

Principles for Responsible Banking

3rd Report and Self-Assessment Template

Reporting and Self-Assessment Template



Principle 1: Alignment

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

1.1 Business model

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

Response

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

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

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

The report refers to activities during the period from January 1, 2022 until December 31, 2022, unless otherwise indicated.

Links and references

(incl. [alpha-services-and-holdings-financial-statements-31122022-en.pdf](#)
([alphaholdings.gr](#)), p.10-11

1.2 Strategy alignment

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

Yes

No

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

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

UN Guiding Principles on Business and Human Rights

International Labour Organization fundamental conventions

UN Global Compact

UN Declaration on the Rights of Indigenous Peoples

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

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

None of the above

Response

Alpha Bank's updated Sustainability Strategy is based around 3 pillars:

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

As part of this strategy and for the purpose of implementing the Principles, Alpha Bank has reviewed its contribution to society's goals in reference to the SDGs, Paris Agreement and relevant regional frameworks such as the European Union Action Plan on Sustainable Finance and Greece's national strategy for sustainable development. The analysis of the Bank's activities, using the tools provided by UNEP-FI and the GRI Materiality Analysis, concluded that the most significant impacts relate to the following six areas (of the Impact Radar) and society's goals:

- **Provide an Inclusive Work environment/ Support equal access to Healthcare, Education, Culture and Heritage - aligning with SDG 10** – Alpha Bank respects and defends the diversity of its Employees (specifically with regard to age, gender, race, nationality, religion, disability/special ability, sexual orientation) and treats all employees with respect. In this context, the Bank has a commitment to the management of human rights, which are described in its Corporate Responsibility Policy and Code of Ethics. Additionally, a Diversity Policy is implemented to ensure clarity for all on the standards set.

Links and references

[Sustainability Report 2022](#) - p.12-15

Finally, the Bank executes targeted CSR initiatives in order to enhance equal and inclusive access to education, cultural events and healthcare services.

- **Waste - aligning with SDG 11** – “Sustainable cities” and **SDG 12** – “Responsible consumption and production”. The portfolio of Alpha Bank shows a significant association with sectors potentially impacting the circular economy development, particularly the management of waste. Therefore, the Bank could achieve a significant impact by aligning its strategy towards SDG 11, for example by reducing the adverse impact of cities through the financing of waste management activities (Goal 11.6) and towards SDG 12, for example by reducing waste generation through prevention, reduction, recycling and reuse (Goal 12.5). This strategy would also support the European Circular Economy Action Plan of 2020.
- **Reduction of waste generation and promotion of the principles of the circular economy -aligning with SDG 12-** Alpha Bank focuses on responsible consumption and production, through the rational management of the waste it generates, applying the environmental motto “reduce, reuse, recycle”.
- **Climate change -, aligning with SDG 13 – “Climate action”.** The portfolio of Alpha Bank shows a significant association with sectors having a significant impact on climate change. Climate change is also identified as the defining challenge of the decade. The Bank has a role to play in fighting climate change through aligning its strategy towards SDG 13 and the Paris Agreement with the development of a green offering and the reduction of its own and financed emissions to NetZero.
- **Protecting the local habitats and species -aligning with SDG 15-** The Bank follows strict procedures, screening processes and policies that filter out investments in activities with an adverse impact on local fauna and flora.
- **Enhancing the implementation of regulations governing the Bank’s operation and reduction of the impact of potential risks from the Bank’s operation – aligning with SDG 16-** Alpha Bank supports the development of effective, responsible and transparent institutions at all levels. As part of its continuous effort to consistently meet the expectations of its stakeholders, the Bank has introduced procedures to ensure the strict application of the laws, regulations and decisions of relevant Authorities, applicable to the financial sector. The Group has a firm position towards corruption and bribery and has established a framework of relevant policies and control mechanisms to combat such risks. In order to protect personal data and avoid breaches, Alpha Bank applies appropriate best practices, which are updated on a regular basis, in line with national and international regulations. The Group further considers meeting the needs of its customers a top priority and in this context, consistently strives to provide high-quality services to all clients, respecting their legal interests and human rights.



Principle 2: Impact and Target Setting

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

2.1 Impact Analysis (Key Step 1)

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

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

Response

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

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

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

Scope: Institutional & Consumer banking portfolio

Geographic location: Greece

Excluded from scope:

- Investment banking portfolio
- Group subsidiaries

Links and references

[Alpha Bank Strategy Update 2020-2022 - Information about our Action Plan 2020-2022](#)

[Sustainability Report 2022 \(p.6\)](#)

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

[The PRB Guidance describes reporting on the PRB, including the impact assessment-](#)

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 It should be noted that the Bank's portfolio concern up to September 30, 2022.

Reason for exclusion:

Data provision was not available. It should be noted that corresponding initiatives are being implemented on a Group level as well and are expected to be reported in the following PRB Report.

Finally, appropriate methods are also planned for the presentation of the investment portfolio.

<https://www.unepfi.org/industries/banking/principles-for-responsible-banking-guidance-document>

Institutional Banking Scope:

- The PRB Impact Analysis Institutional Banking Module has been utilized in a way that covers “a mix of Business and Corporate Banking” which comprises the following Business Lines: Small Business, Corporate, Business Centers, Hospitality, Shipping, Structured Finance. These business lines constitute Alpha Bank’s Institutional Banking representing 48.60% of Alpha Bank’s total business activity.
- The analysis has been performed by using NACE industry classification and drawn outstanding amount as an indicator, since it “generates the most accurate impact profile as this reflects funds actually disbursed”, according to the PRB Impact Analysis Guidance.
- Top 50 sectors with the highest exposure drawn outstanding amount have been selected, taking into consideration exposure to climate sensitive sectors.
- Total portfolio exposure 18bn & PRB analysis exposure 13,8bn (75,8% of total portfolio) (see highlighted rows of 2nd image below).

Indicator	Business lines						Total
	Small Business	Corporate	Business Centers	Hospitality	Shipping	Structured Finance	
Total drawn outstanding loans for each type of Business Line (in € mil)	1,743.49	4,632.42	3,891.32	2,120.60	2,744.86	3,118.94	18,251.63
% of institutional banking	10%	25%	21%	12%	15%	17%	100%
Portion of the bank's overall business represented per Business Line (as gross income, in € mil)	58.25	90.27	81.52	34.67	39.72	63.30	367.73
% of institutional banking	16%	25%	22%	9%	11%	17%	100%

Business segments

Indicator	Institutional Banking	Consumer Banking
Geographic scope	Greece	
Size of Business segment	18,251,609,342.93 (€)	5,193,907 (number of customers) 31,757,591,274.84 (€)
Proportion of the bank's overall business activity represented per Business segment (as gross income, in € mil)	48.6%	32.87%
Industry classification	NACE	
Choice of indicators	Drawn outstanding loans	Number of customers

Impact	Exposure €	Exposure %	# of sectors
Key positive	1,585,708,395.04	11%	9
Key negative	3,440,594,855.01	25%	12
Key positive and negative	4,039,762,482.49	29%	22
Non-key sectors according to PRB, but included in CPRS perimeter	4,047,570,740.15	29%	5
Non key-sectors, nor included in CPRS perimeter but with significant exposure amount	722,259,146.08	5%	2
Total	13,835,895,618.77	100%	50
Total portfolio exposure	18,251,609,342.93	-	632
Table 2 exposure (% of total portfolio)	13,835,895,618.77	75.8%	50

Consumer Banking Scope:

- 10 types of products provided by Alpha Bank to total amount (drawn outstanding loans) of €31.7 bn and a total number of €5.2m retail clients
- The number of retail clients provided may include clients who possess more than one product
- The clients captured are only first holders and not all holders of these retail products
- Percentages of client types (based on income, gender, age and location) were applied on to the number of clients for each product category

Products added into the tool

64,411 Current accounts with payment services (cheques, debit cards)

64,421 Savings accounts

64,431 Credit cards

64,432 Consumer loans & overdraft

64,433 Securities-backed/Lombard/Structured loans

64,434 Home loans/mortgages

64,435 Vehicle related loans

64,436 Education related loans

64,443 Targeted products - youth

64,446 Targeted products – other vulnerable groups

b) Portfolio composition: Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition your portfolio globally and per geographical scope

i) by sectors & industries⁴ for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or

ii) by products & services and by types of customers for consumer and retail banking portfolios.

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

Response

b) The Bank determined the scope and perimeter of its financed activities (financial products and services) to be included in the analysis as follows, based on the UNEPFI Principles for Responsible Banking (PRB) Impact Analysis “context module” methodology:

Business segments

Indicator	Institutional Banking	Consumer Banking
Geographic scope	Greece	
Size of Business segment	18,251,609,342.93 (€)	31,757,591,274.84 (€)
Proportion of the bank's overall business activity represented per Business segment (as gross income, in € mil)	48.6%	32.87%
Industry classification	NACE	
Choice of indicators	Drawn outstanding loans	Drawn outstanding loans

Links and references

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

⁴ 'Key sectors' relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.

Consumer Banking:

- 10 types of products provided by Alpha Bank to total amount (drawn outstanding loans) of €31.7 bn and a total number of €5.2m retail clients
- All products provided were added into the tool
- The number of retail clients provided may include clients who possess more than one product
- The clients captured are only first holders and not all holders of these retail products
- Percentages of client types (based on income, gender, age and location) were applied on to the number of clients for each product category

# of types of products	Products added into the tool	No of clients	Amount of drawn outstanding loans* (in € mil):
1	64,411 Current accounts with payment services (cheques, debit cards)	3,955,869.00	22,575.16
2	64,421 Savings accounts	65,962.00	996.90
3	64,431 Credit cards	564,713.00	937.25
4	64,432 Consumer loans & overdraft	342,683.00	812.79
5	64,433 Securities-backed/ Lombard / Structured loans	864.00	14.46
6	64,434 Home loans /mortgages	90,760.00	5,952.90
7	64,435 Vehicle related loans	11,710.00	71.03
8	64,436 Education related loans	194.00	1.24
9	64,443 Targeted products - youth	159,637.00	395.20
10	64,446 Targeted products - other vulnerable groups	1,515.00	0.65
Total		5,193,907.00	31,757.59

Institutional Banking

Corporate portfolio

Sector	Proportion of portfolio
H50 - Water transport	19.62%
I55 - Accommodation	16.63%
D35 - Electricity, gas, steam and air conditioning supply	10.77%
L68 - Real estate activities	7.17%
C10 - Manufacture of food products	5.94%
H52 - Warehousing and support activities for transportation	5.61%
G46 - Wholesale trade, except of motor vehicles and motorcycles	5.41%
G47 - Retail trade, except of motor vehicles and motorcycles	4.57%
K64 - Financial service activities, except insurance and pension funding	4.11%
C24 - Manufacture of Basic metals	3.48%
F42 - Civil engineering	2.82%
C19 - Manufacture of coke and refined petroleum products	1.60%
N77 - Rental and leasing activities	1.60%
F41 - Construction of Buildings	1.43%
Other	9.23%
Total	100%

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?⁵ Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

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

Country needs' scores metrics amendments

The following table presents the updates of the country needs that resulted from the review of the sources undertaken in order to ensure that assessments are relevant and updated for Greece. The following table summarizes the updates of the metrics, their reason, the new value and the source.

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

Impact area	Impact topic	Metric	Updates on metric country need score (old/new)	Reason for update / Effect on IMPACT TOPIC	Value	Source
Availability, accessibility, affordability, quality of resources & services	Connectivity	Population covered by at least a 4G mobile network (%)	- / 1	Updated source / No metric score was given in previous version / No effect	99%	ITU - Digital Development Dashboard
	Water	Proportion of population using safely managed drinking water services	1	Updated source / No effect	100%	Sustainable Development Report 2022
	Housing	Proportion of urban population living in slums	1	Updated source / No effect	0%	Sustainable Development Report 2022
		Housing cost overburden among low-income owners with mortgage	4	Updated year in source / No effect	35	OECD - Affordable Housing Database

[Sustainability Report 2022](#) (p. 26-29) – The results and the Identification of Material Impact Areas

⁵ Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

		Housing overcrowding among low-income	4	Updated year in source / No effect	25	OECD - Affordable Housing Database
	Education	Mean years of schooling (composite index: mean years of schooling of adults)	1	Updated year in source / No effect	11.4	Mean years of schooling
	Mobility	Congestion level (as a function of hours lost to traffic)	3	Updated year in source / No effect	31	TomTom Traffic Index
Equality & justice	Gender equality	Gender inequality	1	Updated year in source / No effect	0.119	UNDP - Gender Inequality index
	Ethnic/racial equality	Everyday racism	- / 4	Updated source / No baseline source or score / Increased country need	Everyday racism	"The Greek reality of racist violence: from extremist racist groups to "everyday" racism"

Impact area	Impact topic	Metric	Updates on metric country need score (old/new)	Reason for update / Effect on IMPACT TOPIC	Value	Source
Climate Stability	-	CO ₂ emissions (metric tons per capita)	3 / 2	Updated year in source / No effect	4.4	IEA
Biodiversity & healthy ecosystems	Waterbodies	Proportion of water bodies with good ambient water quality	3	Updated source / No effect	41%	"UN Global SDG Database"
	Air	Modeled annual mean PM2.5	2	Updated year in source / No effect	15.4	Sustainable Development Report 2022
	Soil	Proportion of degraded land	- / 2	Updated source / No metric score was given in previous version / Increased country need	16%	Proportion of land that is degraded over total land area, (%)
	Habitat	Vegetation loss since 2004	- / 1	Updated source / No metric score was given in previous version / Increased country need	0.49%	OECD - Environment Database
Circularity	Resource intensity	Energy consumption per capita (GJ/capita)	2 / 1	Updated source / No effect	76	IEA Atlas of Energy
		Water withdrawals per capita, in cubic metres per year	3	Updated source / No effect	946.11	Eurostat database

Healthy economies	Sector diversity	Economic Complexity Index (ECI)	2	Updated year in source / No effect	0.25	Harvard Growth Lab - Country & Product Complexity Rankings
Socio-economic convergence	-	Gini coefficient	2	Updated year in source / No effect	33.1	World Bank

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)⁶? Please disclose.

Response

Based on the most recent impact analysis, and by taking into consideration the country needs, GRI materiality analysis results, stakeholder needs and expectations, regulatory framework and corporate priorities, the two prioritized impact areas are:

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

GRI Materiality Analysis Results- Positive Impacts

ESG Strategy priority impact areas	ALPHA BANK's material positive impacts	Type of impact	Prioritized impact topics
Financial health & inclusion	Finance	Financed & operational	Impacts created through specific financial products/services and operational initiatives that improve accessibility to the use of financial services

Links and references [Sustainability Report 2022](#) (The identification of the material impact areas are presented on p. 27-29. Furthermore, the results of the PRB impact analysis are presented on p. 32, 58-59)

⁶ To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.

	Gender equality	Operational	Impacts created through operational activities and initiatives that improve stakeholders' ability to live free from gender inequality
	Age discrimination	Financed & operational	Impacts created through specific financial products/services and operational activities that improve stakeholders' ability to live free from ageism
	Employment	Financed & operational	Impacts created through specific financial products/services and operational activities that improve stakeholders' accessibility to productive work in conditions of freedom, equity, security and human dignity
Health, Safety and Well being	Health, safety, & well-being	Financed & operational	Impacts created through specific financial products/services that affect the ability of stakeholders to live in a state of complete physical, mental and social well-being and stakeholders' accessibility to quality essential health-care services
Culture and Heritage	Culture and heritage	Financed & operational	Impacts created through specific financial products/services and CSR initiatives that improve stakeholders' ability to access and participate in cultural life, to enjoy the arts and to share in scientific advancement and its benefits
Climate	Climate stability	Financed & operational	Impacts created through specific financial products/services that address climate change, and through energy reduction and efficiency initiatives in the Bank's supply chain and operations
Biodiversity	Biodiversity (air, waterbodies)	Financed & operational	Impacts created through specific financial products/services and operational initiatives that reduce and/or eliminate air pollutants (e.g. NOx, SOx, PM, VOCs) and/or are targeted to

			the quality and the quantity of surface water and groundwater
Circularity	Circularity (resource intensity, waste)	Operational	Impacts created through operational activities that increase the efficient use of limited, non-renewable natural and renewable natural resources and/or are focused on waste management and the ability to manage waste
Materiality Analysis Results- Negative Impacts			
ESG Strategy priority impact areas	ALPHA BANK's material negative impacts	Type of impact	Prioritized impact topics
Climate	Climate stability	Financed & operational	Impacts created through specific financial products/services that contribute to climate change and through the creation of direct and indirect GHG emissions in the Bank's supply chain and operations
Biodiversity	Biodiversity (air, soil, waterbodies, species, habitats)	Financed & operational	Impacts created through financial products/services to certain sectors and operational activities that create air pollutants (e.g. NOx, SOx, PM, VOCs), that affect the composition of soil and its ability to deliver ecosystem services, the quality and quantity of surface water and groundwater, the ability to maintain species and/or the ability to protect, restore and promote sustainable ecosystems and habitats
Circularity	Circularity (resource intensity, waste)	Financed & operational	Impacts created through financial products/services to certain sectors and through operational activities that affect the efficient use of limited, non-renewable, and

			renewable natural resources and/or the ability to manage and reduce waste
Governance	Data privacy	Operational	Impacts created through operational activities that affect stakeholders' accessibility to the right of personal privacy (Issues of non-compliance)

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

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

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

If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.

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

Response

1. Institutional banking portfolio

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

POSITIVE Impact areas	Impact topics	Proportion of portfolio
Livelihood	Employment, Wages, Social protection	75.81%
Availability, accessibility, affordability, quality of resources & services	Water, Food, Energy, Housing, Healthcare & sanitation, Education, Mobility, Connectivity, Culture & heritage, Finance	56.93%
Healthy economies	Flourishing MSMEs	55.19%
Infrastructure	Infrastructure	25.06%
Health & safety	Health & safety	24.05%
Climate stability	Climate stability	11.82%
Biodiversity & healthy ecosystems	Waterbodies, Air	11.82%
Circularity	Resource intensity, Waste	5.32%
Integrity & security of person	N/A	0.00%
Equality & justice	N/A	0.00%
Strong institutions, peace & stability	N/A	0.00%
Socio-economic convergence	N/A	0.00%

[Sustainability Report 2022](#) (The performance measurement of the material impacts areas - Climate & Financial Health and Inclusion- are presented on p. 55, 110-111)

NEGATIVE Impact areas	Impact topics	Proportion of portfolio
Health & safety	Health & safety	75.81%
Circularity	Resource intensity,Waste	68.08%
Livelihood	Wages,Social protection	68.03%
Climate stability	Climate stability	64.50%
Biodiversity & healthy ecosystems	Waterbodies, Air, Soil, Species, Habitat	59.48%
Availability, accessibility, affordability, quality of resources & services	Water, Food, Energy, Housing, Healthcare & sanitation, Mobility, Culture & heritage, Finance	20.51%
Integrity & security of person	Conflict, Child labour	4.96%
Strong institutions, peace & stability	Rule of law	3.11%
Healthy economies	Sector diversity	0.77%
Equality & justice	Gender equality,Ethnic/racial equality,Age discrimination,Other vulnerable groups	0.52%
Infrastructure	N/A	0.00%
Socio-economic convergence	N/A	0.00%

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

a) Positive Impacts Contributing Sectors

	Impact areas	Impact topics	Associated SDGs	Contributing sectors (top 5 by proportion of portfolio per impact area)
Institutional Banking POSITIVE	Livelihood	Employment, Wages, Social protection	SDGs 1, 5, 8	<ol style="list-style-type: none"> 1. 50.20 Sea and coastal freight water transport (14.49%) 2. 55.10 Hotels and similar accommodation (12.61%) 3. 46.71 Wholesale of solid, liquid and gaseous fuels and related products (4.10%) 4. 35.1 Electric power generation, transmission and distribution (3.98%) 5. 52.23 Service activities incidental to air transportation (3.18%)
	Availability, accessibility, affordability, quality of resources & services	Water, Food, Energy, Housing, Healthcare & sanitation, Education, Mobility, Information, Connectivity, Culture & heritage, Finance	SDGs 1-9, 11-13, 16-17	<ol style="list-style-type: none"> 1. 55.10 Hotels and similar accommodation (12.61%) 2. 46.71 Wholesale of solid, liquid and gaseous fuels and related products (4.10%) 3. 35.1 Electric power generation, transmission and distribution (3.98%) 4. 52.23 Service activities incidental to air transportation (3.18%) 5. 64.20 Activities of holding companies (3.11%)

		Healthy economies	Flourishing MSMEs	SDGs 8, 9	<ol style="list-style-type: none"> 50.20 Sea and coastal freight water transport (14.49%) 55.10 Hotels and similar accommodation (12.61%) 46.71 Wholesale of solid, liquid and gaseous fuels and related products (4.10%) 52.23 Service activities incidental to air transportation (3.18%) 64.20 Activities of holding companies (3.11%)
b) Negative Impacts Contributing Sectors					
		Impact areas	Impact topics	Associated SDGs	Contributing sectors (top 5 by proportion of portfolio per impact area)
Institutional Banking	NEGATIVE	Health & safety	Health & safety	SDG 3	<ol style="list-style-type: none"> 50.20 Sea and coastal freight water transport (14.49%) 55.10 Hotels and similar accommodation (12.61%) 46.71 Wholesale of solid, liquid and gaseous fuels and related products (4.10%) 35.1 Electric power generation, transmission and distribution (3.98%) 52.23 Service activities incidental to air transportation (3.18%)
		Circularity	Resource intensity, Waste	SDGs 6,8, 11, 12, 14	<ol style="list-style-type: none"> 50.20 Sea and coastal freight water transport (14.49%) 55.10 Hotels and similar accommodation (12.61%)

				<ul style="list-style-type: none"> 3. 35.1 Electric power generation, transmission and distribution (3.98%) 4. 52.23 Service activities incidental to air transportation (3.18%) 5. 64.20 Activities of holding companies (3.11%)
	Livelihood	Wages, Social protection	SDGs 1, 8	<ul style="list-style-type: none"> 1. 50.20 Sea and coastal freight water transport (14.49%) 2. 55.10 Hotels and similar accommodation (12.61%) 3. 46.71 Wholesale of solid, liquid and gaseous fuels and related products (4.10%) 4. 35.1 Electric power generation, transmission and distribution (3.98%) 5. 64.20 Activities of holding companies (3.11%)
	Climate stability	Climate stability	SDGs 1, 7, 12, 13	<ul style="list-style-type: none"> 1. 50.20 Sea and coastal freight water transport (14.49%) 2. 55.10 Hotels and similar accommodation (12.61%) 3. 46.71 Wholesale of solid, liquid and gaseous fuels and related products (4.10%) 4. 35.1 Electric power generation, transmission and distribution (3.98%) 5. 52.23 Service activities incidental to air transportation (3.18%)
	Biodiversity & healthy ecosystems	Waterbodies, Air, Soil, Species, Habitat	SDGs 2, 3, 6, 11, 14, 15	<ul style="list-style-type: none"> 1. 50.20 Sea and coastal freight water transport (14.49%) 2. 55.10 Hotels and similar accommodation (12.61%)

					<ol style="list-style-type: none"> 3. 46.71 Wholesale of solid, liquid and gaseous fuels and related products (4.10%) 4. 35.1 Electric power generation, transmission and distribution (3.98%) 5. 68.20 Rental and operating of own or leased real estate (3.00%) 	
2. Consumer banking Contributing Sectors						
Consumer Banking	POSITIVE	Impact areas	Associated Impact topics	Associated SDGs	Contributing sectors (not only key sectors incl.)	% of portfolio
		Socio-economic convergence	Socio-economic convergence	SDGs 1, 10	<ol style="list-style-type: none"> 1. Education related loans 2. Targeted products - youth 3. Targeted products - other vulnerable groups 	3.10%
		Availability, accessibility, affordability, quality of resources & services	Finance, Housing, Mobility, Education	SDGs 9, 11.2, 1, 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.a, 4.b, 4.c, 8.6, 12.8, 13.3, 1.5, 2.2, 3.1, 3.5, 3.7, 3.8, 3.b, 3.c, 3.d, 5.6, 1.4, 11.1, 11.3	<ol style="list-style-type: none"> 1. 64.411 Current accounts with payment services (cheques, debit cards) 2. 64.421 Savings accounts 3. Credit cards 4. Consumer loans & overdraft 5. Securities-backed/ Lombard 6. Home loans /mortgages 7. Vehicle related loans 8. Education related loans 9. Targeted products - youth 10. Targeted products - other vulnerable groups 	100%

		Equality & justice	Gender equality, Ethnic/racial equality, Age discrimination, Other vulnerable groups	SDGs 8.5, 8.7, 10.2, 11.2, 11.7, 16.2 4.5, 8.5, 8.8, 10.2, 11.2, 11.7	1. Targeted products - youth 2. Targeted products - other vulnerable groups	3.10%
		Healthy economies	Flourishing MSMEs	SDGs 8.3, 9.3		
NEGATIVE		Equality & justice	Gender equality, Ethnic/racial equality, Age discrimination, Other vulnerable groups	SDGs 3.7, 4.5, 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.a, 5.b, 5.c, 8.5, 8.7, 8.8, 10.2, 10.3 11.2, 11.7	1. Consumer loans & overdraft 2. Education related loans 3. Home loans /mortgages	8.35%
		Healthy economies	Flourishing MSMEs	SDGs 8.3, 9.3	1. Targeted products - youth 2. Targeted products - other vulnerable groups	3.10%
		Climate stability	Climate stability	SDGs 1.5, 7.b, 12.a, 13.1, 13.2, 13.a, 13.b	1. Home loans /mortgages 2. Vehicle related loans	1.97%
		Circularity	Resource intensity	SDGs 6.3, 6.4, 8.4, 12.1, 12.2		
		Availability, accessibility, affordability, quality of resources & services	Finance, Housing, Mobility, Education	SDGs 8.10, 9.3	1. Credit cards 2. Consumer loans & overdraft 3. Securities-backed/ Lombard 4. Home loans /mortgages 5. Vehicle related loans 6. Education related loans 7. Targeted products - youth 8. Targeted products - other vulnerable groups	22.57%

Climate: Performance measurement has been conducted via the Financed Emissions measurement exercise through which the key contributing sectors (Power generation and shipping) have been identified and established the baseline (2021) for climate target setting on financed emissions which is in progress. Additional KPIs and climate related targets have been set, though, as described below⁷:

- 1) Scope 2 emissions- associated with electricity consumption - location-based (tCO₂e)
- 2) Scope 2 emissions market-based (tCO₂e)

Financial health & inclusion: Performance measurement has been finalized and KPIs have been established to measure the performance, as described below⁷:

- 1) New employee hires and employee turnover
- 2) Average hours of training per year per employee

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?⁸

- 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, climate change adaptation, resource efficiency & circular economy, biodiversity, financial health & inclusion, human rights, gender equality, decent employment, water, pollution, other: please specify

Climate: *Climate stability*

Financial health and inclusion: *Finance, gender equality, age discrimination, employment.*

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

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

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

⁷ Climate and Financial health & inclusion KPIs concern up to December 31, 2022.

⁸ You can respond "Yes" to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.

2.2 Target Setting (Key Step 2)

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

The targets⁹ 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 with¹⁰ 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.

For the purpose of implementing the Principles, key business divisions (Business Centres Division; Card and Personal Loans Division; Corporate Governance and Sustainability Division; Human Resources Division; Investment Portfolios Management Division; Procurement, Safety and Property Division; Small Business Division; Structured Finance Division etc.), and senior management of Alpha Bank worked on setting SMART targets supporting society's goals and addressing the most significant impacts identified. As a result of the first impact analysis, conducted in 2020, the Bank decided to identify a first set of 11 SMART targets in its first PRB self-assessment report. These targets address the 4 most significant areas of impact of the Bank (as identified in the first PRB impact assessment) and are relating to our business activities as well as to our own operations as follows:

- **To support Climate-related objectives**

In relation to our business activities,

- We will develop products and financial instruments in cooperation with European Institutions in agricultural sector aiming to reach 5% of new disbursements by 2025;
- We will increase Alpha Green Loans Products penetration to double the 2020's percentage of Total New Disbursements by 2022;
- We will increase the ESG related products assets (such as Green Bonds) by 5% on a yearly basis or 25% cumulative until 2025; and
- We will increase our funding of Renewable Energy Systems ("RES") of € 40 million equivalent to approximately 70 MW by 2025.

In relation to our own operations,

- We will continue to procure 100% renewable electricity for all our buildings and branches until 2025.

- **To support Waste-related objectives:**

In relation to our own operations,

Links and references
[Sustainability Report 2022](#) (p.13-15)
[Alpha Bank Strategy Update 2020-2022](#) -
Information about our Action Plan 2020-2022

⁹ 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.

¹⁰ 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.

- We will further reduce our annual rate of paper usage by 7% until the end of 2025; and
- We will reach 30% annual rate of recycled vs used toners by the end of 2025.
- **To support Water-related objectives:**
In relation to our business activities,
 - We will decrease the funding of activities that have negative effects on the intensity and pollute the water of 2% by 2030.
- **To support Employment-related objectives:**
In relation to our business activities,
 - We will design a Corporate Responsibility program to support young people and entrepreneurship by 2025.
 In relation to our own operations;
 - We will increase our Youth Hiring's by 20% by 2025; and
 - We will reach a 12 percentage points increase in the branch accessibility to persons with mobility disabilities by 2025.

Based on the most recent Impact analysis, conducted in October 2022, the Bank has proceeded to additional targeting setting, aligned with the overall ESG Strategy and the Bank's operating model. The methodology applied to identify the updated material impacts is in accordance with the revised Global Reporting Initiative Standards (GRI) and the Principles of Responsible Banking (PRB) of the United Nations - Environment Program Finance Initiative (UNEP FI). Additionally, the Bank's contribution to the SDGs was taken into consideration along with Paris Climate Agreement and relevant regional frameworks such as the European Union Action Plan on Sustainable Finance and Greece's national strategy for sustainable development. The updated targets and commitments are presented in the sustainability report 2022.

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

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

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

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

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Climate change</i>		

Impact area	Indicator code	Response
Financial health & inclusion		

Response

Baseline year for the targets already set: 2020
Baseline year for the updated targets: 2022

[Sustainability report 2022](#) (p. 13-15)

c) SMART targets (incl. key performance indicators (KPIs)¹¹): 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.

In the context of the revamped Sustainability strategy, the following targets have been set. It should be noted that the Sustainability Strategy has been defined on the basis of the key areas on which the Group has material actual and potential impacts in order to align with the Bank's business plan for 2023-2025 and allocate resources appropriately to ensure achievement of its stated objectives

[Sustainability report 2022](#) (p. 13-15)

A) To support Climate-related objectives:

- Allocate € 3 bn to new Sustainable Financings by 2025
Relevant KPI: New financing volumes (in €mn)
- Within the total Sustainable Financings, achieve at least Euro 1 billion to Renewable Energy Systems by 2025
Relevant KPI: New financing volumes (in €mn)
- Within the total Sustainable Financings, achieve at least Euro 300 million of Retail green loans, including loans to small businesses until 2025.
Relevant KPI: New financing volumes (in €mn)
- Launch new sustainability-based mortgage and consumer loan products and credit cards until 2025
Relevant KPI: No. of Products Launched

¹¹ Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.

<ul style="list-style-type: none"> • Zero financing to new investments in thermal coal mining, upstream oil exploration or coal-fired electricity generation (ongoing as of 2023) Relevant KPI: New financing volumes (in €mn) <p>B) To support Financial Health and Inclusion:</p> <ul style="list-style-type: none"> • Increase employment of young people by 20% by 2025 Relevant KPIs: 1) Percentage of hirings in the age group of 18-25 2) Percentage of employees in the age group of 18-25 • Increase access to people with mobility limitations to 85% of our Branches, by 2025. Relevant KPI: Percentage of branches accessible (ramp or easily accessible) by people with disabilities (%) 	
<p>d) Action plan: which actions including milestones have you defined to meet the set targets? Please describe. Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.</p>	
<p>The Bank has developed and implementing an ambitious ESG Workplan with the ultimate objective to effectively manage any ESG related issues and improve its environmental and social impact. As such, specific KPIs and metrics have been set for each one of the targets in order to monitor its progress¹². These KPIs reflect Alpha Bank’s ambition to:</p> <ul style="list-style-type: none"> • To support an environmentally sustainable economy • Foster Healthy economies and societal progress • Ensure a robust and transparent Governance <p>Additionally, the Bank, periodically tries to identify, assess and prioritize the ESG issues which are related to its activities and might impact the Group’s operations and/or its Stakeholders, through a materiality analysis process, which is in accordance with the “GRI 3: Material Topics 2021”. The materiality analysis consists of 6 steps:</p> <ol style="list-style-type: none"> 1. Understand the organization’s context The Bank determined the scope and perimeter of its financed activities (financial products and services) to be included in the analysis based on the UNEPFI Principles for Responsible Banking (PRB) Impact Analysis “context module” methodology. 2. Identify actual and potential impacts The purpose of this step is to identify “the actual and potential impacts on the economy, environment, and people, including impacts on human rights, across the organization’s activities and business relationships. Impacts can be negative or positive, long term or short term. 3. Identify “in-house” and “financed” impacts 	<p>Sustainability Report 2022 (p.13-15 &27-29)</p>

¹² There is no formal written procedure yet established on the structural procedures to be followed in case of a target is not achieved or unexpected negative impacts are followed. It should be noted that appropriate action plans are expected to be designed in the following PRB Report

In order to identify **in-house impacts** across its operations and its supply chain, outputs from internal management systems, including certifications, anti-corruption and compliance management systems, occupational health and safety inspections, grievance mechanisms and CSR initiatives, have been reviewed. To identify the Bank's **financed impacts (i.e. impacts from the Bank's portfolio)**, a dedicated portfolio alignment analysis, in accordance with the UNEP FI Principles for Responsible Banking (PRB) Impact Analysis, using the Portfolio Impact Analysis Tool for Banks (version 3) has been conducted.

4. Assess the significance of the impacts

The assessment of impacts was based on a qualitative analysis by the Bank's ESG Working Group, through a dedicated electronic survey (e-survey) tool.

5. Prioritize the most significant impacts

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

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

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

Additionally, in 2022 in the context of ESG (Environmental, Social & Governance) initiatives, Alpha Bank was the first bank in Greece to verify its Organizational Resilience framework with the international standard ISO 22316 (Organizational Resilience). Also the Bank obtained ISO 45001 (Occupational Health and Safety) certification, further enhancing the Group's alignment with international standards and best practices.

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:... (please name it)	...second area of most significant impact:... (please name it)	(If you are setting targets in more impact areas) ...your third (and subsequent) area(s) of impact:... (please name it)
Alignment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No
Baseline	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
SMART targets	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
Action plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No

2.3 Target implementation and monitoring (Key Step 2)

For each target separately:

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

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

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

As of next year, performance on more ambitious targets that will be set based on the update PRB impact analysis. With regards to the targets previously set, the following progress has been made, until December 31, 2022:

- **Agricultural sector financial products and services:** In 2022, 3.6% of the new disbursements have been allocated to the agricultural sector (in cooperation with European Institutions)
- **Alpha Green Loan Products:** In 2022, the penetration rate of Alpha Green Loan Products reached 8%, which is increased compared to the penetration rate of 2020 (7%)*.
- **ESG related assets:** Since 2021 the regulatory framework (SFDR) makes the following distinction with regards to the sustainability character of the investment products: Article 6 financial products: do not promote sustainability characteristics, Article 8 financial products: promote environmental or social characteristics among others, Article 9 financial products: promote sustainable investment as one of its objectives. Products under Article 8 and 9 are considered ESG. As such, this differentiates completely the Bank's of "ESG" products as defined before SFDR regulation when the initial target was set.
- **Renewable Energy Systems (RES):** In 2022, the total of MW reached around 674MW, which is c.447MW higher than the total amount of 227MW of 2021 and in line with the mid-term goal of 70MW increase by 2025.
- **Own operations:** The Bank procures 100% renewable electricity for all its buildings and branches.
- **Paper usage:** In 2022, the tons of paper used were reduced by almost 23% compared to 2020. The target is overachieved due to several initiatives (MPS expansion, digitization of transactions, web penetration, increase of e- statements etc) Global recycling rate: In 2022, the annual rate of recycled vs used toners has been 103%, due to employee's trainings and awareness with regards to the recycling of the Bank's consumables and previous years' clearing. The specific index is the percentage of recycled toners to the total consumption of toners.
- **Water scarcity and pollution:** The target has been achieved since more financings are gradually targeted to companies which adopt environmentally responsible policies and invest in energy-saving and generally eco-friendly operations, thus achieving a faster pace of reducing exposures to company clients that negatively effect water aquifers".
- **Young people and entrepreneurship:** The Bank is implementing educational partnerships and programmes targeted to young people, as part of the Corporate Responsibility Program. It is noted, that in 2022 youth hirings reached 22% which is increased compared to 2021 youth hirings (3%). More information about the Bank's educational initiatives and programmes that support entrepreneurship, can be found in the Sustainability report 2022.
- **Branch accessibility:** In 2022, the branch accessibility for persons with mobility disabilities increased by 7%, compared to 2021.

**Percentage for 2020 has been restated in order to be comparable with the more extended perimeter of the Bank's green loans (to include EPC>A 2% provision and hybrid cars)*

*Links and references
[Alpha Bank Strategy Update 2020-2022](#) -
Information about our
Action Plan 2020-2022*



Principle 3: Clients and Customers

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

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers¹³ 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 activities¹⁴. It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

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

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

Alpha Services and Holdings respects and promotes human rights through the business policies it applies, its responsible supply chain and the relations it develops with its Customers. Alpha Bank's Corporate Responsibility Policy and its Code of Ethics describe its approach and commitment to the management of human rights. At the same time, it applies the law and follows internationally acclaimed directives, principles and initiatives to protect human rights, such as the Core Labour Conventions of the International Labour Organization (ILO) and the Universal Declaration of Human Rights (UDHR).

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

Links and references

¹³ 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.

¹⁴ Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

The Cybersecurity and Information Security Division, under the supervision of the Group Information Security Officer, manages all Cybersecurity issues at Group level. In 2020, the Division completed its three-year Strategic Plan (2018-2020), which was based on the formal Cybersecurity Maturity Assessment process. The main target of the Plan was to reorganize Cybersecurity at organizational, procedural and technical levels. The successful completion of the program has set the foundation for continuously improving Cybersecurity efficiency and effectiveness, in full alignment with the business objectives of the Bank.

The new Strategic Plan (2021-2023) is based on a more granular assessment model and aims to further develop critical Cybersecurity operations, enhancing significant activities and developing necessary skills.

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

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

To inform Individuals about the processing of Personal Data carried out in each case by the competent Units of the Bank or by external third parties processing data on its behalf, the Bank has prepared the document entitled "Notification on the Processing of Personal Data", which is provided upon collection of their Personal Data. This document is posted at a central point on the Bank's website and serves as a set point of information for all relevant details that Individuals need to know as regards personal data processing, such as the purpose of processing, the sources and recipients of data, the storage period, their rights and how to exercise them and the contact persons at the Bank's competent Services.

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

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

- Review of the Register of Processing Activities (RoPA), kept by the Bank and Group Entities, which includes all operations, that involves personal data processing and update of the Record of Processing Activities with the addition of the new processing flows and the update/modification of the existing ones in the relative GRC Platform – (Operational Risk, Cyber Security) RoPA module in accordance with the instructions of the Group Data Protection Officer. Ongoing Process for Group Entities.
- Assessing the impact on Personal Data processing flows of potentially high risk for the freedoms and rights of Natural Persons and development of action plans for applying technical and organizational measures in order to mitigate risks.
- Developing the appropriate infrastructure for collecting and efficiently managing consent to data processing, as well as for withdrawing consent.
- Update of the Employees' Privacy Notice in accordance with the requirements arising from the General Data Protection Regulation. Ongoing process for Group Entities.

<ul style="list-style-type: none"> • Adoption of Key Risk Indicators (KRIs) for monitoring the Organization's level of compliance with the GDPR and definition of Key Performance Indicators (KPIs) for assessing the effectiveness of the Personal Data Protection Framework. • Training of Divisions and Group Entities regarding issues related to the implementation of the General Data Protection Regulation. 	
<p>3.2 Business opportunities <i>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.).</i></p>	
<p>Alpha Bank continuously promote responsible practices among its customers and clients by:</p> <ul style="list-style-type: none"> • raising awareness and incentivising more sustainable choices; and • improving its products and services to address its customers' banking needs in a modern and responsible manner. <p>For example, Alpha Bank:</p> <ul style="list-style-type: none"> • informs its customers, through events and tailor-made trainings, about investment opportunities in mutual funds that meet ESG criteria. • has developed services and products for its Retail Banking clients and Small/ Medium Enterprises to support their transition towards sustainable activities. <p>Alpha Bank seeks to increase its positive effect on society and the environment, utilising new business opportunities and generating value for all stakeholders. The Bank offers thematic investments with a positive direct or indirect impact on humanity and the environment (Socially Responsible Investing - SRI) as well as on mutual fund choices that also take into account social responsibility and corporate governance with regards to the underlying assets under management (Environmental, Social and Governance - ESG criteria). Aiming to raise awareness regarding ESG and sustainable investments, Alpha Bank organizes informative events and on a regular basis publishes relevant informative material in reports. It supports households and business responsible investment choices and invests in large infrastructure projects and projects that have a positive environmental and social impact. On this basis, Alpha Bank regularly coordinates internal and external (Customer) events focused on the merits of ESG investing.</p> <p>The Bank's Project Finance Unit works on securing financing for investments in projects aiming at benefiting society. In 2022, the Project Finance Unit continued its successful activity, providing financing for new investments in wind farms and solar parks, while it also undertook or participated in new financing arrangements. Since 2016, the Group has incorporated the "Environmental and Social Risk Management Policy on Legal Entities Lending" in the Group's existing Credit Risk Management Framework and the Group's Credit Policy, thereby enhancing the effective management of the environmental and social dimension of financing. The Policy presents the responsibilities and the approach followed in managing environmental and social risk at every stage of the lending process and also provides an industry-specific Exclusion List (i.e. a list of sectors that the Group does not finance), as well as a list of crucial industry sectors/activities associated with environmental and social risk.</p>	<p><i>Links and references</i></p>



Principle 4: Stakeholders

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

4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups¹⁵) you have identified as relevant in relation to the impact analysis and target setting process?

Yes

In progress

No

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

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

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

The Bank recognizes as its Stakeholders the natural and/or legal persons who/which, either directly or indirectly, are connected to, and affect or are affected by the Bank's decisions and its operation. Based on the relevant laws, its daily operations, the existing policies and procedures and the Group's corporate governance strategy, Alpha Bank has recognized four distinct Stakeholder groups:

- Analysts and Investors
- Employees
- Society
- Customers

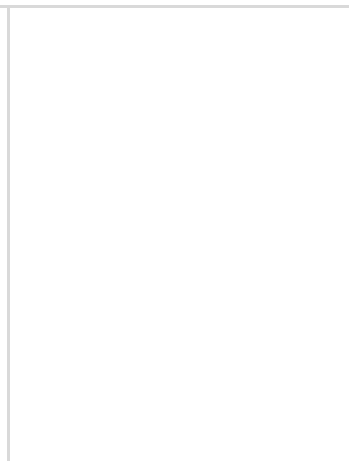
It seeks to engage in an ongoing dialogue and collaboration with these Stakeholders, in order to understand and, as far as possible, respond to their expectations, needs, concerns and requests. Investors and Analysts are provided with full and prompt information via specific sections on the website, together with the Financial Statements, the Business Review, the Sustainability Report as well as

Links and references

¹⁵ Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations

direct meetings. Furthermore, Alpha Bank pays great attention to ensuring its Customers' satisfaction and to providing high-quality products and services. The Customer Service Division is in charge of Quality Assurance and is committed to fulfilling these objectives. Alpha Bank ensures effective communication with Employees, by establishing the role of Human Resources Business Partners that serve as a first point of contact for employees and Visits by Human Resources Unit Executives to Bank Units and Branches. Finally, the Bank is often involved in a dialogue and in consultations with Official sector authorities, both locally and at European level. The Bank supports public administration services, local organizations, foundations and it communicates with representatives of local communities on a regular basis.

Alpha Bank, periodically, tries to identify, assess and prioritize the ESG issues which are related to its activities and might impact the Group's operations and/or its Stakeholders, through a materiality analysis process, in accordance with the "GRI 3: Material Topics 2021". The prioritization was based on the results of an e-survey assessment, via which the significance of the impacts was determined, and thresholds set to determine which positive and negative impacts will be material for the organization's strategy and disclosures. The final list of material impact areas was debated by a dedicated working group, comprised of executives from Governance & Sustainability Division, Strategy & Investments, Digital, Transformation Office, Climate & ESG Risk and HR, was validated by a discussion at the Group Sustainability Committee and approved by the Board of Directors.





Principle 5: Governance & Culture

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

5.1 Governance Structure for Implementation of the Principles

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

- Yes
 In progress
 No

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

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

Response

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

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

The comprehensive ESG Governance Structure that has been developed at a Group level, demonstrates the Group's strong commitment to Sustainability issues. It should be noted that the Governance, Sustainability and Nominations Committee supports the Board of Directors in overseeing the Sustainable Development processes and operations. The Committee has a central role in ESG direction setting and oversight. The purpose of the Committee is to strengthen the Bank's long-term commitment in creating value through the ESG objectives and to monitor the effectiveness of Alpha Services and Holdings to meet its targets and goals in relation to ESG issues. During 2022, the Bank's ESG capability was further developed by the establishment of expert teams with advanced skills in specific areas, such as the **Climate & ESG Risk Team** in the CRO area under the newly assigned **Chief Risk Control Officer** and the nomination of a **Sustainability Strategy lead** in the Strategy and Investments Division.

[Sustainability Report 2022](#) (Our sustainability governance structure is presented on p. 83-92. Furthermore, our policies are presented on p. 93)
[Non Financial Report 2022](#)- p. 37-38
[Remuneration Report 2021](#) (The executive remuneration is presented on p. 16-20)

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).

Alpha Bank also works toward fostering a culture of responsible banking. This can be seen in the incorporation of responsible values throughout the group vision and the identification of responsibilities for sustainability initiatives and training programmes).

Links and references

Effective communication with the Bank's employees, in order to enable them to voice their issues and the Bank to communicate its culture and principles constantly. Two prime examples of effective communication channels are:

- Resources Business Partners (HRBPs) who are the immediate contact person for the employees of their assigned Units who can discuss with them any issue (work related or personal) they have and the #stayconnected platform which is a direct communication point with employees.
- The Employees are also informed via the monthly online internal newsletter "MAZI" ("Together"), as well as via announcements posted on the Alpha Bank Intranet, whenever any issue arises.

Additionally, in 2022, the revamped learning brand of Alpha Bank, **ACE #together we grow**, was enriched with new content consisting of e- Learnings, classroom trainings and webinars, in cooperation with consultants selected for their functional expertise and leading learning practices. What is more, new learning Academies were launched, one of which is the dedicated ESG Academy, in view of further accelerating the establishment of a sustainability related culture in the Bank. Finally, a partnership with two global online learning platforms have been initiated, offering to employees, access to thousands of curated courses on a multitude of topics.

Last, the Remuneration Policy that has been established determines variable remuneration. Variable remuneration reflects the annual sustainable and risk-weighted performance as well as performance in excess of that required to fulfil the tasks entrusted. More details in the "Corporate Governance" section.

5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio?¹⁶ Please describe.

Please describe what due diligence processes your banks has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

Response

Following the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), the Bank assesses the impending environmental policies, the legal requirements and the guidelines associated with the climate, in order to record and efficiently manage related risks. In this context, it has proceeded to the insurance of its infrastructures and buildings, also including its offices, Branches and warehouses, in order to mitigate the physical risks associated with the impact of extreme weather conditions. In addition, such incidents are addressed within the Bank's Business Continuity Management System to ensure the uninterrupted provision of services to Customers and other Stakeholders. Alpha Services and Holdings seeks to improve in terms of measuring, managing and minimizing the risks associated with climate change. Indicatively, The Bank has reviewed the European Central Bank Guidelines on the risks associated with climate change and the environment and has launched a specific project to harmonize it.

Since 2016, the Group has incorporated the "Environmental and Social Risk Management Policy on Legal Entities Lending" in the Group's existing Credit Risk Management Framework and the Group's Credit Policy, thereby enhancing the effective management of the environmental and social dimension of financing. The Policy presents the responsibilities and the approach followed in managing environmental and social risk at every stage of the lending process and also provides an industry-specific Exclusion List (i.e. a list of sectors that the Group does not finance), as well as a list of crucial industry sectors/activities associated with environmental and social risk which are available in the Non Financial Report and the Sustainability report 2022.

All obligors-legal entities are evaluated, assessed and reviewed against the possible environmental or social risks in each stage of the Group's corporate credit procedure. When specific criteria are met, an environmental and social due diligence, i.e. on-site visit at customer's premises, is conducted by environmental and social specialists in order to assess customer's compliance with the respective legislation. Similarly, in order to assess the investments, the Project Finance team collaborates with specialized technical advisors on the projects' environmental licensing and environmental due diligence. Following the disbursement of credit, adherence to environmental terms and commitments is obligatory, throughout the long duration of the said financings.

Links and references

¹⁶ 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.

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



Principle 6: Transparency & Accountability

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

6.1 Assurance

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

- Yes
 Partially
 No

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

Response

Yes the 3rd self-assessment PRB Report has been assured by Deloitte Certified Public Accountants S.A. Please refer to Annex 2, for the independent assurance report.

Links and references

6.2 Reporting on other frameworks

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

- GRI
 SASB
 CDP
 IFRS Sustainability Disclosure Standards (to be published)
 TCFD
 Other:

Response

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

- The Principles of Accountability AA1000 Principles Standard (2018) (www.accountability.org), specifically:
- The Athens Stock Exchange ESG Reporting Guide (2022) for listed companies.
- The Sustainability Accounting Standards Board (SASB) framework.
- The United Nations Sustainable Development Goals.
- The Task Force on Climate-related Financial Disclosures - TCFD (The Group published its first separate TCFD Report in 2023), which is also published in a stand alone report.

Links and references

6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis¹⁷, target setting¹⁸ and governance structure for implementing the PRB)? Please describe briefly.

As stated above the Bank has developed an ambitious ESG Action plan aiming to integrate sustainability criteria in the Bank's decision-making process including strategy, risk management framework and lending operations. The objective is to enhance management of climate and environmental risks, comply with any regulatory frameworks and pursue the emerging opportunity of sustainable finance. In addition, the Bank is focusing on increasing awareness on ESG and climate risks to its employees, customers and markets, via training plans and, targeted communication and promotion, aiming to leverage the power of its brand to the wider sustainability transition effort.

Links and references

To ensure effective implementation and monitoring of the Principles of Responsible Banking, the Bank aims to proceed to the following:

- Updated the targets set, to align with the overall ESG Strategy and impact areas as these have been identified by the recent impact analysis (PRB Tool)
- Set Medium-Term Climate Strategy Targets (2024-2030)
- Further communicate these targets to the Organization, to ensure awareness and commitment across business lines
- Allocate ESG Topic owners to further enhance the Bank's ESG capability
- Define the Bank's ESG operating model for Climate and Environmental risks management, including responsibilities of 3 lines of defense

6.4 Challenges

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

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

- Embedding PRB oversight into governance
- Gaining or maintaining momentum in the bank
- Getting started: where to start and what to focus on in the beginning
- Conducting an impact analysis
- Assessing negative environmental and social impacts
- Choosing the right performance measurement methodology/ies

¹⁷ 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

¹⁸ For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

- Setting targets
- Customer engagement
- Stakeholder engagement
- Data availability
- Data quality
- Access to resources
- Reporting
- Assurance
- Prioritizing actions internally
- Other: ...

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

Annex 1

A set of indicators has been produced for the impact areas of climate mitigation and financial health & inclusion. These indicators will support you in your reporting and in showing progress against PRB implementation. Banks are expected to set targets that address minimum two areas of most significant impact within the first four years after signing the PRB. That means that Banks should ultimately set targets using impact indicators. Acknowledging the fact that banks are in different stages of implementation and on different levels of maturity and therefore might not be able to report on impact from the beginning, a Theory of Change approach has been used to develop the set of indicators below.¹⁹ The Theory of Change shows the **pathway to impact** and considers the relationship between inputs, actions, outputs, and outcomes in order to achieve impact. The Theory of Change for climate mitigation can be found [here](#), the Theory of Change for financial health & inclusion can be found [here](#).

How to use: Both practice (action, outcome and output) and impact performance need to be understood because practice is the conduit for achieving desired impacts (including targets). The Theory of Change allows to identify metrics and set targets which align with a bank's maturity. The indicators below are all connected to a bank's impact and can be considered as steps towards measuring impact. Some of the practice indicators (on the action, output, and outcome levels respectively) are connected to portfolio composition and financial targets²⁰ (highlighted in **green**) or to client engagement²¹ targets (highlighted in **blue**), which enable your overall target. If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex to measure your performance and baseline.²² Once you have set the target, you can use the indicators as guidance for your action plan as well as defining Key Performance Indicators (KPIs) which you can then use to measure progress against the set targets.

¹⁹ It is not required from banks to work with the Theory of Change concept internally. In fact, the Theory of Change has been used to structure the requirements of setting SMART targets using relevant indicators.

²⁰ Financial targets also aim for real economy outcomes but are not directly expressed as such. Instead, they are expressed with financial indicators and metrics, e.g., to redirect flows of lending and investments to sectors, activities or projects aligned with SDGs and/or related to the selected impact area. Banks can also set financial targets related to specific types of customers e.g., low-income customers or female entrepreneurs.

²¹ Client engagement targets involve engaging relevant clients and customers to enable your overall target. The purpose of client engagement is to support clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

²² You might not be able to report on all indicators and/or or levels of practice (i.e. from left to right), in which case you should report on all applicable indicators on the respective level of practice no matter if it is an action, output or outcome indicator.

- **For Signatories of the Net-Zero Banking Alliance:** please report on the climate targets set as required in the [Guidelines for Climate Target Setting](#). As a member of the Alliance, you are required to publish first 2030 targets for priority sectors within 18 months and further sectoral targets within 36 months after signing. You can use the PRB template to disclose the required climate target information if its publication date is in line with the committed NZBA timeframe.

- **For Signatories of the Collective Commitment to Financial Health & Inclusion:** please report on financial health and/or financial inclusion targets set as required in the [Financial Health and Inclusion Commitment Statement](#). As a signatory to the Commitment, you have agreed to set a SMART ambitious target within 18 months after signing. To facilitate your process, please refer to the [Guidance on Target Setting for Financial Health and Inclusion](#) and the [Core Indicators](#) to measure financial health and inclusion. Keep in mind that signatories of the Commitment are encouraged to measure as many indicators as possible from the Core Set or their equivalent to be able to set a SMART impact driven target.

Impact area	Practice ²³ (pathway to impact)									Impact ²⁴		
	1. Action indicators			2. Output indicators			3. Outcome indicators			4. Impact indicators		
	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics
A. Climate change mitigation	A.1.1	Climate strategy: Does your bank have a climate strategy in place?	Yes / In progress / No	A.2.1	Client engagement process: Is your bank in an engagement process with clients regarding their strategy towards a low(er)-carbon business model (<i>for business clients</i>), or towards low(er)-carbon practices (<i>for retail clients</i>)?	Yes / Setting it up / No; <i>If yes:</i> Please specify for which clients (types of clients, sectors, geography, number of clients etc.)	A.3.1	Financial volume of green assets/low-carbon technologies: How much does your bank lend to/invest in green assets / loans and low-carbon activities and technologies?	bln/mn USD or local currency, and/or % of portfolio; <i>please specify</i> the definition of green assets and low-carbon technologies used	A.4.1	Reduction of GHG emissions: how much have the GHG emissions financed been reduced?	% over time; baseline and tracking GHG emissions in kg of CO ₂ e (or applicable metrics) ²⁵
	A.1.2	Paris alignment target: Has your bank set a long-term portfolio-wide Paris-alignment target? To become net zero by when?	Yes / In progress / No; <i>If yes:</i> - please specify: to become net zero by when? - Emissions baseline / base year: What is the emissions baseline / base year for your target?	A.2.2	Absolute financed emissions: What are your absolute emissions (financed emissions = scope 3, category 15) in your lending and/or investment portfolio?	Total GHG emissions or CO ₂ e (<i>please also disclose what is excluded for now and why</i>)	A.3.2	Financial volume lent to / invested in carbon intensive sectors and activities and transition finance: How much does your bank lend to / invest in carbon-intensive sectors and	bln/mn USD or local currency, and/or % of portfolio	A.4.2	Portfolio alignment: How much of your bank's portfolio is aligned with Paris (depending on the target set [A.1.2] either 1.5 or 2 degrees)?	% of portfolio (<i>please specify which portfolio; for corporate and business clients: % of sectors financed</i>)

²³ Practice: the bank's portfolio composition in terms of key sectors, its client engagement, and its relevant policies and processes, and, if applicable, its advocacy practices

²⁴ Impact: the actual impact of the bank's portfolio

²⁵ If possible and/or necessary, please contextualize the progress: Greenhouse gas emissions might even increase initially because the scope of measurements is extended and financed emissions from a growing proportion of the portfolio are measured, emission factors are updated etc. Emission reductions made by the clients should over time lead to a decrease in GHG emissions financed.

			- Climate scenario used: What climate scenario(s) aligned with the Paris climate goals has your bank used?				activities ²⁶ ? How much does your bank invest in transition finance ²⁷ ?			
A.1.3	Policy and process for client relationships: has your bank put in place rules and processes for client relationships (both new clients and existing clients), to work together towards the goal of transitioning the clients' activities and business model?	Yes / In progress / No	A.2.3	Sector-specific emission intensity (per clients' physical outputs or per financial performance): What is the emission intensity within the relevant sector?	Please specify which sector (<i>depending on the sector and/or chosen metric</i>): kg of CO ₂ e/ kWh, CO ₂ e / m ² ; kg of CO ₂ e/USD invested, or kg of CO ₂ e/revenue or profit					
A.1.4	Portfolio analysis: Has your bank analyzed (parts of) its lending and/or investment portfolio in terms of financed emissions (Scope 3, category 15); technology mix or carbon-intensive sectors in the portfolio?	Yes / In progress / No; <i>If yes:</i> please specify which parts of the lending and investment portfolio you have analyzed	A.2.4	Proportion of financed emissions covered by a decarbonization target: What proportion of your bank's financed emissions is covered by a decarbonization target, i.e. stem from clients with	% (<i>denominator: financed emissions in scope of the target set</i>)					

²⁶ A list of carbon-intensive sectors can be found in the [Guidelines for Climate Target Setting](#).

²⁷ Transition finance is defined as financing the transition towards a low-carbon future in alignment with the Paris climate goals. It entails any form of financial support for non-pure play green activities to become greener and reduce emissions.

	A.1.5	Business opportunities and financial products: Has your bank developed financial products tailored to support clients' and customers' reduction in GHG emissions (such as energy efficient mortgages, green loans, green bonds, green securitisations etc.)?	Yes / In progress / No; Please specify which ones, and what financial volume and/or % of the portfolio they account for		a transition plan in place?							
B. Financial health	B.1.1*	# of products and services in the portfolio with a focus on financial health	Internal data based. Measures how many of the products and services in the portfolio have a financial health focus. We deem a product or service to have this focus when it facilitates decision making and supports financial health increase based on our definition of financial health. This covers products and services embedded with nudges to simplify decision making, round-up, high yield savings accounts, easy investment tools, etc.	B.2.1*	# of individuals supported with dedicated and effective financial and/or digital education initiatives	Based on internal data. Measures the number of users (customers and non customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs, training videos, articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many cases a prioritized group). Effective means that the bank has	B.3.1*	% of individuals with a good and/or very good level of financial skills	Assessment based. Measures the percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals benefitting from the bank's financial education initiatives.	B.4.1	% of customers with a high level of financial health	Survey and/or transactional data based. Measures the percentage of customers with a high level of financial health according to the score chosen by the financial institution.

					measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users.						
B.1.2	% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health	Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger skills, and thus, any individual that is supported with the initiative	B.2.2*	% of customers actively using the online/mobile banking platform/tools	Transactional data based. Measures the percentage of customers logging in, at least once a month, to one of the following digital platforms (measure those applicable for your bank): Online internet banking and/or mobile phone banking and/or digital tools (including financial health tools)	B.3.2	% of customers who use the bank's services to create a financial action plan with the bank	Transactional and/or survey data based. Measures the percentage of customers who create a financial action plan with the bank using the bank's services. A financial action plan is anything that helps the customer build financial resilience. It is done "with the bank" if the bank can visualize, through the transactions of the customer,	B.4.2	% of customers for which spending exceeded 90% of inflows for more than 6 months last year	Survey and/or transactional data based. Measures the percentage of customers with a transaction account and/or savings/investment accounts for which spending exceeded 90% of inflows for more than 6 months in the year within the reporting period compared to the total of customers within PRB scope. Focus on main financial institution customers.

			will achieve the desired results. Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers' financial health					the results of the plan.			
B.1.3	# of partnerships active to achieve financial health and inclusion targets	Based on internal data. Measures the number of partnerships currently active to achieve financial health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.				B.3.3	% of customers using overdraft regularly	Transactional data based. Measures the percentage of customers using the overdraft option in their accounts or credit cards, regularly. Overdraft can be used to handle unexpected emergencies but more than 1/3 of the year (banks may deviate if proper reasons are provided) denotes regularity and a precursor to lower financial health	B.4.3	% of customers that feel confident about their financial situation in the next 12 months	Survey based data. Measures the percentage of customers that answered positively to feeling confident about their financial situation in the next 12 months compared to the total number of customers surveyed. By confident we mean not feeling worried about their financial situation.
						B.3.4	% of customers with a non-performing loan	Transactional data based. Measures the percentage of customers with past-due loans ("past due" defined by policies at each bank) compared to the total amount of customers with	B.4.4	% of customers with products connected to long-term saving and investment plans	Transactional and/or survey data based. Measures the percentage of customers with products connected to long-term saving and investment plans. "Long-term" will depend on each bank's definition.

								loans in the bank's lending portfolio.				
							B.3.5	% of customers showing an increase or stable amounts in savings, deposit and/or investment account balances, quarter on quarter.	Transactional data based. Measures the percentage of customers showing an increase or stable amounts in savings and/or deposit AND/OR investment accounts balances, quarter on quarter.	B.4.5	% of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense	Survey based data. Measures the percentage of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense. We consider a major unexpected expense, one that the customer hadn't planned for and would require them to spend more than what they have available for secondary expenses in their monthly budget or 1/20th of the country's Gross National Income (banks may deviate if proper reasons are provided). A good example is: unforeseen medical bills, large appliance malfunctioning, car repair, etc. Survey based using the question: "If a major unexpected expense arises, how can you cover it right now?" and give the multiple choice options of insurance, emergency funds, loan, credit card, family/friends, etc.

C. Financial Inclusion	C.1.1*	# of products and services in the portfolio with a focus on financial inclusion	Internal data based. Measures how many of the products and services in the portfolio have a financial inclusion focus. We deem a product or service to have this focus when its design facilitates the access and usage by the prioritized customer. For example, no-fee savings account, low interest microloan, offline access or sim-based banking apps, etc	C.2.1	# of individuals supported with dedicated and effective financial and/or digital education initiatives	Based on internal data. Measures the number of users (customers and non customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs, training videos, articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many cases a prioritized group). Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is	C.3.1*	% of individuals with a good and/or very good level of financial skills	Assessment based. Measures the percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals benefitting from the bank's financial education initiatives.	C.4.1	% of customers with 2 or more active financial products, from different categories, with the bank	Transactional data based. Measures the percentage of customers with 2 or more active financial products, from different categories, with the bank. By active we mean there's at least one usage per month. By category we mean credit/debt, savings/deposit/payment, insurance, investment, etc. Once a target has been set for this indicator, we encourage banks to ensure responsible selling policies or other initiatives so that the target doesn't become a toxic incentive.	

					presented as # of individuals for deanonymized users and # of interactions for anonymized users.					
C.1.2*	% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health	Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger skills, and thus, any individual that is supported with the initiative will achieve the desired results. Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers' financial health	C.2.2	% of customers with effective access to a basic banking product	Transactional data based. Measures the percentage of customers with effective access to a basic banking product. By effective we mean the usage beyond first access. Basic banking products vary by bank. Good examples are: checking accounts, payment accounts, credit cards, saving accounts, deposit accounts, e-money accounts, etc.	C.3.2	% of customers supported with dedicated customer journey/advisory services	"Transactional data based. Where dedicated customer journey/advisory services are in place for prioritized groups, this indicator measures the percentage of customers using such services. Depending on size of bank, either number or percentage can be the unit of measure.		
C.1.3	# of partnerships active to achieve financial health and inclusion targets	Based on internal data. Measures the number of partnerships currently active to achieve financial	C.2.3	# of new customers per month	Transactional data based. Measures the number of new customers per month. Once the	C.3.3*	% of customers actively using the online/mobile banking platform/tools	Transactional data based. Measures the percentage of customers logging in, at		

		health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.			bank sets a target, this indicator can become a KPI to measure the percentage of new customers from the prioritized groups, per month.			least once a month, to one of the following digital platforms (measure those applicable for your bank): Online internet banking and/or mobile phone banking and/or digital tools (including financial health tools, if applicable)			
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Annex 2

Independent Limited Assurance Report to the Management of Alpha Services and Holdings S.A.

Scope of our work

Alpha Services and Holdings S.A (the “Company”) has engaged us to perform independent limited assurance reporting in accordance with International Standard on Assurance Engagements 3000 Assurance Engagements Other than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board (“IAASB”) over the responses to principles:

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

(“the selected responses”) of Alpha Bank S.A., which have been prepared by the Management of the Company and Alpha Bank S.A. (the “Bank”) (collectively referred to as “Alpha”), included within the Principles for Responsible Banking – 3rd Report and Self-Assessment Template (“the PRB Reporting and Self-Assessment Template”) for the year ended 31 December 2022, presented on pages 5-33 and 39 in the published PRB Reporting and Self-Assessment Template of Alpha Services and Holdings S.A, based on the Principles for Responsible Banking Guidance Document, published by UNEP FI in November 2021 and the Principles for Responsible Banking Reporting and Self -Assessment Template, published by UNEP FI in September 2022 and the basis of preparation presented on pages 5-33 and 39 (collectively “the applicable criteria”).

Our assurance conclusion

Based on our procedures described in this report, and evidence we have obtained, nothing has come to our attention that causes us to believe that the selected responses on pages 5-33 and 39, in the PRB Reporting and Self -Assessment Template for the year ended 31 December 2022, are not prepared, in all material respects, in accordance with the applicable criteria.

Inherent limitations of the selected responses

- Where, under the scope of our engagement, financial information was used from the Annual Report 2022 and other published information of the Bank and the Company our work was limited to check the accuracy of the transfer of the relevant information to the selected responses.
- Any internal control structure, no matter how effective, cannot eliminate the possibility that fraud, errors or irregularities may occur and remain undetected and because we use selective testing in our engagement, we cannot guarantee that errors or irregularities, if present, will be detected.
- We do not provide any assurance relating to future performance, such as estimates, expectations or targets, or their achievability.
- Our assurance services were limited to the English version of the selected responses. In the event of any inconsistency between the English and Greek versions, as far as our conclusions are concerned, the English version of the selected responses prevails.

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

Management responsibilities

The Management of Alpha is responsible for the preparation of the PRB Reporting and Self-Assessment Template, which complies with the requirements of the applicable criteria and for being satisfied that the selected responses, taken as a whole, is fair, balanced, and understandable.

The Management of Alpha is also responsible for:

- Preparing, measuring, presenting and reporting the information within the PRB Reporting and Self-Assessment Template.
- Designing, implementing, and maintaining internal processes and controls over information relevant to the preparation of the PRB Reporting and Self-Assessment Template 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 work.
- Confirming to Deloitte through written representations that Alpha has provided Deloitte with all information relevant to our work of which Alpha is aware.

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 responses included PRB Reporting and Self-Assessment Template.
- Communicating matters that may be relevant to the selected responses to the Company's Management including identified or suspected non-compliance with laws and regulations, fraud or suspected fraud, and bias in the preparation of the selected responses.
- Reporting our conclusion in the form of an independent limited Assurance report to the Company's Management.

Our independence and competence

In conducting our engagement, we complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) related to assurance engagements issued by the International Ethics Standards Board. This code is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior. The fundamental principles of ethics establish the standard of behavior expected of a professional accountant.

Deloitte applies International Standard on Quality Management ("ISQM") 1 and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Key procedures

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 PRB Reporting and Self-Assessment Template is likely to arise. Our procedures were informed by the Guidance for assurance providers – Providing Limited Assurance for Reporting - Version 2 (October 2022) published by the United Nations Environment Program Finance Initiative (“UNEP FI”) in November 2022. These procedures do not necessarily obtain the confidence level as outlined by UNEP FI’s Guidance for assurance providers, but rather what is normally obtained by a practitioner in a limited assurance engagement under ISAE 3000. The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the description of activities undertaken in respect of the selected responses we performed the following procedures:

- Through inquiries of management, obtained an understanding of the entity, its environment, the processes and information systems relevant to the preparation of the selected responses to identify areas where material misstatements of the subject matter information is likely to arise and to obtain limited assurance to support a inclusion;
- Conducted interviews with personnel of the Bank to understand the processes and control activities for measuring, reporting, and presenting information in the PRB Reporting and Self - Assessment Template, in accordance with the applicable criteria;
- Performed inquiries with personnel of the Bank, obtained and reviewed supporting evidence to assess whether disclosures within the selected responses in the PRB Reporting and Self -Assessment Template reflect the Bank’s assessment of the stage of implementation of the Principles;
- In respect of Principle 2.1 (Impact analysis), based on inquiries made with personnel of the Bank and information obtained and reviewed that the Bank’s business areas and scope are clearly described, reconciled the portfolio composition to management information and checked that the challenges and priorities have been analyzed. Furthermore, we checked that the Bank has disclosed the method for determining its impact areas and has selected what was determined as the two most significant areas of impact. For the two impact areas where performance has been measured (Climate & Financial health and inclusion), reconciled the indicators to published information referenced in the response and to supporting management information. Finally, we checked to supporting evidence, including meeting minutes, that the stated governance process was followed;
- In respect of Principle 2.2 (Target setting), based on inquiries made with personnel of the Bank and information obtained and reviewed, checked that the Bank sets targets for the two significant impact areas (Climate & Financial health and inclusion) and that the targets are linked to that impact areas. We checked that the Bank explained how targets contribute to relevant goals, the base year for climate targets (2023) is no more than two full reporting years prior to the year when the targets have been set (2025) and that the targets are Specific, Measurable, Achievable, Relevant and Time-bound;
- In respect of Principle 2.3 (Target Implementation and Monitoring), based on inquiries made with personnel of the Bank, obtained and reviewed supporting evidence to assess whether disclosures within the selected responses in the PRB Reporting and Self -Assessment Template reflect the Bank’s assessment of the stage of implementation of the Principle;
- In respect of Principle 5.1 (Governance Structure for Implementation of the Principles), based on inquiries made with personnel of the Bank and information obtained and reviewed, we checked the consistency of the disclosures against supporting evidence, including meeting minutes with that of the disclosures of the Bank’s governance structure for implementation of the Principles, that the structure is in line with existing governance structures as defined by the Bank and checked that the Board of Directors obtained information on the Bank’s stage of implementation of the Principles for Responsible Banking on an annual basis.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Use of our report

This report is made solely to the Company's Management in accordance with ISAE 3000 and our agreed terms of engagement. Our work has been undertaken so that we might state to the Company's Management those matters we have agreed to state to them in this report and for no other purpose.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company's Management as a body, for our work, for this report, or for the conclusions we have formed.

Athens, 19 June 2023

The Certified Public Accountant

Dimitris Katsibokis

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