneration Policy was approved by the 2022 Annual General Meeting of Shareholders. The amendments concerned, inter alia, the addition of ESG considerations in remuneration practices.

Remuneration Policy

The ability of the Group to implement a comprehensive human capital strategy to attract, retain, reward, and motivate highly skilled individuals is important for its continued success. Group Remuneration Policy is consistent with the corporate strategy aiming to align the Group's objectives with those of its stakeholders: employees, management, and shareholders.

The Group monitors, reviews, and updates the remuneration procedures and structures, on an ongoing basis and whenever there is a material change so that they are aligned with the evolving business objectives and the regulatory framework. At the same time, remuneration practices and levels, as well as variable incentive schemes, do not encourage excessive risk-taking, potential conflicts of interest, or the violation of laws and regulations. Group Remuneration Policy aims to:

- Attract, retain, and motivate high-caliber employees who achieve the expected results by embracing the corporate values and culture.
- Support a performance-driven culture that is based on excellence and on creating sustainable growth, taking into account climate and ESG aspects.
- Embrace equal pay policy, for both male and female employees, for equal work or work of equal value, supporting a culture of fairness.
- Align remuneration with profitability, capital adequacy, and liquidity without encouraging excessive risk-taking.
- Promote a culture of compliance and effective risk controls.
- Enhance internal and external transparency.

Piraeus Group annually discloses both quantitative and qualitative information related to the remuneration, in line with all applicable legal and regulatory requirements.

Project Proteus structures the management of ESG and climate risks

Following the European Central Bank's "Guide on climate-related and environmental risks: Supervisory expectations relating to risk management and disclosures", Piraeus launched the Project Proteus to align with the 13 expectations of the Guide. Proteus aims to integrate the ESG risks with initial focus on climate-related and environmental risks within all functions of the Bank. The cross functional governance structure facilitates effective and timely decision-making related to C&E risks, permits the holistic monitoring and implementation of Project Proteus, and ensures Piraeus Group's operational readiness to participate in dedicated regulatory exercises (e.g., Fit for 55 and other regulatory exercises).

The Group, through Project Proteus, identified the business functions across all three Lines of Defense related to or affected by C&E risks and the respective policies in order to map any gaps and ensure that climate and ESG aspects are incorporated accordingly. Within this framework, the review of Group policies took place through separate working groups per function to support the responsible Business Units in reviewing policies under their ownership through a C&E lens.

A project plan, as defined in the ECB roadmap, with the underlying work programmes, has been submitted to the supervisor, while several updates regarding the progress performed are communicated accordingly. Working groups included the participation of executives who contributed to the Group's smooth transition to the new requirements and the integration of supervisory expectations into its operations. The eight working groups' managers work together with the Project Management Office (PMO) team. A dedicated Steering Committee, chaired by the Group CRO and comprised of executive members across all functions of the Group, has the oversight of the Project. Overall, focus has been placed on redefining and enhancing processes, data management systems, policies, and frameworks, raising awareness and building a robust climate and ESG risks governance. The developments and progress achieved through this project are further detailed per area in the following sections.

Project Proteus Steering Committee

A dedicated Steering Committee (Project Proteus Steering Committee) was established to provide direction and set the strategy for the implementation of the ECB Roadmap as well as the thematic climate stress test. Furthermore, the Steering Committee has the overall responsibility for the project. The Committee:

- Defines the strategy and provides directions as well as sets priorities for the implementation of the Project Proteus (ECB Roadmap, Climate Stress Test, Fit for 55).
- Reviews the completion status, ad-hoc Information requirements and identifies potential issues.
- Decides and proposes mitigating actions and approves any updates that might be needed on the ECB action plan.
- Discusses and resolves issues escalated by the Project Management Office (PMO) regarding the implementation of the Project Proteus.
- Provides targeted direction, where needed, to PMO/Workstream Managers.
- Approves ad hoc targeted information requirements information packages for submission to ECB/SSM/BoG.
- Ensures adequate staffing for the implementation of the ECB roadmap and Climate Stress Test.

The Head of the Project Proteus Steering Committee regularly updates the respective BoD's Committees, and ExCo.

Central Project Management Office (PMO)

To coordinate and assist in the implementation of the Project Proteus, a dedicated central PMO was established. The central PMO informs the Steering Committee and Working Groups on the ECB requirements and the deadlines set thereby for the implementation of the ECB roadmap and has the overall project management. Due to the broad scope of the project, the PMO members are executives from various functions (ESG Unit, ESG Risks, and Regulatory & Resolution Affairs) of the Piraeus Group. The responsibilities of the central PMO are:

- Holds the overall responsibility of the project management.
- Informs Steering Committee and Working Groups, on the ECB requirements and the deadlines set thereby for the implementation of the ECB roadmap and Climate Stress test.
- Escalates issues to C&E Risks Steering Committee.
- Cooperates with and supports Task Groups and Workstream Managers.
- Prepares the relevant presentations and informative package.
- Informs all stakeholders of potential developments and changes to the Project Plan.

For more information, see: www.piraeusholdings.gr/en/documentation/pillar-iii-disclosures

Piraeus Financial Holdings Board The PFH Board sets the strategy for the Group			
Board Ethics & ESG Committee	Remuneration Committee	Risk Committee	Audit Committee
Piraeus Bank Board			
Strategy Committee	Risk Committee	Audit Committee	Remuneration Committee
Executive Management Committees			
Group Executive Committee			
ESG & Corporate Responsibility Committee			
Assets & Liabilities Committee			
Operational Risk Committee			
Project Proteus Steering Committee			
Involved Units			
1 st Line of Defense	2 nd Line of Defense	3 rd Line of Defense	
Business Units Corporate Development & ESG Group Credit Group Cultural & Social Initiatives	Group Risk Management Risk Strategy & ESG Risks	Group Internal Audit	
ESG Framework			
Sustainable Development Policy ESG Strategy	Risk Framework C&E Risks Framework	Green Bond Framework Sustainable Finance Framework Sustainability Linked Loans Framework	Strategy Plan Business Plan 2024-2026

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).

Code of Conduct and Ethics

The Code of Conduct and Ethics is the overarching document reflecting the purpose and values of Piraeus Bank Group. It defines and describes the way employees shall conduct themselves when carrying out their work and taking decisions as employees of the Bank. The Code has been drafted in accordance with the Code of Banking Ethics of the Hellenic Bank Association and the Group's compliance standards, policies and methods. In this context, the Code of Conduct and Ethics is fully aligned with the corporate values, representing how these values are transformed into desirable behaviours and applied by all levels of responsibility, with emphasis on the principles of responsibility, meritocracy, and transparency.

The Code includes the Group's basic Policies and Regulations and outlines a set of principles for decision-making in the workplace and applies to all employees across the Group, with emphasis on the principles of responsibility, meritocracy and transparency. The Code is available to everyone in the Organisation through internal communication channels and is accompanied by an interactive training programme. Additionally, the Code is included in the documents provided for reading and signing in every new hire of the Bank, ensuring alignment by all employees with the values and behaviours required.

The renewed Code of Conduct and Ethics is available to all employees in the Organisation.

Training

Targeted training programmes were implemented for each category of the learning pyramid, in accordance with the Bank's strategic priorities, as well as the requirements of specialised roles.

Sustainability & Business Report 2023,
pages: 35, 106, 218

Code of Conduct & Ethics

Sustainability e-learning

In 2023, a new training course was developed, planned to inform all employees on sustainability matters and ESG disclosure trends. The e-learning will be targeted to all employees in 2024, regardless of level or responsibilities. The e-learning will touch upon climate, environmental, social and governance issues to provide in simple terms an overview of sustainability issues.

Environmental awareness and employee training

In 2023, 105 EMS Coordinators were trained through the updated e-learning course on EMAS and the Environmental Management System. The e-learning course aims to promote key environmental concepts and raise awareness about the Bank's environmental work and to actively involve the EMS Coordinators in their tasks. In 2023, a total of 420 training man-hours were spent for environmental e-learnings, while the Bank's intranet continued to be updated monthly with news about the environment and sustainability.

Annual environmental management competition

For thirteen consecutive years, Piraeus Bank is running the annual environmental management competition Green Behaviour Wins! which is a significant incentive for improving the Bank's carbon footprint and raising employee awareness. Every year, employees from 12 Branches and 3 administration buildings with the best performance in recycling consumables (paper, batteries, and ink cartridges/toner) and in energy saving are rewarded with symbolic gifts.

Ef Zin health and well-being programme

The Group's health and wellness programme Ef Zin (i.e. well-being in Greek) is now identified with positive social and environmental action as well as with employee volunteering. At the same time, it is the core of their awareness of personal-family-work life balance and the cultivation of teamwork.

The programme is implemented on a monthly basis and is supported by an inter-departmental team and specialised partners within and outside the Agency.

In 2023, 47 actions (face-to-face and/or online) were carried out in which more than 6,400 employees across Greece expressed interest, while more than 3,740 Group employees participated, a percentage that exceeds 50% of the Bank's population.

Action topics	Actions	Beneficiaries
Physical well-being	16	1,797
Mental wellness	15	967
Volunteering and social awareness	16	979

5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio? ¹³

Please describe.

Please describe what due diligence processes your bank 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.

¹³ 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.

**Sustainable Development Policy,
SFF, GBF, SLLF,
ESMS,
Exclusion List,
ESGr
Climate Risk Classification**

**Sustainability & Business Report 2023,
pages: 66-67, 70-79, 145-147**

Project Sustainability Assessment and Environmental and Social Management System in Business Credit

Following the implementation of the Environmental and Social Risk Management System (ESMS) in 2018, the Environmental and Social Risk Assessment became part of the Bank's Credit Policy and the business credit appraisal process. In 2023, the Bank's Credit Policy incorporated provisions related to the inclusion of climate risk parameters in the business financing process. The main objective of the current system is to apply environmental, social, and climate criteria, in addition to the economic ones, in the Bank's credit approval process for the lending activities. According to the Greek institutional framework and international standards, environmental, health, safety, and social risks should be considered in risk assessment for credit facilities. The climate crisis that affects a business' viability is also taken into account, via additional steps that lead to the mitigation of an enterprise's climate risk. Piraeus Bank carries out a holistic business approach for companies and proposed business plans, recognising, assessing, and managing all relevant credit risks, to protect Bank customers and shareholders. This process is part of the ongoing efforts to deal with ESG risks that have been identified as important in the Bank's Operational Risk Management and Internal Control Policy.

The Financial and Technical Assessment of Green Projects (e.g., photovoltaics, wind farms, biogas projects, small hydroelectric, self-generation and electrical storage, circular economy, etc.) has been part of the Bank's Credit Policy since 2013. The Bank assesses new projects by scrutinising the technology adopted, works components, infrastructure capacity and expected utilisation rate, skills and experience of the companies implementing the

project, etc. The licensing process is monitored throughout the investment, as per national legislation and European standards. The Financial and Technical Assessment of project sustainability is also carried out at various stages of the project to ensure the continued and uninterrupted operation of the installed equipment and infrastructure, the expected utilisation rate, and the relevant conditions and estimates set initially. The assessment aims to prevent any operational failures and risks to the benefit and protection of both the customer/investor and the Bank.

In 2023, Piraeus Bank carried out a total of 1,287 assessments, of which 319 were related to new RES projects, while a specific tool, maintained by the Unit, calculates the appropriate replacement values to be included in insurance contracts renewals for PV systems.

Goals for 2024

European and international regulations, as well as investor interest, have recently focused on channelling funds to sustainable investments. The green transition of corporations is a major EU policy goal leading the field, along with the Taxonomy Regulation, as well as the European Sustainability Reporting Standards, play a major role in achieving EU goals.

The transition to a more resilient and sustainable operation of European firms is a European priority that compels businesses to include ESG considerations in their business strategy. Piraeus Bank, through its considerable experience in sustainable finance, is expected to support this transition.

In this context, Piraeus Bank in 2024 plans to:

- Create tailor-made financing products for the support of green and digital investments.
- Fulfil all supervisory requirements by adapting products and processes to include climate risk parameters.
- Strengthen the holistic assessment and management of ESG risks by continuing the incorporation of additional environmental and climate issues into the ESMS process.

Piraeus Bank is ready to commit to a transparent model of operations where, in accordance with the European legislative framework, businesses of all sectors (and especially those in the Banking sector) extensively document their impacts on climate, environment, and society.

Climate Risk Classification

Piraeus Group has introduced a common language and understanding/method for decision-making and for business and strategic planning regarding climate-related risks. It aims to provide useful insights to the Group's current exposure to climate-sensitive sectors, areas, and customers and create a basis for materiality assessment in terms of credit, market, liquidity, operational, reputation, and business and strategic risks. The analysis is based on potential impact from climate-related risks on the Group's material portfolios representing the majority of its exposures (i.e., business portfolio and immovable property held as collateral), using quantitative and qualitative analyses that conclude to certain heat maps.

Environmental and Social Management System (ESMS) in business financing incorporated in Credit Policy

The Executive Committee has approved the ESMS and, consequently, the Group's Credit Policy incorporates new environmental and social (E&S) criteria in line with international standards, in addition to traditional credit criteria. The main objective of the ESMS is to identify and assess the environmental and social impacts, in addition to the economic impact, of the lending activities to be used in the Group's credit approval process.

Specific parameters are integrated into the existing loan approval processes and in new business financing projects for the evaluation and management of the environmental and social risks of each project. With the implementation of the ESMS, environmental and social risks are integrated into the credit assessment. The assessment procedure requires that the process starts with the loan applications and/or during the due diligence review. The Group carries out a holistic business approach for companies and proposed business plans, recognising, assessing, and managing all relevant risks, to protect the Group's customers and shareholders.

Piraeus Group has integrated the Climabiz climate risk results and ESMS evaluation system into the loan due diligence and evaluation process. Also, the Group has incorporated C&E risks in credit decision-making through targeted amendments of the Bank's Credit Policy to differentiate treatment of obligors deemed to be high-risk from a C&E perspective. Finally, the Bank has introduced a C&E controversy assessment process to evaluate ESG controversies at obligor level and has developed a dedicated questionnaire and respective process for the identification and assessment of such controversies to mitigate reputation risk.

Exclusion List

The Group has incorporated into its Credit Policy a list of business activities that are excluded from financing. Furthermore, environmental, social, reputational and litigation factors are integrated in the Group's Credit Policy.

Environmental and Social factors

The Group does not provide credit facilities to companies operating in sectors included in the Exclusion List according to the ESMS, except for certain sectors (i.e., tobacco, alcohol) where the Group's cumulative exposure does not exceed 5% of the total loan portfolio. As part of Project Proteus, the Group further consolidated its Exclusion List, committing to:

- zero new investments in new coal mines or/and expansion of existing mines;
- zero new investments in electricity production from coal; and
- zero financing to customers with income from coal-fired electricity generation, unless they have adopted a diversification strategy with a transition plan to sustainable fuels and a commitment to a reliable, time-bound exit plan from coal-fired electricity generation.

In addition, rigorous due diligence is applied for activities within environmentally protected areas (e.g., Natura 2000 Network).

Reputational and litigation factors

The Group is particularly cautious in providing any type of credit facility to legal entities or individuals who are accused (based on reliable published information, reports, court cases) of environmental crime, money laundering, violation of human and labor rights, bribery, etc. In such cases, Bank officers must immediately inform the competent approval body and, if necessary, the Group Compliance Officer.

Interbank ESG Risk Assessment Questionnaire

Further to the ESMS Questionnaire and process and considering the need for banks to obtain detailed and accurate ESG-related information from their counterparties, while avoiding unduly burdensome requirements, a collaborative initiative has been launched by Greek banks and introduced a common ESG Questionnaire that has been disseminated to counterparties in their corporate portfolios and is being leveraged by each bank for credit assessment purposes. The construction of this common ESG Questionnaire, along with a classification score, is an initiative of the Hellenic Bank Association (HBA), in partnership with six Greek banks. The initiative also includes the design and implementation of an IT platform to host the common questionnaires. The Interbank ESG Questionnaire captures important environmental issues (physical and transition risks, pollution, waste disposal systems, etc.), social issues (human rights policies, labour practices, harassment, etc.) and governance issues. The content of the Interbank Questionnaire is aligned with relevant international standards, guidelines, and supervisory expectations, such as the ones included in the ECB Guide on Climate-Related and Environmental Risks. Standardised ESG questionnaires that adopt internationally recognised standards, guidelines, and best practices have been developed and are available at ESGr, the interbank platform.

Since 2023, relevant communication actions to the corporate clientele have been initiated. Within this context, companies operating in Greece, depending on their size and sector of activity, will be called upon to respond promptly.

Advantages of standardised ESG questionnaires for companies include the following:

- Companies are required to provide less information volume.
- They are a fully-fledged automated solution that accelerates recording processes, ensuring at the same time the correct completion of data and their protection.
- They establish a common approach for companies of the same size and sector.
- The requested data are harmonised, among others, with the provisions of Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive – CSRD). Upon the operationalisation of the interbank questionnaires the Bank will be able to assess, in quantitative terms, the performance of its obligors across all material environmental, social, and governance risk factors. This joint initiative will facilitate, thanks to its convenience and the low costs it entails, the ESG transition of the Greek companies. The Greek banking system remains committed to support by all means the transition of companies towards a green and socially responsible operating model, promoting thus the sustainable development of the Greek economy, society, and entrepreneurship. Piraeus Group will further engage with its customers, requesting targeted action plans to remediate issues, mitigate ESG-related risks, and support their transition to low-carbon operations.

SELF-ASSESSMENT SUMMARY

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

✓ **Yes**

No

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)?

✓ **Yes**

No

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

✓ **Yes**

In progress

No

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.

Transparency & Accountability

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.

Independent Assurance Statement of the Sustainability and Business Report 2023

Independent Limited Assurance Report to the Management of Piraeus Financial Holdings S.A., page: 73

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: UN Global Compact, ATHEX ESG

GRI

Piraeus discloses non-financial information in accordance with the Global Reporting Initiative Standards (GRI), which provide organisations with a set of principles so that they may prepare a complete report about their impacts on sustainable development. Furthermore, the adoption and implementation of GRI Standards contributes to better ranking for Piraeus, which is actively involved in international initiatives and included in corporate sustainability indices.

Sustainability & Business Report 2023, pages: 87-88

CDP

Piraeus TCFD Recommendations

Piraeus 2023 CDP submission is publicly available following log in

Pillar III Disclosures

6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis¹⁴, target setting¹⁵ and governance structure for implementing the PRB)?

Please describe briefly.

¹⁴ 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.

¹⁵ For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

Piraeus' plans and next steps

- Examine further targets alignment with 1.5°C pathway.
- Publish the first Sustainability Statement according to the EU CSRD and the ESRS.
- Complete the integration of new disclosure requirements (stemming from EU regulations) into Piraeus' systems and build internal capacity and infrastructure.
- Further integration of the UNEP FI ESRS Conversion Tool to the double materiality analysis.
- Increase data quality for the calculation of indirect GHG emissions (Scope 3 – Category 15) from Piraeus' portfolio.
- Reinforce internal culture on sustainability and transition through training and specialized awareness sessions.
- Conduct the second assessment of the impacts of our financing on biodiversity and the first assessment of dependencies using the ENCORE tool.

Sustainability & Business Report 2023, pages: 73-75, 85-88, 101-103, 112-114

Commitment to Financial Health & Inclusion - Summary Report, page: 33

9M.23 Corporate Presentation, pages: 52-61

H1.24 Results Presentation, pages: 57-58

Task Force on Climate-Related Financial Disclosures (TCFD)

The TCFD recommendations suggest companies disclose detailed information on climate change management in four thematic areas that represent core elements of how an organisation operates: governance, strategy, risk management, metrics, and targets.

Piraeus Policy Framework and Board & Management Oversight of Climate Risks		
GOVERNANCE	<p>The Chairman of the Board of Directors is actively engaged in the ESG and climate agenda The Board Ethics and ESG Committee is overall responsible for ESG and climate issues, proactively setting the pace for sustainability matters</p> <p>The ESG & Corporate Responsibility Committee at management level chaired by the CEO ensures a holistic approach with tangible and defined medium and long-term goals</p> <p>Project Proteus Steering Committee managing climate-related and environmental risks; active in monitoring and decision-making process regarding sustainability-related projects</p> <p>Business Plan 2024-2026 sets Piraeus' ESG aspirations</p>	
	<p>The CEO drives the ESG and climate agenda</p> <p>The Board Risk Committee has the oversight of and is responsible for the identification and management of ESG and climate-related risks</p> <p>Piraeus' policy tools: Sustainable Development Policy, Climate & Environmental Strategy, Green Bond Framework, Sustainable Finance Framework, Sustainability Linked Loans Framework, SFDR Policy</p> <p>The three Lines of Defence are actively involved in the implementation of the Climate & Environmental Strategy</p> <p>Tangible KPIs (short and long term) have been assigned to support the sustainability journey</p>	
	<p>Climate Risks</p> <p>Physical risks (chronic and acute) may affect Piraeus' infrastructures, immovable collaterals, and its customers' probability of default</p> <p>Transition risks are closely monitored due to their possible negative impacts (e.g., energy prices, fines, reputation, financial viability) of Piraeus' customers in the long run</p>	<p>Climate Opportunities</p> <p>Following the commitment to the UN Principles for Responsible Banking, Piraeus is focusing on Sustainable Banking; specialised products already launched (green deposit) with further initiatives under development</p> <p>Launch of mutual funds with ESG criteria, ESG Deposit, etc</p> <p>Piraeus aims to interact with clients and customers to communicate its sustainability agenda; specialised products, services, and advisory initiatives will be designed to facilitate its clients and customers' transition to energy efficiency and sustainability</p> <p>Green Bond Framework and successful issuance of a €500mn Green Senior Preferred Bond; Revised Green Bond Framework (completed in 2024) to incorporate EU Taxonomy eligible activities</p>
	<p>STRATEGY</p>	<p>RISK MANAGEMENT</p>
<p>Climate Risk is Integrated in Piraeus' Risk Management Processes</p>		
<p>In Piraeus' Risk Identification Process, climate risks are identified as risk drivers and standalone risks.</p> <p>Piraeus Group has incorporated environmental and climate related risks into its Risk Appetite Framework</p> <p>Piraeus uses the Climabiz tool to estimate climate-related risks of Piraeus' business borrowers (including physical and transition risks)</p> <p>Sectors mostly affected by physical risk: production of Energy (Hydro), accommodation, manufacture of food products, crop, and animal production, hunting and related service activities</p>	<p>Our new Climate Risk Classification creates a common language, methodology and assessment regarding climate-related risks</p> <p>Environmental & Social Management System in business financing for all new business loan originations</p> <p>Sectors mostly affected by transition risk: manufacture of other non-metallic mineral products, manufacture of basic metals, water transport, production of energy (fossil fuel), manufacture of gas and distribution and steam and air conditioning supply</p>	

	Climate Metrics	Climate Targets
METRICS & TARGETS	Climate-related risk calculation (physical & transition risks) of the Bank's business loan portfolio using the Climabiz tool	Become a net-zero bank by no later than 2050 (in both Piraeus' operations and portfolio)
	Calculation of Piraeus' operational emissions (Scope 1, 2, and 3, Cat. 1-14) using the proprietary. Environmental Footprint Database based on PCAF methodology	Science-based targets for Piraeus' operational emissions and for nine asset classes (well-below 2°C) that cover 9% of Piraeus' total investments and lending activities, representing 56% of financed emissions
	Calculation of Piraeus' financed emissions (Scope 3 Cat. 15) using the PCAF methodology. Estimating positive and negative impacts of Piraeus portfolio on climate & ESG issues, using the UNEP FI Impact Analysis Tool for Banks	The goal for 2030 is to increase Piraeus' sustainable financing from €2.7 bn to over €10 bn. Piraeus also aims to boost its green funding from €0.5 bn to more than €5 bn. Additionally, it expects to raise its sustainable assets under management from €0.3 bn to above €1.5 bn.

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 prioritised to address when implementing the Principles for Responsible Banking?

Please choose what you consider the top three challenges your bank has prioritised to address in the last 12 months (optional question). If desired, you can elaborate on challenges and how you are tackling these:

- 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
 - Prioritising actions internally
 - Other: ...

ISAE 3000 (Revised) independent limited Assurance Report to the Management on Piraeus Bank's S.A. Principles for Responsible Banking 5th Reporting and Self-Assessment under the United Nations Environment Program Finance Initiative ("UNEP FI") Principles for Responsible Banking ("PRB") Framework for the period from January 2023 to 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 5th Reporting and Self-Assessment ("PRB Report") for the period January 2023 to 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 12-42 & 54-60 of the PRB Report.

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 Piraeus Bank S.A. (the "Piraeus" or "Client" or "you" or "your" or the "Bank") to obtain an Assurance Report (limited assurance) on the following discrete elements of the entity's PRB Report:

- 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 12-42 & 54-60 of PRB Report for the period from January 2023 to December 2023.

The guidance requires the Bank to publish other information within its PRB Report. This other information is not the subject of this Assurance Report.

Basis of our assurance conclusion

Piraeus 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 the Bank 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, 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 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 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.

The work we performed - Continued

- 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 its significant impact areas 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, 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 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.

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 was designed for the purposes of the Bank preparing and publishing a PRB Report 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, 12 September 2024

The Certified Public Accountant

Konstantinos Kakoliris

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