

19

CORPORATE  
RESPONSIBILITY  
REPORT



ALPHA BANK



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## LETTER FROM THE CEO

This year's letter was written in an entirely different Greece than the one that it was called upon to describe in the context of this Report.

Our country -and the entire world- is suffering from an unprecedented threat, which will certainly leave its mark on societies and on the global economy.

Staying true to its principle of standing by its Personnel, its Customers and the Local Communities where it operates, Alpha Bank immediately launched a set of decisive measures to address the Covid-19 pandemic. Our efforts focused on protecting the health and safety of our Employees and our Customers, on supporting the Greek economy and society and, certainly, on actively supporting the doctors and medical staff working on the front line of the pandemic.

Alpha Bank supported the National Health System, offering cutting-edge medical and healthcare equipment to the Intensive Care Units of three reference Hospitals in Greece: the General Thoracic Diseases Hospital of Athens "I Sotiria", the University General Hospital of Thessaloniki "ACHEPA" and the General University Hospital of Larissa. At the same time, thousands of protective facemasks were offered to cover the needs of doctors and nurses serving at the 6th Regional Health Authority of the Peloponnese and the Ionian Islands.

Our thoughts, however, also go beyond hospitals, to those who were challenged by the restrictions imposed to control the pandemic. The Bank undertook to support the Doctors of the World in helping vulnerable elderly citizens, with home delivery of medicines and the provision of remote medical advice and psychosocial support.

The upheaval caused by the Covid-19 pandemic in no way means that everything we have built on in the previous year has been lost. On the contrary, these actions have set strong foundations for Alpha Bank, allowing it both to overcome the crisis and to support society.

2019 was a decisive year for Alpha Bank, as that was when the strategy for the Bank of Tomorrow was methodically planned. Based on the Galaxy Project, which was warmly welcomed by the investment community, we continue to work towards the removal of the burdens left by the ten-year Greek crisis on our balance sheet, in order to focus on providing high-quality services to our Customers, both Businesses and Individuals.

In the previous year, the Bank confirmed its leading position in the Greek market, accelerating its digital transformation plan - a progress that was also evident in our successful response to the increased demand for digital transactions during the lockdown period - strengthened the procedures connecting productivity and rewards, while taking decisive steps towards the management of Non-Performing Loans, meeting the relevant annual target.

The actions taken in Southeastern Europe were as important as our initiatives in Greece. In Romania, we became the first bank in the country to issue a mortgage loans covered bond amounting to Euro 200 million. In Cyprus, we concluded a strategic cooperation with doValue for the management of a Non-Performing Exposures portfolio.

Moreover, in 2019, in addition to its actions for Education, Health and Culture, the Bank was proclaimed "**Best Private Bank in Greece**" for 2019 by the prestigious publications "Professional Wealth Management (PWM)" and "The Banker" of the Financial Times Group, while it also received an additional distinction for its product "**Bleep app**", which was named "**Product of the Year**" in the category "Bank Prepaid Card", in a Panhellenic consumer survey. Additionally, the International Finance Corporation (IFC), a member of the World Bank Group, named Alpha Bank "**Best Issuing Bank in Southern Europe**" for 2019, rewarding its consistently high performance in promoting international trade.

Alpha Bank is on the international front line as regards corporate responsibility, directly or indirectly contributing to the **17 Sustainable Development Goals** (SDGs). In August 2019, it signed the six Principles for Responsible Banking, which were developed through an international initiative of the United Nations Environment Programme Finance Initiative (UNEP FI), following consultations with the global banking community.

The Bank remained a constituent of the Financial Times Stock Exchange4Good (FTSE4Good) Emerging Index, which includes listed companies in emerging markets with a positive financial, environmental and social performance, while it was included in the Bloomberg Gender-Equality Index (GEI) for the first time.

At the same time, in addition to its wide sponsorship program, Alpha Bank carried out a number of programs in the fields of Health, Education and Culture.

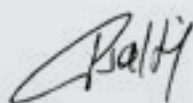
In specific, the program **“Together, for better health”**, designed to deliver medical and pharmaceutical equipment and supplies to local health centers in the Greek islands, took place for the sixth consecutive year. Since the launch of the Program, in 2014, and by the end of 2019, **more than 233,000 items of medical and pharmaceutical supplies and related equipment were donated to local health centers of 51 islands** in Greece.

With the purpose of supporting education, the Bank launched the program **“Together, for better education”** to reinforce the operation of primary schools throughout Greece with modern teaching systems, books and sports equipment. Since the launch of the Program in 2018 and up to now, Alpha Bank has donated **39 interactive boards, 780 books** and more than **3,500 items of sports equipment to 39 primary schools throughout Greece.**

Furthermore, with the program **“Together with the children at the Museum and the Theater”**, Alpha Bank aimed to offer the joy of theatrical performances to children living in children's homes and foundations. To date, with the help of Volunteers from the Personnel of the Bank, **27 visits** in total **to Museums and Theaters** have taken place, with the participation of **more than 600 children.**

In the field of culture, the program **“The defacements that hurt”**, continued for the seventh year, with actions that included the restoration of the external surfaces of the Numismatic Museum and of the National Library buildings, of the “Garden of Sculptures” in Thessaloniki as well as of sculptures in public spaces in Nafplio. Moreover, since 2013, an ongoing project is in place for the preservation of the sculptures restored under the above Program, in the center of Athens.

The Covid-19 pandemic deeply affected the entire planet, changing everyone's priorities. There is, however, one priority that remains unchanged for us: to keep our focus on our Personnel, on our Customers and on the society where we operate. We, the people of Alpha Bank, TOGETHER, play a leading role in restarting the economy, in strengthening Employment and Social Cohesion and in protecting the Environment. These are goals that not only correspond to Alpha Bank's principles but also set the foundation for generating value for our Personnel and our Shareholders.



Vassilios E. Psaltis

## 2 CORPORATE RESPONSIBILITY REPORT METHODOLOGY

The present Corporate Responsibility Report is the 13th such Report released as an individual publication by Alpha Bank S.A. (hereinafter the “Bank” or “Alpha Bank”). It has been prepared in accordance with the core option of the internationally recognized standards for sustainability reporting GRI– (GRI Standards) ([www.globalreporting.org](http://www.globalreporting.org)) and based on the four key principles for defining Report content: 1) Stakeholder inclusiveness, 2) Sustainability Context, 3) Materiality and 4) Completeness. In addition, the Report has also taken into consideration:

- The principles of AccountAbility’s AA1000 Principles Standard ([www.accountability.org](http://www.accountability.org)), whose foundations are the “inclusion of stakeholder interests in the decision-making process” (Inclusivity), the “identification of the most material issues for the Bank” (Materiality), the Bank’s “responsiveness to stakeholder needs and expectations” (Responsiveness) and the “monitoring and measurement of the impacts of the Bank’s activities” (Impact).

- The new Athens Stock Exchange ESG Reporting Guide for listed companies.

For the 11th consecutive year, in the preparation of the Corporate Responsibility Report use was also made of the GRI’s Financial Services Sector Supplement (GRI-FSSS), the most specialized standard on the contents of reports for companies in the banking sector.

Note that Alpha Bank is a societe anonyme with Banking Operations as its main activity and a registered office in Athens, at 40 Stadiou Street, P.C. 102 52.

Alpha Bank is a multi-stakeholder organization. The Bank’s share capital, as of 31.12.2019, amounted to Euro 463,110, divided into 1,543,699,381 registered voting shares with a nominal value of Euro 0.30 each.

The 2019 Corporate Responsibility Report is addressed to all stakeholders of the Bank and refers to its activities in Greece during the period from January 1 to December 31 2019, unless otherwise indicated. Specific points of the Report present, for the first time, consolidated information about Alpha Bank Greece and the foreign Banks in Romania, Cyprus, Albania and the United Kingdom. No significant changes were introduced in the measurement methods, scope and reporting framework compared to the Bank’s 2018 Corporate Responsibility Report.

In determining the most important issues for Alpha Bank’s sustainable development, use was made of the findings of the process for the identification of material issues (materiality analysis) carried out in 2019.

This Report is based on the findings of this analysis and has been enhanced based on the requirements of analysts and international rating agencies that assess the Bank's performance. Furthermore, the Bank has assigned the relevant projects to Deloitte Certified Public Accountants S.A., to safeguard the Report's contents. The relevant Assurance Report can be found in the last pages of the Report.

The Report was prepared by a dedicated team of Executives from various Bank Units, under the coordination of the Corporate Social Responsibility Department.

**Interested parties can address queries, comments and suggestions regarding Alpha Bank's 2019 Corporate Responsibility Report to:**

**Alpha Bank**  
**Marketing and Public Relations Division**  
**Corporate Social Responsibility**  
**40 Stadiou Str., 102 52 ATHENS**  
**Tel.: 210 326 2437**  
**Fax: 210 326 2401**  
**E-mail: [csr2@alpha.gr](mailto:csr2@alpha.gr)**

# 2017

- Alpha Bank participated, for the first time, in the CDP platform on climate change
- Alpha Bank remained as a constituent of the Financial Times Stock Exchange4Good (FTSE4Good) Emerging Index
- Senior Management members participated, for the first time, in the material issues analysis procedure

# 2018

- Alpha Bank was included, for the first time, in the Bloomberg Gender-Equality Index (GEI)
- Alpha Bank improved its score to B in the CDP platform on climate change (on an A to F rating scale)
- The Corporate Responsibility Report was approved by the Board of Directors
- Alignment of the material issues analysis procedure with the business risk management methodology

# 2019

- The Chief Executive Officer signed the UNEP FI's 6 Principles for Responsible Banking
- Alpha Bank was included, for the first time, in the Vigeo Eiris index listing the 100 better performing companies in emerging markets.
- Following an assessment by MSCI ESG Ratings, the Bank received an A score (on a AAA to CCC rating scale).
- Alpha Bank was included for the second consecutive year in the Bloomberg Gender-Equality Index (GEI).



The background features a complex geometric composition of overlapping shapes in two shades of red and purple. A large, light purple triangle is positioned in the upper right, overlapping a darker purple triangle. A large, light red triangle is in the upper left, overlapping a darker red triangle. In the lower right, a light red semi-circle is partially visible, overlapping a darker red square. The bottom portion of the image is a solid dark purple rectangle.

### **3. ALPHA BANK AND CORPORATE RESPONSIBILITY**

The Alpha Bank Group is one of the largest financial-sector Groups in Greece. It offers a wide range of high-quality financial products and services, including retail banking, banking for medium and large enterprises, asset management and private banking, insurance products, investment banking, brokerage and real estate management.


The Alpha Bank Group operates in the Greek and international banking market; in 2019, it was present in Cyprus, Romania, Albania and the United Kingdom. It also has an extensive network of correspondents (banking institutions) in Greece and abroad. The Parent Company and main Bank of the Group is Alpha Bank, which was founded in 1879 by John F. Costopoulos. Alpha Bank, a Bank that inspires confidence and constitutes a consistent point of reference in the Greek banking system, has one of the highest capital adequacy ratios in Europe. All activities of Alpha Bank and of the Alpha Bank Group Companies, which are ultimately aimed at the Group's growth and robustness, are governed by principles imposed by law or ethics, such as integrity and honesty, impartiality and independence, discretion and confidentiality, conscious, disciplined and reasonable risk-taking, complete, full and truthful disclosure, and contributing to society. Adherence to the principles governing the Bank's operation and its corporate responsibility practices is checked annually by the Management and by the competent Divisions of the Bank. Employees comply with the provisions of the Bank's Code of Ethics, which encompasses the Bank's values, guidelines and requirements regarding responsibility and professional conduct. In parallel, the Bank ensures its full alignment with the law and takes into account the fundamental principles of the Universal Declaration of Human Rights and the Conventions of the International Labour Organization. Through its participation in the UN Environment Programme Finance Initiative (UNEP FI), undertaken by financial organizations around the world to promote sustainable development, it incorporates the relevant environmental principles in its financial activities.

The Marketing and Public Relations Division (to which the Corporate Social Responsibility Department belongs) supports the Bank Management in matters of corporate responsibility, by submitting for approval related policies and strategies and by managing, coordinating, developing and promoting the Bank's corporate responsibility activities, seeking to continuously improve its performance in this area. In 2019, Executives of the Division met with members of the Senior Management, of the Board of Directors and of the Audit Committee, to discuss the Bank's Corporate Responsibility actions (such as materiality analysis, disclosure of the Bank's non-financial information in accordance with Greek law, etc.). Furthermore, in August 2019, following an update regarding the developments and international trends in the field of Corporate Responsibility, the CEO of Alpha Bank signed the 6 Principles for Responsible Banking of the UNEP FI. Alpha Bank, focused on its sustainable development, is committed to operating with responsibility, also taking into account the financial, social and environmental aspects of its operation both in Greece and in the other countries where it operates. In this context, it has prepared a "Corporate Responsibility Policy", which has been approved by the General Management and is available on the Bank's website. Finally, in 2019, the Bank enhanced the Corporate Responsibility report content about the assessments it receives from international analysts and rating agencies regarding its performance in sustainable development issues and its participation in International organizations.

### 3.1 RESPONSIBLE BUSINESS MODEL

The Alpha Bank business model is designed to generate value for its stakeholders. Alpha Bank invests in its Employees, its Branch Network and its infrastructure in order to develop and offer quality products and services. It also works together with its stakeholders in order to ensure the early identification of their needs, to operate responsibly and to offer its support to society.

Alpha Bank provides a healthy work environment, in which its Employees broaden their knowledge and skills and contribute to the development of new products and services. The Bank supports the Greek Economy, enhances its electronic services, offers products and services with strong social and environmental features and contributes to society.

<p>TOTAL ASSETS <b>€57,981,192</b></p> <p>TOTAL DEPOSITS <b>€1,201,807</b></p> <p>TOTAL NET WORTH <b>€8,107,375</b></p> <p>SHARE CAPITAL <b>€463,110</b></p> <p>TOTAL LIABILITIES <b>€49,873,817</b></p>	<p><b>Financial Capital</b> Use of financial resources for investing in actions of the Group, including equity, Customer deposits and other sources of financing.</p>	 <p><b>ALPHA BANK</b></p>				
<p><b>6,969</b> EMPLOYEES</p>	<p><b>Human Capital</b> Investing in Employees, in their management and growth, with a view to improving and developing products and services that meet Customer needs.</p>		<ul style="list-style-type: none"> <li><b>Code of Ethics</b> (Commitments, Principles and Obligations)</li> <li><b>Activities</b> Private and Business Banking Portfolio Management and Brokerage Investment Banking and Cash Management Operations</li> <li><b>Other Activities</b> Real Estate Management</li> </ul>			
<p><b>134,607</b> HOURS OF TRAINING</p> <p><b>382</b> BRANCHES</p>	<p><b>Production Capital</b> Investing in infrastructure for the operation of the Group (e.g. Branches, ATMs, IT systems etc.)</p>	<p><b>Corporate Responsibility Strategy</b></p> <table border="1"> <tr> <td>Together for the market</td> <td>Together for our people</td> <td>Together for the Environment</td> <td>Together for Society</td> </tr> </table> <p><b>Responsible Operation</b></p>	Together for the market	Together for our people	Together for the Environment	Together for Society
Together for the market	Together for our people		Together for the Environment	Together for Society		
<p><b>219</b> NEW ATMS</p> <p><b>118</b> NEW ACTCS</p>	<p><b>Intellectual Capital</b> Investing in the development of innovative products and services.</p>					
<p><b>€133,000</b> Total investment in IT systems for the development of new products and services</p> <p><b>57,455 MWh</b> OF ELECTRIC POWER</p> <p><b>4,372 MWh</b> OF TRAFFIC FUEL</p>	<p><b>Natural Capital</b> Using natural resources, including electricity, for the operation of the Group</p>					
<p><b>646</b> TONNES OF PAPER CONSUMED</p> <p><b>2.4</b> MILLION SOCIAL CONTRIBUTION</p> <p><b>674</b> EMPLOYEE PARTICIPATIONS IN VOLUNTARY ACTIONS</p>	<p><b>Social Capital</b> Cooperation with Stakeholders, with the aim of responsible operation and supporting the community.</p>					



**Financial Capital**

Offering banking and investment Products and Services, supporting the Greek Economy.

**Human Capital**

Providing a healthy work environment. Employees with knowledge, skills and experience.

**Production Capital**

Better infrastructure for Customer service and for offering Products and Services.

**Intellectual Capital**

Supporting consulting Services and expansion of e-Services to cover Customers' changing needs.

**Natural Capital**

Inclusion of environmental criteria in credit, financing investments in environmentally beneficial projects, offering environmental Products, improving the Group's energy efficiency, reducing CO2 emissions.

**Social Capital**

Maintaining the Branch Network in low-density and less financially robust areas, provision of social contribution services, social support and reinforcement of Employee voluntarism.

TOTAL TAXES PAID

**€ 95,3** million

TOTAL AMOUNT OF EMPLOYEE SALARIES

**€ 346,199** th



TOTAL PROFIT

**€ 1,923,158**

TOTAL BUSINESS AND PRIVATE LOAN BALANCE

**€ 34,855**



**177**

BRANCHES feature an "e-corner"



**49**

Branches in less populated areas

**92**

ATMs

**9** voluntary actions

**9**

islands were supported in the context of the program "Together, for better health"



**€ 206** million for new RES projects

Total amount of loans approved for "green solutions" products

**€ 16.9** million



**OUTFLOWS**

### 3.2 IDENTIFICATION OF MATERIAL ISSUES

In 2019, Alpha Bank performed anew the process for the identification of the most significant issues regarding its responsible operation (Materiality Analysis), with the involvement of its Stakeholders and of Members of its Senior Management, in accordance with best practices (i.e. GRI Standards).

Members of the Bank's Senior Management proceeded to assessing the issues identified using risk management principles. This approach was in line with the risk management methodologies and tools that Alpha Bank is currently using. Eleven Senior Management Executives (i.e. General Managers and Executive General Managers), including a member of the Board of Directors, assessed the probability of the known and potential impacts/risks of the issues

identified in the following two-year period, as well as the gravity thereof for the Bank, society, the economy and the environment. Senior Management took into account the policies, actions and results of existing practices.


In total, 5,180 representatives from all Stakeholder groups participated in the process, via an online electronic questionnaire.

The issues evaluated and the assessment results are presented as following.

Influence on Stakeholder assessments and decisions

<ul style="list-style-type: none"> <li>•Responsible Communication with Customers</li> <li>• Human Rights and Equal Opportunities</li> </ul>	<ul style="list-style-type: none"> <li>•Customer Service and Satisfaction</li> <li>•Business Ethics and Compliance</li> <li>•Risk Management</li> </ul> 	<ul style="list-style-type: none"> <li>•Data Protection</li> <li>•Innovation and Digitalization</li> </ul>  
<ul style="list-style-type: none"> <li>•Direct Environmental Impact</li> <li>•Financial Inclusion</li> <li>•Support of Society</li> </ul>	<ul style="list-style-type: none"> <li>•Responsible Investment and Financing</li> </ul>	<ul style="list-style-type: none"> <li>•Financial Performance</li> <li>•Attraction, Development, and Retention of Employees</li> </ul>   
<ul style="list-style-type: none"> <li>•Responsible Procurement and Outsourcing</li> </ul>	<ul style="list-style-type: none"> <li>•Corporate Governance</li> </ul>	

Significance of economic, environmental and social impacts

 Most material issues

According to the analysis, there are seven issues that have been acknowledged as material both by the Senior Management and by stakeholders. Alpha Bank assessed the impact, in accordance with the risk assessment and management methodology (probability x impact), taking into account the measures its takes to minimize risks. The issues identified as material present the most significant potential impact. Compared to the previous year, in the list of the most material issues, the issue "Customer Responsible Information" was replaced by the "Risk Management" issue. Risk minimization practices / internal controls applied by the Bank lead to reducing the occurrence rate of risks that are associated to these issues, to acceptable levels.

Issues such as the responsible information to Customers, human rights and fair work practices, access to financial services and responsible supplies and outsourcing were given low risk ratings by the Senior Management, as the Bank believes that the existing measures and practices applied have minimized the potential risks related to said issues.

Alpha Bank recognizes the significance of these issues and has thus taken specific measures (e.g. provision of comprehensive information to Customers regarding financial management issues, assessment of all advertising communication plans before they are launched, implementation of human rights and fair work practice policies, observation of collective labour agreements and union rights, communication with Employee associations, operation of Branches in low density or remote areas, accessibility to financial services for disabled persons, implementation of outsourcing policy, suppliers' performance assessment, etc.).



### 3.3 STAKEHOLDERS

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. In 2019, Alpha Bank proceeded to a reassessment of its stakeholders, following a series of internal meetings and

based on the relevant laws and its daily operations, the existing policies and procedures and the Group's corporate governance strategy. The result of this procedure was four Stakeholder groups:



#### DIALOGUE AND COOPERATION IN ACTION

The Bank seeks to engage in an ongoing dialogue and collaboration with its Stakeholders, in order to understand and, as far as possible, respond to all their expectations, needs, concerns and requests. The means and the manner in which the Bank responds to the expectations of Stakeholders are presented below.

#### ANALYSTS AND INVESTORS

Communication with analysts and investors is coordinated by the Investor and Analyst Relations Division and the Back Offices - Investments Division. Analysts and investors are provided with full and prompt information via specific sections on the Bank's website ("Investor Relations" - "Economic - Markets Research"), where relevant announcements are posted, together with the Financial Statements of the Bank and the Group (quarterly, biannual and annual). Finally, analysts and investors are informed of the Bank's annual results via its Business Review and its Corporate Responsibility Report, while they also participate in the Bank's ordinary and extraordinary General Meetings.



**EMPLOYEES**

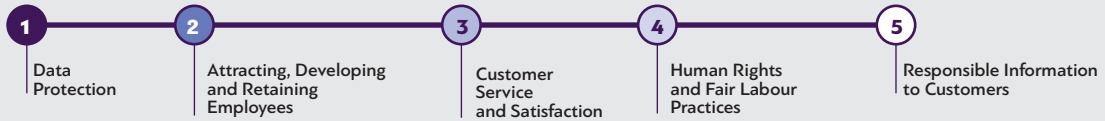
To ensure effective communication with Employees, the following have been established: “Communication Day” with the Human Resources Division and Staff Visits of the Human Resources Division in Branches and Units of the Bank. The Personnel is also informed via the online edition

of “MAZI” (“Together”), the Bank’s monthly internal communication publication as well as via announcements posted on the Alpha Bank Intranet, whenever any issue arises.



**FIVE (5) MOST MATERIAL ISSUES**

Source: Analysis of Material Issues Alpha Bank 2019



**SOCIETY**

Via its business activity, Alpha Bank contributes to economic stability and growth. Therefore, it is often involved in a dialogue and in consultations with State authorities, both in Greece and at European level. The Bank also supports public administration services, local organizations and foundations by donating new or withdrawn office, electronic or other equipment and other supplies (food supplies, medication, books, computers etc.). Alpha Bank communicates with representatives of the local communities primarily via its Branches and ensures that they are provided with the best possible service, while at least once a year it

holds meetings with body representatives in order to exchange views and jointly plan relevant programs and actions. The Bank actively participates and is represented in Committees and Boards of the Hellenic Bank Association (HBA), the Hellenic Advertisers Association, UNEP FI and the Hellenic Network for Corporate Social Responsibility as well as in other committees and associations in order to understand the issues of concern for the business community and take action with a view to safeguarding the interests of the banking industry.



**FIVE (5) MOST MATERIAL ISSUES**

Source: Analysis of Material Issues Alpha Bank 2019



## CUSTOMERS

The Bank pays great attention to ensuring its Customers' satisfaction, as well as to providing high-quality products and services. The Bank's Customer Service Division is in charge of Quality Assurance and is committed to fulfilling these objectives. The methods applied by the Bank for measuring Customer satisfaction and monitoring quality in the services available to them are Customer Satisfaction Surveys, Communication and Marketing Surveys, a Customer Satisfaction Questionnaire (leaflet) entitled "Your opinion counts", which can be mailed back by prepaid post, which allows Customers

to evaluate the services offered at the Branches, as well as Key Performance Indicators (KPIs) at all points of contact with Customers. Finally, the Bank ensures the high level of quality provided to Customers through the centralized handling of complaints and provides information to Customers via the Business Review and the Corporate Responsibility Report, both of which are published annually.



### FIVE (5) MOST MATERIAL ISSUES

Source: Analysis of Material Issues Alpha Bank 2019



### **3.4 CONTRIBUTION TO THE ACHIEVEMENT OF THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS**

In 2015, the United Nations (UN) announced the adoption of the 17 Sustainable Development Goals (SDGs) included in the UN "Agenda 2030". Their objective is to achieve economic progress and prosperity for all, while ensuring social justice and caring for the environment. Alpha Bank is indirectly contributing to the promotion of all SDGs and, through its services, products and activities, it is also directly contributing to the achievement of specific SDGs.

The Bank mapped its contribution to the achievement of the 17 SDGs, taking into account both the positive and the negative impacts of its value chain. In 2019, an analysis of material issues for the Bank's sustainable operation resulted in four key sustainable development goals, on which the Bank focuses in the activities it implements or plans to implement in the future. For Alpha Bank, these key SDGs also include the SDG on Good Health and Well-Being (SDG 3) and the SDG on Climate Action (SDG 13), as it wishes to substantially contribute to their achievement. The six key sustainable development goals for Alpha Bank are presented below.

### United Nations Sustainable Development Goals with significant contribution from Alpha Bank



### Alpha Bank's contribution to the Sustainable Development Goals identified as most closely related to its business

Contribution to Sustainable Development Objectives	Relevant Sections of the Report Containing Information on Related Alpha Bank Activities
 <p>▼ <b>Improvement of the quality of health services in the Greek islands</b> Alpha Bank contributes to improving the quality of health services on Greek islands through the program "Together, for better health". More specifically, the Bank offers medical and pharmaceutical equipment and supplies to the islands' local Health Centers, thus helping cover basic medical needs of the local residents and reducing the need for them to travel to bigger islands for health issues.</p>	<p><b>Support for Social Needs</b></p>
 <p>▼ <b>Promotion of learning opportunities</b> Quality education is a fundamental principle for the improvement of people's lives and sustainable development. The Bank supports in practice not only the continuous education of its Employees but also, in a broader sense, the efforts to enhance education for all people through the "Together, for better education" program, partnerships, events and sponsorships in the countries it is present.</p>	<p><b>Responsible Investments and Financing</b></p> <p><b>Attracting, Developing and Retaining Employees</b></p> <p><b>Support for Social Needs</b></p>
 <p>▼ <b>Support of economic growth</b> Alpha Bank promotes continuous, inclusive and sustainable economic growth as well as full and productive employment and decent work for all. Specifically, it promotes policies that support productive activities, the creation of decent jobs, entrepreneurship, creativity and innovation and encourages the establishment and growth of enterprises through their access to financial services. Strengthening the capacity of domestic financial institutions in order to encourage and broaden access to banking, insurance and financial services for all is a key priority for the Bank. The use of innovative digital means allows remote access to financial services for all Customers. It also ensures a suitable and safe workspace for its Employees.</p>	<p><b>Financial Performance</b></p> <p><b>Innovation and Digital Transformation</b></p> <p><b>Responsible Investments and Financing</b></p> <p><b>Attracting, Developing and Retaining Employees</b></p> <p><b>Occupational Health and Safety</b></p>
 <p>▼ <b>Support for industry and infrastructure development</b> Sustainable industry and strong infrastructure are key pillars of growth for any economy. As one of the largest Greek financial sector Groups, Alpha Bank is constantly assisting new industries and businesses by providing financial services and products whose aim is to support them and promote innovation.</p>	<p><b>Responsible Investments and Financing</b></p>

**Alpha Bank's contribution to the Sustainable Development Goals identified as most closely related to its business**

Contribution to Sustainable Development Objectives	Relevant Sections of the Report Containing Information on Related Alpha Bank Activities
 <p>▲ Investing in activities dealing with climate change</p> <p>▼ Reduction of environmental effects from the Bank's operation</p> <p>Taking action to combat climate change, Alpha Bank makes targeted investments in the environment and in renewable energy sources. In parallel, it seeks to reduce its environmental footprint and raise awareness of the issues related to climate change, through actions, events and sponsorships.</p>	<p><b>Risk Management</b></p> <p><b>Innovation and Digital Transformation</b></p> <p><b>Responsible Investments and Financing</b></p> <p><b>Together for the Environment</b></p>
 <p>▼ Enhancing the implementation of regulations governing the Bank's operation</p> <p>▼ Reduction of the impact of potential risks from the Bank's operation</p> <p>Alpha promotes the development of effective, responsible and transparent institutions at all levels. As part of its continuous effort to consistently meet the expectations of its Customers and the State, the Bank has introduced procedures to ensure the strict application of the regulations and decisions of the Authorities responsible for the financial sector. Its position towards corruption and bribery is firm and, for this reason, it has established a system of relevant policies and control mechanisms to minimize such risks. To avoid personal data breach incidents, Alpha Bank applies best management practices, which it also updates on a regular basis in accordance with national and international regulations. For the Bank, meeting personal and business needs is a priority and it thus provides quality services to all its Customers without exception, protecting the legal interests and human rights of all.</p>	<p><b>Business Conduct and Compliance</b></p> <p><b>Risk Management</b></p> <p><b>Human Rights and Fair Labour Practices</b></p> <p><b>Data Protection</b></p> <p><b>Customer Service and Satisfaction</b></p>

▲ maximization of positive effects

▼ minimization of negative effects

### 3.5 COLLABORATION AND ESTABLISHMENT OF RELATIONSHIPS TO ACHIEVE THE GROUP'S STRATEGY

The Bank participates and is represented in a number of associations and organizations that address major issues of concern for the banking sector, such as Committees and Boards of the Hellenic Bank Association (HBA), the Bank of Greece and the Hellenic Advertisers Association. It also participates in bodies and initiatives working to promote and support the adoption of the principles of Sustainable Development and Corporate Responsibility.

In 2019, Alpha Bank signed the six Principles for Responsible Banking, which were developed as an international initiative of the United Nations - Environment Programme Finance Initiative (UNEP FI), thus confirming in practice its commitment to create a sustainable banking system. The Bank aims to increase its positive effect on society and the environment and mitigate any risks and negative consequences arising from its operation, while building a Responsible Banking culture. For more information, see section Responsible Investments and Financing.



Moreover, wishing to support events presenting significant sustainability issues that emerge internationally and are expected to affect companies and organizations in the near future, the Group became a sponsor for the following events:





### 3.6 ALPHA BANK ASSESSMENT BASED ON ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) CRITERIA

Alpha Bank is subject to assessments by international analysts and rating agencies regarding its performance in Sustainable Development issues. In 2019, the Marketing and Public Relations Division (through its Corporate Social Responsibility Department) coordinated communication with the Bank's Divisions whose participation was considered necessary in order to ensure that the requirements of the analysts and international rating agencies assessing the Bank's performance on the environment, society and corporate governance issues would be met in the best possible way.



**CDP:** In 2019, Alpha Bank disclosed on the CDP platform the necessary information regarding its activities for dealing with climate change, obtaining a "C" score, confirming that the Bank recognizes the impact of climate change on its activities and its effects on the environment.



**Financial Times Stock Exchange4Good (FTSE4Good):** Following its assessment by the FTSE International Organization, in 2019 Alpha Bank remained as a constituent of the Financial Times Stock Exchange4Good (FTSE4Good) Emerging Index, which includes listed companies in emerging markets with a positive financial, environmental and social performance. Its performance in this index proves that, in parallel with its business activity, the Bank is also highly aware of environmental and social issues, investing effectively in sustainable development. At the same time, it also strongly motivates it to strengthen its presence in the field of Corporate Responsibility, both in Greece and internationally.



**MSCI ESG Ratings:** In 2019, following an assessment by MSCI ESG Ratings the Bank received an A score (on an AAA to CCC scale), showing a steady improvement in the ESG ratings it receives in recent years.



**Bloomberg Gender-Equality Index (GEI):** In January 2020, Alpha Bank was included for the second consecutive year in the Bloomberg Gender-Equality Index (GEI). This index is the only place where investors can find qualitative, comparable information related to gender equality. It is an international index that includes companies from all over the world and from all business sectors, whose performance in gender equality issues is above the internationally defined threshold.



**Vigeo Eiris:** As of July 2019, Alpha Bank has been included in the Vigeo Eiris index listing the 100 best performing companies in emerging markets. The companies included in the index feature the best performance in ESG issues in 31 different emerging markets.



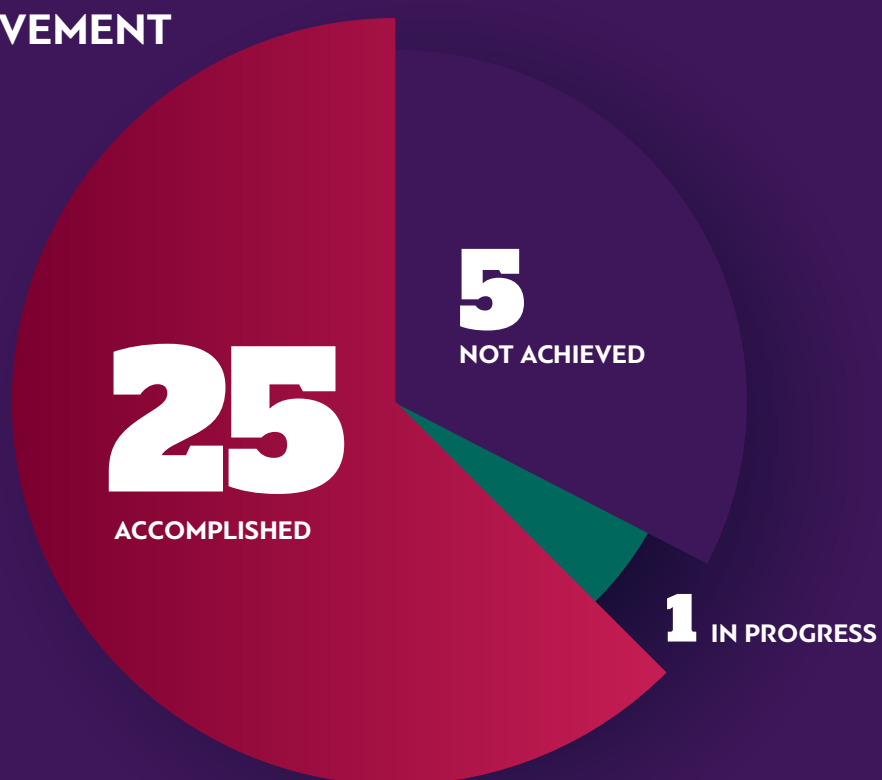
### **DISTINCTIONS IN 2019**

Alpha Bank received an excellence award in the event “Corporate Responsibility Awards 2019”, held by the Hellenic Advertisers Association, in the category “Society, Culture and Sports” for the educational program “Nomos-Nomizo-Nomisma”. Furthermore, in 2019, Alpha Bank was included in the “Most Admired Companies” according to the annual survey of the magazine Fortune Greece.

### **3.7 2019 PERFORMANCE AND 2020 CORPORATE RESPONSIBILITY TARGETS**

Alpha Bank sets short-term targets, which reflect its steady and gradual approach to the implementation of its policy and its commitments and priorities in the field of Corporate Responsibility. This section presents the total achievement level for the targets set for 2019, as well as the targets for 2020 by subject, according to the strategic approach of the Bank and the structure of the Report. The detailed targets set for 2019, by subject and their achievement level, are presented in the Annex of the Report.

2019  
TARGET  
ACHIEVEMENT



## ALPHA BANK AND CORPORATE RESPONSIBILITY

- To further strengthen the involvement of the Senior Management in Corporate Responsibility issues.
- To enrich the Corporate Responsibility web pages on the Bank's website in order to provide its Stakeholders with more comprehensive information.
- To publish further data assessed by investors and analysts.

## THE BANK

- Effective use of funds to deal with Non-Performing Steps.
- Transformation of the operational model.
- Significant consolidation of the balance sheet that will lead to the normalization of the Cost of Credit Risk.
- New disbursements of Euro 14 billion by 2022 in the real Economy, with the aim of supporting Private Entrepreneurs and Businesses.
- To further enhance the independence of the Board of Directors, with the appointment of two additional Non-Executive Independent Members.
- To provide further specific training programs to the Members of the Board of Directors.
- To enhance gender representation in the Board of Directors.
- To monitor the developments in Corporate Governance matters and to update the relevant documents, where required.
- To further enhance Personal Data Protection by applying appropriate technical and organization measures, as necessary.
- To complete the systemic support of all mechanisms and infrastructure that are included/concern the personal data protection framework.
- To train personnel regarding the "Group Environmental and Social Risk Management Policy on Legal Entities Lending".
- To monitor and control the proper implementation of the "Group Environmental and Social Responsibility Risk Management Policy on Legal Entities Lending".
- Update Privacy Notices, Policies and Procedures
- Training of GDPR Coordinators
- Cross checking & data verification using GDPR monitoring tools
- Conclude implementation of Technical Measures at Group level

## RESPONSIBLE BANKING

- To expand the selected products that meet ESG criteria within the rated lists.
- To further promote Socially Responsible Investments (SRIs) through informative events.
- To gradually apply the UNEP FI Principles for Responsible Banking, through collaboration and targeted meetings with the Divisions of the Bank.



# TARGETS FOR 2020

## EMPLOYEES

- To implement a targeted application of Development Centers by business sector and level.
- To apply Assessment Centers in case of succession to cover needs from the population of the Bank.
- To further use LinkedIn to attract new talented Personnel to the Bank from the labour market.
- Further development of the supporting services to Alpha Bank Employees and to their families,
- To provide targeted actions for Employees, in order to nurture a team spirit in each Division.
- To implement a new Employee Satisfaction Survey. To certify the Occupational Health and Safety Management System by an external certification body in accordance with the ISO 45001:2018 International Standard.
- To steadily attempt to modernize operations further, upgrade the provided services and improve the "user experience", further using the relevant know-how, technology and systems.
- To develop an appropriate mobile application allowing Employees' access to the leave application and the e-pay slip.

## ENVIRONMENT

- Further reduction of the Bank's environmental footprint, through a series of actions with the main reduction of Electricity consumption by 2%.
- To launch the tasks for the EMAS Environmental Certification "Eco-Management and Audit Scheme".
- To launch the tasks to receive the ISO 14064 (Greenhouse Gases) Certification
- Calculation of indirect greenhouse gas emissions (Scope 3).
- To reduce the total quantity of paper used by 1.5%.
- To increase by 0.5% the rate of recycled to used toner and ink cartridges compared to the respective rate of the previous year.

## SOCIETY

- To enhance the promotion and support of the Social Contribution Program "Bonus in Love" and enrich the Program with even more charities and NGOs.
- To design a Corporate Responsibility strategy as regards the Bank's response to emergencies.
- To design a Corporate Responsibility program to support young people and entrepreneurship.
- To further extend the initiatives and programs supporting health and education.

# 2017

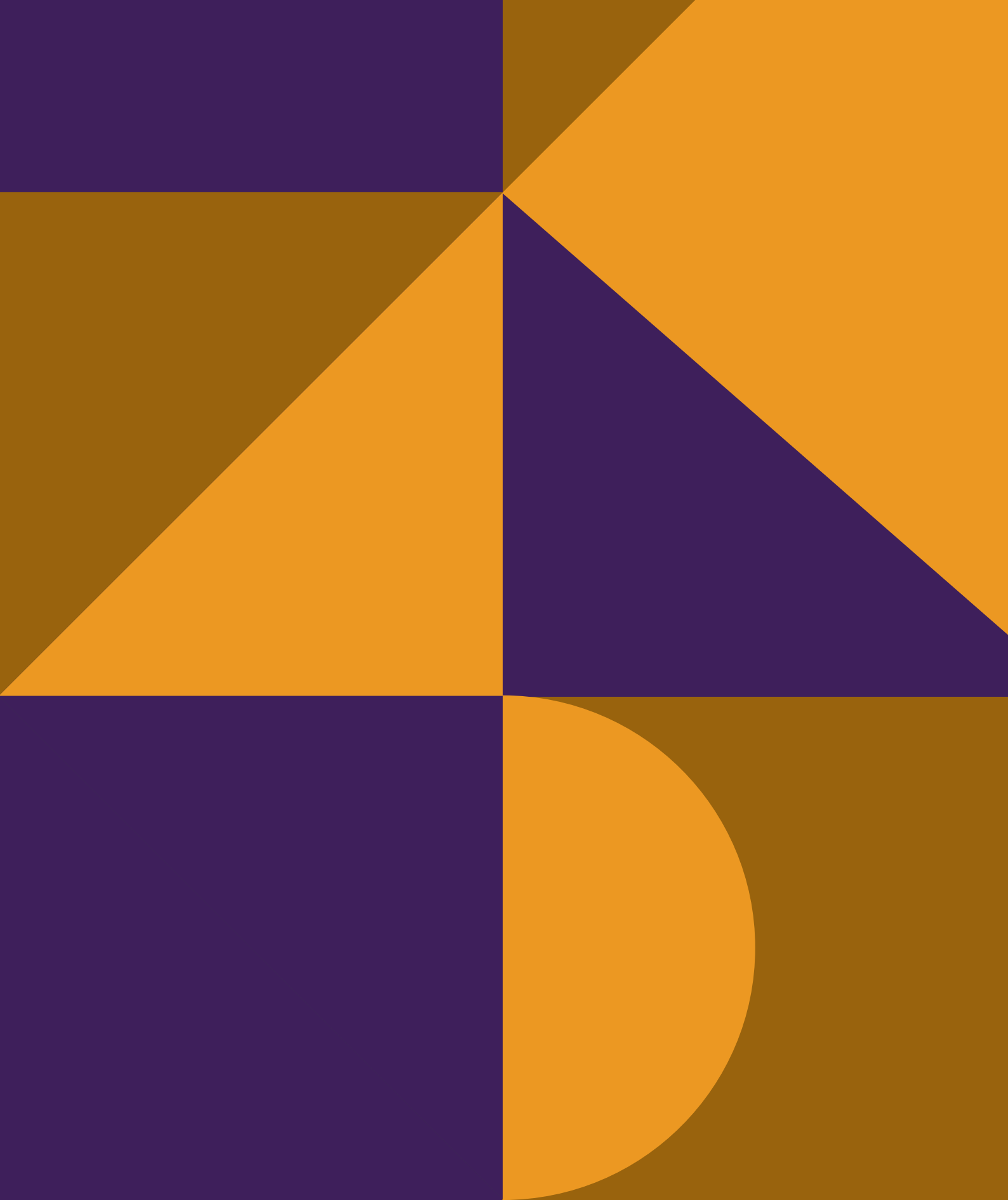
- Renewal of the Operational Risk Control Framework
- Review of the Operational Risk Management Policy
- Enhancement of the assessment methods for Outsourcing Risks
- Certification of the Internal Audit Division according to ISO 9001

# 2018

- Review of the Outsourcing Policy
- Development of a new methodology for assessing the risks regarding suppliers' data safety
- Review of the Operational Risk rating scale
- Certification of the Organization and of the Cybersecurity and Information Security Divisions according to ISO 22301

# 2019

- Strengthening of the fraud assessment and control framework
- Application of a new advanced Operational Risk Platform
- Application of a new Anti-Fraud Platform and update of the reporting systems
- Certification of the Information Technology Division according to ISO 20000-1



## 4. THE BANK

#### 4.1 FINANCIAL PERFORMANCE



Alpha Bank is one of the four systemic banks in Greece and, as such, its economic performance has a broader effect on the country's economy. The Bank's optimal performance is the utmost priority for its Management. In 2019, Alpha Bank continued to consistently implement its Business Plan and was able to further strengthen its capital position, which remains the highest among Greek banks.

The Bank focuses its activities on its Customers, offering high quality products and services, using a more effective service platform. In this manner, it supports the real economy while generating maximum value for its Customers and Shareholders. In 2019, Alpha Bank supported sustainable growth, innovation and entrepreneurship in Greece, providing new financing of Euro 3.5 billion, while it also further improved its liquidity, increased its net fee and commission and reduced its operating costs. There was also significant progress in the reduction of non-performing exposures, with a parallel reduction of impairment loss.

In 2019, Alpha Bank prepared and presented its updated Strategic Plan to investors. The Strategic Plan includes actions to accelerate the clean-up of the Alpha Bank balance sheet and the overall transformation of its Operating Model by the new Management Team. To achieve the Strategic Plan targets, Alpha Bank is based on an effective and transparent Corporate Governance system, with clear delegation of competences and fast and efficient decision taking, while promoting meritocracy and rewards for contributing to the common result across the organization. Alpha Bank continues to put its trust in the prospects of the Greek economy and its ability to successfully address any new challenges. Alpha Bank's strong capital position is the robust basis that allows it to continue to play a leading role in developments.

#### Indicatively, the main corporate events that took place in 2019 were:

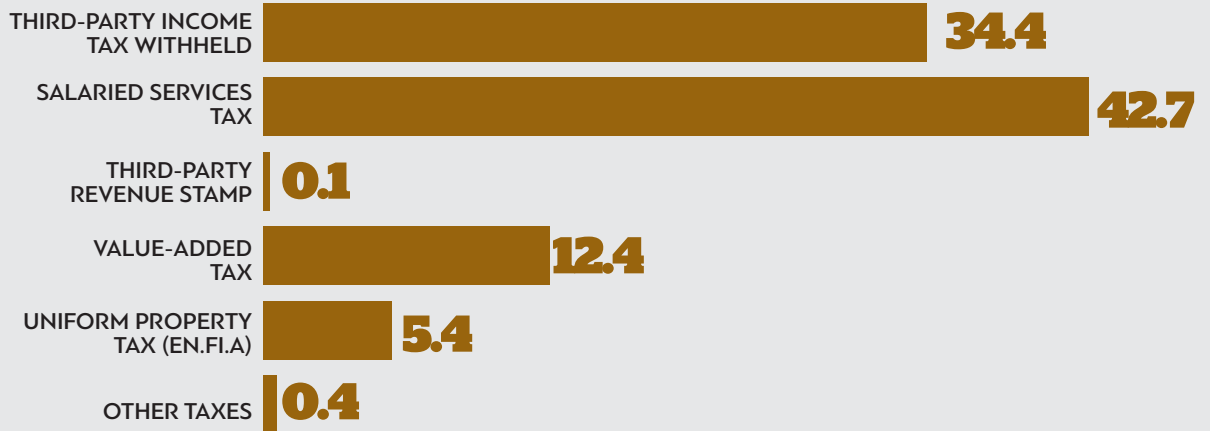
- On January 2, 2019, Vassilios E. Psaltis assumed his duties as Chief Executive Officer of Alpha Bank, following the unanimous decision of the Bank's Board of Directors on November 29, 2018.
  - Alpha Bank was proclaimed the most active Bank in promoting international commerce in 2018 in Greece ("Most Active Issuing Bank in 2018 in Greece") by the European Bank for Reconstruction and Development (EBRD) and "Best Private Bank in Greece" for 2019 by the prestigious publications "Professional Wealth Management (PWM)" and "The Banker" of the Financial Times Group.
  - In May 2019, the subsidiary of the Alpha Bank Group in Romania successfully completed the initial issue of a covered bond amounting to Euro 200 million.
  - In July 2019, Alpha Bank signed two agreements, totalling Euro 150 million, actively participating in the innovative new program of the European Investment Bank, for the business empowerment of women and the creation of new jobs for young people.
  - In September 2019, Alpha Bank and Eurobank signed an agreement with the European Investment Bank for their joint participation in the Infrastructure Fund of Funds - (InfraFoF), to support investments in priority sectors, such as renewable energy sources, enhancing energy efficiency and urban development.
- In November 2019, Alpha Bank presented the new Strategic Plan 2020-2022 and turned a new leaf with an integrated plan for addressing Non-Performing Exposures and a renewed Customer-orientated planning.



**DIRECT ECONOMIC VALUE GENERATED  
AND DISTRIBUTED**

 2019 amounts  
(in Euro th.)

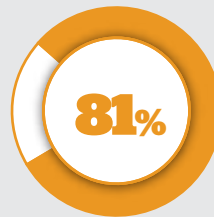
<b>Total income</b>	<b>1,923,158</b>
- of which: Expenses from Interest payable to Credit Institutions	34,524
- of which: Expenses from Interest payable to Customers	140,350
- of which: Expenses from Interest payable to debt securities in issue and other borrowed funds	25,523
<b>DIRECT ECONOMIC VALUE GENERATED</b>	<b>1,923,158,0</b>
General administrative and other expenses and depreciation expenses	520,724
- of which: Other Taxes – Fees and Fines	69,893
- of which: Sponsorships	2,278
Personnel fees and expenses (including cost/provisions for compensations under the voluntary departure scheme)	395,814
Dividends	0
Income taxes	3,050
<b>ECONOMIC VALUE DISTRIBUTED</b>	<b>919,588.0</b>
<b>UNDISTRIBUTED ECONOMIC VALUE</b>	<b>1,003,570.0</b>



**95.3**

Euro million  
IN TAXES

THIRD PARTY  
TAX WITHHELD



77.2

BANK  
PROPERTY TAX



18.1

**CAPITAL ADEQUACY**

The Group's policy is to maintain a strong capital base in order to safeguard the Bank's growth and retain the trust of depositors, Shareholders, markets and business parties.

Its capital adequacy is supervised by the European Central Bank (ECB) Single Supervisory Mechanism, to which reports are submitted on a quarterly basis. The minimum ratios (common equity, Tier 1 capital and capital adequacy) for the Group are set in

accordance with the applicable institutional framework. The Capital Adequacy Ratio is calculated in accordance with the applicable transitional provisions. The Capital Adequacy Ratio compares the Group's regulatory capital with the risks undertaken by the Group (risk-weighted assets).

The Group's capital adequacy ratios on 31.12.2019 are shown in the following table:

GROUP RATIOS	31/12/2019
Common Equity Tier 1 Ratio	17.9%
Tier 1 ratio	17.9%
Capital adequacy ratio	17.9%
Leverage Ratio	13.41%

Regarding the impact on regulatory capital from the adoption of the IFRS 9 Standard, Alpha Bank decided to make use of article 473a of Regulation (EU) 2017/2395 and to apply the transitional arrangements provided for the calculation of Capital Adequacy, on both an individual and a consolidated basis. The Bank is adequately capitalized in order to meet the needs arising from the implementation of the new standard, as the Common Equity Tier (CET1) stands at 17.9% while the impact from the standard's full implementation (in 2023) is estimated at 3%, with the Group-level CET1 ratio standing at 14.9% as at 31.12.2019.

#### 2020 Stress test

The stress test for European Union banks is carried out every two years. However, due to the spread of Covid-19 (Coronavirus), the European Banking Authority (EBA) decided to postpone this test for 2021, in order to facilitate Banks to focus on their operations and allow the uninterrupted continuation of their activity. For 2020, the European Banking Authority (EBA) will carry out an additional transparency exercise to offer updated information to the market, as regards the risks for banks and the quality of their assets.

#### Issue of Tier 2 bond

On February 6, 2020, Alpha Bank successfully placed a Euro 500 million, Tier 2 bond with 10-year maturity callable after 5 years at a yield of 4.25%, listed on the Luxembourg Stock Exchange. The transaction is an integral part of Alpha Bank's strategic plan and helps optimize the Bank's capital structure and diversifies its capital sources, while further strengthening the Total Capital Ratio by about 104 bps.

#### Recent Supervisory Developments

Following the postponement of the stress test due to the spread of Covid-19, the European Banking Authority (EBA) and the European Central Bank (ECB) announced relaxation measures. In specific, European Banks may temporarily operate below the level of capital defined by the Pillar 2 Guidance (P2G), the capital conservation buffer (CCB), the countercyclical capital buffer (CCyB) and the liquidity coverage ratio (LCR). Moreover, it was decided to proceed with the early application of the change brought about by the adoption of CRD5 regarding the supervisory requirements of Pillar 2 Requirement (P2R), allowing the use of additional Tier 1 and Tier 2 capital instruments in addition to the exclusive use of Common Equity Tier 1 (CET1) capital.

#### Liquidity

The Bank, true to its strategic and financing plans, in Q1 2019 repaid the emergency liquidity assistance (ELA) and continued to focus on recovering the deposits and the diversification of funding sources, monitoring the markets for any opportunities it can use. For more information see [Annual Financial Report for 2019](#).

**4.2 CORPORATE GOVERNANCE**

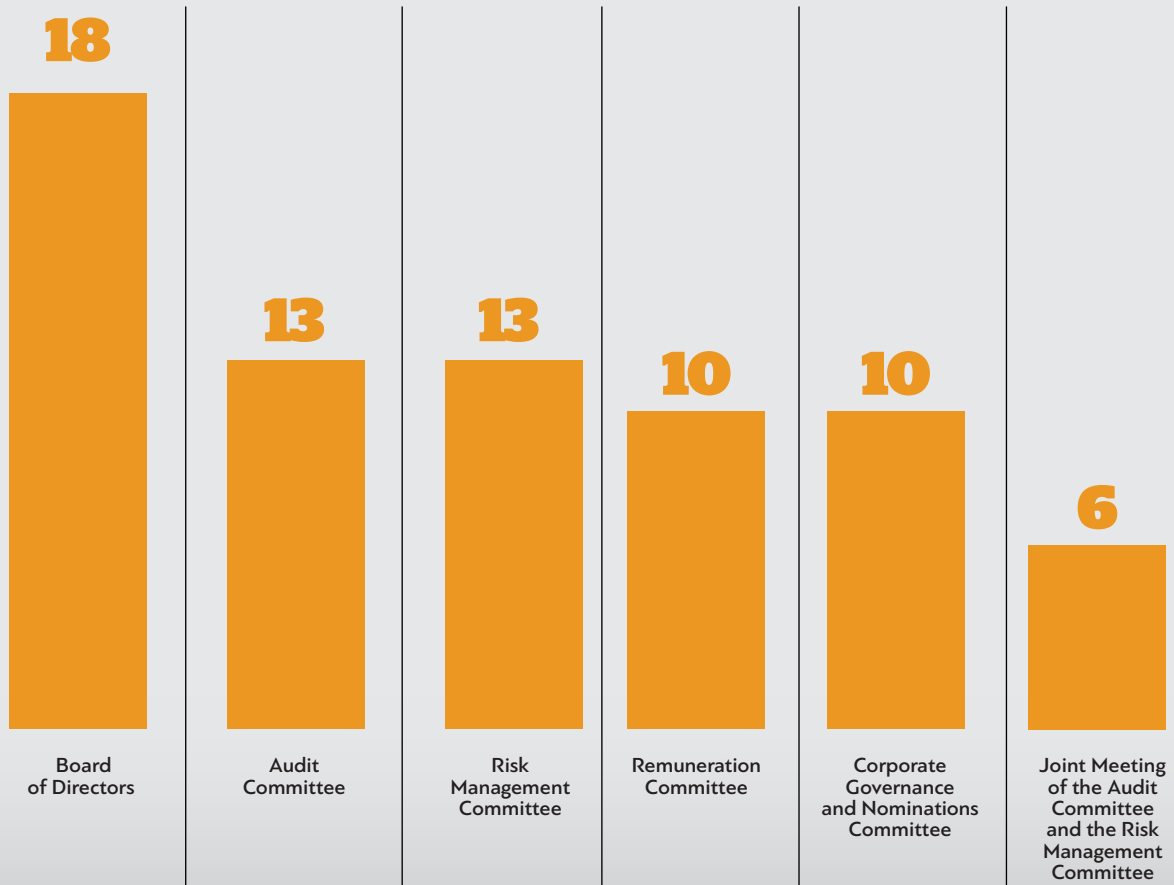
For Alpha Bank, effective Corporate Governance is a stated objective, which the Bank pursues on an ongoing basis, taking into account the requirements of the institutional framework, the best practices at international and European level, the interests of its Shareholders and the expectations of its Stakeholders and of society.

The Corporate Governance Code and the Corporate Governance practices applied by the Bank comply with the requirements of the relevant legislative, supervisory and regulatory frameworks, with the

Greek law and the law of the European Union and with the best international Corporate Governance practices. Both the Corporate Governance Code and the Charters of the Board of Directors' Committees are posted on the Bank's website ([www.alpha.gr/en](http://www.alpha.gr/en)).

Two (2) General Meetings were held in 2019, as well as several meetings of the Board of Directors and its Committees, as shown below.

**NUMBER OF MEETINGS IN 2019**



In the same year, the Bank updated its Statutes and the Senior Executives Severance Payment Policy, while it also created a Remuneration Policy in implementation of articles 110 and 111 of Law No. 4548/2018. Said documents were approved by the General Meeting of Shareholders and are available on the Bank's website ([www.alpha.gr/en](http://www.alpha.gr/en)). Furthermore, the Board of Directors decided that as of 2.12.2019, the powers and competencies of the Board of Directors - except those concerning matters that, under the legislation in force, require a collective decision - are exclusively assigned to the CEO, who shall have the power to further delegate said powers and competences. At the same time, the position of Deputy CEO was eliminated. Throughout the year, the Bank reviewed Policies related to the Corporate Governance practices used by the Group Companies. After thoroughly analyzing discrepancies, said Policies were fully aligned with the legal and regulatory requirements, the guidelines of the European Banking Authority and the corporate governance practices of Alpha Bank. Given the increased interest of institutional investors for Corporate Governance matters, in 2019, the Bank held meetings and teleconferences with representatives, analysts and investors. Through this initiative, the Bank strengthened its ties with Shareholder representatives and Institutional Investors interested in corporate governance matters. As a result of the above, Alpha Bank's results for 2019 on corporate governance matters (ISS ratings) were significantly improved. The Bank offers new Board Members an induction program with information about Corporate Governance, Risk Management, Internal Control, Compliance, Capital Adequacy and Financial and Accounting Services, IT and Information Security and Strategic Planning, as well as relevant information conferences and meetings. The Bank has introduced a Code of Ethics describing the Bank's commitments and practices regarding its activities, its management and the rules of conduct that apply to its Executives and Employees not only in their interaction with each other but also with transacting parties and with the Shareholders. The application of the Code of Ethics and of the principles of Corporate Governance, together with the operation of the Audit Committee, the Risk Management Committee, the Remuneration Committee and the Corporate Governance and

Nominations Committee have allowed Alpha Bank to effectively enhance the principles of integrity and transparency in its operation and to ensure optimal risk management.

The Bank attaches great importance to matters of ethics and transparency and has in place clear rules and regulations, established by the Personnel Regulations and the Acts of the General Management, regarding matters such as the protection of personal data, the prohibition for Executives and Employees to accept gifts in the context of performing their official duties and potential cases of conflict of interest in conducting transactions. Further details on the mechanisms ensuring Alpha Bank's effective, transparent and responsible Corporate Governance can be found in the Bank's Corporate Governance Code, in its Business Report, in the Corporate Governance Statement and in the Annual Report of the Board of Directors, which are posted on its website ([www.alpha.gr/en](http://www.alpha.gr/en)).

4.3 BUSINESS CONDUCT AND COMPLIANCE



Alpha Bank complies with the applicable legal and regulatory frameworks at national as well as at European level. As part of its continuous effort to consistently meet the expectations of its Customers and the State, Alpha Bank has introduced procedures to ensure the strict application of the regulations and decisions of the Authorities responsible for the financial sector. Alpha Bank firmly believes that its success is the result of the behavior of each member of the Group. To this end, it implements best practices, which promote effective corporate governance and good individual behavior in the context of the highest level of ethics.

The Compliance Division is responsible for managing the risk arising from non-compliance with the regulatory framework in force according to its role as a second line of defense and part of the Internal Control System. In particular, it identifies, assesses and manages the risk to which the Bank may become exposed in connection with the

applicable regulatory framework. It prepares an Annual Regulatory Compliance Program, in accordance with the regulatory requirements, in which the most important objectives for the year are reflected, always in accordance with the regulatory developments.

Basic Codes, Policies and Compliance Regulations applied by Alpha Bank

- Code of Ethics
- Corporate Governance Code
- Remuneration Policy
- Compliance Policy
- Business Continuity Policy
- Operational Risk Management Policy
- Fraud-related Risk Management Policy
- Early Warning Policy for Credit Risk
- Group Credit Risk Management Policy
- Group Market Risk Management Policy
- Group Environmental and Social Responsibility Risk Management Policy on Legal Entities Lending
- Credit Impairment Policy

- Policy on the Prevention of Conflict of Interest
- Policy on Related Parties Transactions
- Policy Manual for the Prevention and Suppression of Money Laundering and Terrorist Financing
- Outsourcing Policy Manual
- Group Personal Data Protection Policy
- Corporate Responsibility Policy
- Policy and Procedure for the Provision of Financial Assistance
- Group Environmental Management Policy
- Reporting Policy and Procedures

In the context of its fixed transaction control policy, in 2019, Alpha Bank continued to conduct audits of transactions and Customers for compliance with the legal and regulatory framework, aimed at combating money laundering, financial crime and fraud, using the specialized control and reporting systems it has put in place and working closely with the competent Regulatory Authorities.

The Bank's position against corruption is unwavering and thus, in 2019, for yet another year, the Market and Operational Risk Division and the Compliance Division examined all cases that could be associated with corruption and bribery and could pose an operational or compliance risk.

### 2019 Compliance Training Program

# 543

**Executives and Officers of the Bank** attended training programs on anti-money laundering and anti-corruption policies and procedures.

# 749

**749 Executives and Officers of Branches** attended specific training programs on raising further awareness on compliance issues.



Each Branch has an Anti-Money Laundering (AML) Officer. These Executives are provided with adequate training on AML and anti-corruption policies and procedures as well as with daily telephone support by (a) the Anti-Money Laundering and Combating the Financing of Terrorism Functional Area, (b) the Due Diligence Measures and Suspicious Transactions Administration Functional Area and (c) the Restrictive Measures Monitoring and AML System Administration Functional Area of the Compliance Division, to ensure that they are able to identify and efficiently handle such incidents. Once they are identified and thoroughly analyzed by the competent Areas, the cases decided as having substantial evidence suggesting money laundering and corruption are reported in writing to the Anti-Money Laundering, Counter-Terrorist Financing

and Source of Funds Investigation Authority. The Group's Policy for the Prevention and Suppression of Money Laundering provides the Group Companies in Greece and abroad with instructions on the due diligence measures that must be taken when business relations with new Customers are established as well as in relations with third parties. The Bank, with the main concern of transparency in providing information to contractual parties, strictly adheres to regulatory provisions, both in the pre-contractual and the contractual term and throughout the duration of the cooperation. In specific, prior to the commencement of their contractual relationship, Customers receive a copy of the Cooperation Framework in printed form or in any other durable medium, being entitled - at any time during the contractual term - to receive a new copy of the document in the same manner.

Moreover, they can obtain detailed information about the characteristics of the products/services using the official website of the Bank, the pre-contractual information document and in person, by the Branch Network. Furthermore, Customers receive the prescribed periodical update after the conclusion of loan and deposit contracts, as well as following their relevant requests throughout the term of their contractual relationship.

Prior to the sale of new products/services or the amendment of older ones, the Bank ensures strict compliance with the regulatory provisions on proper and transparent information to Customers. Similar steps are also taken to inform Customers during investment transactions by incorporating into the Bank's policies and procedures the provisions of the regulatory framework concerning the markets in financial instruments and, in particular, Directive (EU) 2014/65 (MiFID II), as transposed into Greek law by Law 4514/2018, and Regulation (EU) 600/2014 (MiFIR).

Alpha Bank also applies a framework of Policies and Procedures regarding issues related to ethics and transparency, in accordance with the principles of Corporate Governance. At the same time, it applies a Policy and Procedures on Anonymous Reporting ("Whistleblowing") of serious irregularities, omissions or offences of which its Personnel, Suppliers or Customers become aware, in order to safeguard its integrity and good reputation. In this year, eight (8) reports were submitted using the Whistleblowing mechanism.

Following examination by the competent Committee no significant findings were identified.

It should be noted that in 2019 no bribery and corruption incidents were identified in the Bank, and no breaches were identified in relation to anti-trust and monopoly practices. Moreover, the Bank did not finance any political parties or politicians.

Furthermore, the Bank was not charged with any significant fines concerning non-compliance with the legal and regulatory framework for financial, Employee, urban or other socially related issues, while no ratifications for non-financial issues were imposed. In total, 399 cases were resolved using legal and official dispute resolution mechanisms.

Finally, throughout the year, Alpha Bank actively participated in consultations for draft Bills, Ministerial Decisions and Decisions of the Hellenic Capital Market Commission, during the transposition into national law of Directives or Regulations of the European Union, as well as in interbank committees for the formulation of the regulatory framework and the information regarding impending developments. [For more information, see Annual Financial Report for 2019.](#)





#### 4.4 RISK MANAGEMENT

The effective management of all types of risk focuses on accurate and effective risk measurement using specialized methodologies and calculation models, as well as on the introduction of various policies and limits, through which the Bank's exposure to the various types of risk is controlled. In this framework, Alpha Bank has in place a dedicated Risk Management Business Unit, which reports to the General Manager and Chief Risk Officer of the Group, to the Risk Management Committee and, through the latter, to the Bank's Board of Directors. More details on Alpha Bank's risk management practices are presented in the Annual Financial Report for 2019.

#### MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISK IN BUSINESS FINANCING

The Group's commitment to the provision of banking services and products that promote sustainable development as an integral part of its Corporate Responsibility Policy is enhanced by the effective management of the environmental and social dimension of financing. It is further strengthened with the incorporation of the **"Group Environmental and Social Risk Management Policy on Legal Entities Lending"** in the existing Credit Risk Management Framework and Credit Policy of the Group. The new policy took effect in July 2016 and is available on the Alpha Bank Intranet.

The Policy presents the responsibilities and the approach followed in managing environmental and social risk at every stage of the lending process - from identifying the origin of credit risk to assessing it, granting approval and monitoring the Group's Wholesale Banking Customers. It also provides an industry-specific Exclusion List (i.e. a list of industries that the Group does not finance) as well as a list of crucial industry sectors/activities associated with environmental and social risks. Based on their risk level, borrowers/projects are classified into high, medium and low-risk categories. Following an agreement with the other systemic banks, as of early 2018 and in the cases of new financing applications, the risk assessment scope was extended to include an inspection conducted at the facilities of the debtors/financed projects.

The environmental and social risk associated with lending to legal entities is taken into account in all cases by the relevant Credit Committees,

is indicated by the corresponding flag in the credit proposals submitted and is entered in the Alpha Bank Rating System (ABRS) IT application. The "Group Environmental and Social Risk Management Policy on Legal Entities Lending" provides for different application levels depending on (a) the Customer's environmental and social risk rating and (b) the type of financing. In all cases, Customer questionnaires are completed in order to establish a summary background of the Customer, while in cases where specific criteria are met, a specialist advisor conducts an inspection to identify, assess, mitigate and/or eliminate any potential environmental and social risk. In the event that related issues arise from the inspection, remedial actions to be carried out within a specific time schedule are agreed with the Customer and this agreement is reflected in the contractual documents and in the IT application, which produces monthly reports.

In 2019, controls were carried out to confirm the proper implementation of the “Group Environmental and Social Responsibility Risk Management Policy on Legal Entities Lending” by the Credit Risk Policy and Control Division. The key points examined, among other things, included the following:

- The correct use of matrix tools
- The correct conduct of due diligence procedures
- The signature of contractual documents for Environmental and Social Responsibility Risk
- The Action Plan recording in the IT application of the Bank
- The notification of the relevant Credit Committee about major findings
- The notification of the ESMS Officer regarding new approvals to high-risk borrowers

Following the control, there was a small number of cases where either a due diligence control was not carried out in accordance with the prescribed procedure, or an approval was granted without prior notice of the competent Committee for significant findings of the due diligence procedure. In cases where discrepancies from the prescribed procedures were identified, the competent Units took the necessary corrective actions for the prevention of similar incidents.

In this year, an assessment inspection of environmental and social responsibility risks was carried out for 128 Customers, who as at 31.12.2019, had in total a business loan balance of Euro 449 million. Moreover, in all cases of approval for new Project Finance loans the environmental and social responsibility risks are thoroughly considered with the conduct of inspections.

In 2019, there were no cases of loan non-approvals due to issues arising during the assessment of said risks.

The assessment of climate change risks is a key priority for Alpha Bank. 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 any transitional risks. At the same time, it identifies the physical risks implied by climate change both for the Bank and for its Customers. 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. Alpha Bank seeks to constantly improve its procedures and minimize any risks associated with climate change.

According to the training program of the Training Division, credit seminars are held in the Bank, the content of which includes a section referring to the environmental and social responsibility risk in business loans. Furthermore, at the initiative of the Credit Risk Policy and Control Division, informative meetings with the competent Units are held.

As part of banking operations, the implementation of environmental and social policies on products and services lies within the Bank’s Audit Universe, where risks are assessed annually, in accordance with the relevant methodology of the Group. The International Standards for the Professional Practice of Internal Auditing are followed for the internal audit.

#### 4.5 HUMAN RIGHTS AND FAIR LABOUR PRACTICES

Alpha Bank respects and promotes human rights through the business policies it applies, its responsible supply chain and the relations it develops with its Customers. The Bank's Corporate Responsibility Policy and its Code of Ethics describe its approach and commitment to the management of human rights. At the same time, it applies the law and follows internationally acclaimed directives, principles and initiatives to protect human rights, such as the Core Labour Conventions of the International Labour Organization (ILO) and the Universal Declaration of Human Rights (UDHR). The Bank respects human rights and renounces any form of child labour, forced or compulsory labour. It respects and defends the diversity of its Employees (e.g. age, gender, race, nationality, religion, disability/special ability, sexual orientation etc.) and treats all Employees with respect. It ensures excellent working conditions and development prospects, based on meritocracy and equal treatment, without discriminations. It offers fair remuneration, based on contracts that are in line with the relevant national labour market and ensures compliance with the respective national regulations on legal minimum wage, working hours and leave days. According to data, the gender pay gap in the Bank is 16% (in favour of men), while when foreign Banks are also taken into account the gap is 9%.

At the same time, the Bank recognizes the right to form trade unions and the right of collective bargaining. Collective bargaining and trade union rights are established under national and international regulations. Alpha Bank, fully respecting the rights of Employees, is committed to fully safeguarding these rights, as established under national and EU Law and the conventions of the International Labour Organization.

The validity of sectoral Collective Labour Agreements (CLA) covers the entire banking sector, while the validity of Enterprise-Level Collective Labour Agreements (ELCLA) covers all regular Personnel of the Bank. The validity of both sectoral and Enterprise-Level Collective Labour Agreements is irrespective of the capacity of the trade union member of any level.

In total four (4) Employee associations are active in the Bank, representing 88% of its Human Resources. The most representative amongst them is recognized as the responsible representation body in labour-related bargaining with the Management. The Bank and the Group Companies take all suitable measures to ensure that Partner Providers act in a manner consistent with the values, principles, commitments and obligations of the Code of Ethics set out in the Bank's Corporate Responsibility Policy. In particular, Service Providers established in third countries and their subcontractors are required to assure that they are acting in a socially responsible manner and respect international standards on human rights and appropriate working conditions, including the prohibition of child labour.

For Alpha Bank, meeting personal and business needs is a priority and it thus provides quality services to all its Customers without exceptions, protecting the legal interests and human rights of all Customers.

Finally, the Personnel, Customers and suppliers of the Bank and Group Companies are encouraged to submit reports about actions that undoubtedly breach the rules of conduct and ethics of the Bank, specifically the Code of Ethics of the Bank, using the Whistleblowing mechanism. Last year, there were no convicting judgements against the Senior Management of Alpha Bank for human rights violation incidents.

#### 4.6 ALPHA BANK GROUP SYSTEM MANAGEMENT

All procedures and policies of an Organization aimed at achieving a specific goal (product quality, environmental performance etc.) constitute an integrated management system. In recent years, the need to standardize management systems using International Standards becomes increasingly established, as it promotes the quality, safety and reliability of the products and services offered to Customers and therefore, to society.

The certified management systems the Alpha Bank Group already has in place are designed to enable it to better respond to the ever-changing needs of Customers, in full alignment with the applicable legislative and regulatory requirements. At the same time, the certification of critical operations in accordance with International Standards seeks to establish a resilient Organization, which successfully addresses issues such as the early identification, measurement and management of the undertaken risks, compliance with the applicable legislative and regulatory framework, the continuous improvement of products and services offered, the modern and responsible management of Customers' banking needs and to safeguard its approach to matters of:

- **Governance and Organizational Structure**
- **Sustainability**
- **Social Responsibility**

To enhance the monitoring and centralized management of all the Group's management systems, the Bank established the "Group International Standards Certification Management" Functional Area in the Organisation Division, which:

- Proposes, at Group level, the certification strategy, policy and methodology per International Standard (ISO, British Standard etc.) and is responsible for investigating and introducing new systems in accordance with International Standards.
- Evaluates and oversees the application of International Standards at Group level.

<b>Bank Units / Group Companies</b>	<b>Table of 2019 International Standard Certifications</b>			
	<b>ISO 9001</b> (Quality Management System)	<b>ISO 20000</b> (IT Services Management System)	<b>ISO 27001</b> (Information Security Management System)	<b>ISO 22301</b> (Business Continuity Plan)
<b>ALPHA BANK</b>				
Human Resources Division	✓	—	—	—
Internal Audit Division	✓	—	—	—
Project Management Division	✓	✓	—	✓
IT Systems Division	✓	✓	—	✓
Customer Service Division	✓	✓	—	—
Cybersecurity and Information Security Division	—	—	✓	✓
Back Offices - Investments Division	✓	—	—	✓
Organisation Division	—	—	—	✓
Procurement, Property and Security Division	✓	—	—	—
Information Systems Division	✓	✓	—	✓
Operations Division	—	—	—	✓
Credit Operations Division	✓	—	—	✓
Back Offices - Payments Division	✓	—	—	✓
Trading Division	—	—	—	✓
Financial Products Division	—	—	—	✓
ALPHA Supporting Services S.A.	✓	✓	✓	✓
ALPHA BANK ROMANIA S.A.	—	—	—	✓
ALPHA FINANCE INVESTMENT SERVICES S.A.	—	—	—	✓
ALPHA LEASING S.A.	✓	—	—	✓
ALPHA ASTIKA AKINITA S.A.	✓	—	—	—

<b>Group Company</b>	<b>Table of 2019 International Standard Certifications</b>		
	<b>ISO 14001</b> (Environmental Management System)	<b>ISO 45001</b> (Occupational Health and Safety Management System)	<b>BS 10012</b> (Personal Information Management System)
ALPHA BANK S.A.	✓	—	—
ALPHA Supporting Services S.A.	✓	✓	✓

In addition to the above, actions are currently under way in the Bank for the development and certification of the Occupational Health and Safety Management System in accordance with the ISO 45001:2018 International Standard.

#### **ALPHA BANK GROUP BUSINESS CONTINUITY MANAGEMENT**

The development by Alpha Bank of a comprehensive and effective Business Continuity Management Framework ensures, to the maximum extent possible, the protection of the health and safety of Employees, the uninterrupted provision of services and information to Customers and other Stakeholders (shareholders, partners, suppliers, regulatory and state authorities etc.) and the minimization of the consequences (in terms of operation, finances, legal issues and reputation) in case of an unforeseen event that can affect its operation.

In full compliance with the above, Alpha Bank, a pioneer in Business Continuity at European level, has been applying since 2008 a uniform Business Continuity Management Framework for the entire Group, based on best practices and methodologies and certified in accordance with the ISO22301 international standard from the very first year of the standard's implementation.

The scope of application of the ISO22301 certification of the Bank and the Group Companies encompasses critical operations as well as additional services and is considered significantly more extensive than that applied by other financial-sector

companies in Europe as well as internationally. In specific, in 2019 the Group Companies' certifications were renewed, while the Business Continuity Management certification of Alpha Bank Romania S.A. was extended to additional critical operations (cards and alternative networks).

In accordance with the Framework procedures, annual risk and business impact analyses are carried out and taken into account for the development and implementation of the Strategic Recovery and the Business Continuity Plans.

The Bank's Organisation Division is responsible for maintaining, improving and managing the Group's Business Continuity Framework.

In each Business Unit of the Bank, a Business Continuity Officer has been appointed, who coordinates, updates and tests of the Plan for their Unit. Similarly, in the Group Companies in Greece and abroad, Business Continuity Coordinators or local Business Coordination Offices have been appointed, to ensure adherence to the relevant procedures, achieving uniformity and compliance with the requirements of the Group Business Continuity Management Framework.

#### **PERSONNEL TRAINING AND BRIEFING**

The effective operation and application of the Business Continuity Plan depends greatly on the human factor and on the Personnel's knowledge of their role and responsibilities in its development, implementation and trial application.

Over the past years, Alpha Bank has been regularly implementing an extensive training program, in order to brief the Group's Personnel on issues pertaining to the Business Continuity Plan. This consists of the following modules:

#### **I. Orientation Exercises / Tabletop Exercises**

In 2019, theoretical training sessions (consisting of Orientation and Tabletop Exercises) took place, attended by representatives from 40 Business Units of the Bank and from all Group Companies. Furthermore, concerning Emergency and Building Evacuation procedures, evacuation trainings and drills were carried out in the Central Services and in the domestic Branch Network, as well as in the Group Companies abroad.

#### **II. In-house Business Continuity Management Training Programs**

In 2019, a total of 96 Executives from 42 Business Units of the Bank and 9 Group Companies were certified (67 as Business Continuity Certified Planner, 16 as Business Continuity Certified Specialist and 13 as Business Continuity Certified Lead Auditor), while since 2014, 532 Executives of the Bank and Group Companies have been certified in total.

#### **FUNCTIONAL TESTS**

During the functional tests, participating Unit Employees move to the recovery area, in order to confirm the correct operation of the recovery infrastructure, including IT infrastructure (applications, terminals, peripheral equipment etc.) and networks (communication and data). Employees also familiarize themselves with their role and duties during recovery (organization, management structure, actions and communication).

In 2019, a total of 48 functional tests were carried out at Group level, of which 14 involved Units of the Bank and 34 involved Units of Group Companies.

Furthermore, the competent IT Units in Greece and abroad carry out annual Disaster Recovery Testings.

# TOGETHER AGAINST COVID-19

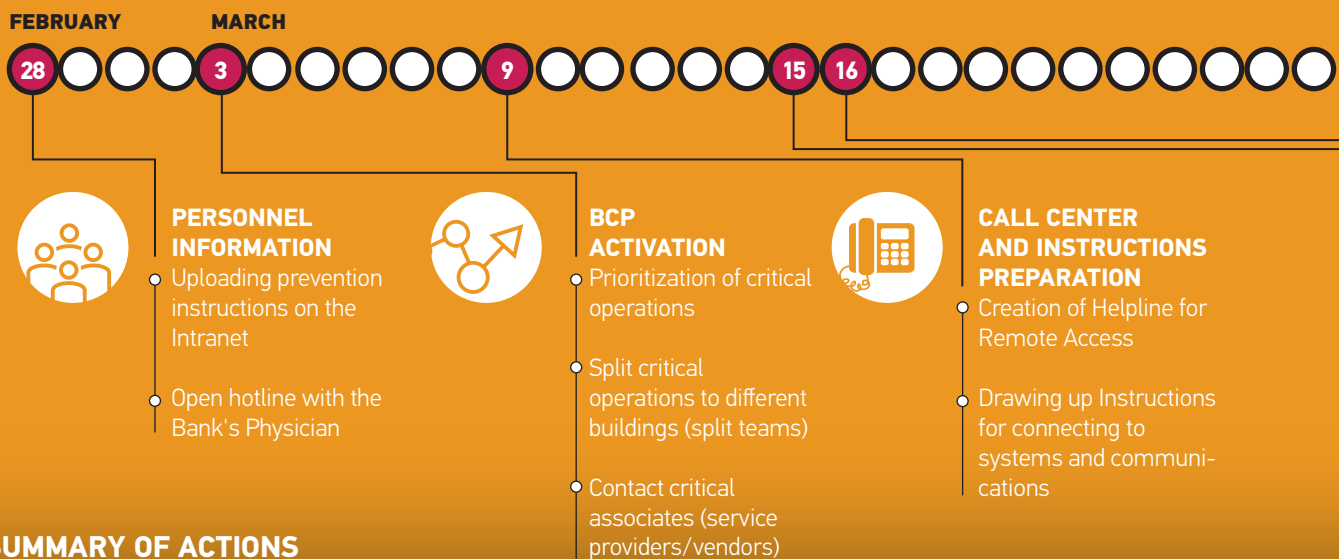
The unprecedented conditions created by the pandemic required bold decisions and measures to safeguard the health of all Employees and their families. Thanks to the immediate mobilization and exemplary cooperation of all Bank Units, Branch Network and Group Companies, it was possible to effectively apply a contingency plan for the pandemic.

Monitoring developments and always focused on the Health and Safety of Employees, from the very first moment, the Human Resources Division, in cooperation with the Bank Physicians, provided reliable medical information to all Personnel about virus prevention and protection issues. The Organization Division, which is responsible for the implementation of the Business Continuity Plan, in consultation with the General Management and in cooperation with the relevant Divisions, per sector, activated the existing plan to address pandemics,

assuming the central coordination and immediately proceeding to the application of the necessary measures.

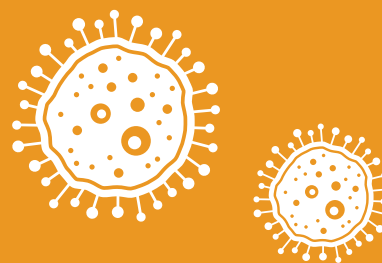
Under the plan, among other things, the Bank applied procedures for implementing the program for the prevention and mitigation of virus transmission in case of a pandemic, such as splitting working teams, teleworking, teleconferences, use of alternative networks for Customer service etc.

The Procurement, Property and Security Division proceeded to the disinfection of all surfaces and the



## SUMMARY OF ACTIONS IMPLEMENTED IN RESPONSE TO COVID-19





dispatch of healthcare material, such as disinfectants, face masks, gloves etc., to the Branch Network and the Head Office Units. Furthermore, it activated the procedures to ensure security stock and procured the necessary technological equipment for the application of teleworking.


Note that the Information Systems Division in cooperation with the Cybersecurity and Information Security Division managed, within a very brief period, to design and develop a platform using existing and new technologies that allow Employees to work from

home (teleworking) with the necessary security and offer them access to all systems and telecommunication networks of the Bank, as well as to the call recording systems.

APRIL

31

28



### REMOTE ACCESS IMPLEMENTED FOR 3,476 EMPLOYEES

- 3,296 Employees from the Bank's Central services

- 180 Employees from the 11 Group Companies in Greece



### ACTIVATION OF TELEWORKING

- 1,142 Employees from the Bank's Central Services and the Group Companies work from home (32% of the Head Office Units)

- Start of dispatch of 480 PCs to Employee homes



### 85% OF EMPLOYEES IN TELEWORKING STATUS

- 3,836 Employees from the Bank's Central Services and the Group Companies work from home (more than 85% of the Head Office Units)

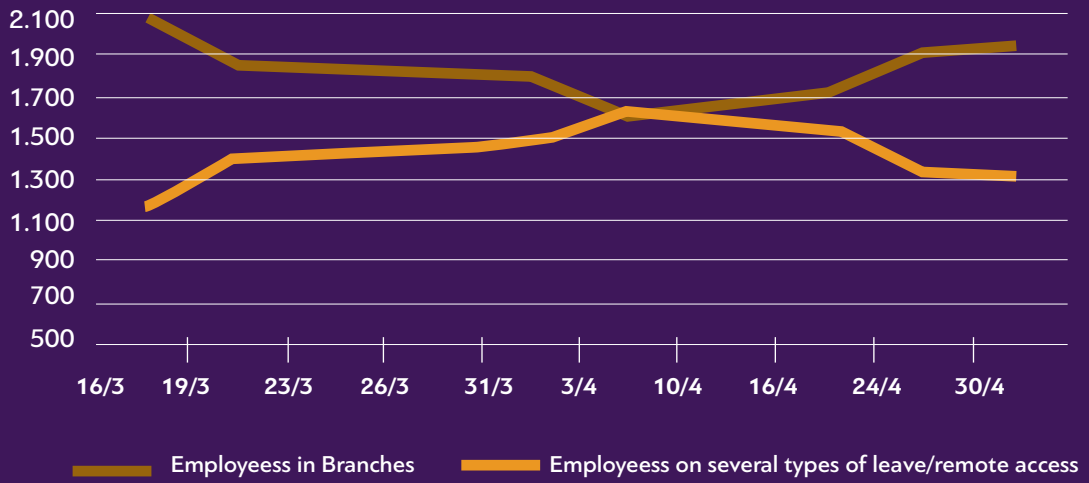


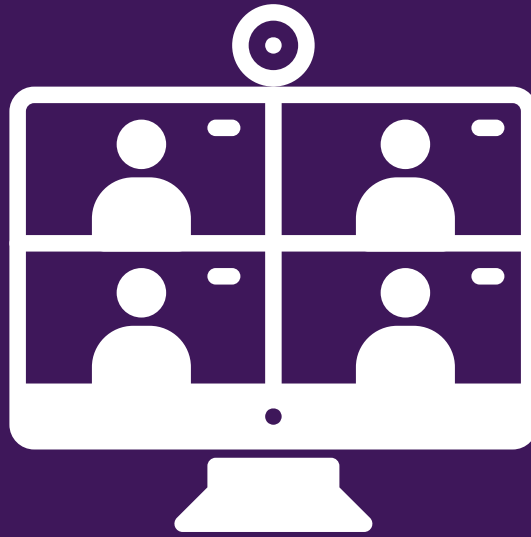
### 90% OF EMPLOYEES IN TELEWORKING STATUS

- 4,015 Employees from the Bank's Central Services and the Group Companies continue working from home

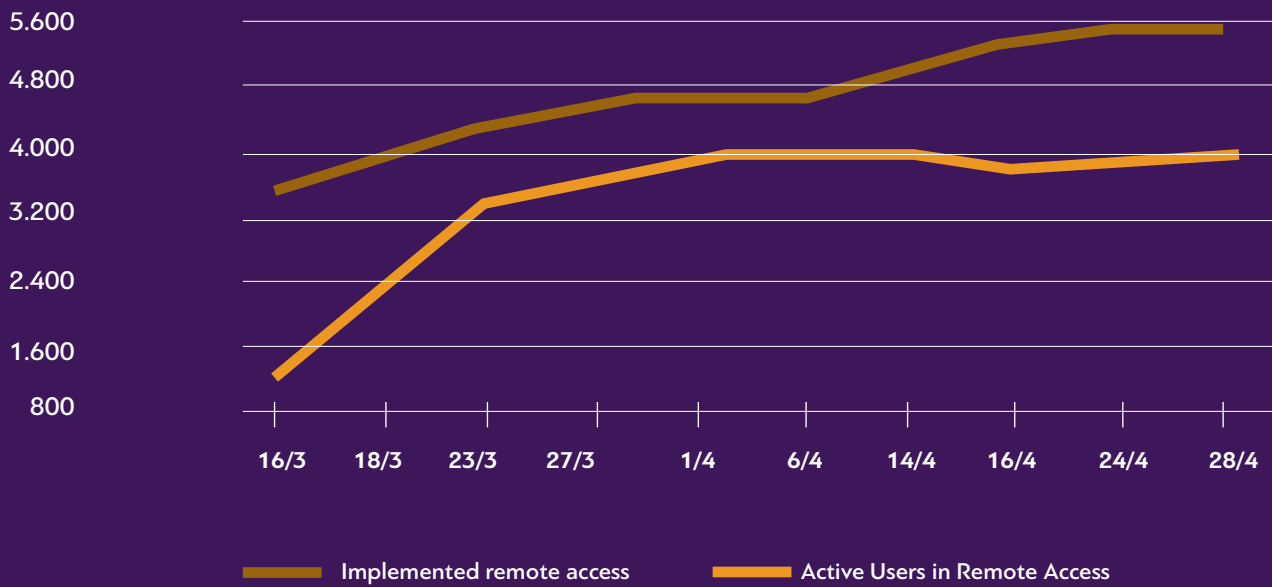


### Physical Presence in the Branch Network





### Remote Access



#### 4.7 RESPONSIBLE SUPPLIES AND OUTSOURCING

The purpose of Alpha Bank's Procurement Policy is to define a single framework for planning, evaluating, approving, executing, managing and controlling the Bank's investment and operating expenses related to the purchase of goods, acquisition of services, implementation of its projects. The above are performed in accordance with procedures and control mechanisms, for the timely, correct and effective execution of the required procurement actions, at the optimal price and at a specified time. To this end, the following are carried out:

- Actions to reduce the operating costs of the Bank and the Group Companies as well as the planning and monitoring of their implementation.
- Market research to identify and evaluate potential suppliers and record-keeping for every type of purchase.
- Monitoring the implementation of the Expenditures and Investments Budget regarding the procurements included in it.
- Drafting of supply contracts, service contracts and maintenance contracts.
- Planning and carrying out of tender procedures for the award of contracts for the supply of goods and the provision of services.
- Negotiation, evaluation and selection of a supplier for the preparation, publication and processing of Requests for Information (RFIs), Requests for Proposal (RFPs) and for conducting electronic auctions (e-Auctions).
- Coordination and care for the determination of requirements, collection, preparation of specifications and needs for the implementation of Projects.

- Monitoring of the progress of assignments, contracts and the accounting processing of approved investments and expenditures.

- Monitoring the smooth operation of the Bank's warehouses and the warehouses of the Network's suppliers.

In December 2019, the register of suppliers kept by the Procurement, Property and Security Division contained 948 Suppliers in Greece and abroad, with which the Division can cooperate. Collaboration with these suppliers involves the supply of products or services (consumables and printed material, electrical and electronic IT equipment, cleaning services, dining services, general maintenance services, IT support services, technical projects and works contracts).

Almost all types of suppliers are covered (contractors, consultants, distributors, logistics support partners, sales representatives, manufacturers).

Suppliers are evaluated regularly, according to their performance and economic activity. Among other things, the Bank evaluates whether suppliers apply management systems in line with international standards such as ISO 9001, ISO 18001 and ISO 14001.

An effort is made to support local communities, as for certain services (e.g. cleaning) the Bank cooperates with local suppliers.

#### Geographic Distribution of Suppliers in Alpha Bank's Supplier Base



The initial or/and periodic assessment of suppliers of Outsourcing services (critical - non critical) is carried out with specifically designed questionnaires containing many questions and information. Through these questionnaires, based on their competencies and scope, the specific jointly-competent Units assess any risks for the quality of services, counterparty risk (financial status, long-term sustainability), information security risk, confidentiality risk, personal data management risk, business continuity risk, regulatory/legal and tax compliance risk. Furthermore, the cooperation and service agreement contracts contain contractual terms for compliance with labour and insurance legalisation and for taking the necessary measures

to ensure the health and safety of Employees. Lastly, a draft of the suppliers' Code of Conduct has been submitted and is subject to finalization and approval. This draft records and analyzes the four main principles of the Code which are:

- Human Rights,
- Health and Safety,
- Environmental Responsibility,
- Ethics and Business Conduct.

#### 4.8 DATA PROTECTION



MATERIAL ISSUE

**Personal data protection is important, given that corporate information is a crucial asset of the Bank, which specifically focuses on taking appropriate measures to protect said asset in its entire life cycle.**

An important part of corporate information is Bank Customer data, which are protected under Regulatory requirements, by the application of the Group Cybersecurity and Information Security Framework. The Group Cybersecurity and Information Security Framework specifying the principles, rules and procedures for information protection is regularly updated to meet the requirements arising as a result of changes to the Group's internal and external environment. The Cybersecurity and Information Security Division, under the guidance of the Group Information Security Officer, manages all Cybersecurity issues at Group level. Among other things, it uses all prescribed procedures to check compliance with the Group Cybersecurity and Information Security Framework, carries out special security checks (penetration tests and vulnerability assessments) and continuously assesses the level of security, taking further measures - as appropriate - to address new threats and risks.

These measures include among others:

- use of advanced multi-layer technology to protect the services offered,

- use of a custom Data Leakage Prevention infrastructure to prevent information leakage over the Internet, e-mails and user terminals
- use of a custom mechanism to register logins and protect systems in which confidential information is stored,
- centralized management of users' access to systems on the basis of their business role (role - systems - rights),
- use of special document shredders in all Branches and Central Services of the Bank, for the secure shredding of documents
- use of a specialized device and software to destroy or securely erase, as required, information stored on electronic media,
- use of software for the mandatory classification of documents drawn up by Units of the Bank,
- designation of a special team to monitor the threats and address cybersecurity incidents in a timely manner, using specific technologies and services.

In 2019, in the context of the Bank's constant efforts to strengthen the level of security, which also includes personal data protection, the Cybersecurity and Information Security Division renewed the following certifications:

- As Level 1 Service Provider and as Level 4 Merchant at Bank level, in accordance with the international security standard **PCI DSS v3.2**, for safeguarding Customer card data.
- For the design, development, operation, management and support of information security for the Alpha Bank Group, in accordance with the international information security standard **ISO/IEC 27001:2013**.
- For the Business Continuity (BCP) of Cybersecurity and information security works, in accordance with the international standard **ISO 22301**.

Particular attention is also paid to Personnel training and awareness raising on security issues. Training lectures were given to all new Personnel and to special Officer teams, to inform all members of the Personnel of contemporary threats and risk management measures and of their obligations in protecting corporate information both in everyday business and outside the Bank's environment. The Alpha Bank Intranet portal contains an e-learning program for issues related to information protection and the general security principles.

#### **GENERAL DATA PROTECTION REGULATION (GDPR)**

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 regards to the processing of personal data.

Fully respecting the rights and freedoms of the Data Subjects, the Bank collects, stores, uses, notifies and, in general, processes personal data of Individuals in the context of its business activity, in full compliance with applicable laws.

In order to inform Individuals about the processing of personal data carried out in each case by the competent Units of the Bank or by external associates processing data on its behalf, the document entitled "Information on Personal Data Processing" is made available to Customers when they first contract with the Bank. Furthermore, said information is uploaded on a central point on the Bank's website and offers a consistent point of information for all relevant details that Natural Persons 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 said rights 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. The Bank applies a set of coordinated actions in order to further establish personal data protection. These include, but are not limited to:

- Training and periodic review of the Processing Operation Record, which includes all operations, existing and new, that require personal data processing.

- Assessing the impact on personal data processing provided under the General Data Protection Regulation (GDPR).
- Creating a Data Protection Framework for any new or amended product/service, application, system and procedure developed by the Bank.
- Developing the appropriate infrastructure for taking and efficiently managing consent to data processing, as well as for withdrawing consent.
- Developing a mechanism for assessing third parties/suppliers' compliance with all prescribed GDPR requirements.

In 2019, the Bank received 51 requests by Customers who exercised their rights in accordance with the GDPR. For these requests, the Customers received a reply in accordance with the GDPR, where the Bank provided all relevant information. In particular, in 2019 the Bank received 18 privacy violation cases registered in the Recommendations Application, of which none were documented as founded. The above excludes complaints, requests, out-of-court clients and third-party cases against the Bank for the transfer of personal data to collection companies and / or law firms.

As regards data breaches, in 2019, the Bank recorded two (2) personal data breach incidents of its Customers, which were notified to the Hellenic Personal Data Protection Authority. In both (2) incidents, the Bank immediately took corrective actions to minimize potential risks and to protect its Customers' personal data. Moreover, to avoid the recurrence of such incidents, the Bank proceeded to actions for improving and strengthening the existing technical and organizational measures.

To better coordinate all the above actions, the organization has appointed a Group Data Protection Officer, who notifies the Management and the Audit Committee of the Bank's Board of Directors as regards the level of compliance of Group Companies with the existing legislative framework.

#### **MANAGEMENT OF EMPLOYEE PERSONAL DATA**

The Bank has updated the procedures for its Employee personal data management in accordance with the requirements arising from the General Data Protection Regulation. In specific, for serving Personnel, a Confidentiality Statement has been prepared and the Employment Contracts have been updated. Furthermore, Employee Rights are uploaded on the Alpha Bank Intranet, while a standardized form has been prepared for Bank events/actions where photo-shooting/filming may take place.

In 2019, the Division's Processing Operation Record was updated in the application GDPR Information Catalogue (Information Governance Catalogue), in the Alpha Bank Intranet in accordance with the instructions of the Group Data Protection Officer.

Interested candidates wishing to submit their curriculum vitae either in response to a specific classified or for future reference, are informed about the Confidentiality Statement and their consent - if they agree with it - is a prerequisite for completing the application.

# 2017

- Preparation of Digital Transformation Program
- Creation of the myAlpha Wallet application - the First NFC contactless payments application in the Greek market
- Addition of thematic options for Socially Responsible Investments

# 2018

- Creation of the first prepaid Bleep card, with exclusive issuance and management through the application "Bleep app"
- Establishment of a program for the transfer of cash transactions on digital channels
- Organization of the first "Digitalized" event
- Organization of informative events for Customers, for responsible investments, with domestic and foreign investment bodies.
- Participation of the Bank in international conferences on Social Investment Responsibilities
- Inclusion of Alpha Asset Management A.E.D.A.K. in the UN-supported PRI initiative

# 2019

- New web-banking for Retail Customers
- Implementation of the i3- the first internal competition for innovation and new ideas of Alpha Bank and of FinQuest by Alpha Bank, the competition for innovative solutions in the financial sector
- Creation of a platform for approved electronical signatures for Business Customers
- Extensive Internal Training on Responsible Investments (ESG).



The background features a complex geometric design. It is divided into several sections by diagonal lines and a horizontal line. The top-left and bottom-left quadrants are solid purple. The top-right and bottom-right quadrants are solid orange. A diagonal line runs from the top-left to the bottom-right, and another from the top-right to the bottom-left. In the bottom-right quadrant, there is a large, semi-circular shape in orange that overlaps the purple background.

## 5. RESPONSIBLE BANKING

### 5.1 ACCESS TO FINANCIAL SERVICES

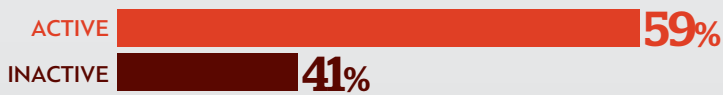
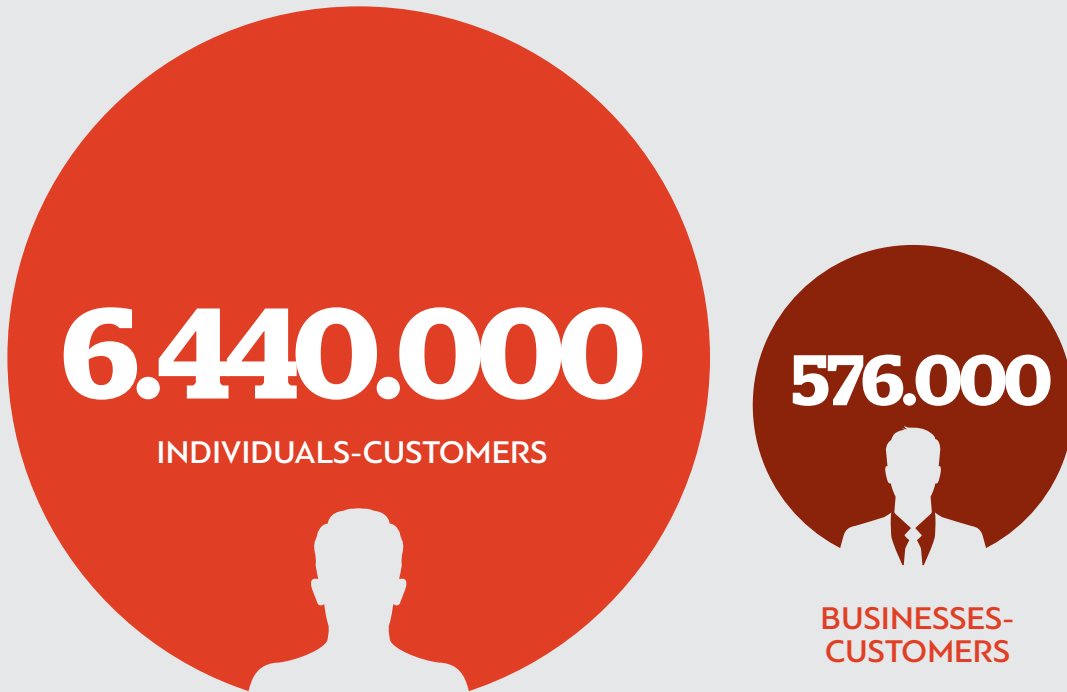
Alpha Bank offers a wide range of high-quality financial products and services, including retail banking, banking for medium and large enterprises, asset management and private banking, insurance products, investment banking, brokerage and real estate management.

More information about the business sectors, products and services of the Bank is included in the annual Business Report and the website: [www.alpha.gr/en/](http://www.alpha.gr/en/).



Total Bank Customers in 2019 were 7,016,000 (Individuals and Legal Entities). Out of these, 60% are active Customers (in total 4,188,000 Individuals and Legal Entities).

#### Alpha Bank Customers in 2019

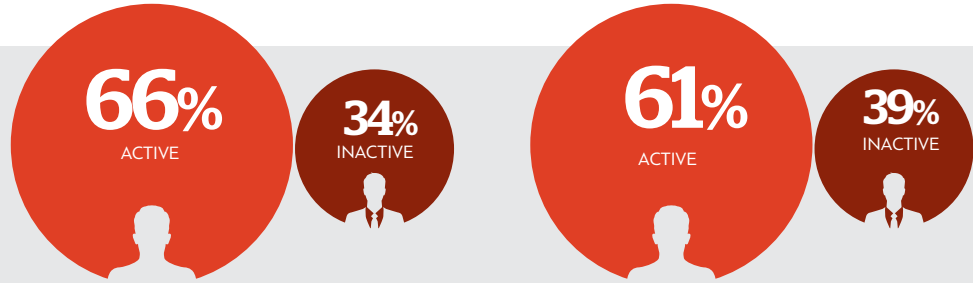


**Active Business-Customer:**  
Business with at least one product/one service (deposit account, credit, investment, letters of guarantee, leasing, POS or import/export turnover).



**Inactive Individual Customer:**  
Has no active credit account (loan or card), has deposits under Euro 100 and has made no transaction in the last three months.

Customers of Alpha Bank and Subsidiary Banks Abroad



**625.161**  
INDIVIDUALS-CUSTOMERS

**\*Active Business-Customer:**  
Business with at least one product/one service (deposit account, credit, investment, letters of guarantee, leasing, POS or import/export turnover).

**7.224.374**  
BUSINESSES- CUSTOMERS

**\*Inactive Individual Customer:**  
Has no active credit account (loan or card), has deposits under Euro 100 and has made no transaction in the last three months.

The Bank develops and offers products and services meeting the needs of the contemporary economic environment, taking economic, social and environmental factors into consideration. The Bank keeps improving its services and facilitates Customer access to these services and products. In addition to Greek, the Alpha Bank website is also

available in English and the same applies to its Customer Service Call Center. Similarly, Customers visiting Branches can also be served in English, while the option to select an English-language interface is available in all of the Bank's ATMs.

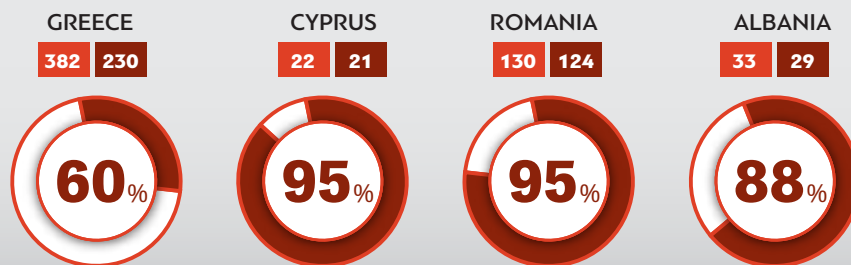
**BRANCH NETWORK**

At the end of 2019, the Branch Network of the Bank comprised of 382 Branches in Greece (compared to 431, in 2018) and one Branch abroad [UK], excluding Business Centers and Alpha Private Bank Centers, covering all of Greece and serving urban centers as well as less densely populated and financially robust areas.

Out of the 382 Branches in Greece, 230 are accessible to people with disabilities (PwD), of which 106 are fitted with a fixed ramp, two with a movable ramp and two with a special elevator. The percentage of Branches accessible to persons with mobility impairments has increased to 60%.



Alpha Bank Group Branch Network



ALPHA BANK GROUP BRANCH TOTAL 568\*

NUMBER OF BRANCHES ACCESSIBLE TO PEOPLE WITH DISABILITIES

\*The total number of Branches includes one Branch in the United Kingdom.

NUMBER OF BRANCHES



**THRACE**

EVROS	4
XANTHI	1
RODOPI	1

**MACEDONIA**

GREVENA	1
DRAMA	2
IMATHIA	4
THESSALONIKI	34
KAVALA	4
KASTORIA	1
KILKIS	2
KOZANI	5
PELLA	4
PIERIA	3
SERRES	4
FLORINA	1
HALKIDIKI	3

**EPIRUS**

ARTA	2
THESPROTIA	2
IOANNINA	3
PREVEZA	1

**THESSALY**

KARDITSA	1
LARISSA	8
MAGNESIA	7
TRIKALA	2

**CENTRAL GREECE**

AETOLOAKARNANIA	5
ATTICA	159
VIOTIA	3
EVIA	6
EVKITANIA	1
FTHIOTIDA	3
FOKIDA	2

**PELOPONNESE**

ARGOLIDA	4
ARCADIA	3
ACHAIA	9
ILIA	4
CORINTH	5
LAKONIA	4
MESSINIA	8

**AEGEAN ISLANDS**

DODECANESE	12
CYCLADES	17
LESVOS	4
SAMOS	3
CHIOS	3

**CRETE**

HERAKLION	9
LASITHI	3
RETHYMNON	1
CHANIA	5

**IONIAN ISLANDS**

ZAKYNTHOS	1
CORFU	4
CEPHALONIA	3
LEFKADA	1

Alpha Bank has an extensive network of Branches and off-site ATMs across Greece. The Bank operates 13 Branches and 39 ATMs in as many sparsely populated areas with fewer than 2,000 inhabitants. Moreover, the Bank has a significant presence, with 36 Branches and 53 ATMs, in areas with a population between 2,000 and 5,000 inhabitants. With a view to a more rational staffing of its Branch Network, the Bank is to apply a new model, which is currently in the final stages of development.



**AUTOMATED SERVICE**

To enhance Customer service and increase the efficiency of the Bank's ATM networks while rationalizing their operating costs, approximately 450 feasibility studies, primarily concerning the configuration of the network of Off-site ATMs (withdrawals, relocations, new installations, replacements, adjustment of rentals etc.), were carried out in 2019 and cost-benefit reports were compiled on the operation of all Off-site ATMs. The Bank also installed 219 new ATMs (109 Off-site and 110 in Branches) and withdrew 86 ATMs (26 Off-site and 60 due to changes in the Branch Network). Moreover, as part of the program for ATM replacement with state-of-the-art machines, launched in 2018, 89% of Branches now offer online cash deposits. Transactions increased by 2.6% over 2018.

To better serve Customers and reduce the Branch teller workload for deposits and cash payments, 118 new Automated Cash Transaction Centers (ACTCs) were installed, covering 89,2% of the Branch network and resulting in a 39,3% increase in ACTC transactions over 2018.

By the end of 2019, 177 Branches of the Alpha Bank Network featured specially designed areas (**digital corners**), where Customers could use digital e-banking services, as suitable equipment was installed in 88 new Branches during the year.

ATMs with special settings for people with visual impairments **181**

ATMs abroad, in countries where Alpha Bank operates. **325**



**SERVING PEOPLE WITH VISION IMPAIRMENTS**

In the context of serving people with disabilities (PwD), Alpha Bank adopted a number of actions to facilitate their access to the Bank's services.

In specific, the following options are available for Customers with vision impairments:

- — Service at the Branch without presence of witnesses
- — Printout of Bank documents in Braille code (The estimated processing time for such requests is seven (7) calendar days).

## 5.2 INNOVATION AND DIGITAL TRANSFORMATION



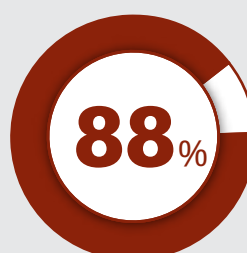
Innovation and digital transformation require a modernized Branch network, digital networks and e-services, facilitation of access to financial services for all. The continuous qualitative and quantitative improvement of the level of products and services, the modern and responsible approach to all banking needs of Customers and the Bank's uninterrupted operation are all the result of proper strategic planning.

Having identified the opportunities and challenges of the new digital era from an early stage, Alpha Bank has prepared a digital transformation program. The Innovation department of the Digital Transformation and Innovation Division is responsible for designing, coordinating and implementing actions and activities that promote the Bank's digital transformation, its ongoing improvement, extroversion, corporate culture shift and alignment with international developments in the field of innovation. The department closely monitors international trends and technology developments in digital innovation for the financial sector. It proposes the application of digital solutions to improve both the Bank's operation and Customer experience. Using the possibilities offered by digital technology, the Bank is successfully developing its digital channels.

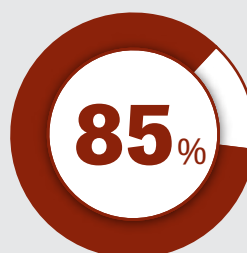
### INITIATIVES ENHANCING DIGITAL INNOVATION

The first digital innovation contest by Alpha Bank "i3" was successfully completed with the participation of its Personnel (281 entries). On Monday, 21 October 2019, an event was held to announce the winning employees, where the 12 finalists presented their ideas to a jury panel of General Management Executives and Bank Managers. This contest aimed to promote an innovation culture and a new way of cooperation, via the Personnel's direct involvement in the Bank's digital transformation.

On Monday, 25 November 2019, the first international digital innovation competition FinQuest by Alpha Bank was completed, with the announcement of the three most innovative financial services proposals for the digital era, among 70 entries from 12 countries.



of cash transactions were carried out through Digital Networks.



of cash transactions in all banks of the Group were carried out through Digital Networks.

The competition, aiming to identify innovative solutions and applications that can change the future of the financial sector, was addressed to the Greek and international fintech ecosystem and to the broader start-up community.

The strong impact of digital transformation on corporate culture was highlighted by the event Digitalized 2019 by Alpha Bank, held on Monday, 9 December 2019 at the Athens Concert Hall, with the participation of about 500 executives of the Bank and top businesses of the Greek market. The main purpose of Digitalized by Alpha Bank, which was held for the second consecutive year, is to establish a public forum for top market executives to discuss corporate digital transformation.



**DIGITAL NETWORKS**

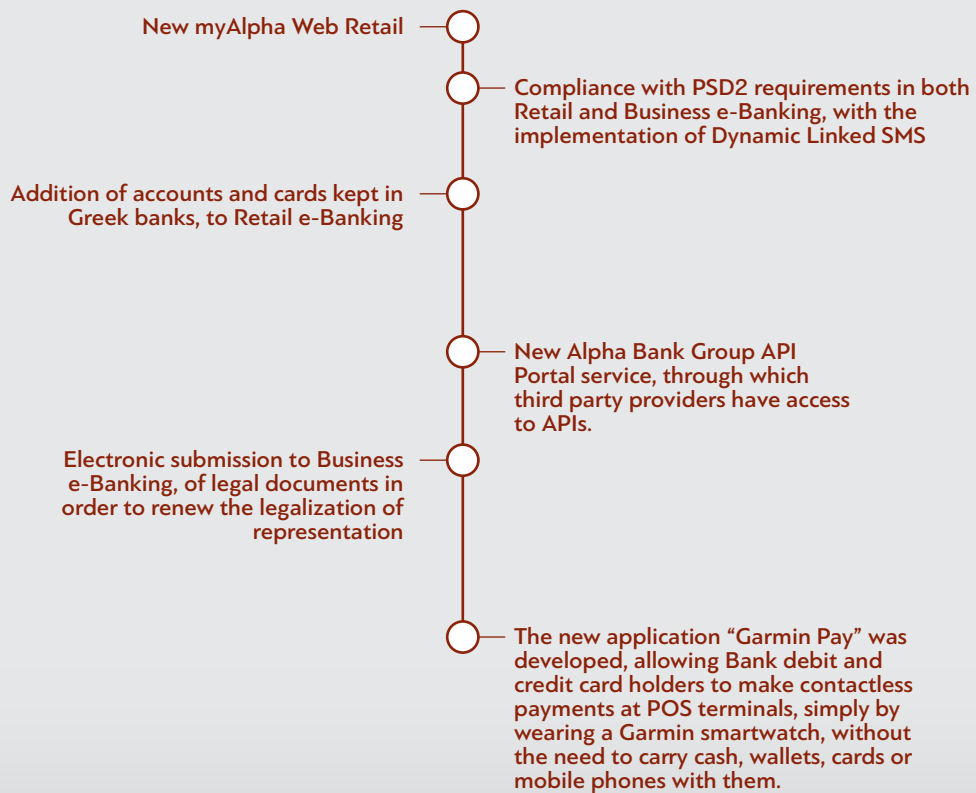
The Digital Networks Division, following strictly its business plan and using the possibilities of digital technology, is constantly implementing a series of new projects, successfully developing the digital channels of the Bank.

This effort to provide greater security, flexibility and time savings resonated with Customers, who prefer to carry out their cash transactions through the Digital Networks.

At the end of 2019, the quarterly total of active e-Banking Customers (myAlpha Web, Mobile, Phone) increased by 18%, while the number of cash transactions increased by 12%. Cash transactions made using e-Banking exceeded 88%, while about 900 different payments are served in total.

To provide better guidance to Customers and competent digital service Officers, the Bank has developed training and informative material, manages the comments of social network users, implements actions to inform Customers and train new Executives in digital services.

**SIGNIFICANT EVENTS  
IN 2019**







### DISTINCTIONS IN 2019

2019 was yet another year in which Alpha Bank received distinction for its advanced e-Banking and e-payment

Alpha Bank's Bleep app was announced "Product of the Year" in the category "Bank Prepaid Card", in a Panhellenic consumer survey. This distinction is one of the greatest and most significant internationally in the field of product innovation.

Furthermore, the Bank received a gold and a silver prize at the "e-volution Awards 2019", in the categories "Digital Innovation" and "Mobile app" respectively.

### Alpha e-Banking services

#### my Alpha Mobile

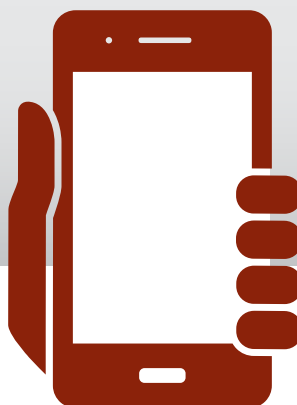
"myAlpha Mobile" is evolving dynamically in recent years, attracting increasingly more users. Specifically, in 2019, the quarterly total of active users increased by 41% and cash transactions by 63%, while there was a 63% increase over 2018 in users served exclusively through "myAlpha Mobile" on their mobile phones.



**3** OUT OF **5** Alternative Network Users currently use the mobile application on a monthly basis.



**1** OUT OF **3** Active users of Alpha e-Banking use exclusively myAlpha Mobile, for updating and processing their transactions.

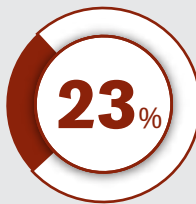


**myAlpha Web**

“myAlpha Web for Individuals” continued its upward trend in 2019, expanding its Customer base, with an 8% increase in the quarterly total of active users over 2018.

An important event in 2019 was the redesign of “myAlpha Web”, which is now even more stylish, boasting simplified navigation and a user-friendly structure. All available actions and information were reorganized and regrouped, maintaining a high level of reliability and transaction security. In December 2019, through the new “myAlpha Web” service, the Bank was the first in Greece to provide access for Individuals to their accounts at other banks.

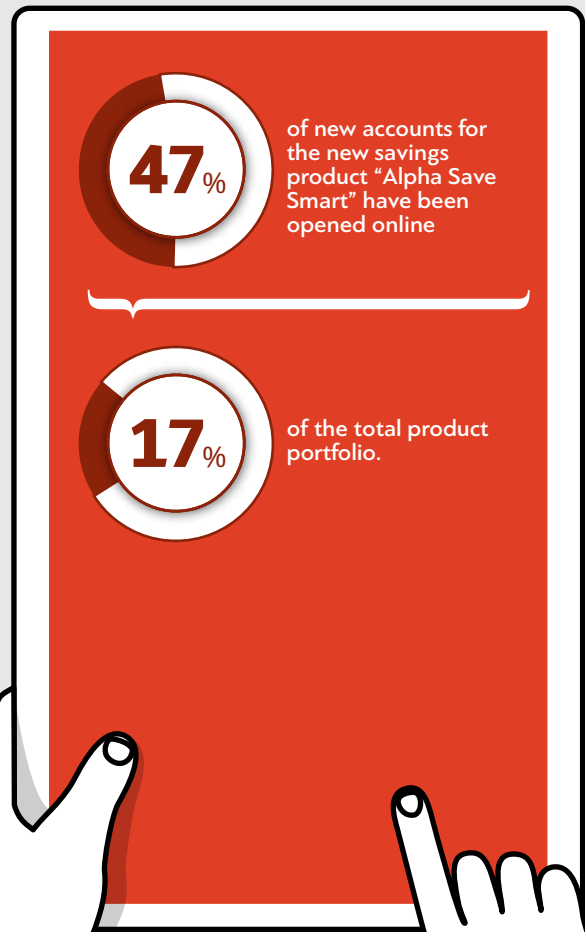
Similarly, “myAlpha Web for Businesses” continued its upward trend in 2019, expanding its Customer base, with a 10% increase in the quarterly total of active users over 2018 and an 8% increase in the number of cash transactions. Furthermore, in 2019, the service offered easy and fast online access for the electronic submission of legalization documents.



of Individual Time Deposits are created online



of all Time Deposits, are created online.



**myAlpha Phone**

myAlpha Phone provides information to Customers and helps them carry out transactions with the assistance of a Call Center agent. This is particularly useful for Customers with reduced mobility or visual impairments.

## Electronic Services for Companies

### Alpha e-Commerce

The increase in new businesses joining “Alpha e-Commerce” and in transactions carried out through this Service continued in 2019.

The project of the new IRIS service, which replaced “MyBank” for payments by debiting an account, was completed in October 2019. Consumer preference for this payment method is obvious, as turnover in 2019 stood at almost Euro 49 million, marking a 22% increase.

### Alpha Mass Payments

“Alpha Mass Payments” is dedicated to collecting dues via standing orders and/or alternative networks, as well as carrying out mass payments (e.g. payroll, payment of suppliers etc.). The service’s user-friendly interface offers features that allow users to create, send and monitor the progress of mass payment orders (e.g. payroll or payment of suppliers) and effectively serves Small and Medium-sized Enterprises.

### Alpha e-statements

“Alpha e-statements” continues to contribute to reducing paper and ink use and saving resources, as a considerable number of Retail and Business Customers of the Bank opt for electronic statements instead of paper account statements.

Following older actions, in September 2019, the Bank proceeded to the mass activation of approximately 36,000 credit cards in the e-statements service. Furthermore, in 2019, all consumer loans of e-Banking users were included in the Alpha e-statements service. The service was further updated, as it now automatically includes all new housing or consumer loans of existing e-Banking users, as well as the existing loan products of any new Customers signing up for the service

27%

active  
Subscribers

57%

card transactions

26%

card transaction  
turnover

17%

number  
of transactions  
by debiting an account

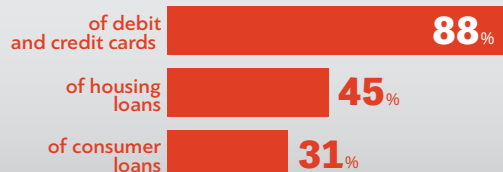
22%

turnover  
of transactions  
by debiting an account

11%

“Alpha  
e-statements”  
subscribers

E-statements are sent for:



### 5.3 SUPPORTING HOUSEHOLDS AND BUSINESSES

#### SUPPORT OF HOUSEHOLDS

As it has done in previous years, with great sensitivity, Alpha Bank continues its social contribution in financing households for acquiring privately-owned homes. Focused on the Greek family, Alpha Bank designed a complete package specifically for the purchase of a first residence. In this way, households can now buy their own home, taking advantage of the favorable financing terms and privileges offered for all family members.

#### Green Solutions

With a great sense of environmental awareness, Alpha Bank offers a multitude of financing solutions that allow Customers to cover their needs while protecting the environment.

In specific, Alpha Bank offers the new, repriced housing loan “**Energy Saving Home**”, which covers home buying with favorable pricing and higher interest discounts for higher energy efficiency class properties. In specific, in 2019, loans exceeding **Euro 11 million** were approved for the purchase of energy efficient homes or for upgrading the energy efficiency of existing homes through the program. The Bank also participates in the co-funded “**Exoikonomisi Kat’ Oikon**” Program of the Ministry of the Environment and Energy, which provides citizens with incentives to improve the energy efficiency of their residence. In 2019, the Bank accepted 1,400 loan applications via the program and disbursed **Euro 9 million**.

In addition to the expenses eligible for funding under the “**Exoikonomisi Kat’ Oikon**” Program, the Bank has created the consumer loan “**Alpha Green Solutions**”, to support actions that enhance environmental protection and help reduce energy consumption. The loan finances environmentally friendly initiatives upgrading the energy efficiency of homes, as well as actions related to alternative energy saving sources, such as the purchase of hybrid/electric vehicles.

In 2019, for all loan programs included in Alpha Green Solutions (“Energy Saving Home”, “Exoikonomisi Kat’ Oikon”, “Consumer Loans”), the Bank accepted more than loan **1,500 applications** of which 1,118, corresponding to **Euro 16.5 million**, were approved.

#### Alpha 1|2|3

Alpha Bank has created the banking product line “Alpha 1|2|3”, with the aim to cover the saving needs of children, teenagers and young people up to 27 years old, offering them a more secure economic future.

#### SUPPORT OF BUSINESSES

Alpha Bank provides products and services specifically developed to address the requirements of Greek businesses.

#### Small Enterprises

In 2019, Alpha Bank implemented an integrated strategic framework to support entrepreneurship and bolster the competitiveness of Small Enterprises, by promoting modern solutions focused on meeting the daily requirements of Small Enterprises and strengthening their prospects for development. At the end of 2019, the total balance of loans to Small Enterprises (with credit limits up to Euro 1 million) stood at Euro 5.0 billion.

#### Alpha Bank Gold Business Banking

Staying true to its commitment to providing integrated added-value services to the Small Enterprises market, in 2019 Alpha Bank continued vigorously with the development of the “Alpha Bank Gold Business Banking Service”, adopting a differentiated model to meet the needs of Gold Business Customers. Investing in the upgrade of the points of presence and emphasizing the particular characteristics of local markets, it strengthened its cooperation with the most dynamic segment of Small Enterprises, significantly increasing the members of the Service.

Euro **5** bn total loan balances  
to Small Enterprises

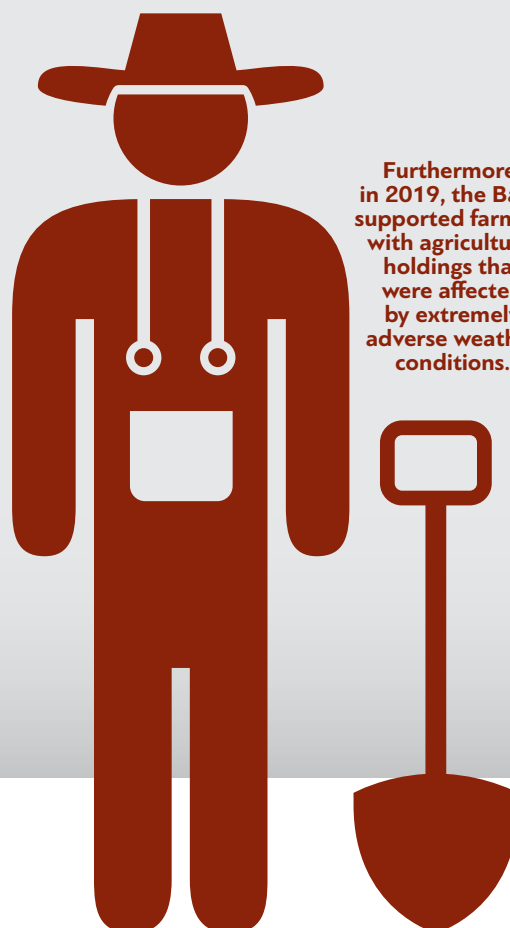


### Alpha Agricultural Entrepreneurship

During 2019, the Bank continued to dynamically support the growth of the primary sector by enriching the “Alpha Agricultural Entrepreneurship” line of products and responded fully to challenges and opportunities by actively supporting entrepreneurship at every stage of the agri-food chain.

In addition to funding, the Bank supports farmers and agricultural operations in various ways, by offering:

- Deposit sight Account “**Alpha Premier Farmers Account**”, with a particularly favorable interest rate for farmers who had declared this account as the one to be credited with their agricultural subsidy payments for 2019.
- Full range of specific Agricultural Insurance programs (plant production insurance, agricultural vehicle insurance, greenhouse insurance etc.) to manage a great number of risks related to agricultural holdings, ensuring sustainability and growth.
- The “**My Alpha POS**” program for partner businesses operating in the trade of agricultural supplies, with privileged pricing for the acquisition of a POS terminal, low commissions for clearing card-based transactions and the “**My Alpha POS - Credit Line**” option for Working Capital financing, depending on the amount of transactions carried out with the terminal.
- Special financing solutions covering fixed costs to better serve farmers.



Furthermore, in 2019, the Bank supported farmers with agricultural holdings that were affected by extremely adverse weather conditions.

### **Flexible Contractual Entrepreneurship Programs**

For the fifth consecutive year, the “**Flexible Contractual Entrepreneurship Programs**” proved successful, representing the most comprehensive mediation and targeted financing banking program for individual agricultural and livestock farmers as well as for the manufacturing, export and trading businesses associated with production in the primary sector. This form of financing is a comprehensive service proposal to the agri-food sector which helps create partnerships between farmers-producers and businesses-buyers operating in agricultural production, while also contributing to its rationalization, the modernization of the transaction cycle and the creation of an extended network of businesses operating in agricultural supplies etc., thus strengthening the development of local markets.

### **Agro-Carta**

For the third consecutive year, Alpha Bank, in collaboration with the Ministry of Rural Development and Food, offered the “**Agro-Carta**”, a financing tool that enhanced farmers’ liquidity during the 2019 growing season, allowing them to make advance payments on part of the agricultural aid (Basic and Green Subsidy) in order to cover their short-term needs.

### **Alpha Tourism Entrepreneurship**

For the fourth year in a row, the Bank, with a clear focus on strengthening the tourism sector, offered the “**Alpha Tourism Entrepreneurship**” program, seeking to boost Small Enterprises operating in the tourism industry. The Program was enhanced with new products and services that fully meet the particularly increased needs of tourism Enterprises, both in the preparation period and during the tourist period, to facilitate their daily operation.

### **Other Programs and Services for Small Enterprises**

Throughout 2019, aiming to strengthen business relationships with its Customers, the Bank held a series of **Information Seminars** in major Greek cities (Volos, Zakynthos, Heraklion, Ioannina, Kalamata, Larissa, Xanthi, Komotini) as well as a series of focused personal meetings with Small Enterprises-Customers of the Bank. The topics covered focused on the challenges and opportunities that emerge in the Small Enterprise

sector, with accompanying presentations of successful practices that help strengthen competitiveness. Additionally, the promotion of the “**Alpha In Business**” line of financing products to all Enterprises-Customers of the Bank continued, with the Bank effectively responding to new applications for financing short-term working capital and/or investments in business premises and equipment. Finally, throughout the year and in spite of the capital controls in place, the Bank continued to provide a prompt and efficient service in connection with all import settlement requests from Small Enterprises. From the beginning of the year and until 31.12.2019, it handled more than 120,000 such requests, totalling over Euro 1.2 billion.

## Investment Programs for SMEs

True to its commitment to providing concrete support to Greek entrepreneurship, Alpha Bank provides SMEs with liquidity in order to strengthen their competitiveness in the Greek market and abroad.

In March 2019, the Bank promoted the new co-financing products from its participation in the ETEAN Action “**Entrepreneurship Fund II - Business Finance**” in cooperation with the ETEAN S.A., now called Hellenic Development Bank (HDB). This Action entails co-investment by the Fund and the Banks, with a 1:1.5 participation ratio in each loan for the above co-investors and a total budget of **Euro 915.75 million**

(Banks: Euro 549.45 million and Entrepreneurship Fund II: Euro 366.3 million), with a specific geographic distribution across Greece. Under the agreement, by the end of the program, Alpha Bank will grant eligible SMEs investment loans and working capital loans for business development, totalling at least Euro 250 million, at preferential interest rates, reduced by 40% due to the interest-free participation of the Entrepreneurship Fund II in the capital of each loan. By 31.12.2019, loan applications of Euro 49.64 million were approved, while total disbursements amounted to Euro 43.32 million.

Moreover, in 2019, the allocation of the Action “**Entrepreneurship Fund I - Business Restarting Interim**” was completed. The action was a co-investment of the Fund and the

Banks, with a 1:1 participation ratio, offering investment loans and working capital for development purposes at preferential interest rates, reduced by 50% due to the interest-free participation of the Entrepreneurship Fund II in the capital of each loan. By 28.2.2019, loan applications of Euro 79.12 million were approved, while total disbursements amounted to Euro 57.78 million.

In the context of the Bank's ongoing and seamless cooperation with the European Investment Fund (EIF), it was agreed to extend the allocation of the Loan Guarantee Facility program **INNOVFIN (HORIZON 2020)** until May 2020. Furthermore, the allocation of the Loan Guarantee Facility **COSME (LGF)** continued during the year.

• **INNOVFIN:** Innovative Small and Medium-sized Enterprises and Small Mid-Caps will obtain access to Euro 100 million with favorable financing terms and with the guarantee of the European Investment Fund. By 31.12.2019, loan applications of Euro 91.87 million were approved, while total disbursements amounted to Euro 79.78 million.

• **COSME-LGF:** The Bank will secure Euro 500 million of liquidity for Small and Medium-sized Enterprises, with reduced requirements for collateral, given the guarantee provided by the European Investment Fund. By 31.12.2019, applications of Euro 475.32 million were approved,

while total disbursements amounted to Euro 416.86 million. At the end of the year, the European Investment Fund (EIF) approved Alpha Bank's application for participation in the EASI programme, for microfinancing of up to Euro 25,000 to Micro-enterprises employing under 10 employees, with turnover under Euro 2 million at the stage of their establishment or development. All the above programs allow Alpha Bank to finance eligible SMEs and help them implement their investment and development plans, covering their needs in working capital and credit lines, with favorable pricing terms. The Bank's objective is to support quality entrepreneurship, competitiveness and business extroversion, focusing on innovation and increasing domestic added value.

### Medium-sized Enterprises

2019 has been a recovery year for the Greek economy, especially in the second half, although this was not directly reflected in the results of most Enterprises. The Bank continued to support approximately **8,800 Medium-sized and Hospitality Enterprises** and to support their efforts and business options, always based on securing its own receivables and the economic viability of the relevant enterprises.

In 2019, the total loan balances of the Business Centres and the Hospitality and Island Enterprises Division to **Medium-sized and Hospitality Enterprises** and the operators thereof **amounted to Euro 5.5 billion**, including letters of guarantee and letters of credit.

In 2019, to better serve the needs of Medium-sized Enterprises, new loans were approved in cooperation with the European Investment Bank and the European Investment Fund. In specific, via the European Investment Bank program **"ALPHA BANK LOAN FOR YOUTH EMPLOYMENT"** the Bank approved new loans totalling **Euro 100 million** to Medium-sized Enterprise Customers with banking interest (mainly export, primary-sector manufacture and tourism enterprises).

At the same time, via the loan guarantee facilities of the European Investment Fund **COSME - LGF and INNOVFIN**, 327 new loans were approved, totalling Euro 160 million, of which **Euro 128 million** have already been disbursed, while via the action **"Entrepreneurship Fund II - Business Restarting"** 150 new loans were approved, totalling **Euro 48 million**, of which **Euro 43 million** have already been disbursed.

Finally, it is expected that in 2020 the **COSME-LGF** program will be extended, with simultaneous budget increase and that financing will be provided via the European Investment Fund program **"AGRI GUARANTEE FACILITY - ESIF EAFRD GREECE FoF"**.

### Large Enterprises

In 2019, transactions carried out for the Bank's Large Corporate Customers amounted to approximately Euro 1 billion and involved new loans as well as amendments to existing loans.

On 31.12.2019, the total balance of loans managed by the Corporate Banking Division stood at **Euro 6.2 billion**, including letters of guarantee, letters of credit and lending to the Division's Customers by Group Companies in Greece and abroad (excluding Customer lending through the subsidiaries Alpha Leasing S.A. and ABC Factors S.A.).

Euro **5,5** bn  
of total loan  
balances to  
Medium-sized and  
Hospitality  
Enterprises





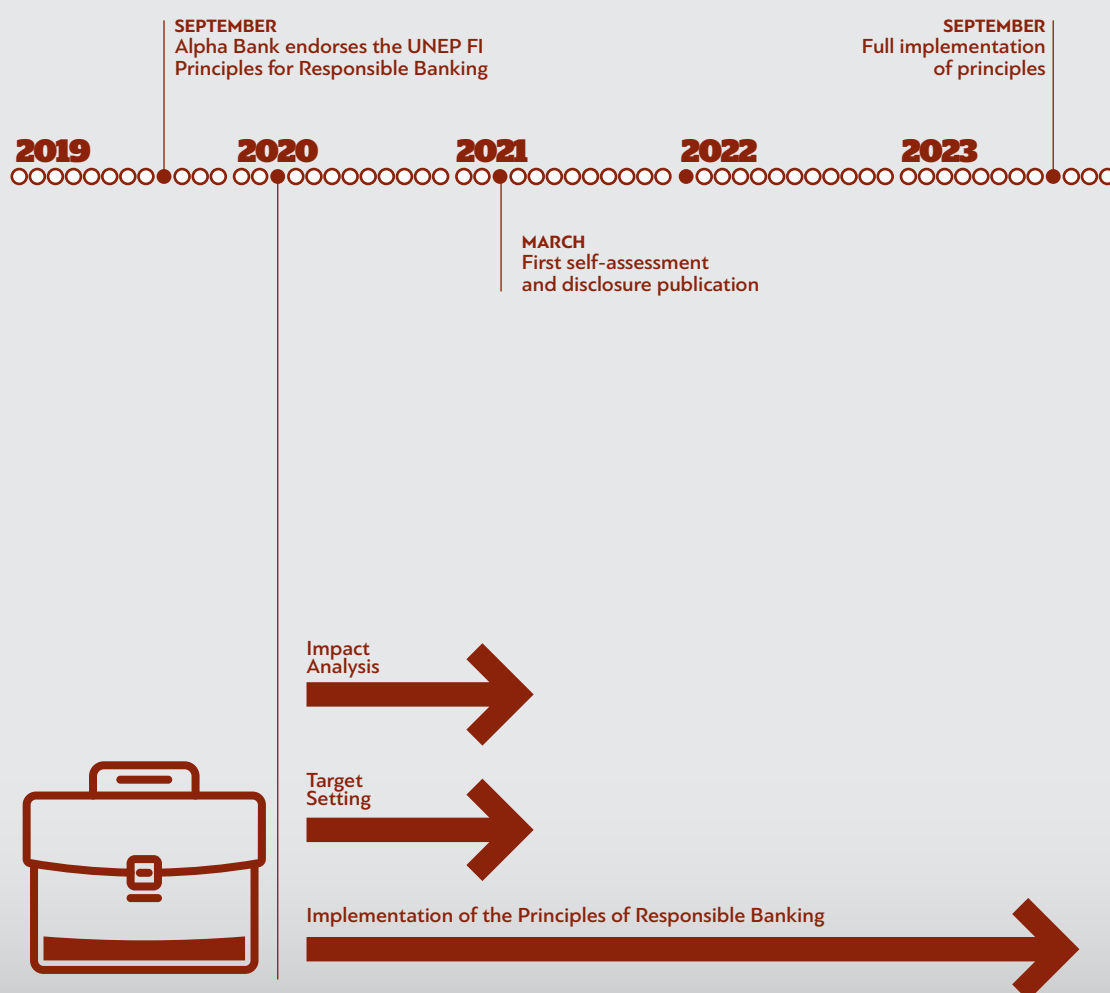
## 5.4 RESPONSIBLE INVESTMENTS AND FINANCING

Alpha Bank actively participating in the global effort to build a sustainable future for the economy and the planet, signed the six Principles for Responsible Banking, which were developed as an international initiative of the United Nations - Environment Programme Finance Initiative (UNEP FI).


Towards this direction, the Bank seeks to increase its positive effect on society and the environment, utilising new business opportunities and generating value for all stakeholders.

For this effort, Alpha Bank has created a four-year plan for the implementation of the Principles of Responsible Banking.

### FOUR-YEAR PLAN FOR THE IMPLEMENTATION OF THE PRINCIPLES FOR RESPONSIBLE BANKING



Alpha Bank analyzed Principles the existing practices of the Banking Principles in order to determine Principles the next steps for its further alignment with the Principles.

	<b>The Principles</b>	<b>Current state</b>	<b>Next actions</b>
<b>Principle 1</b> Alignment	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.	The Bank promotes the SDGs and contributes towards their achievements, focusing on: 	Align the existing corporate responsibility strategy with the SDGs that relate to the most significant impacts of the Bank.
<b>Principle 2</b> Impact and Target Setting	Continuously increase our positive impact while reducing the negative impact 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 impact.	The Bank has set more than 30 CSR targets for the upcoming years in alignment with its business strategy.	Identify our most significant impact and set relevant SMART targets using the UNEP FI Impact Assessment methodology.
<b>Principle 3</b> Customers	Work responsibly with our Customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.	The Bank continuously improves products and services to address all banking needs of Customers in a modern and responsible manner, especially focusing on digital innovation.	Collaborate with our Customers to improve our environmental and social impact thanks to the maintaining and development of an innovative sustainable service offering/product.

	<b>The Principles</b>	<b>Current state</b>	<b>Next actions</b>
<b>Principle 4</b> Stakeholders	Proactively and responsibly consult, engage and partner with relevant Stakeholders to achieve society's goals.	The Bank seeks to engage in an ongoing dialogue and collaboration with its Stakeholders, for example by conducting annual materiality analysis.	Implement a Stakeholder engagement strategy to support the achievement of our SMART targets.
<b>Principle 5</b> Governance and Culture	Implement our commitment to these Principles through effective governance and a culture of responsible banking.	The Bank's governance and culture are partially aligned with its sustainability strategy.	Adapt the Bank's governance structure to ensure an effective implementation of the Principles, the integration of sustainability in the Bank's strategic agenda and the monitoring of SMART targets.
<b>Principle 6</b> Accountability	Periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impact and our contribution to society's goals.	The Bank is aligned with the market's best disclosure practices, through the implementation of the EU Non-Financial Reporting Directive, the CDP and the GRI reporting standards.	Publish UNEP FI self-assessment and other CSR disclosures with our positive and negative environmental and social impact and our progress in the implementation of the Principles.



## RESPONSIBLE INVESTMENTS

In 2019, responsible investments were the main focus of interest for investment products globally. Asset management entities were particularly interested in the assessment criteria for companies and investment products in terms of environmental and social, responsibility and proper governance (Environmental, Social, Governance - ESG).

Managed funds in investments that meet these criteria currently exceed \$30 trillion.

Europe was and still remains a keen supporter of integrating environmental, social and corporate governance issues in the decision-making process for investments. However, the combination of international awareness about climate change and the positive effect of the UN Sustainable Development Goals seems to have an increasingly important effect globally. Geopolitical issues, global wealth inequality and population movement increasingly reveal the two other great ESG pillars, namely corporate responsibility and good corporate governance. These two assessment pillars become even more important for the operation of multinational group companies identified as holdings in shares or bonds in Mutual Fund portfolios.

Responding to developments, the Investment Portfolios Management Division operated in three main axes this year:

- Internal training
- Ongoing Customer information
- Extroversion to domestic and foreign investors

### Internal training

Alpha Bank remained committed to the target of training the wider team of Bank representatives serving mass affluent (Alpha Gold) and high-net-worth (Alpha Private Bank) Customers. In 2019, 582 Alpha Bank Employees participated in informative actions with international investment firms.



## TRAINING EVENTS ATTENDED BY ALPHA BANK EMPLOYEES IN 2019

Investment Firm	Subject
BNP Paribas	ESG
Goldman Sachs	Climate change, investment opportunities
BNP Paribas	ESG and emerging markets
Pimco	ESG and bond investments
Franklin Templeton	Climate change, investment opportunities
BNP Paribas	ESG and international trends
Franklin Templeton	ESG and bond investments
Franklin Templeton	ESG
Schroders	ESG
JP Morgan	Climate change, international trends
BNP Paribas	Climate change, international trends
Pictet	Climate change, international trends
BNP Paribas	ESG
JP Morgan	Responsible investments and markets
Franklin Templeton	Green bonds
Blackrock	ESG
Amundi	Climate change, international trends
JP Morgan	Responsible investments and markets
BNP Paribas	ESG and international trends
BNP Paribas	ESG and international trends



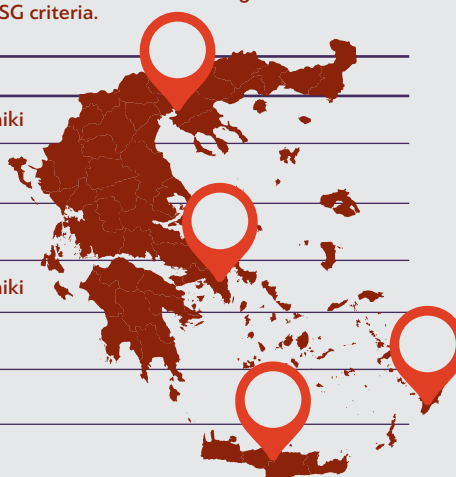
### Information to Customers

In 2019, Alpha Bank held a number of informative events in Athens, Thessaloniki, Larissa and Crete for mass affluent and high net-worth Customers, with the assistance of the Marketing and Public Relations Division and in collaboration with the Private Banking Division and the Individuals and Personal Banking Division.

All of the briefings highlighted the significant investment opportunities that result from investing in mutual funds that meet ESG criteria.

### TRAINING EVENTS HELD IN 2019

Subject	Area
International markets - Roadmap for the new investment reality	Thessaloniki
Blackrock - Megatrends, Investment trends changing the world	Athens
International markets - Roadmap for the new investment reality	Rhodes
BNP Paribas - Thematic Investments (ESG, SRI)	Thessaloniki
International markets - Roadmap for the new investment reality	Crete
International markets - Roadmap for the new investment reality	Athens



### Participation in international conferences

During the year, the Investment Portfolios Management Division promoted the Bank's presence in relevant conferences with the participation of teams assessing and selecting investment products (bonds, shares, mutual funds), as well as Portfolio Counsellors - the team of portfolio investment advisors who have joint meetings with private banking representatives and high-net-worth Customers. Executives were informed of the latest developments regarding products meeting responsible investment criteria, investment strategies and opportunities arising from these investments, providing valuable investment ideas to Customers.

### Incorporation of ESG criteria into the investment operations of Alpha Asset Management A.E.D.A.K.

In December 2018, Alpha Asset Management A.E.D.A.K. was included in the UN-supported international Principles for Responsible Investment (PRI) Initiative, the leading network for the promotion of responsible investments. Alpha Asset Management A.E.D.A.K. is committed to the implementation of the six Principles for the promotion of responsible investments. Specifically, it is committed to the incorporation of environmental, social and corporate governance (ESG) criteria into investment analysis and decision-making processes as well as in ownership policies and practices. Alpha Asset Management is committed to seeking appropriate information on ESG issues, promoting the Principles in the investment industry, monitoring investments in terms of ESG criteria, working together with other organizations and networks for the implementation of the Principles and on producing annual reports on their implementation.

The ESG methodology of Alpha Asset Management was developed to cover all categories of assets it manages, to identify long-term investment opportunities, to better manage risks, to collect, measure and publish its performance using ESG indexes, while supporting dialogue.

By the end of the year, the Incorporation Policy of Environmental, Social and corporate Governance (ESG) criteria in investment portfolio management had been completed. This policy is the methodology for incorporating these criteria in the decisions and business culture of the company.

The new framework applied includes three different strategies for decision and investment (excluding investments based on ESG criteria, thematic investing and ESG issue incorporation). The rating procedure includes a series of ESG indexes, as well as a thorough analysis of the long-term sustainability of investments. The ratings are made at company, industry and country level, taking into account the international financial and regulatory environment.

Moreover, during the year a two-day training seminar on Responsible Investments was held for Alpha Asset Management Employees.

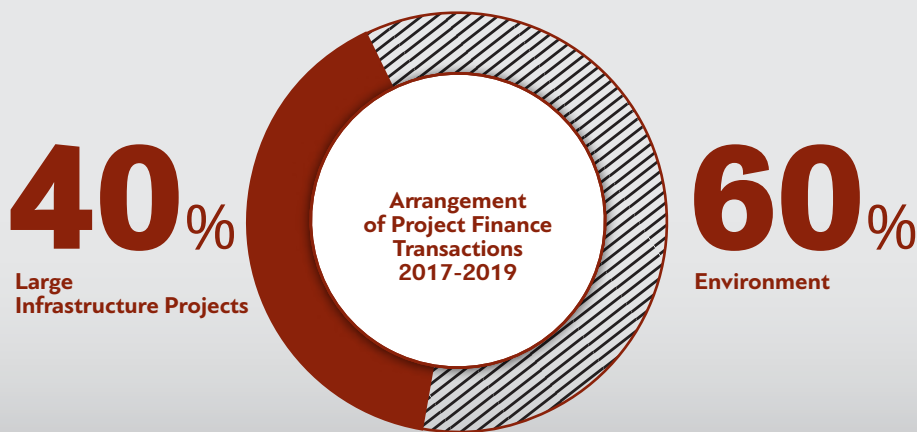
**PROJECT FINANCING**

The Bank has a specialized Project Finance Unit, which works on securing financing for investments in Renewable Energy Sources (RES) projects, Large Infrastructure projects and Public-Private Partnerships (PPPs).

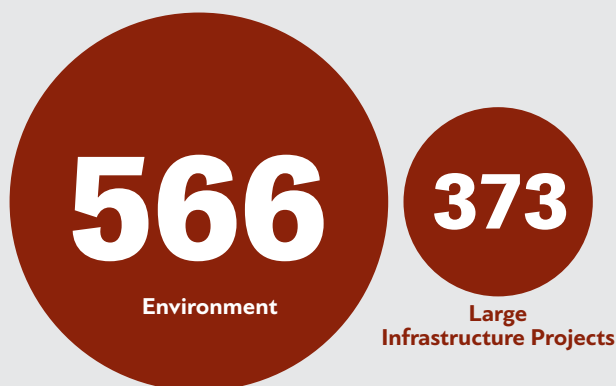
Over the past five years, the Project Finance Unit has financed a number of investments with a total budget about Euro 1 billion, confirming the Bank's dominant position in these sectors. Specifically, the Bank has financed a total of 42 projects, including solar farms, wind farms and biogas plants, with a total output of 650 MW. Most of these projects are already operating, while 15 of them are in the construction phase.

To assess these investments, project teams collaborate with specialized technical advisors on the identification and assessment of the environmental risk (environmental due diligence) and social impact, so as to ensure that the projects will be implemented in accordance with the environmental legislation in force, in a socially responsible manner and in line with proper environmental management practices. In addition, in cases of large-scale syndicated financing arrangements, there are requirements for compliance with special environmental and social performance standards (EIB's Environmental and Social Standards/IFC Equator Principles).

Following the disbursement of credit, adherence to environmental terms and commitments is certified on an annual basis, throughout the long duration of such construction.



**Arrangement  
of Project Finance  
Transactions  
2017-2019  
(in Euro million)**



### **Environment Renewable Energy Sources (RES)**

New financing arrangements concern projects that use eco-friendly technologies (wind farms, electricity generation from biogas, combined heat and power plants) and replace old polluting units (e.g. oil units), thus reducing air pollutant emissions.

The Bank contributes substantially to the efforts towards the national energy plan, which provides that by 2020 the final consumption of power generated from RES will stand at least at 20%.

The investments financed rely on domestic sources of energy and help reduce dependence on exhaustible conventional energy resources, thus strengthening energy supply nationally and contributing to the rational utilisation of the country's energy resources.

In 2019, 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 with a total value of **Euro 206 million**.

The expected annual output capacity (MWh) from the RES projects co-financed by the Bank and are in operation and/or under construction stands at **2,028 GWh**. Using the standard coefficients for each RES technology, it is estimated that the operation of these projects will help reduce emissions by **1,278,822 t CO<sub>2</sub> annually**.

### **Waste Management**

The Bank has financed the Epirus Region Waste Management PPP project. It also continued to provide exclusive Financial Advisor services to the contractor for the largest waste management project in Greece and one of the most important projects of its kind in the EU (Peloponnese Region Waste Management PPP), with a total budget of Euro 160 million.

### **Large Infrastructure Projects (Transport, Social Infrastructures)**

Jointly with the World Bank, the European Bank for Reconstruction and Development and the European Investment Bank, the Bank is financing the concession and upgrading of Greece's 14 largest regional airports. This project will significantly increase safety in the facilities and will minimize the risk of accidents and environmental pollution.

In financing large infrastructure projects, particular emphasis is placed on environmental due diligence, with borrowers often required to submit special environmental reports on the reduction of generated traffic noise, the measurement of air pollution, the use of natural resources etc.

In the infrastructure sector, Alpha Bank actively participates in loan syndications for all road networks in Greece that are constructed under concession contracts. Up to 2019, the Bank's participation stood at Euro 373 million in total. These projects have greatly improved road safety for thousands of users, significantly reducing the number of traffic accidents.

## 5.5 RESPONSIBLE INFORMATION

In order to provide full and transparent information to its Customers, Alpha Bank ensures that the principles that govern Customer service and assure Customer satisfaction are communicated to them in writing or verbally.

Moreover, to ensure that Customers receive full and complete information, the Bank complies with the regulatory framework in force and makes sure that they are supplied with the necessary information about the products and services it provides (see also Responsible Operation - Business Conduct and Compliance).

### RESPONSIBLE MARKETING

To ensure its Customers' trust in its products and services, Alpha Bank pays particular attention to ongoing communication and dialogue.

The Bank's advertisements present all the details necessary to inform the public about its products and services. When a particular advertising medium cannot convey adequate details due to space or time limitations (TV or radio spots), the Bank's website ([www.alpha.gr/en](http://www.alpha.gr/en)) or Call Centre number are always provided.

Every advertising communication plan is assessed by the competent Divisions and, if required, by the Legal Services Division or by the Compliance Division, to ensure objectivity when providing information. In this respect, the Bank complies with the regulatory framework in force regarding transparency in providing information to contractual parties, pre-contractual information, advertising as well as the terms of contracts with its Customers. The Bank takes care to ensure that Customers are provided with the fullest possible information regarding financial management matters. To this end, relevant information leaflets of the Hellenic Bank Association are distributed at the Bank's premises, with simultaneous promotion of face-to-face communication and briefings of Customers by the competent Personnel of the Bank. Furthermore, the provisions of the regulatory framework are strictly adhered to in the promotion/advertising of all products/services by the Bank or its Subsidiaries.

In 2019, the Bank was not imposed significant fines for non-compliance with the applicable regulatory framework for the promotion and provision of products/services, while there were no cases submitted for consideration to the First-Degree Committee of the Communications Control Council.



## 5.6 CUSTOMER SERVICE AND SATISFACTION



Customer satisfaction constitutes a primary goal of the Bank, while addressing all Customers' banking needs in a modern and responsible manner is a daily concern of its Employees. A key method employed to identify Customer needs and to measure and enhance Customer satisfaction is carrying out surveys at regular intervals.

### CUSTOMER RELATIONSHIP MANAGEMENT

Aiming for the constant enhancement of positive Customer experience, which leads to the continuous reinforcement of the relationship between Customers and the Bank, Alpha Bank analyzes the Customers' transaction behavior and processes related data, in order to meet the needs of its Business Units. The Bank builds on the feedback received in response to the activities it carries out and leverages technology (such as the CMART Portal IT tool) in order to implement its Customer-centered approach.

The analysis carried out by the CRM Division, in response to the constant and specialized needs and requirements of the Bank's Business Units, continued intensely during 2019, based on the Bank's Customer-centered philosophy.

In full alignment with the requirement for the Bank to comply with the general principles of the GDPR, the CRM Division carried out numerous communication campaigns throughout the year, sending messages to Customers via alternative channels (e.g. e-mail, viber, SMS and e-Banking). These campaigns contributed to the collective efforts to ensure a high level of Customer service and improve the overall Customer experience. Based on the above campaigns, the first step was to determine the desired medium of communication on the basis of the Customers' declared preferences and consent. At the same time, numerous informative messages about the Bank's products and services, based on the Customers' actual and personalized needs, were sent faster, more directly and with a higher level of security and reliability.

Finally, the results and the specialized analyses led to the correct assessment and evaluation of opportunities for growth and facilitated decision-making by the Bank's Business Units and Management, where required.



### DISTINCTIONS IN 2019

In recognition of the Customer service provided to the general public, in 2019, Alpha Bank's Call Center received the 3rd national award (1st award among Banks), at the annual contest "CRM Grand Prix Customer Service Annual Awards", in the category "Large Call Centres".

As a result of investing in the quality upgrade of specialized Executives and of using new technologies, Alpha Bank Gold Business Banking received a distinction at the Greek Customer Service Awards, in the category "Best Omni-Channel Customer Experience".

For the 5th consecutive year, the Operations Division won its 6th international distinction in a row, through the European Society for Quality Research (ESQR), in the category "International Diamond Prize for Excellence in Quality 2019".

ESQR is active in researching, analyzing and highlighting the high quality of business practices, rewarding the best. Note that, this year's distinction relates to the strategic targeting of the Bank to use best practices oriented to Quality, Growth and Economic Advancement for the Organization and the Society.

Finally, in a special event held in London, as part of the "Global Private Banking Awards 2019", Alpha Bank was named "Best Private Bank in Greece" for 2019.

**QUALITY ASSURANCE - COMPLAINTS MANAGEMENT**  
**Complaints Management Unit**

The Complaints Management unit works under the Customer Service Division and implements ISO 9001: 2015 certified procedures. The Strategic targeting of the Unit is a framework of actions that concerns:

- The optimization of the Customer experience, through the timely and correct management of cases.
- The provision of quality customer service through the use of best practices.
- The analysis of the causes of Customer dissatisfaction and the use of data to continuously improve the services provided.
- The systematic mapping of Customer satisfaction to understand their needs and expectations.

18,361

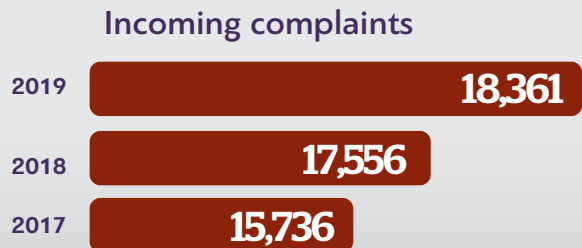
complaints

In 2019, incoming complaints totalled 18,361, up by 5% compared to 2018. Focused on quality Customer service, Alpha Bank handles complaints with responsibility and honesty, while taking steps to constantly improve its operational procedures.



Incoming complaints referred by third parties (supervisory and non-supervisory) were almost unchanged from 2018. These 477 complaints account for 2% of the total number of complaints for 2019.

The Hellenic Consumers' Ombudsman is the main source of the cases submitted through third parties, accounting for 52% of such cases against 44% in the previous year.



**17,443**  
complaints were resolved in 2019, up by 8% compared to 2018

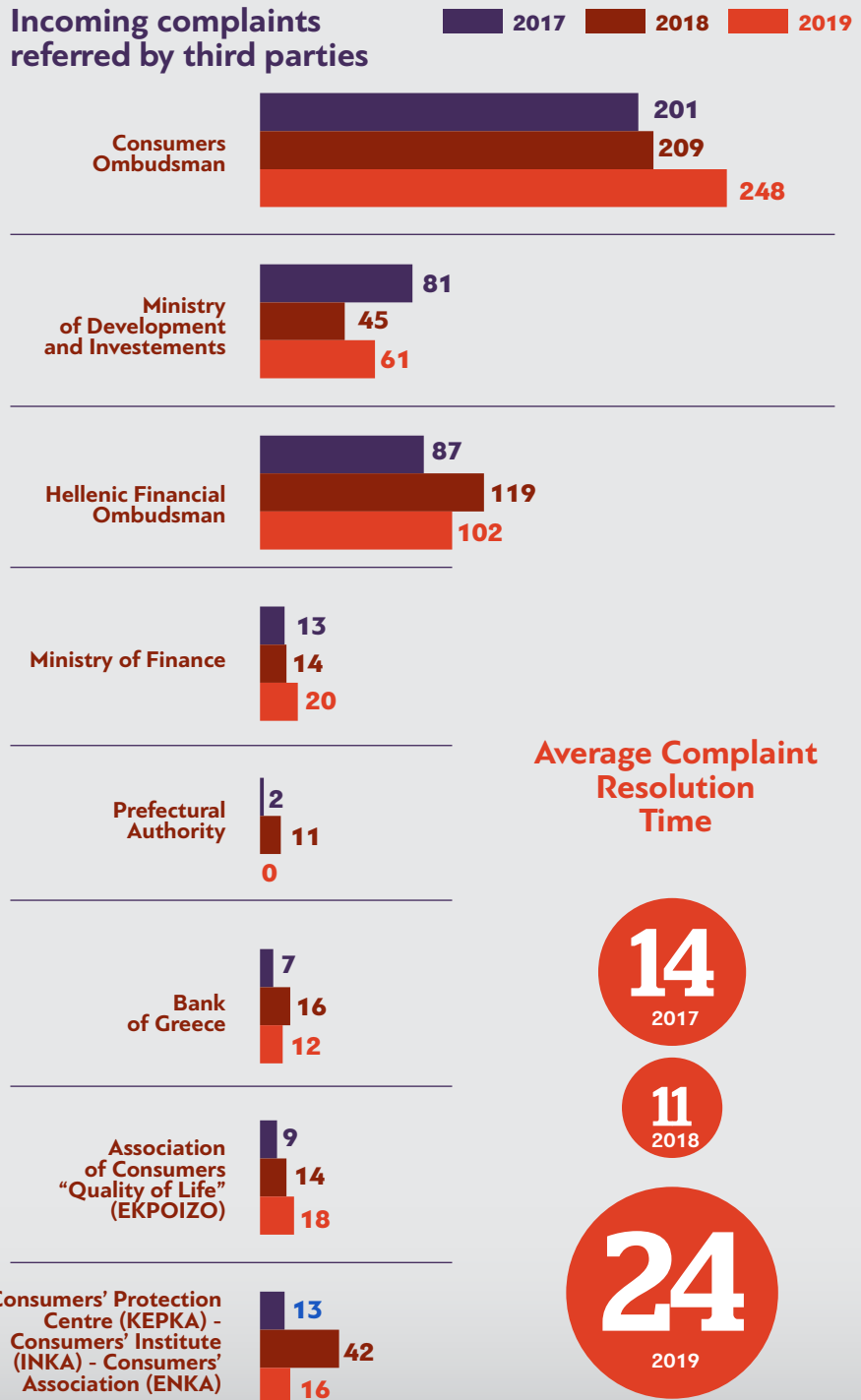
**52%**  
of these complaints was resolved in 14 days

**21%**  
of incoming complaints was resolved in one (1) day.

**24**  
calendar days is the Average Complaint Resolution Time, due to case diversity.

**79%**  
of total resolved cases, slightly down from 2018 due to the increased volume and complexity of cases.

**Incoming complaints referred by third parties**



**Average Complaint Resolution Time**



### SATISFACTION SURVEY OF CUSTOMERS SUBMITTING COMPLAINTS

Alpha Bank constantly monitors Customer satisfaction and, to this end, has carried out structured surveys using computer-assisted telephone interviewing (CATI) for Greek Customers. The survey is based on complaints whose handling has been completed and aims to further analyze Customers' expectations and needs on an annual basis, in the context of the quality service provided through the expression of their complaints. The survey population is determined by a random selection of Customers, without quotas by type of complaint or complaint resolution channel, while Customers are notified of the conduct of the survey by text message (SMS). The main findings of the survey held in 2019, which comprise some of the main action pillars for 2020, are:

- **Thorough management:** In 2019, fully resolved complaints were up by 5% compared to 2018. The Bank ensures that Customers are informed at each stage of their complaints, while aiming to constantly reduce complaint response and handling time.
- **Training of representatives:** More than 80% of assessments of complaint handling by the Bank's personnel are positive, as the Bank constantly invests in excellent training for its representatives, focused on Customers.
- **Improving the experience of complaining Customers:** The TRI\*M Index was increased by seven (7) points compared to 2018. Through a detailed action plan, the Bank aims to further improve the experience of complaining Customers. To further improve Customer experience, the Bank centralized Customer affair management in a single Division, in order to strengthen Customer relations and simplify procedures.

### ACTIONS AIMED AT IMPROVING CUSTOMER SATISFACTION

In the context of redefining Customer orientation as a quality in its business strategy, the Bank implemented actions to enhance its Customer-oriented culture, aiming at an integrated, high quality experience offered to Customers via all available channels.

Alpha Bank Management systematically measures and monitors Customer Experience at key moments of their interaction with the Bank's channels (Moments of Truth) such as the 1st Web Banking login, visits to a branch, the issue of debit cards etc., using international Customer Experience indexes,

such as the Net Promoter Score (NPS). Furthermore, the Bank uses specific methodologies with the active participation and engagement of Customers for redesigning its digital channels, such as the new myAlpha Web, through the conduct of usability tests ensuring ease of use for the redesigned channels, covering Customer needs in a direct and efficient manner.

In March, the **1st Voice of the Customer Day (VoC Day)** was held, with the participation of the Chief Executive Officer and the General and Senior Management of the Bank.

In April, the Bank participated in the 24th Banking Forum with the main topic of "The Bank of the Future". Furthermore, in June, the **2nd Management Back to the Floor** event was held, which involved visits of the Management and the Senior. Executives of the Bank to "front line" Customer service channel. Executives made 310 visits to more than 86 Network Branches, Business and Private Banking Centers, Call Centers and Gold Personal & Business Banking Centers.

Finally, in October, Alpha Bank participated for the third year in the National Customer Service Week. In this period, the Bank rewarded the trust of Customers who applied for the product "Alpha online Term Deposit with Bonus" with **20% more** Bonus points and the Operations Division held an event on **"The Leadership's role and the necessity for Transformation and Innovation in Customer Care"**. Alpha Bank Albania launched the **"Alpha Bot virtual assistant"** application, which provides 24-hour Customer service. Through the application, Customers can address FAQs to the Bank's Facebook page and receive answers automatically, without the need for human participation.

### CONSUMER SATISFACTION SURVEYS

2019, a year marked by a series of political and economic developments in Greece, saw a decrease in uncertainty and an increase in expectations for economic stabilisation. This is reflected in the behavior of Customers, who gradually regained their trust in the banking system. At the same time, the digital transition that renders the banks tools for facilitating everyday life is consolidated in the perception of Customers. Customers seek an easy and fast experience through contact points, expanded offerings through innovation and the creation of products tailor-made for their needs.

In this context, through its research program for 2019, the Bank invested in developing research methods, including the measurement of satisfaction with

transactions (transactional Net Promoter Score or t-NPS), through all physical and electronic contact channels.

Responding to Customer expectations, through its Branch Network, the Bank adopted an innovative banking service for **"Retail Onboarding"**. This allows new or existing Private Customers to start their relationship with Alpha Bank in just a few minutes and acquire a complete product package simply by presenting one or two documents. Seven out of ten Customers who used the service stated that, based on their experience, they would recommend Alpha Bank to their immediate environment (Average Score t-NPS 63, second half of 2019).

Customers positively assessed the effort they took for the first use of "myAlpha Mobile" (Effort Average Rating 8.5/10) and "myAlpha Web" (Effort Average Rating 8.2/10).

Customers provided even better assessments for the effort they need to make in order to activate their

debit card (Effort Average Rating 8.8/10).

In 2019, the Alpha Bank Customer Satisfaction Index (TRI\*M Index) was high (77) supported by the excellent performance rating of the Bank (88) and by the preference (67) to the Bank.

In the Branch Network, the strong connecting point between Customers and Alpha Bank was yet again the Personnel's friendliness and eagerness (74% positive reviews), while overall service is the spontaneous response to "the main reason for recommending Alpha Bank" (27%).

In total, the 2019 Individual-Customer Satisfaction Index showed very positive results as to the Bank's strategy, which is aimed at following a development course that is mainly Customer-oriented and generally rewarding for society. Achieving the desired goals for 2020-2022 brings into focus the upgrading of Customer experience at any contact point with the Bank, so that Alpha Bank may further boost the preference of Customers who choose it as their bank.

A similar Customer Satisfaction Survey held in Albania, examined the Customer satisfaction rate of six major Banking Institutions of the country. Alpha Bank Albania SHA presented one of the highest satisfaction rates, with 89% of its Customers declaring "Satisfied" with the Bank.

## IDENTITY OF THE RESEARCH SURVEY

t-NPS Quantitative Survey

Company: KANTAR TNS

Country-wide online survey for Private Customers. Sample N=Customers who used myAlpha Mobile / myAlpha Web or activated a debit card.

Period conducted: July - December 2019

Quantitative Customer Satisfaction Survey 2019

Company: KANTAR TNS

Country-wide survey via telephone interviews with Private Customers aged 18-75. Sample N=3,600 individuals (Alpha Bank Customers N=2,000 / Competition Customers N=1,600).

Period conducted: May-July and October-November 2019

Image Quantitative Survey for Loyalty Programs

Company: QED

Sample: 4 focus groups and 12 personal interviews.

Period conducted: June - July 2019

## 2017

- Collaboration with the Athens University of Economics and Business, the University of Piraeus and the National Technical University of Athens for Internships for excelling postgraduate students
- Rewarding of the Volunteer Blood Donor Employees of the Bank

## 2018

- Creation of Development Centres for its Employees, to identify and develop their individual critical skills
- Alpha Bank launches its presence on LinkedIn with a corporate page and job postings.

## 2019

- Implementation of a variable pay framework to reward exceptional rewards for Branch Employees (Sales Incentive Program- SIP) and Head Office Unit Employees (Performance Incentive Program - PIP)
- Implementation of the 360 degrees Performance Assessment Program



## 6. EMPLOYEES

Alpha Bank's Employees are its most important and most valuable asset, the driving force behind its successful course and growth. Flexible, committed, united and with a strong sense of responsibility, they successfully adapt to the ever-changing circumstances. Part of Alpha Bank's strategy over the years has been the training and development of its

Employees, as demonstrated by the creation of a working environment that respects individuality, acknowledges contribution and supports the continuous development of each Employee.

## 6.1 ATTRACTING, DEVELOPING AND RETAINING EMPLOYEES



A key factor in increasing performance and enhancing creativity and innovation at Alpha Bank is making the best of Employees, with equal opportunities in terms of development and advancement, based on uniform qualification and competence evaluation procedures. The ongoing training and development of Employees is a top priority for the Bank, directly linked to the provision of quality and upgraded services. At the same time, the Bank's presence in career events of University Institutions and private institutions of the country is strengthened, as well as its engagement in modern channels of talents' attracting such as e.g. social media, in order to establish a relationship of mutual benefit with newcomers to the labor market and to strengthen its corporate reputation (employer branding).

In order to enhance a positive work environment and Employee well-being, the Bank strives to constantly provide infrastructure that ensures fair compensation for their work and enables more effective Customer service. The optimal use of technology and modern practices in basic human resource management functions helps optimize internal procedures, thereby improving Employee experience and fostering a relationship of mutual trust and reciprocity.

The Bank, acting as a responsible employer, strives to meet the expectations of its Employees. It therefore constantly invests in their continuous training and education. With the creation of the Development Centers, it aims to contribute to the development of its Employees' critical skills and competences. Alpha Bank promotes a healthy balance between the professional and personal life of its Employees and provides them with equal employment and advancement opportunities.

The Bank seeks the optimal use for its Employees and, to this end, it supports their promotion by means of internal announcements of vacancies and also helps them move closer to their place of residence or of choice.

The Bank also encourages its Employees to participate in volunteering actions aimed at contributing to social and environmental issues.

### EMPLOYMENT

The creation of a healthy work environment, the working hours, the renewal of the Human Resources with new recruitments and the provision of fair remuneration are all of paramount importance and help establish a well-functioning work environment while ensuring that Employees contribute to Alpha Bank's daily operations more efficiently.

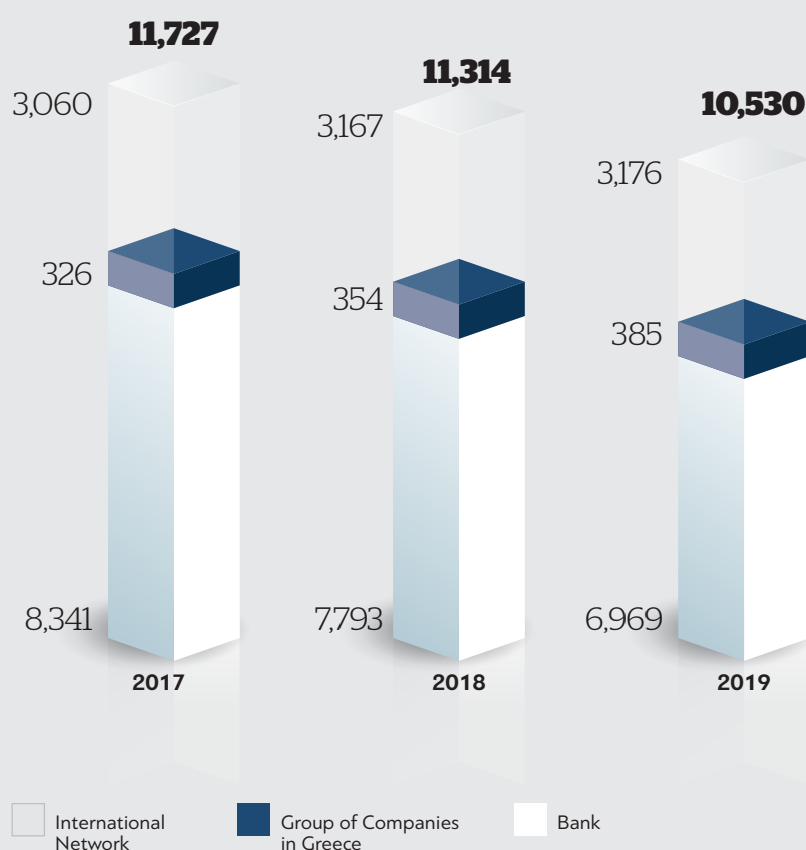
At the end of 2019, Alpha Bank employed in Greece, 6,969 full-time Employees (3,123 male and 3,846 female) with employment contracts of indefinite duration.



During the same period, the subsidiary Banks abroad in Cyprus, Romania, Albania and the United Kingdom employed a total of 3,228 Employees. The total number of Employees for the entire Group stood at 10,530.

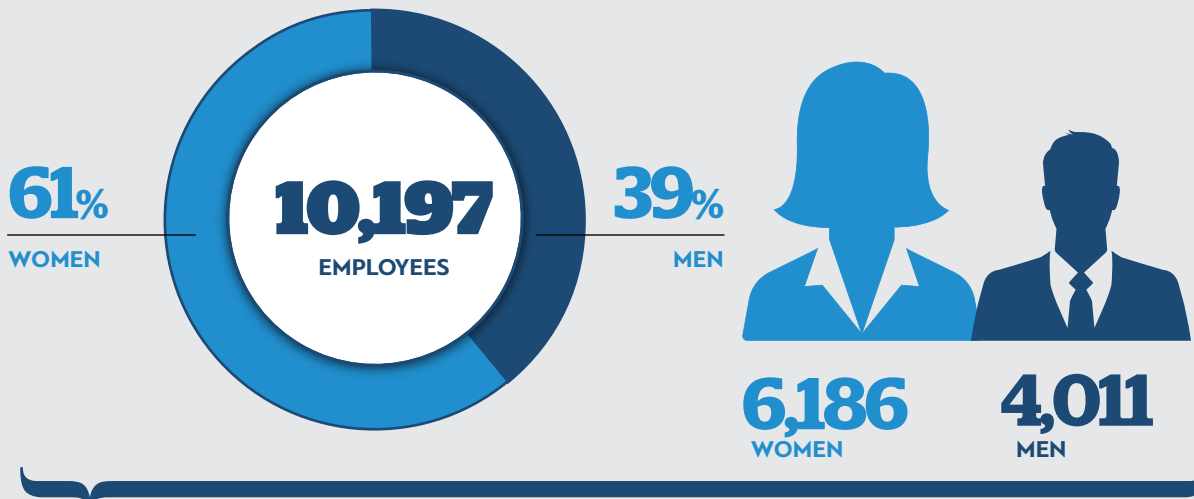
Moreover, the Bank employs a small number of seasonal full-time Employees. Specifically, in 2019 (as of at 31.12.2019), it employed a total of 45 individuals (24 men and 21 women) as temporary Employees, 44 of them in Attica and one in the rest of Greece.

#### Evolution of the Alpha Bank Group Human Resources



It should be pointed out that the reduction in Personnel numbers in Greece is due to the implementation of a Restructuring Plan aimed at reducing operating costs. During 2019, the Bank implemented a Voluntary Separation Scheme for regular Personnel wishing to depart. The benefits provided to interested Employees were particularly favorable, while the option of a three-year-long paid leave was also provided. In specific, 731 persons (81%) of all departures used the Voluntary Separation Scheme, while in total 99% of regular Personnel departures were recorded as voluntary departures.

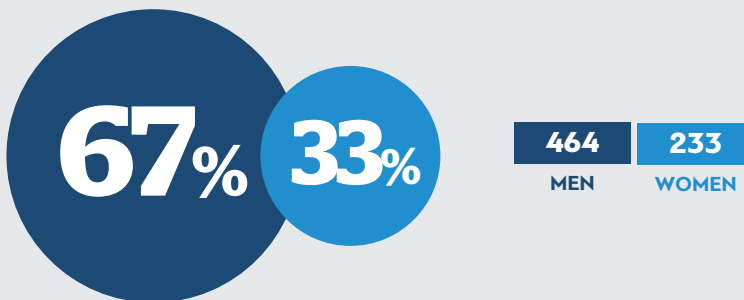
Figures refer to the number of Employees on December 31 of the respective year.



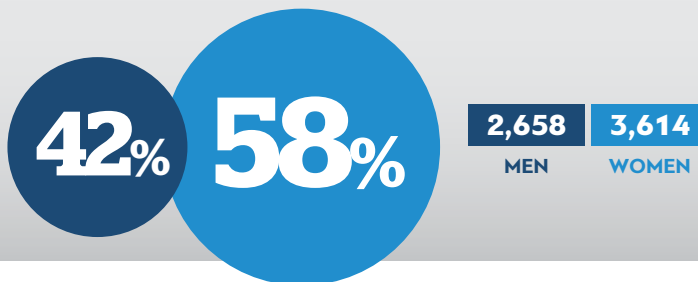
AGE DISTRIBUTION OF ALPHA BANK PERSONNEL

18-25 years old	3%	275
26-40 years old	43%	4,432
41-50 years old	37%	3,776
51+ years old	17%	1,714

Alpha Bank Personnel Breakdown for Employees included in the top 10% of Employees by total compensation



Alpha Banks Personnel Breakdown for Employees included in the bottom 90% of employees by total compensation





**75**  
UNITED  
KINGDOM



**2,052**  
ROMANIA



**418**  
ALBANIA



**6,969**  
GREECE



**683**  
CYPRUS





IONIAN ISLANDS



\*Refers only to the number of Bank Employees on secondment abroad and not to the total Personnel employed by the Group abroad





WESTERN  
MACEDONIA

112

EASTERN MACEDONIA  
AND THRACE

NORTH AEGEAN

81

THESSALY

120

EASTERN  
CENTRAL  
GREECE

4,942

ATTICA

PELOPONNESE

SOUTH AEGEAN

205

182

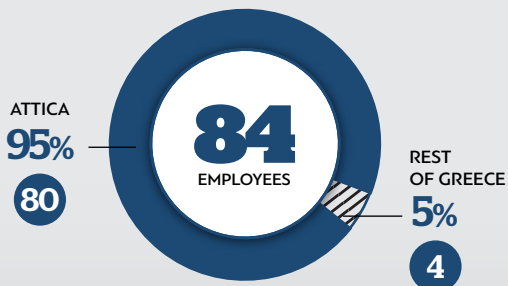
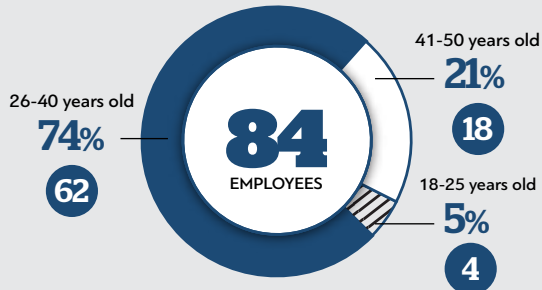
CRETE



**84**  
EMPLOYEES

Recruitment as % of all Employees

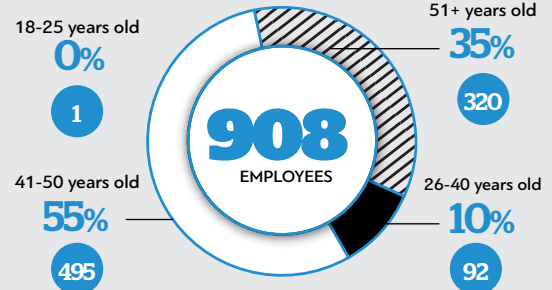
**1.2%**

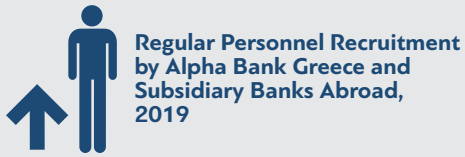


**908**  
EMPLOYEES

Departures as % of all Employees

**13%**

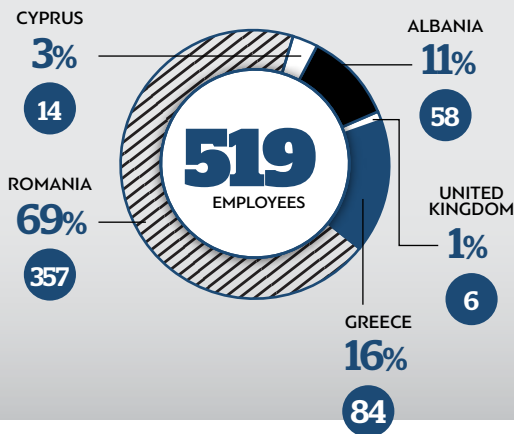
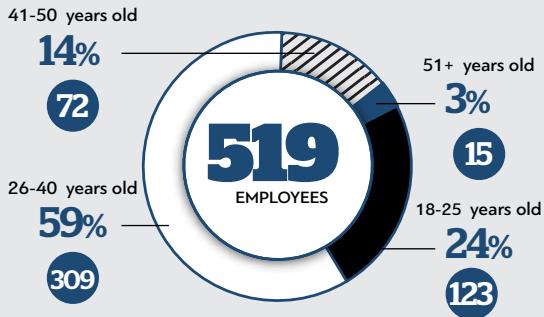




**519**  
EMPLOYEES

Recruitment as %  
of all Employees

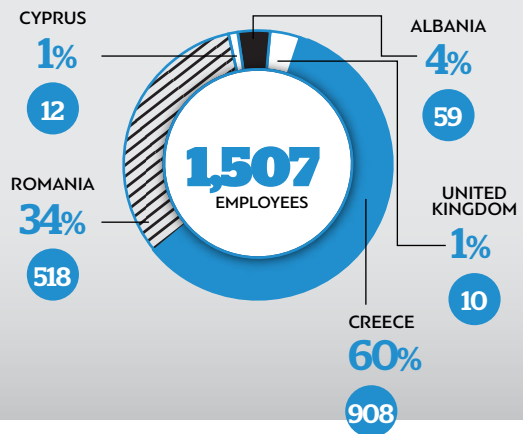
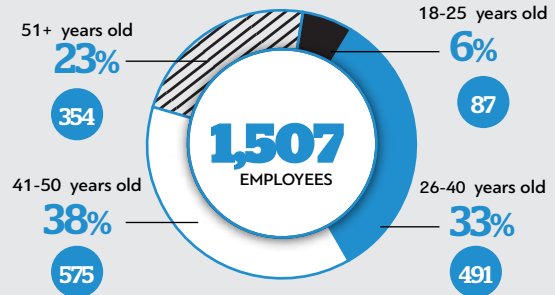
**5.1%**



**1,507**  
EMPLOYEES

Departures as %  
of all Employees

**15%**



**Online Evaluation System**

Bank Employees are evaluated using the Online Application for the Submission of Personnel Performance Evaluation Forms, according to their position. The results of the evaluation process are used for Personnel development purposes and, in particular, for rank-based promotions, advancements, transfers, appointments and training.

Within 2019, the Bank made substantial operational changes and improvements, including:

- Targeting electronic completion and monitoring.
- Electronic completion of fixed-term Employee evaluations.
- Optimization of the management and display of Evaluation Forms.

**EVALUATION FORMS FOR THE YEAR 2019**

**TOTAL EVALUATION FORMS RECEIVED**

**7,229**

**TOTAL POPULATION FULFILLING THE EVALUATION CONDITIONS**

**7,335**

\*The total population evaluated also includes Employees who had not been included in the Bank's workforce on 31.12.2019 but have been evaluated for the previous year.

688 promotions took place in 2019. 365 in Head Office Units and 323 in the Network, after utilizing the results of the Performance Evaluation System and practising Internal Announcements of vacancies, which led to an enhanced scope of work and supervision responsibility. Respectively, in Alpha Bank Romania, 147 Employees were promoted, of which 126 were women. During the year, the performance of the Employees was also evaluated; 1,095 people participated in the evaluation.

**Relocations - Transfers**

In 2019, the percentage of completed transfer requests stood at 38.4% (out of a total of 237 applications), while 25 internal announcements with an open invitation to all Personnel were published and 28 appointments were made.

**Collaboration with Education Institutions and Employment Organizations**

In 2019, Alpha Bank intensified and extended its presence in career events at undergraduate and postgraduate level, in order to enhance the Bank's corporate reputation as an exceptional employer and to attract new talent to cover existing or/and future needs.

In specific, it collaborated with the Athens University of Economics and Business, the University of Piraeus, the ALBA Graduate Business School, the American College of Greece and the University of the Aegean for the employment of students at the Branch

Network under the auspices of the Hellenic Bank Association (HBA) and the Hellenic Banking Institute. Nineteen (19) Officers of the Human Resources Division participated in the Career Days 2019 held by the company KARIERA, for the corporate promotion of the Bank (employer branding), meeting and briefly interviewing new entries as well as experienced Executives of the Greek market. The Bank's participation in this event was advertised in collaboration with the Marketing and Public Relations Division on the Bank's LinkedIn page, both to attract more candidates and to build a relationship of mutual trust with the job market through this promotion. The Bank also collaborated with Universities and Technological Institutions across Greece, such as the Athens University of Economics and Business, the University of Piraeus, the University of Macedonia, the Aristotle University of Thessaloniki, the University of West Attica and the University of the Aegean, for the education and training of final-year undergraduates. Finally, for yet another year, the Bank participated voluntarily in the preliminary candidate selection process of the ReGeneration program by conducting interviews, thus supporting capable young professionals in their first steps in the labour market.



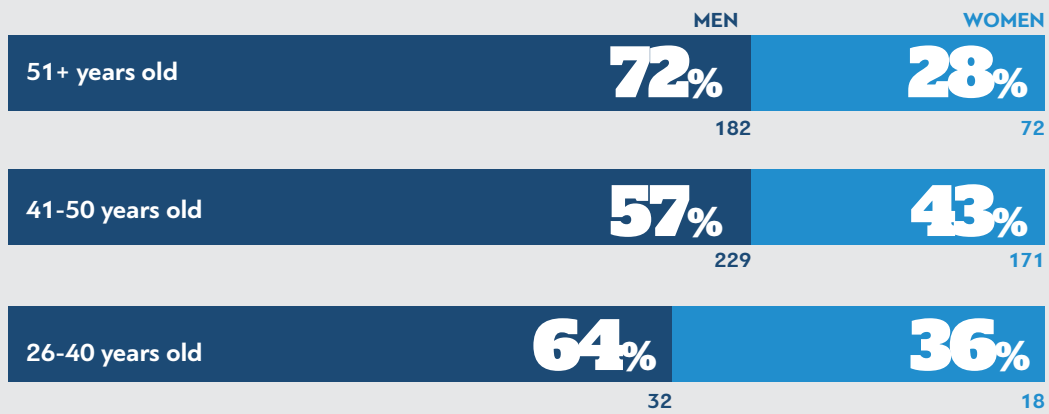
**FAIR LABOUR  
PRACTICES**

Diversity indicators	2017	2018	2019	2019
Scope	Alpha Bank	Alpha Bank	Alpha Bank	Alpha Bank & Banks Abroad
Women Employees	4,515 (54.13%)	4,289 (55.04%)	3,846 (55.19%)	6,186 (60.66%)
Women in the Board of Directors (refers to the BoD of the Group)	1 (8.33%)	1 (8.33%)	1 (8.33%)	1 (8.33%)
Women in managerial positions*	299 (36.60%)	289 (36.35%)	261 (37.07%)	489 (29.98%)
Employees belonging to minority groups	3	1	0	0**
Managers belonging to minority groups	1	0	0	0**
Employees with disabilities	154	142	122	136

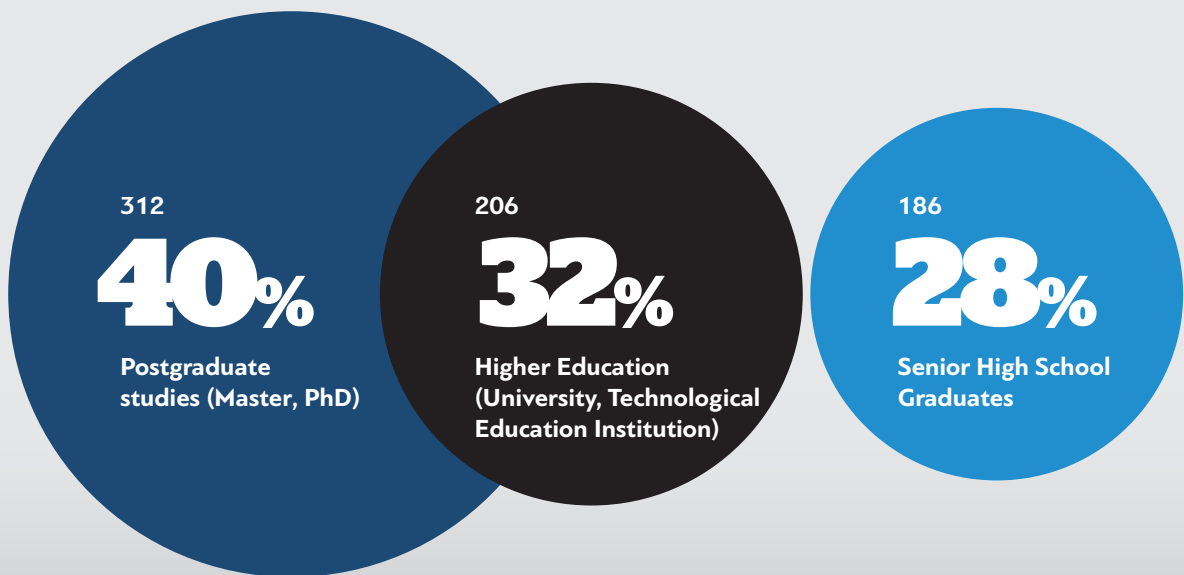
\* Managerial positions include Branch Managers, Managers of Central Unit Divisions and Subdivisions and Senior Management Members (General Managers, Executive General Managers, Chief Executive Officer).

\*\* Data not included for Alpha Bank London.

**Age Distribution of Alpha Bank Personnel  
in Managerial Positions on 31.12.2019**



**Educational Level of Alpha Bank Personnel  
in Managerial Positions**



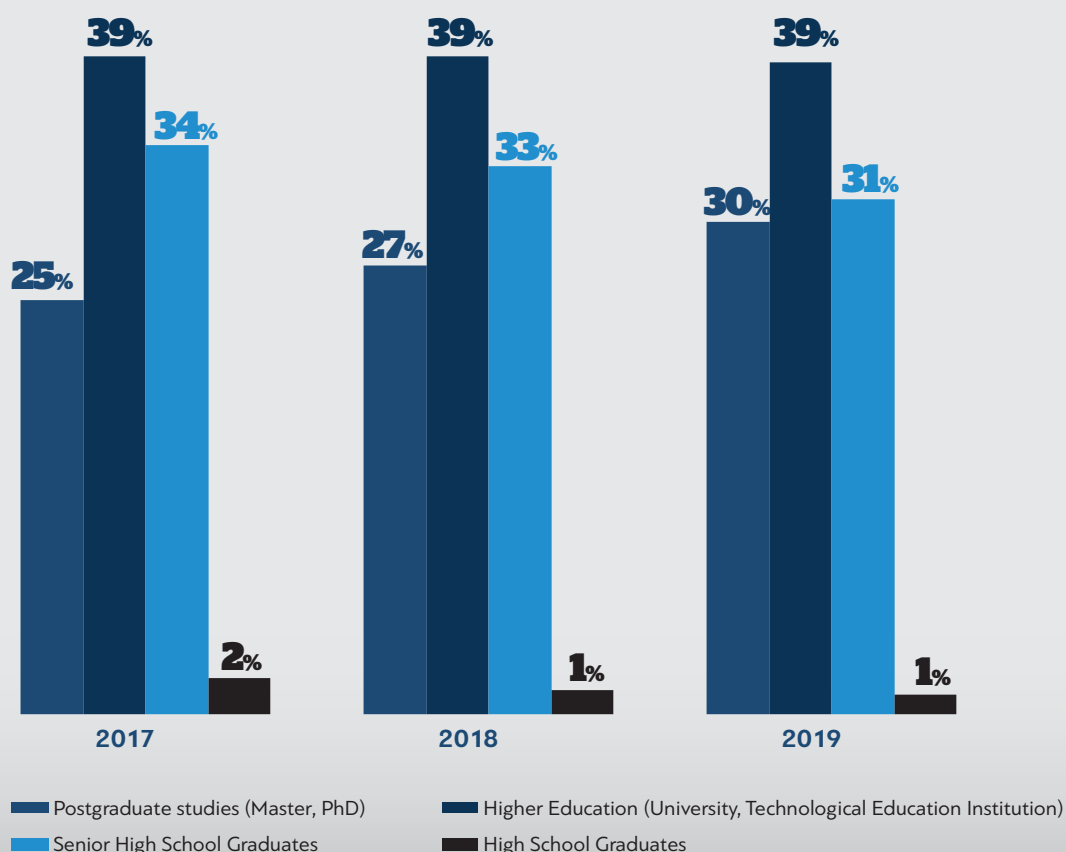


## EMPLOYEE TRAINING AND DEVELOPMENT

Training ensures that the training needs of the Personnel are covered, thus preventing any gaps or weaknesses in connection with the human resources employed and in maintaining jobs. Training needs arise in connection with specific knowledge areas, areas of experience or even personal skills, manifesting themselves as behavior in the workplace. Through appropriate training programs, the Training Division addresses any weaknesses and further bolsters the strengths of the Bank Personnel's professional competence, thus significantly contributing to the Employees' job retention.

The breakdown according to the educational level of Employees shows that, in 2019 - for yet another year - Employees with higher education degrees represented the highest percentage (39%) out of all Alpha Bank's staff members, with 30% of them holding a Master's and/or doctoral degree. The respective rates for all Personnel of Alpha Bank and Group Banks abroad amounted to 44% (Higher Education - University, Technological Education Institute) and 29% (Postgraduate Studies - Master, PhD).

### Educational level of Alpha Bank Employees over time



In 2019, the Bank carried out its regular annual Training Program, which included a large number of subjects covering the following four key training policy areas:

1. Induction Training and General Banking
2. Training for Customer Relationship Officers
3. Training for Business Relationship Officers
4. Management Training

The annual Training Program, which is addressed to all Bank Personnel, together with the training programs held (in-house or at premises outside the Bank) to cover the specialized needs of the Head Office Units and with the training programs for Internal or External Certifications, make up Alpha Bank's overall Training Policy.

The innovative training activities for the year included the following:

- Implementation of the special program "Big Data Analytics", in collaboration with the Athens University of Economics and Business (AUEB), covering 119 hours, providing knowledge and practical skills in business analytics and big data projects. The first cycle was successfully completed with the certification of 10 IT-orientated persons and 11 Business-orientated persons.

The program is expected to continue in 2020.

- Implementation of two e-learning courses, entitled "Environmental Awareness" and "Energy Saving Awareness", in application of the Group's Environmental Management Policy. The aim of the courses is to raise awareness, appropriately train and inform the Personnel of the Group, so that they may contribute to the effective application and ongoing improvement of the Environmental Management System. The training material developed offers a pleasant, interactive and, above all, efficient method of disseminating knowledge.

- Introduction of an e-learning course, in collaboration with the Athens University of Economics and Business (AUEB) on "Corporate Governance in Financial Firms". The program is divided in two sections, with reference to the organization of the Bank based on the requirements set by legislation on corporate governance in the financial sector. During the first cycle of attendance, 108 Bank Executives participated and were certified, and as the topic was extremely interesting, a 2nd cycle was also launched, with expected completion in 2020.

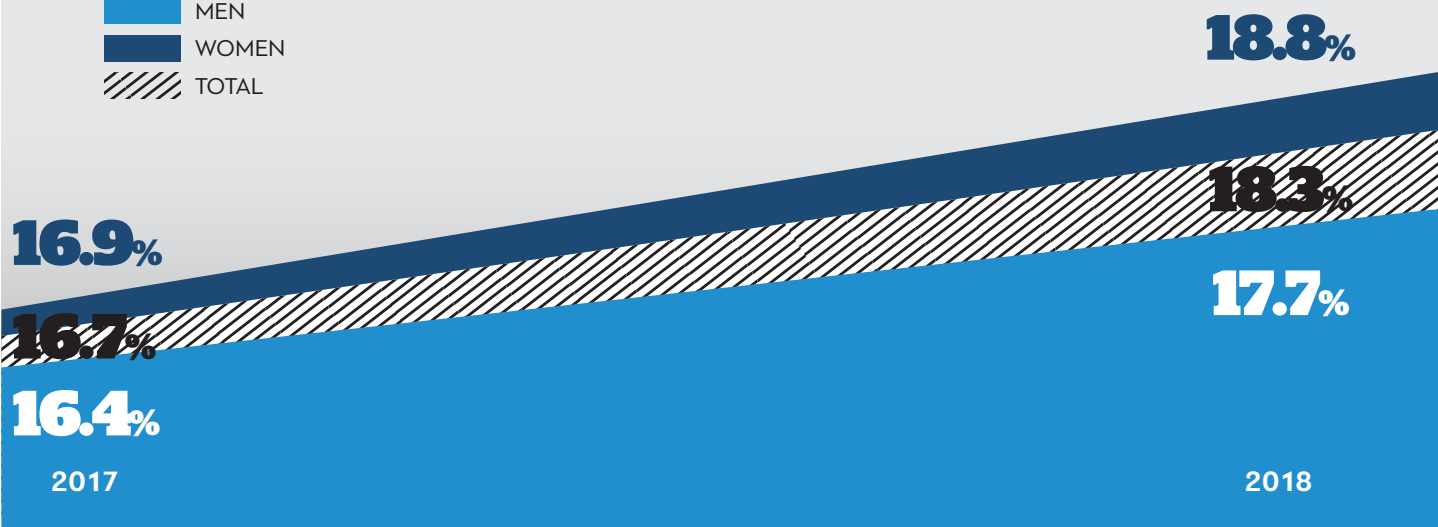
- Organization of seminars on "Compliance Awareness" issues, in collaboration with the Compliance Division. The program was addressed to Branch Managers and Operations Officers and structured in three main thematic sections:

A) Regulatory Framework Supervision, B) Prevention and Suppression of Revenue Legalization by Criminal Activities / Money Laundering and by Terrorist Financing, C) Banking Confidentiality.

- Organization of the specially designed program "Trainer Training" implemented by an external associate. The program was addressed to Head Office Unit Executives, in order to provide them with the necessary knowledge and skills required for Adult Trainers. In total, 14 Executives participated in a three-day program.

- Implementation of the program 360 degrees, which included a skill set (competency framework) and concerned exclusively Bank Executives. In specific, three participation cycles were held; the first (pilot) concerned Senior Executives (2018), the second Division Managers (2019) and the third Division Assistant Managers (2019) across Greece. In total, 293 Executives participated in the Program. This program was completed in 2020.

### Average hours of training per Alpha Bank Employee



Finally, candidates from the talent pool successfully completed the first cycle of personal Coaching by trained Bank Executives. During the Program, participants had one-to-one meetings with the Human Resources Division to discuss in detail their development plan, while the relevant actions were launched. The development of new talent within the Bank, through guidance and exposure to multiple stimuli and different experiences, helps identify people who stand out for their professionalism, ethics and contribution in applying the Bank's Strategy and Vision and in creating a succession plan for the future.

#### **Compliance of the Training Division**

All training programs intended for the renewal of certifications for Bancassurance operations within the regulatory framework laid down by the Bank of Greece were approved for yet another year by said regulatory authority. They are carried out through e-learning courses and e-tests. In specific, in 2019, 1,754 "Certificates of Completion" were issued for the corresponding Certified Bank Executives.

As regards the renewal of certification for the provision of investment services, Executives were prepared through an e-learning course of the Athens University of Economics and Business, approved by the Bank of Greece and the Hellenic Capital Market Commission. The success rate of Bank Employees participating in the exams was 97%.

#### **Participation in Training Programs**

In 2019, Alpha Bank Employee participations in training programs stood at 30,687, while 6,813 people were trained. Training hours (person-hours) reached 134,607 (56,071 for men and 78,536 for women). The average training person-hours per Bank Employee are estimated at 19.3 hours.

Of the total number of participants in Alpha Bank training programs, 30,483 (99%) were Employees of Alpha Bank's Accounting Branch.

**20.4%**

**19.3%**

**18.0%**

2019

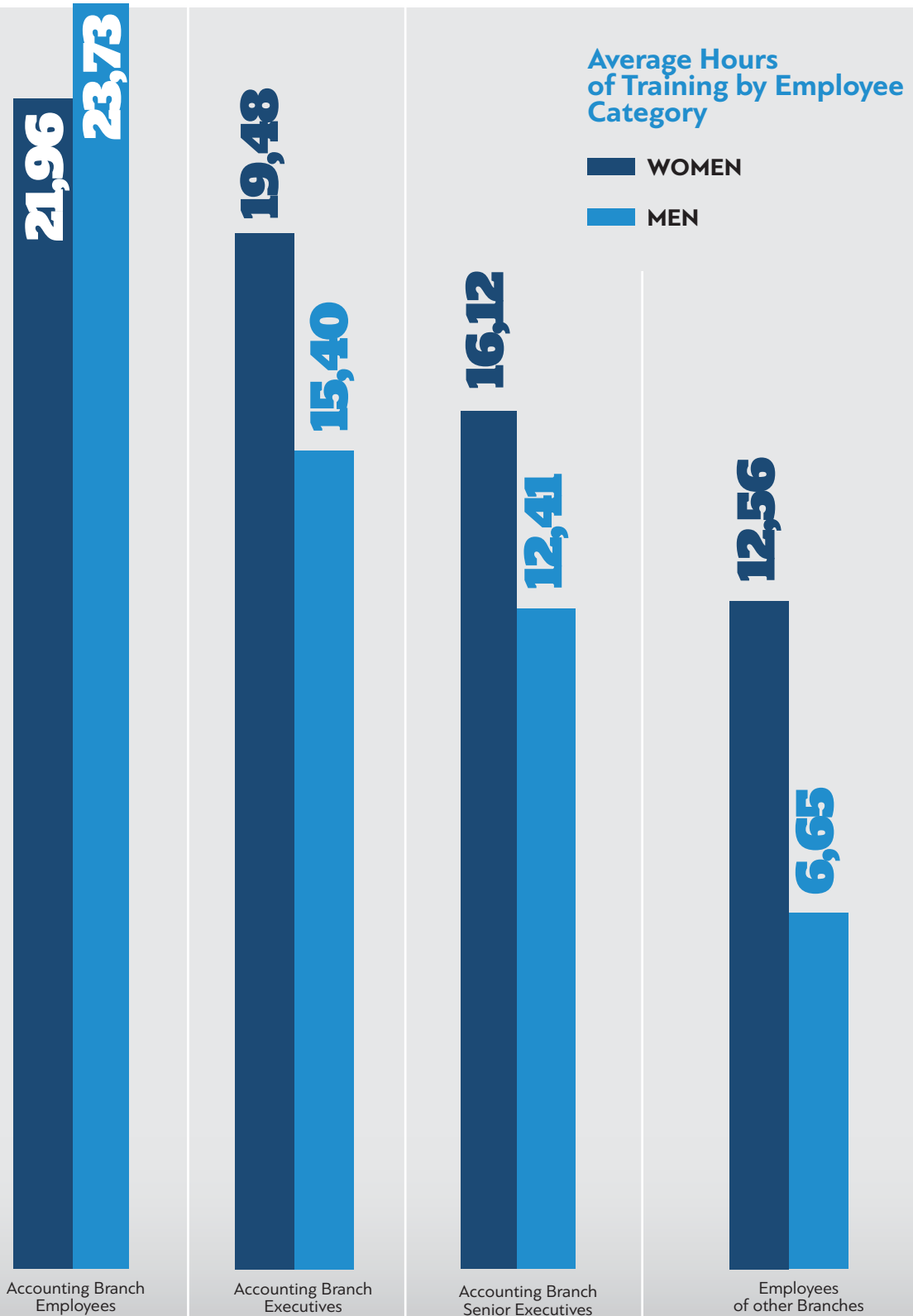
### Participation in Training Programs in 2019

	WOMEN	MEN	TOTAL
ACCOUNTING BRANCH EMPLOYEES	7,725	5,040	<b>12,765</b>
ACCOUNTING BRANCH EXECUTIVES	10,012	6,500	<b>16,912</b>
ACCOUNTING BRANCH SENIOR EXECUTIVES	317	489	<b>806</b>
EMPLOYEES OF OTHER BRANCHES	97	107	<b>204</b>

### Breakdown of training person-hours by training program category\*

\*For the Bank's in-house training programs.





The training person-hours for all Personnel of Alpha Bank and Group Banks abroad were 232,765 (78,819 for men and 153,946 for women), with an average of 22,8 hours per Employee.

### Development Centers

The Human Resources Division continued the operation of Development Centers for Bank Executives, extending the scope of Employees meeting participation criteria in the Branch Network in Attica and in the rest of Greece. The objective of these Development Centers is to develop critical skills of participants from the Bank and to link the results obtained to a number of development activities, such as personalised development programs, succession planning programs, training seminars and other activities. An almost equal number of Employees from the Head Office Units and the Branch Network participate in each program.

## 6.2 OCCUPATIONAL HEALTH AND SAFETY

Occupational health and safety are significant for the Bank and its Human Resources, as any illnesses, injuries or other health issues may affect the work environment and the efficiency of Employees. The safety of Employees, in particular, is a matter of the utmost importance in the banking sector. Therefore, the Bank takes measures to ensure that the workplace is appropriate, to eliminate or reduce occupational risk and

to prevent any injuries. The Bank acknowledges the significant contribution of Employees in its daily operation and in the provision of quality services and takes care to ensure a safe and healthy workplace, in which the measures applied exceed those stipulated by law.

In addition, the Alpha Bank Intranet includes a manual entitled "Instructions on Matters Related to the Enforcement of Provisions on Occupational Health and Safety", which is the main framework of guidelines for matters related to the provisions of the labour legislation on occupational health and safety as well as their enforcement by the Hellenic Labour Inspectorate and the Audit Services of EFKA (Unified Social Security Institution). This Manual provides the Managers of the Bank's Units with information on the obligations that arise from labour legislation.

### In-House Postgraduate Program

Alpha Bank's in-house Postgraduate Program, carried out by the Bank's Training Division in collaboration with the National and Kapodistrian University of Athens, continued in 2019. This 18-month Program covers Monetary Policy, Banking and Finance. Since 2010, a total of 174 Employees have successfully completed their postgraduate studies. The Program is also expected to be implemented in the academic year 2019-2020.



To monitor but also to improve health and safety-related processes, the Bank sets qualitative and quantitative objectives. The objectives are monitored monthly, based on reports received from External Providers of Occupational Health and Safety Services, as well as daily, in collaboration with the Managers of the respective Units, who are responsible for notifying the Human Resources Division in the event of any deviations from the procedures, such as failure to perform visits/inspections.

In 2019, the diagnostic review for the application of the ISO45001 Occupational Health and Safety Management System was completed, and its application across the Bank has been planned for 2020.

As regards Employee health and safety, the Bank not only complies with the laws in force but also ensures the provision of additional inspections, training and programs, such as:

- Control, on a monthly basis, of visits and inspections of the Occupational Physicians and Safety Technicians, through the reports of the cooperating External Providers of Occupational Health and Safety Services.
- Control of the Records of Written Recommendations with their visits and observations and the Human Resources Division and action taking by the Procurement, Property and Security Division for any corrections or improvements.



- Analysis of health and safety hazards, as part of the annual Risk Control Self-Assessment (RCSA) of the Bank's Units.
- Appointment of Employees at each Bank Unit for coaching other Employees on Safety matters. These Employees attend training seminars supervised by the Procurement, Property and Security Division and are regularly briefed on how to handle critical situations.
- Provision of safety technician and occupational physician services by external contractors, as well as by specialized Bank Officers who visit the Bank's Units and regularly brief Employees on health and safety issues.
- Training programs on the "Fire Safety of Branches and Buildings", attended by 188 Bank Officers in Athens and Thessaloniki.
- Theoretical and practical training of 52 Guards and Security Officers on fire safety, earthquake and building evacuation matters.
- Training programs for new Employees, with the participation of 126 Officers, on the "Security of People and Goods, Workplace Safety and Handling Critical Situations - Robberies".
- Training programs on robberies, hostage-taking, fire safety, earthquake and building evacuation for Officers appointed as Managers of Critical Situations and Fire Safety Teams, for a total of 152 people, and training programs carried out in Branches and Divisions, for a total of 489 people.
- Training programs held at Bank Buildings in Attica and other areas of Greece and delivered by Fire Department Officers, under the responsibility of the Procurement, Property and Security Division.
- Preparation of 65 evacuation plans for Buildings and Branches.
- Provision of psychological support in cooperation with special scientists, psychologists-psychotherapists, offering counselling and supporting meetings with Employees. To enhance the positive outlook of Employees in the context of dealing with everyday stress, the Bank organized special workshops on Time and Stress Management, throughout the year. Finally, The Bank, attending to the daily health of its Employees, employs two Physicians on a permanent basis, whom Employees can visit in their fully equipped Dispensaries, which operate during working hours. In 2019, more than 700 Employees consulted the Bank's Physicians.

Health and Safety Indexes	Number of incidents			Days lost due to these incidents		
	2017	2018	2019	2017	2018	2019
Injuries <sup>1</sup>	0	2	1	0	130	1
Fatalities	0	0	0	0	0	0
Other illnesses <sup>2</sup>	4,681	4,328	3,925	42,513	40,236	38,613
Absenteeism rate <sup>3</sup> (AR)	2%	2%	2%			

<sup>1</sup> Excluding incidents caused by pathological conditions.

<sup>2</sup> Maternity leave not included.

<sup>3</sup> Absenteeism rate is the total number of work days lost to the product of the total number of Employees multiplied by the total of working days during a year.

According to the data for 2019, in all Alpha Bank Group Banks abroad (Cyprus, Romania, Albania and United Kingdom), a total of three injuries were recorded, of which two in the United Kingdom and one in Cyprus.

## 6.3 EMPLOYEE COMMUNICATION, BENEFITS AND SERVICES

### INTERNAL COMMUNICATION

Aware that two-way communication with its Employees is pivotal in improving labour relations and everyone's daily life, Alpha Bank has established a weekly "Communication Day". On this day, any Employee who wishes to do so, can meet the Manager of the Human Resources Division to discuss any work-related or personal matter, while similar meetings are also held all over Greece between Officers of the Human Resources Division and Employees. In 2019, a total of 1,075 meetings were held. The Bank also provides other means of communication.

For example:

- The "Alpha Bank Intranet", which aims at effectively supporting the Personnel's daily work and its internal communication and information needs, while providing direct and current information on a wide range of work-related and banking issues.
- The monthly online internal communication publication "MAZI" ('TOGETHER'), which provides information on major developments and events that take place at the Bank and at Group level.
- Regular meetings held for information purposes and to exchange views, especially with the Personnel at the Bank's Branch Network.

### Service/Assistance and Upgrade of Resources

Focusing on the ongoing improvement of services provided and the modernisation of operations, in-house applications are constantly developed for facilitating Employees as well as Managers and Units. Specifically, in 2019, the Human Resources Division expanded the following applications and upgraded the systems below:

- "Organization Structure Management" Application
- "Temporary Unit Changes" Application
- Human Resources Information System
- Payroll System
- Executive Benefits Statement
- Manager E-statement

### ORGANIZATIONAL PERFORMANCE SURVEY

In 2019, the Organizational Performance survey of the Bank was carried out. 80% of Employees asked to take part in the survey, of a total of 7,598 invited, did so. The Organization Performance Survey was designed to help improve the smooth operation, effectiveness and to identify weaknesses in the Bank procedures. The survey results helped determine the strong points that can be utilized, the opportunities for improvement and the obstacles in the Bank's successful development.

### EMPLOYEE REMUNERATION AND BENEFITS

The fair and equitable remuneration of its Personnel, characterized by transparency and ensuring internal balance, is a priority for Alpha Bank. In all cases, the remuneration provided is in line with the legislation in force, the Collective Labour Agreements and the broader regulatory framework applicable to Credit Institutions.

Furthermore, the main factors that determine remuneration rates include the importance of each Employee's job, the systematic evaluation of their performance and the best practices and trends prevailing in the market, combined with the internal needs of the Bank and the Group Companies. In the context of linking Employee remuneration with their performance, namely rewarding Employees who helped achieve exceptional results for 2019 and as part of the approved variable pay framework, the Bank successfully implemented two variable pay schemes, a) for Head Office Unit Personnel (Performance Incentive Program) and b) for Branch Network Personnel (Sales Incentive Program).

To serve the operational needs of specific positions, combinations of benefits are provided, including the use of a company credit card, company mobile telephone and company car, the reimbursement of travel expenses and one annual preventive health check-up.

In addition to their remuneration, as provided for by the Collective Labour Agreements, the Bank offers its Personnel privileged rates on cards and loans and salary advances amounting to 2 to 4 salaries, under specific terms and conditions.

Every year, Alpha Bank and its Group Companies participate in compensation and benefits surveys conducted by renowned Consulting Companies. The Bank seeks to offer competitive salaries in line with the labour market so as to attract and retain people with the abilities, skills, experience and behavior sought by the Group.

### CARING FOR OUR EMPLOYEES AND THEIR FAMILIES

Recognizing the importance and contribution of its Human Resources to its successful course, Alpha Bank offers an additional benefits scheme to its Personnel. These benefits include a number of allowances, coverage and services for Employees and their family members that demonstrate the Bank's active care and concern for its Employees and offer additional support and safety.

The Bank, in collaboration with AXA Insurance S.A., provides the following insurance plans to its permanent Employees and their family members:

• **Health and Life Insurance Plan:** The Bank's Employees are primarily insured for medical and hospital care with the National Healthcare Service Organization (E.O.P.Y.Y.). To ensure the highest level of medical care for its Employees, the Bank additionally provides a free and comprehensive medical and hospital care plan as well as Life Insurance and Insurance for Permanent Total Disability caused by accident or illness and Insurance for Permanent Partial Disability caused by accident.

• **Group Outpatient Insurance Coverage Plan for Bank Personnel:** Acknowledging that the protection and safeguarding of individual and family health are a top priority, with the creation of the new Group Outpatient Insurance Coverage Plan, the Bank provides a comprehensive outpatient coverage plan, valid all over Greece, to all active regular Personnel. The Plan includes a comprehensive set of benefits that cover a wide range of medical services at all times, in a nationwide network, seeing that insured members are attended to immediately.

• **Group Personnel Savings Plan:** The members of the Personnel who have joined this Plan and are not covered by an insurance carrier currently account for 82% of all Employees. The Plan provides for payment of a lump sum upon retirement and is successfully implemented by the Bank, by investing the monthly contributions paid by the Bank and by the Employees. In addition, the Bank provides the following benefits to parents:

• **Childbirth allowance:** The Bank grants a lump sum of Euro 1,557 as childbirth allowance, based on the Sectoral Collective Labour Agreement of the Greek Federation of Bank Employee Unions (OTOE), right after the birth of the child. In 2019, the Bank granted a childbirth allowance to 318 Employees, amounting in total to €377,706.29.

• **Reduced working hours:** To assist mothers in taking care of their newborns, the Bank grants reduced working hours in the form of accumulated continuous paid leave. In 2019, 164 Employees were granted reduced working hours, amounting to a total of 10,903 days. In addition, a total of 18,041 days of maternity leave were granted to 250 Employees since the beginning of the year.

• **Day care benefit:** In an effort to strengthen the family budget of Employees, the Bank grants a day care benefit of Euro 320, per month and per child, to all Employees who have preschool-aged children and apply for this benefit. In 2019, the daycare benefit was granted to a total of 1,366 Employees for a total of 1,686 children. In addition, 36 Employees with a total of 41 children received the benefit for home childcare. Finally, the Bank provides support to specific groups of Employees through special programs, such as:

• **Annual lump sum,** days of leave and reduced working hours for Employees whose children are facing serious health problems.

• **Special monthly welfare allowance** for Employees or pensioners who are blind or suffer from kidney diseases.

• **Additional leaves** for Bank Employees who attend undergraduate courses.

Recognizing the value of arts and culture in the further development of its Personnel and in team spirit support, Alpha Bank actively supported activities that broaden Employees' interests and enrich their daily lives with creative pursuits. In specific, throughout the year, various activities were held, such as guided tours for Employees at exhibitions, museums, collections, etc. and participation in arts and cultural events. Moreover, during the Christmas season, the Bank sent gift certificates to Employees with children aged up to 6 years, across Greece. In 2019, 4,418 Bank Employees participated in events/actions.

## 2017

- Start of systematic replacement of luminaires of older, energy-intensive technology (fluorescent, incandescent, etc.), with lighting systems of new LED technology in Bank Branches and Buildings
- Start of astronomical timer installation in night outdoor lighting in all the Bank's Branches

## 2018

- Gradual replacement, based on budget possibilities, of old energy-intensive air conditioning systems with newer energy systems (inverter) for lower energy consumption. Overall, older air conditioning units have been replaced in 18 Stores.
- Establishment of Environmental Policy at Group level
- Expansion of the Management Printing Service in 16 Units of the Bank

## 2019

- Alpha Bank certification according to ISO 14001 standard
- Start of installation of recycling bins for lighting bulbs in the entire network of Bank Branches
- Completion of installation of astronomical timers in night outdoor lighting in all the Bank's Branches



## 7. ENVIRONMENT

Raising awareness on environmental issues and protecting the environment are key priorities for the Bank. Alpha Bank, fully aware of the consequences of climate change and of the way these affect every aspect of human activity, develops and provides products that allow investment in actions aimed at energy saving, the development of renewable energy sources and the modernization of production procedures by businesses (including Small and Medium-sized Enterprises) as well as corresponding initiatives by households (presented in the section "Responsible Investments and Financing"). Additionally, the Bank enhances the management of its financing operations' environmental dimension, by incorporating new procedures for the assessment of environmental risks in its Credit Risk Management Framework (presented in the section on "Risk Management"). Moreover, the Bank aims to reduce its environmental footprint by promoting the rational

use of lighting, heating and cooling installations in its Buildings, the use of eco-friendly class A++ or higher energy efficiency equipment as well as distance training, by implementing initiatives for the efficient use of raw and other materials and by applying the "reduce, reuse, recycle" principle in the management of the waste produced.

Furthermore, the Bank organizes, supports and participates in environmental actions to cultivate the ecological conscience of its Employees and their families and to improve the quality of the environment.

Aimed at the systematic monitoring, management and improvement of its environmental impact, the Bank designed and developed an Environmental Management System in accordance with the ISO 14001 standard, which was certified by an external body in 2019.



## 7.1 ENERGY CONSUMPTION AND MANAGEMENT OF CLIMATE CHANGE

### REGULAR MONITORING

The General Management is responsible for decision-making on environmental matters related to the Bank's operations, including the implementation of the Environmental Management System (EMS). The representative of the Bank's General Management in the EMS is the Manager of the Procurement, Property and Security Division, who is responsible for the overall oversight of the EMS, reviewing its design and implementation to ensure its proper functioning and continuous improvement, and recommends the approval of the Bank's Environmental Policy. He also informs the General Management of the results of the implementation of the EMS in the Bank, as well as about any opportunities and threats that may arise relating to environmental issues. In line with the above, he undertakes to implement the guidelines decided by the General Management regarding the development of the EMS. Moreover, an Environmental Committee and an Environmental Management Team have been set up, each with distinct responsibilities regarding the environmental management of the Bank's activities.

The Bank regularly monitors energy consumption at its premises and the corresponding greenhouse gas emissions, in line with the requirements of the Greenhouse Gas Protocol. This regular practice aims at improving the accuracy of the Bank's performance data and identifying areas for improvement, even though the direct impact of the Bank's operation on climate change is not significant.

In line with the requirements of the environmental management system, Alpha Bank regularly assesses the risks and opportunities associated with climate change. Risks such as the possible destruction of the Bank's infrastructure due to the increased frequency and intensity of extreme weather events and the increase in energy consumption due to climate change are recognized and evaluated, so that the Bank can take appropriate measures to address them. In this respect, the Bank has insured its infrastructure and Buildings against possible natural disasters. At the same time, the reduction in energy consumption due to increased temperatures during the winter or thanks to more efficient technologies represent opportunities for reducing the Bank's operating costs.

### ENERGY CONSUMPTION

In 2019, Alpha Bank's total energy consumption, resulting from the consumption of electricity, natural gas, heating oil, diesel fuel for generating sets and motor fuels (petrol and diesel) for vehicles, stood at 66,414 MWh (239 TJ).

86.5% of the annual energy consumption comes from the consumption of electricity.

#### Energy consumption over time

	2017	2018	2019
MOTOR FUELS MWh	637	4,287	4,372
DIESEL FUEL FOR GENERATING SETS MWh	114	111	65
HEATING OIL MWh	1,144	1,274	1,255
NATURAL GAS MWh	3,206	2,385	3,267
ELECTRICITY MWh	64,060	60,329	57,455
<b>TOTAL</b>	<b>69,161</b>	<b>68,386</b>	<b>66,414</b>
ENERGY CONSUMPTION*	147	143	141

\*Energy consumption per sq. m. (kWh/m<sup>2</sup>)  
(does not include consumption of motor fuels vehicles)

Note:  
As of 2018, the Bank calculates the fuel consumption of its entire fleet.



### Electricity

The Bank calculates electricity consumption in all Buildings, Offices and Branches. In the table above, the figures given for 2019 are based on measurements taken at Buildings, Branches (Network), empty properties and other facilities of the Bank and its Group Companies which are also housed in these buildings in Greece. In order to calculate the above consumption figures and the corresponding measured areas, the following principles were applied (where applicable and feasible):

- Measurements include the space occupied by the Group Companies (where these are housed in the same Buildings), as well as communal areas, empty areas, parking spaces and auxiliary areas (as derived from the ownership title for the building or from contractual arrangements etc.).
- Cases where the Bank is charged with its share of consumption, through the bills for shared consumption and maintenance expenses for the respective buildings are included.
- Empty properties owned by the Bank or for which the Bank is responsible are included.
- An estimate of the annual consumption for 4% of the total surface occupied by the Bank, for which data were not recorded, has also been included.
- For those areas for which no electricity bills have been received from the supplier, the consumption has been projected to cover the whole year.
- The electricity consumption of the Bank's electric vehicles is not taken into account in the calculation of consumption per m<sup>2</sup> of spaces.

For 2019, the Bank's electricity supplier was the Public Power Corporation S.A. The Electricity Market Operator S.A. (LAGIE) provided the Bank with a Guarantee of Electricity Origin Certificate (GREENPASS), certifying that 53,035 MWh of the electricity consumed by the Bank during 2019 were generated from renewable energy sources (92% of the total consumption). In order to systematize the above process, but also to have increased vigilance in the Managers of the Branch Network, in 2019 the Bank started sending letters to Branches that show an increase in electricity consumption of 20% and above compared to the corresponding period of last year, to provide explanations. In addition, an electrician visits to check the electrical installation, if necessary.

The Bank monitors the electricity consumption rate per m<sup>2</sup> for different types of Buildings and Branches throughout the year, in order to detect any deviations as early as possible. In this way, any unjustified increases in energy consumption can be

identified, their cause can be examined, and the necessary measures can be taken. Overall, the Bank aims at reducing electricity consumption as much as possible. In 2019, following a series of appropriate actions and activities, overall electricity consumption was reduced by 5% compared to 2018; improved performance compared to the 2% target set for 2019.

In 2019, the Bank installed LED lighting units in 19 Branches and Buildings, with a prospect of expanding this measure to more locations as the technology progresses. Additionally, the replacement (where necessary due to age or obsolescence) of old, energy-consuming air conditioning systems with new inverter technology devices, with a lower energy consumption, also continued. Older air conditioning units were replaced in 21 Branches in total. These activities took place either as part of general renovation work in Branches and Buildings of the Bank or as separate cases, where only the lighting or the air conditioning system was replaced, when necessary.

In 2019, the Bank completed the installation of astronomical timers at all locations of its Branch Network. Their installation allowed it to achieve the rational use of outdoor lighting in its Branches. In addition, the Bank replaced the internal lighting units of its signs with LED lighting units in 25 Branches. The target remains for the internal lighting units of signs in 20 more Branches to be replaced with LED lighting units by the end of 2020. Finally, the Bank continued to promote the rational use of lighting, heating and cooling installations. Note that the total electricity consumption for Alpha Bank and the Group Banks abroad for 2019 stood just above 90 GWh.

### Natural Gas - Heating Oil

In 2019, there was a significant increase in the total consumption (MWh) of natural gas by 37%, which was due to the extremely low temperatures of the 2018-2019 winter, especially during the four-month period January-April 2019.

On the contrary, there were no particular fluctuations in heating oil consumption, which remained at the same levels as in previous years. The checks made to inspect the application controls of the environmental management system found that the Branch Network energy stocks and consumption were accurately recorded.



**Diesel fuel for Generating Sets**

The Bank uses 33 generating sets (G/S) in 18 Main Buildings and Branches to ensure uninterrupted operation of its Services in case of power failure due to external factors (weather, electrical grid failures and so on). The changes observed over the years are affected by the frequency of power failures as well as by the diesel fuel reserves stored in the tanks from purchases made in previous years.

**Fuel for Transportation using Bank-Owned and Leased Vehicles**

The Bank uses its own as well as leased vehicles for transportation needs in connection with its operating activities. As of 2018, in order to achieve a more complete and accurate monitoring and disclosure of its performance, the Bank estimates the consumption of all of its vehicles.

In 2019, the Bank had a total of 495 vehicles. The Bank monitors the consumption of 55 of these via the fuel cards with which it has provided their drivers. For all other vehicles, consumption is estimated based on the number of kilometers travelled during the year and the specific fuel consumption rates per vehicle category.

According to the Bank's data, a total of 239,058 litres of petrol and 218,775 litres of diesel fuel were consumed for transportation purposes in 2019. The amount of electricity consumed by the Bank's electric vehicles is included in the amount of electricity consumption stated above.

**GREENHOUSE GAS AND OTHER GAS EMISSIONS**

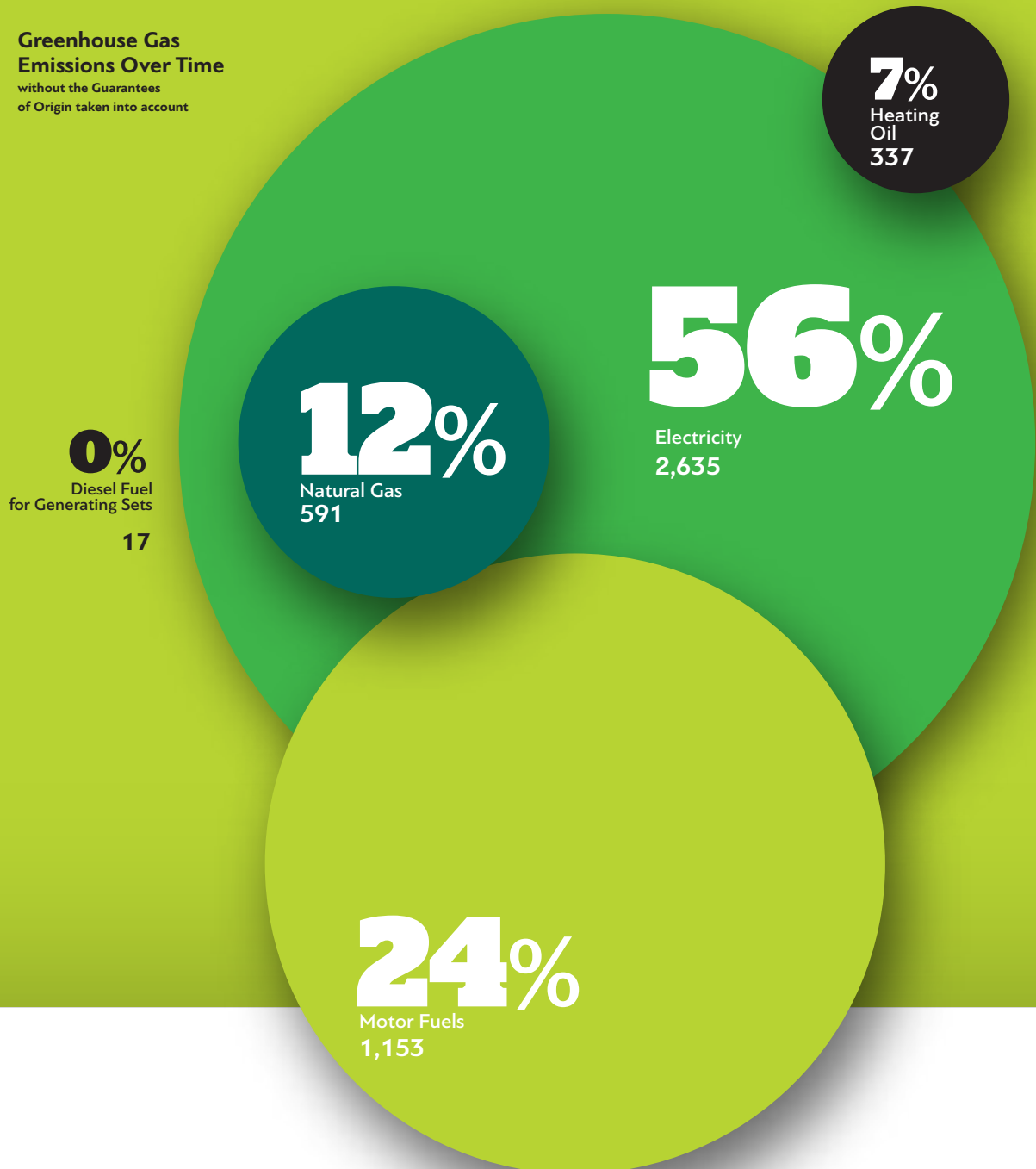
**Greenhouse Gas Emissions from Energy Consumption**

In 2019, Alpha Bank's greenhouse gas emissions from the aforementioned activities were calculated at 38,454 tn CO<sub>2</sub> eq, 95% of which (36,356 tn CO<sub>2</sub> eq) comes from electricity consumption (indirect emissions - scope 2) and the remaining 5% (2,098 tn CO<sub>2</sub> eq) from the consumption of natural gas, heating oil, diesel fuel for the generating sets and motor fuels (petrol and diesel) (direct emissions - scope 1).

To offset the indirect emissions from electricity consumption, Alpha Bank has obtained Guarantees of Origin from Renewable Energy Sources. After taking these Guarantees into account, total emissions are reduced to 4,733 tn CO<sub>2</sub> eq.

**Greenhouse Gas Emissions Over Time**

without the Guarantees of Origin taken into account



To calculate CO<sub>2</sub> emissions from the consumption of natural gas, heating oil, diesel fuel for generating sets and motor fuels (diesel and petrol), the emission coefficients of the Greenhouse Gas Protocol were used. The calculation of CO<sub>2</sub> emissions from the consumption of electricity is based on data from the annual national reports, submitted to the Secretariat of the United Nations Framework Convention on Climate Change (UNFCCC) as well as on Eurostat data on national gross electricity production.

The conversion of CH<sub>4</sub> and N<sub>2</sub>O emissions to tonnes of CO<sub>2</sub> equivalent was based on the global warming potential values over a 100-year period, as included in Decision 24/CP.19 by the Parties of UNFCCC. Finally, the greenhouse gas emissions from the consumption of electricity, taking into account the Guarantees of Origin, were calculated using the residual emission factor from the European Residual Mixes 2018.

### Greenhouse Gas Emissions Over Time without the Guarantees of Origin taken into account\*

	2017	2018	2019
MOTOR FUELS tnCo <sub>2</sub> eq	30	1,136	1,153
DIESEL H/Z tnCo <sub>2</sub> eq	165	30	17
HEATING OIL tnCo <sub>2</sub> eq	307	342	337
NATURAL GAS tnCo <sub>2</sub> eq	584	435	591
ELECTRICITY tnCo <sub>2</sub> eq	43,988	34,814	36,356
<b>TOTAL</b>	<b>45,074</b>	<b>36,757</b>	<b>38,454</b>
GREENHOUSE GAS EMISSIONS OVER TIME*	96	79	85

\*CO<sub>2</sub> eq/m<sup>2</sup> (kg/m<sup>2</sup>) (does not include consumption of motor fuels for vehicles)

The noted increase of emissions compared to 2018 is exclusively due to the change of the special electricity emission coefficient and not to the energy consumption of the Bank, which was reduced by 3% in total.

Note: As of 2018, the Bank calculates the fuel consumption, and consequently the emissions, of its entire fleet.



**Other Indirect Greenhouse Gas Emissions**

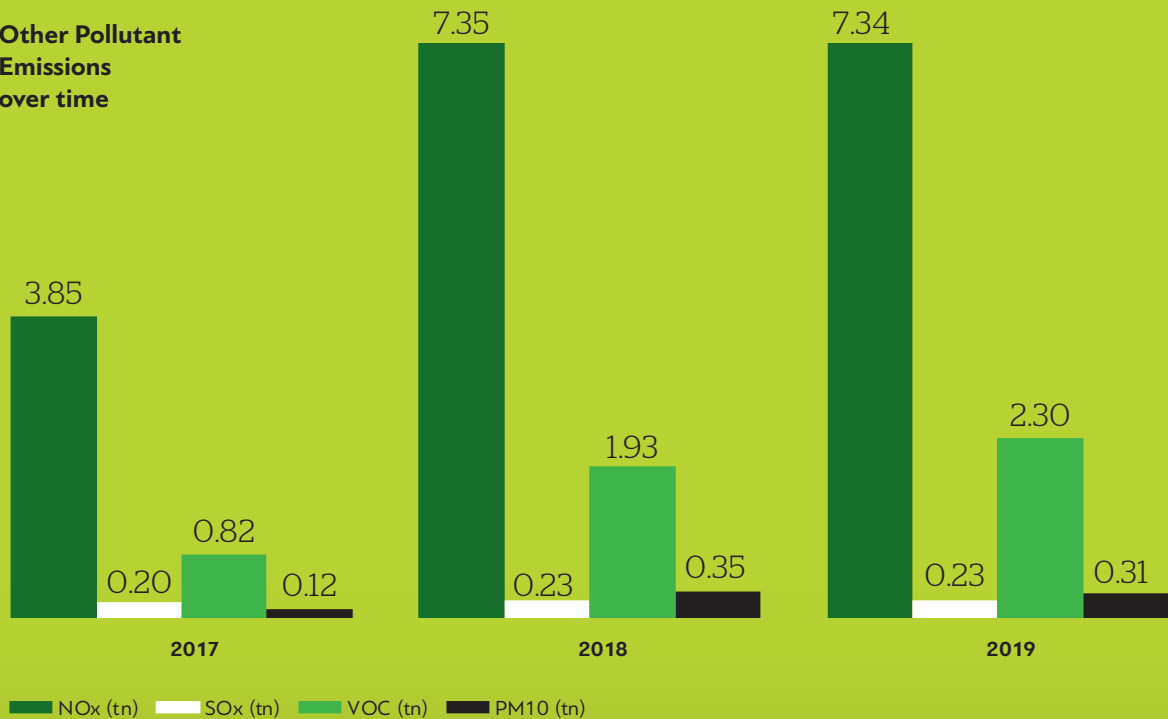
Alpha Bank is proceeding with the quantification and monitoring of its other indirect emissions (scope 3). In 2019, the Bank's emissions caused by Employees travelling by air for business amounted to 288 tn CO<sub>2</sub>. The material sent by post by the Bank to its Customers (account, card and loan statements) is estimated to have caused the release of 14.82 tn CO<sub>2</sub> of emissions. The emission coefficients of the Greenhouse Gas Protocol were used for these calculations.

Note: As of 2018, the Bank calculates the fuel consumption, and consequently the emissions, of its entire fleet. Alpha Bank's emissions of Persistent Organic Pollutants (POPs) and Hazardous Air Pollutants (HAPs) are negligible.

**Other Gas Emissions from Energy Consumption**

For 2019, the emissions of other pollutants (NOx, SOx, VOC and PM10) from the consumption of natural gas, heating oil, diesel fuel for generating sets and motor fuels (diesel and petrol) by the Bank are calculated at 7.34 tn of NOx, 0.23 tn of SOx, 2.3 tn of VOC and 0.31 tn of PM10. For these calculations, the relevant emission factors from the HYPERLINK "<http://www.eea.europa.eu/publications/emep-eea-guidebook-2013>" EMEP/EEA Air Pollutant Emission Inventory Guidebook 2013 were used. The SOx emissions of diesel fuel were calculated on the basis of the relevant national laws. Alpha Bank's emissions of Persistent Organic Pollutants (POPs) and Hazardous Air Pollutants (HAPs) are negligible.

**Other Pollutant Emissions over time**

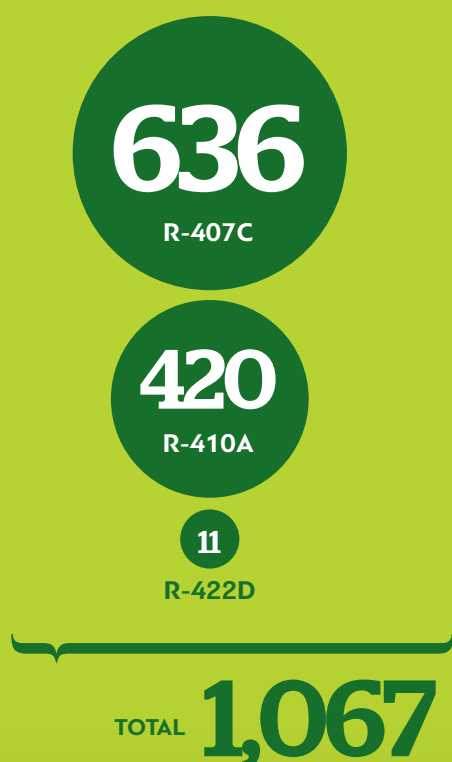


### Ozone

Alpha Bank is gradually replacing the cooling installations that use ozone-depleting substances (ODSs) as coolants, taking into account the provisions of the relevant laws. Hydrofluorocarbons (HFCs) are used to replace ODSs in existing air conditioning systems (retrofitting), while the air conditioning systems which are being installed in new premises use eco-friendly coolants.

In 2019, the Bank used a total of 1,067 kg of coolants in order to top up air conditioning units (topping up due to leakage). This quantity corresponds to 2.03 kt CO<sub>2</sub> eq of greenhouse gas emissions, which make up 5% of all the greenhouse gas emissions (direct and indirect) caused by the use of energy.

### Coolants (kg) added to Alpha Bank's cooling installations in 2019



### INITIATIVES TO REDUCE ENVIRONMENTAL FOOTPRINT

As part of its efforts to save energy and reduce CO<sub>2</sub> emissions, Alpha Bank, in addition to the actions presented above, continued to implement distance learning programs. It is noted that the Training Programs for the renewal of certifications for bancassurance operations in accordance with the regulatory framework laid down by the Bank of Greece, take place via e-learning courses for the approximately 1,800 Certified Employees of the Bank.

It is estimated that in 2019, by sending out electronic account statements (e-statements) for cards, deposit accounts and housing loans, instead of sending printed copies by post, the Bank **saved 198 tonnes of paper**, whose production would have required 3,359 trees to be cut down, and **avoided the emission of 20 tn of CO<sub>2</sub>**, which would have been caused by sending the hard-copy statements by post to Customers.

Additionally, in 2019, the Bank participated, for the eleventh consecutive year, in the "Earth Hour" international initiative, by switching off all lights at its Main Buildings in Athens, Thessaloniki, Patra, Larissa, the Banknote Museum of the Ionian Bank in Corfu and the Cultural Centre in Nafplio for one hour, while it also extended this initiative to its Main Buildings in Crete.

**7.2 MANAGEMENT OF OTHER ENVIRONMENTAL IMPACT FROM ALPHA BANK'S OPERATION**

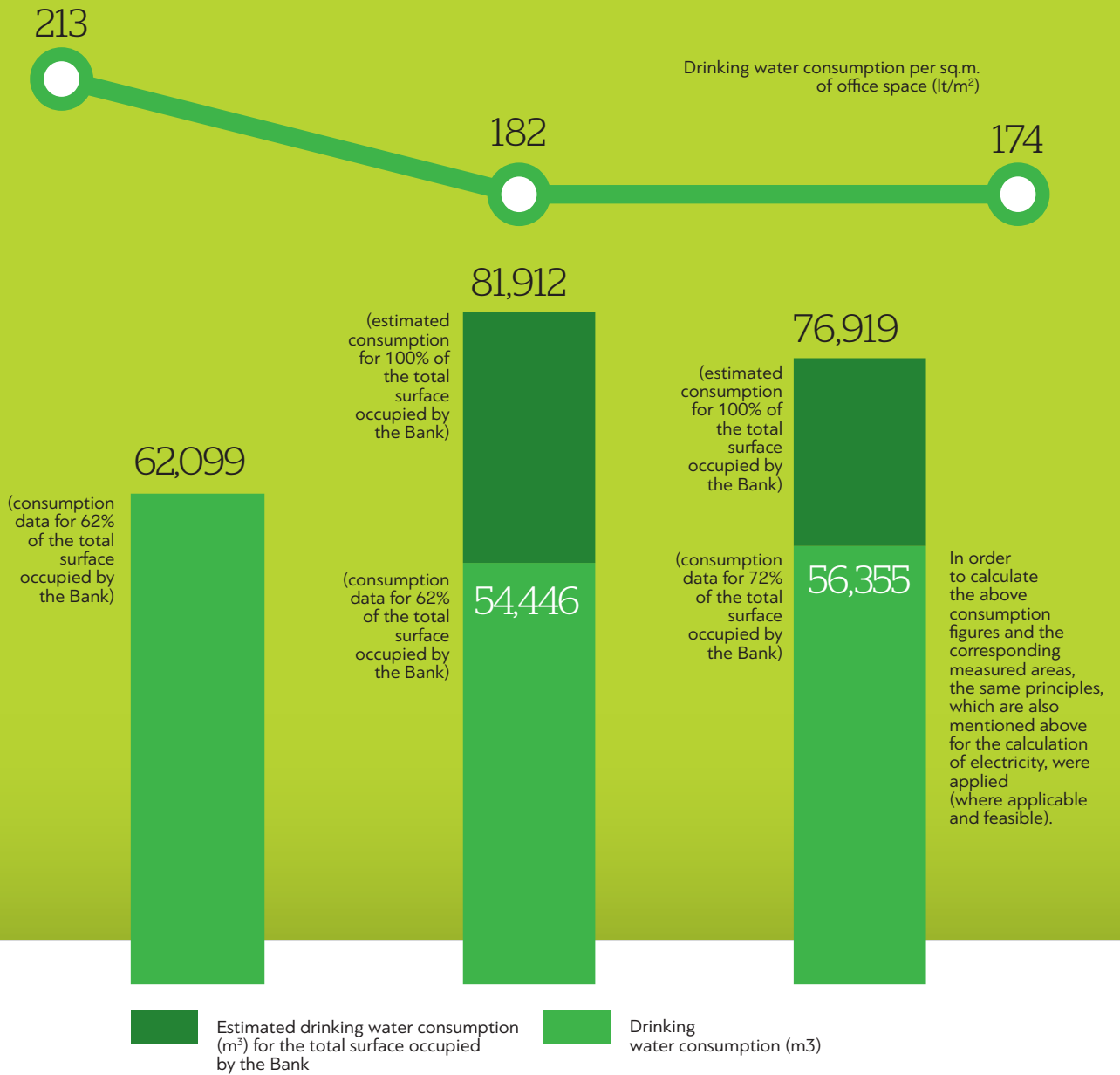
**USE OF RESOURCES AND WASTE MANAGEMENT**

Alpha Bank applies the “reduce, reuse, recycle” environmental practice.

**Water**

The use of drinking water covers sanitation needs at the Bank's Buildings and Branches, as well as irrigation requirements for the watering of gardens, where applicable.

**Drinking water consumption over time**



Water consumption in the Bank Units is monitored via the corresponding water supply bills. Every year, the Bank measures and records water consumption in more Bank Buildings, Offices and Branches whose number and total surface constantly increase. As of 2018, the Bank estimates the water consumption for the total surface it occupies. The calculation of the average annual water consumption per unit area in Branches and Head Office Buildings is based on the available water consumption data for the Bank's Buildings. Water consumption for all buildings is calculated using these two indicators and the surface of the respective Bank Buildings which are not covered by the available water supply bills. The total quantity of water consumed across all of the Bank's premises in 2019 amounted to 76,919 m<sup>3</sup>.

### Paper and Consumables

Alpha Bank uses low energy consumption, 75 gr/m<sup>2</sup> "eco-efficient" copying paper, certified in accordance with international environmental standards. The Bank monitors paper consumption on a monthly basis and seeks to limit the quantities used. In the various Units (Branches and Head Office Buildings), the following 3 basic categories of paper are used:

- A4 copying paper
- Paper for banking transaction forms
- Paper for account statements

The amount of paper used by category is monitored through the monthly reports of partner companies and the central warehouse. In 2019, approximately 646 tons of paper were used.

Paper Category	Total quantity used in kg
A4 copying paper	375,821
Paper for banking transaction forms	122,814
Paper for account statements	147,236
<b>TOTAL</b>	<b>645,871</b>

The total quantity of water consumed by Alpha Bank and the Group Banks abroad stood at 125,000 m<sup>3</sup>. Consumption per square meter was lower by 4.2% (in litres per m<sup>2</sup>) compared to 2018, due to the mild weather conditions and prudent use of water resources.

During the year, paper consumption in the Group's foreign Banks in Romania, Cyprus, Albania and the United Kingdom reached 322 tonnes.

Alpha Bank implements the Managed Printing Services Program for the management of printing operations, providing multiple benefits to the Bank, such as lower consumption of paper, printer consumables and fixed equipment. In 2019, the Program was implemented in 14 Main Buildings.

As regards the efforts to reduce the use of consumables, the following should be mentioned:

- The Bank sent out 12,265 Additional Password generation devices (tokens) to Business Customers, to promote the use of the Alpha Web Banking service for transactions.

- The highly effective project for the online ordering of consumables and printed material by the Bank's Units continued:

- Total orders of printed material: 3,445. A total of 7,987 boxes were dispatched.

- Total orders of consumables: 3,712. A total of 62,869 boxes were dispatched.

With systematic monitoring, management of printer consumables stock and the mass withdrawal of old items stored, the recycling rate for toners and ink cartridges increased from 22% in 2018 to 81% in 2019.

**Waste Management**

In 2019, Alpha Bank continued its partnership with the following licensed recycling contractors: European Recycling Center (paper, plastic and aluminium), ASA Recycle S.A. (solid waste recycling) for paper pulping, Photocycling S.A. for recycling light bulbs and lighting fixtures, Appliances Recycling S.A. (electronic equipment) and AFIS S.A. (batteries). It also extended its cooperation with Appliances Recycling S.A. for recycling used computer ink

cartridges/toners. It should be noted that the Bank, through the cooperating company, by the end of 2019, had placed special recycling bins for lighting lamps, lighting fixtures and small appliances in 96.6% of its Branches and almost all of its Buildings.

**Waste management in 2019**

**RECYCLING**

**460,660** kg  
of paper for pulping  
(and then recycling)

**56,175** kg  
of shredded copier paper  
(from 30 Main Buildings)\*

**28.96** kg  
of aluminium and plastic

**6,540** kg  
lead-acid accumulators  
(from 3 Buildings, 1 Warehouse and 1 Branch)

**3,329** kg  
of batteries

**16,585** kg  
of light bulbs  
and lighting fixtures

**3,612** kg  
pieces of obsolete electronic equipment  
(servers, PCs, monitors, printers, telephones,  
scanners, POS terminals, notebooks etc.)

**7,075** kg  
of printer consumables  
(toners, cartridges and drums)

**1,475** kg  
pieces of miscellaneous equipment  
(refrigerators, fax machines, banknote  
counters, photocopiers,  
calculators etc.)

\* At the Bank Branches, recyclable materials are disposed of locally in the blue bins handled by the municipal authorities. No measurable results are available as to the quantity of recycled paper.



**OTHER DISPOSAL****65,408**<sub>kg</sub>

of old metal and scrap for sale

**10,799**<sub>kg</sub>of electronic  
equipment for sale**359**pieces of fixed equipment  
(cabinets, divider panels, desks etc.)  
for sale**527**

meters of fabric for sale

**4,010**pieces of retired office equipment  
(furniture and utensils, photocopiers, monitors etc.) to be donated

No special practice is applied to municipal waste.  
This waste is taken to sanitary landfills.

## 2017

- Expansion of the Program "Together for Better Health" in 12 new islands
- The educational program "Nomos-Nomizo-Nomisma" begins its journey in the schools of the Greek region

## 2018

- Coordinated response to emergencies. The Marketing and Public Relations Division - Corporate Social Responsibility coordinates all the Divisions of the Bank, in order to jointly formulate a response plan
- Start of the program "Together, for Better Education"

## 2019

- Extension of the Program "Together with the Children in the Museum and in the Theater" in Crete
- Creation of a new co-branded prepaid card "Bleep Smile Visa" in collaboration with the Organization "Smile of the Child"

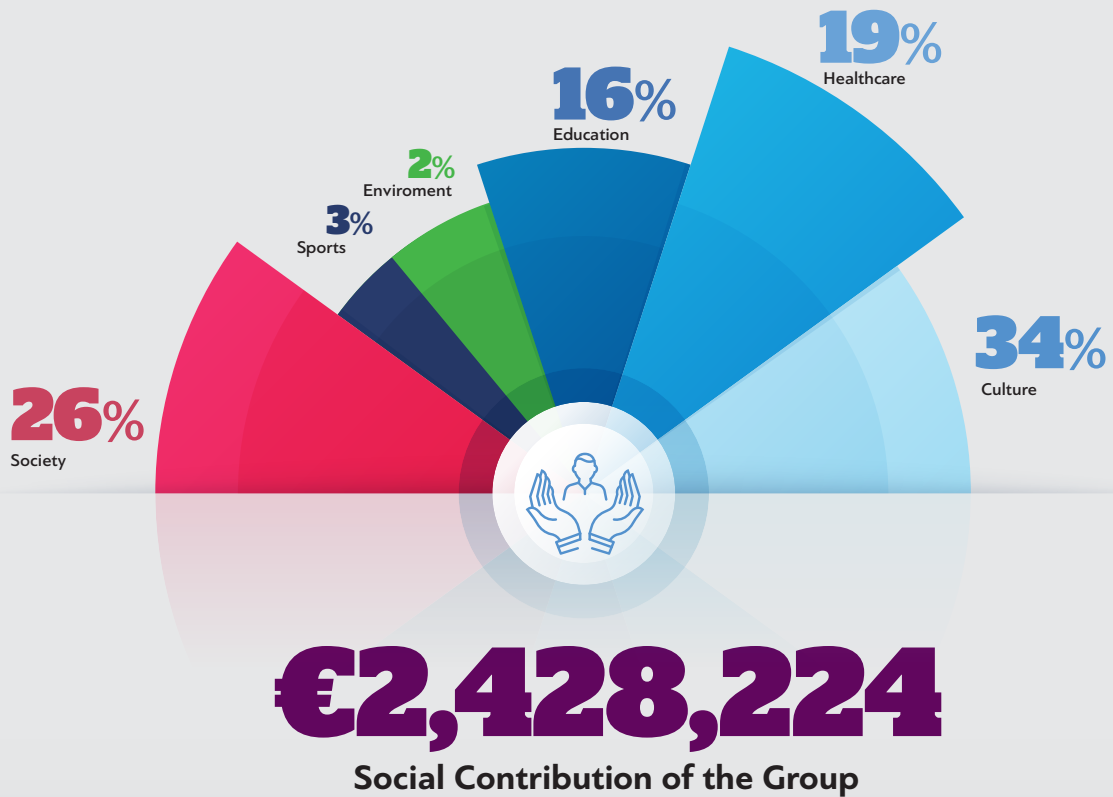


## 8. SOCIETY

**8.1 SOCIAL CONTRIBUTION**

To ensure the transparency of its social investments, the Bank applies an internal evaluation system, according to which all proposals are assessed using objective performance evaluation criteria (economic, social and environmental) and are approved or rejected depending on the evaluation result. To assist the evaluation procedure of the sponsorship requests received, a Sponsoring Manual

has been drawn up. This is available on the Alpha Bank Intranet as the Bank's "Policy and Procedure for the Provision of Financial Assistance". During 2019, a total of **1,154** sponsorship requests were received from Greece, of which **582** were granted. Alpha Bank continues to invest in education, culture, the environment and healthcare. In 2019, under its sponsorship program, the Group allocated totally the amount of **Euro 2,428,224** as indicated below:



### **SOCIAL CONTRIBUTION**

In the context of the Bank's social contribution and of the development of innovative card products, at the end of 2019 the new co-branded prepaid card "Bleep Hamogelo Visa" was created, in cooperation with the organization "To Hamogelo tou Paidiou" (The smile of the child). This is a rechargeable prepaid card, offering Holders security in their daily transactions, while constituting a means for social contribution. In specific, with every purchase made at stores or online, cardholders donate €0.05 and Alpha Bank doubles this amount. At the same time, Alpha Bank further enhances the social contribution of the card by offering to the organization 50% of the annual card subscription fee.

For the 11th consecutive year, the Program "Bonus in Love" allowed Alpha Bank customers to support cooperating non-profit organizations. Through this Program, Customers practically supported their institution of choice, by redeeming Bonus points and sending the corresponding amount to the relevant institution. This year, cooperating institutions also included the historic foundation "Hospice for the Disabled". The Bonus Program subsidized the points redeemed by holders and actively supported the institutions, depositing the amount corresponding to more than double the value of the points. In this way, this year too, the Bank supported people in need and certified environmental organizations. In 2019, 13,332,000 Points were redeemed and Euro 66,660 were donated to the 26 charities participating in the Program. During the year, the program was strongly promoted on social media, while the new Bonus app offered a new medium for promoting the Program to its almost 270,000 users.




The list of institutions participating in the Program "Bonus in Love" is available on the relevant [webpage of the Bank](#)

## 8.2 SUPPORT FOR SOCIAL NEEDS

Through its presence in the countries and the local societies where it operates, Alpha Bank effectively identifies their constant needs and offers solutions related to its sector of operation and beyond.

In 2019, the Bank continued its social activities through the implementation of major Programs designed to support society, education, culture and health care as well as through a number of individual events that were made possible with the contribution of its Employees.

### Major Programs Supporting Social Needs

Program	“Together, for better health”	“Together, for better education”	“Helping Hand”
<b>Target</b>	To support the work of local health centers on Greek islands in covering medical needs and to enhance the quality of life and strengthen the feeling of security of their residents regarding healthcare and health issues.	To reinforce the operation of primary schools throughout Greece with modern teaching systems, books and sports equipment.	To donate food to vulnerable population groups in the country.
<b>Cooperating bodies</b>	The Non-Profit Organization “Agoni Grammi Gonimi”	-	Greek food firms
<b>Start</b>	<b>2014</b>	<b>2018</b>	<b>2012</b>
<b>Up to 2019</b>	<b>233,504 items</b> of medical and pharmaceutical supplies have been offered to <b>51 islands</b> with a total population of <b>548,515 inhabitants</b> .	<b>39</b> integrated interactive teaching systems with special software, <b>780</b> books to support school libraries and <b>3,549</b> items of sports equipment for school activities have been delivered to <b>39 primary schools</b> across Greece.	<b>28,500 carts with food supplies</b> have been delivered across Greece.
<b>Actions in 2019</b>	<b>Seven (7) General-Purpose Regional Surgeries</b> were supported (Aghios Efstratios, Alonissos, Hydra, Kimolos, Poros, Psara and Thirassia) as well as two <b>(2) Hospitals</b> (Aghios Nicolaos – Crete, Kythira), with: <ul style="list-style-type: none"> <li>• <b>28,856</b> items of medical consumables,</li> <li>• <b>1,051</b> items of medical and miscellaneous equipment,</li> <li>• <b>335</b> medical devices.</li> </ul>	<b>20</b> interactive boards, <b>400</b> books and more than <b>1,820</b> items of sports equipment were delivered to <b>20 primary schools</b> across Greece.	<b>Two (2) actions</b> were held, where the Bank handed over <b>2,750 carts with long shelf-life food supplies</b> to Holy Diocese in Serres, Xanthi and Sidirokastro, to the Holy See of Nikaia and the Church of Agios Georgios Hatzikonstas in Attica, as well as to the Municipalities of Egaleo, Thermo, Pogonio, Souli and Halkidona.
<b>Relevant Sustainable Development Goal</b>			
<b>Continued in 2020</b>	<b>Yes</b>	<b>Yes</b>	<b>The program was completed in 2019.</b>

Through the World Vision Program “Hello”, Alpha Bank Albania SHA supports the families of disabled children living in remote areas of the country. Through the Program, appropriate expert physicians monitor children requiring medical care, physiotherapy or speech therapy on a weekly basis. Alpha Bank Romania S.A., in collaboration with the “Aspen Institute Romania” and the “Progress Foundation”, is essentially supporting the “Code Kids” Program, through which children have the opportunity to develop coding in public libraries. The Program aims to create a STEM movement, in which children and young people from small urban and rural areas will have the opportunity to develop digital skills and participate in society by solving creative digital problems. The Program includes libraries from 15 different regions of Romania.

#### **RESPONSE TO EMERGENCIES**

The Bank responds immediately to the need for humanitarian aid to people stricken by floods, earthquakes or other emergencies, by offering clothing and long shelf-life food supplies. It also takes emergency measures consisting of special arrangements in support of its Customers, whether these are Individuals living in affected areas or Businesses based there. The Marketing and Public Relations Division - Corporate Social Responsibility coordinates all Bank Divisions in order to design together a response plan, which enables the Bank to provide the best possible assistance in emergencies, when these occur.

In specific, Alpha Bank contributed to the direct response to the problems of those affected by the

natural disasters of June 2019 in Northern Greece. To facilitate the repayment of mortgages, consumer and business loans and cards by its Retail and Business Customers living or operating in affected areas who have sustained damages, the Bank also offered them an option to suspend their payments for up to twelve months, interest-free. Interested Customers could submit an application to their Branch.

The Bank, supporting the affected areas even after the emergency, participated in actions for environmental recovery, either by donating saplings or through Volunteers participating in various tree-planting actions. The recovery of the natural ecosystem is not only an action of environmental contribution, but also aims to protect and preserve the cultural heritage and economy of the affected areas.

Responding to the earthquake of the November 26, 2019, Alpha Bank Albania made donations via the Albanian Association of Banks, while it also undertook many other actions, including a donation of essentials at the camps created and a festive event for more than 80 children that were accommodated in various hotels.

## Together against Covid-19

Alpha Bank took measures to support the real economy, actively facilitating its Private and Business Customers in addressing the extremely adverse and unprecedented conditions resulting from the spread of the Covid-19 pandemic. In specific, Alpha Bank allowed Medium-Sized Enterprises and Large Corporations - legal entities, operating in industries directly or indirectly affected by this crisis, which had serviced their debts to the Bank up to 31.12.2019, to postpone the payment of all or part of the capital instalments at maturity of their loan. At the same time, for Small Enterprises, Sole Proprietors and Individuals affected by this condition, and provided that a financial emergency is indeed established, the Bank offered a temporary facilitation, suspending the instalments of their loan liabilities up to 30.6.2020.

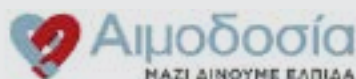
With a high sense of responsibility to society and following the measures it had already taken to support businesses affected by the crisis emerging from the spread of coronavirus in Greece, Alpha Bank donated medical equipment and consumables to the Intensive Care Units of the Hospitals "Sotiria", AHEPA and the General Hospital of Larissa, which are reference hospitals for Covid-19, as well as the 6th Health District of the Peloponnese and the Ionian Islands.

Alpha Bank cooperated with the Doctors of the World to help vulnerable elderly citizens, whose everyday life has become harder due to the Covid-19 pandemic.

In specific, the Bank supported the emergency intervention program for vulnerable persons aged over 60 with chronic diseases, who are living alone, without income and no help from relatives. The Doctors of the World Support Program for the Elderly covers the wider Athens area and includes two actions; home delivery of medicines and providing medical advice and remote psychological support.







### VOLUNTEERISM - BLOOD DONATION

Alpha Bank's Employees also participate in community empowerment programs through voluntary events of blood donation, social solidarity and environmental sensitivity events, which take place in cities where the Bank is present in Greece. Specifically, in 2019, the Personnel participated in 9 voluntary events (eg Olive Gathering, Voluntary Blood Donation, etc.) and the total participation amounted to 674.

Alpha Bank has established a blood bank, through which the Bank's Employees, as Volunteer Blood Donors, assist in the difficult task of finding blood by participating in the Blood Donation Days. In 2019, six Blood Donation Days were held; three in the first half and three in the second half of the year, in Athens (Main Building and Athinon Ave. Building) and in Thessaloniki. A total of 576 blood units (502 in Athens and 74 in Thessaloniki) were collected and are at the disposal of Bank Personnel in case of need.

### OTHER SOCIAL SUPPORT ACTIONS

As part of the Bank's broader social contribution, a series of actions and activities were organized and held, including:

- Financial support and scholarships to national Universities (National and Kapodistrian University of Athens, National Technical University of Athens, University of Economics and Business, etc.).
- Support of the Scholarship Program of the American Farm School, which allows students to attend its training programs.
- Donation of books, infrastructure items, supervisory and logistics material to schools, institutions and organizations across the country. In specific, in 2019, the Bank donated **4,010** items of electronic and fixed equipment (terminals, photocopiers, desks etc.).
- Social contribution events in Athens and Thessaloniki, in order to collect school supplies to support children living in foundations. Volunteering Employees and important Greek athletes participated in the events.
- Informative visits of pupils to Branches, as well as students to the Head Office Building of the Bank. In 2019, 300 pupils and students visited the Bank.
- Support of initiatives in the sector of technology, such as the "CSI Institute" and "SaferInternet" which promote the prevention and management of security issues on the internet and enhance its safe use.
- Support of the "Safe Water Sports" initiative, mainly aimed at enhancing safety in water and sea sports.
- Support of Sports and Greek athletes. In specific, Alpha Bank is a proud sponsor of the Olympic gold medallist **Anna Korakakis** and proudly supports Paralympic athlete **Grigorios Polychronidis**.

### 8.3 SUPPORT OF CULTURE

Alpha Bank actively participates in Greece's cultural life, not only through the financial support of such events but also through its own Programs and Collections.

Latest news on the cultural activities of the Bank are presented on the website [www.alphapolitismos.gr](http://www.alphapolitismos.gr), which in 2019 had 8,077 visitors.

Furthermore, since January 2011, the "ALPHA BANK-CULTURE Store" operates in the Alpha Bank Main Building at 40 Stadiou Street, where visitors may obtain information about the Bank's cultural activities. In 2019, more than 880 persons visited the store.

#### Main Culture Support Programs

Program	"The defacements that hurt"	"Together with the children at the Museum and the Theater"
Target	The restoration and preservation of sculptures found at landmark locations in central cities of Greece.	The organization of theater performances, guided tours in museums and other culture events, exclusively for children living in foundations.
Cooperating bodies	-	-
Start	2013	2015
Up to 2019	<b>35 monument and sculpture restorations in Athens, Thessaloniki and Nafplio.</b>	More than <b>33 actions</b> have taken place, with the participation of children from about <b>20 foundations</b> in Athens, Thessaloniki and Crete.
Actions in 2019	Cleaning of the building of the <b>Numismatic Museum</b> in Athens and of sculptures in public spaces in <b>Nafplio</b> as well as improvement works at the " <b>Garden of Sculptures</b> " in Nea Paralia of Thessaloniki.	<b>6 events</b> were held with the participation of more than <b>365 children</b> from 14 foundations in Athens, Thessaloniki and Crete. For example: • Cinema Workshop " <b>The smart viewer</b> " - Athens Conservatory • Christmas event - American Farm School of Thessaloniki • " <b>HD-The Heroes of Digea</b> " - Heraklion, Crete
Relevant Sustainable Development Goal		
Continued in 2020	Yes	Yes

### NUMISMATIC COLLECTION

Alpha Bank's Numismatic Collection, with approximately **11,000 ancient Greek coins**, is noted as one of the most important collections in the world. The collection features extremely rare exhibits, unique samples of ancient coinage.

#### Main actions in 2019

- **58 students** from Thirasia and Kassos attended the educational program "**Nomos-Nomizo-Nomisma**", aimed at helping them learn about the history of coins, which originated in ancient Greece, and become acquainted with their iconography, diffusion and use as a medium of exchange. Since the launch of the Program in 2017, a total of **13,136 pupils** from 271 nursery, primary, high, music and special education schools across Greece have participated.
- The specially adapted Educational Program "**Nomos-Nomizo-Nomisma**" for the visually impaired was presented at the Lighthouse for the Blind of Greece. Following requests from the educational community, the Program was adapted for pupils of Special Education Schools, where visually impaired children are also enrolled.
- **223 high and senior high school students** in Attica and Aegina attended the educational program "**The fascinating history of coinage**".
- **32,000 visitors** attended the periodic expedition "**CRETAN CITIES. THE TESTIMONY OF COINS**" held at the Museum of ancient Eleuetherna, from June 30 through December 15, 2019.
- Ancient coinage **seminars** were held for students of Greek and foreign Universities and for students of foreign archaeology schools in Greece.
- The Bank's Numismatic Collection participated, by lending coins to selected exhibitions, such as the exhibition "**Picasso and Antiquity. Line and clay**" at the Cycladic Art Museum and the exhibition "**From the South to the North. Colonies of the Cyclades in the Northern Aegean**" at the Archaeological Museum of Thessaloniki.

### BANKNOTE MUSEUM OF THE IONIAN BANK - CORFU

The Banknote Museum of the Ionian Bank is situated at the historic building that housed the first Branch of the Ionian Bank in Corfu, in 1840. The Museum Collection includes banknotes that circulated throughout the history of the modern Greek State. In 2019, **8,042** persons visited the Museum, of which 4,954 were Greek and 3,088 foreign visitors.

#### Main actions in 2019

- 326 students with 32 teachers from five Primary Schools, as well as members of the Scouts of Greece and the Greek Guiding Association participated in the educational program "Architectural Monuments of Antiquity in Greek Banknotes", designed to get children acquainted with the most important architectural monuments of Ancient Greece, the main architectural rhythms of antiquity and the historical buildings of Corfu.
- 342 students participated in the two educational programs "Banknotes - The Greek Banknote" and "When Coins met Banknotes", designed to get children acquainted with the transaction medium.
- Participation in the 21st Annual Meeting of Museums of Contemporary Culture, held by the Directorate of Modern Cultural and Intangible Cultural Heritage, in collaboration with the Hellenic National Committee of ICOM (International Council of Museums).

### ALPHA BANK ART COLLECTION

The Alpha Bank Art Collection numbers **5,500 works, primarily of contemporary Greek art**, and is one of the most important art collections created by banks and financial institutions in Greece.

#### Main actions in 2019

- Presentation of the exhibition **“The Alpha Bank Collection. Greek Art from 1960 until today”** at the Municipal Gallery of Ioannina.
- of the exhibition **“Weavings. Painting and tapestry in Greece from 1960 to the present”** in collaboration with the Benaki Museum.
- **11** works on loan to Greek Museums and Institutions.
- Organisation of a cycle of seven monthly seminars for postgraduate students, in collaboration with the History of Art Department of the Athens University, entitled **“Visual arts in 21st century Greece”**.
- Preparation of the exhibition **“1821. Before and After”** in collaboration with the Benaki Museum, the Bank of Greece and National Bank.
- Organisation of a cycle of four monthly Greek art history seminars for the Bank Personnel, in collaboration with the Human Resources Division.
- Support of the Library and Archive of the National Gallery with donations, paying for the costs of old book preservation and for purchases of foreign exhibition catalogues.
- Participation in the **“Platforms Project”** at the Athens School of Fine Arts.
- Participation in the meeting of the task groups of the International Association of Corporate Collections of Contemporary Art, held in November in Athens.

### ALPHA BANK CULTURAL CENTER-NAFPLIO

The Alpha Bank Cultural Center in Nafplio is located in the neoclassical building where the Bank's Koletti Branch also operates, in the Old City of Nafplio.

#### MAIN ACTIONS IN 2019

- Hosting of the exhibition **“Theophilos the painter”**, for primary and secondary education pupils, in collaboration with the Peloponnesian Folklore Foundation. During the exhibition period an interactive story-telling event was also held.
- Participation of the Alpha Bank Cultural Center - Nafplio in the **“Museum Night”** on 18 May.
- Offer of the Alpha Bank Culture Center - Nafplio halls to the international post-graduate program

“Olympia Summer Academy” of the European International Studies Association, for hosting political science and international studies seminars, with the participation of two executives from the Economic Research Division.

### HISTORICAL ARCHIVES

The Alpha Bank Historical Archives were established in 1999 with a view to preserving the corporate identity and recording the history of the businesses that make up the Alpha Bank Group. Its remit is to gather, catalogue and keep safe the archive collections, seek out new material to enrich them and preserve the most important records of the daily operations of the Bank and the Group Companies. The Archives currently exceed **2,000** meters of processed files, while their digitalized material is almost **500,000** pages.

#### Main actions in 2019

- Organization of the 12th scientific history meeting of the Alpha Bank Historical Archives at the Alpha Bank Cultural Center - Nafplio, on **“Politics and the State in Greece during the 20th and 21st centuries”**, in collaboration with the Marketing and Public Relations Division. In total, more than **30** scientific presentations were made, with the participation of **40** renowned scientists.
- Organization of the **15th cycle of the “Open Seminar of Economic History”** in collaboration with the École française d'Athènes (French School at Athens) at the Conference Hall of the Athens University Historical Archive.
- Production of a short film entitled **“140 years of history”** on the occasion of the 140 years anniversary of the Bank's establishment. The film, using rare material from the Historical Archives Collection, presents the milestones in the history of the Bank, from 1879 to date. Special film screenings for the Bank's Personnel were held in Athens and Thessaloniki.
- Organization of an internal course for the Bank's Personnel entitled **“Four Moments in the History of the Greek State”**.
- Contribution in creating the Exhibition and the namesake Publication titled **“e-Payments: A roadmap”**, held by the Center for Culture, Research and Documentation of the Bank of Greece. The rare archive records and collectibles on loan by the Historical Archives included the **first ever cash withdrawal and deposit cards in Greece and the first manual credit card imprinter**.

## LIBRARY

The Alpha Bank Library counts more than **32,000 book titles** and has **1,155 active Members**.

It serves the needs of the Bank's Units, manages their subscriptions to the daily and periodical Press, magazines and journals while it also offers lending services to the Group's Personnel.

### Main actions in 2019

- Throughout the year, more than **1,500 books** and more than **70** sectoral studies were taken out on loan, while **553** new books and **78** new Members were added.
- 35 researchers visited the Library.
- The Library donated **1,070** copies of Bank Publications and **230** copies of third-party publications to public and academic libraries, cultural foundations and organizations as well as to Units of the Bank in order to cover business needs.
- Organization of the educational program entitled **"Knowing the Library"** for Primary and High School children, which was attended by pupils from the 14th Evening Vocational Senior High School of Thessaloniki, the 12th High School of Thessaloniki, the Primary School of I.M. Panagiotopoulos etc.
- Organization of the exhibition **"Rare Books. The Alpha Bank Collection"** at the Exhibition Area of the Alpha Bank Main Building with works by classical authors.

## MAIN CULTURE SPONSORSHIPS

For many years, Alpha Bank has actively participated in the country's cultural life and is a keen supporter of the arts. In 2019, the Bank undertook several sponsorships, including:

- Ballet performance of Johann Strauss the Younger's opera **"The Bat"** at the Thessaloniki Concert Hall.
- Performance of Giuseppe Verdi's opera **"Simon Boccanegra"** at the Greek National Opera.
- Performance of Dmitri Shostakovich's opera **"Lady Macbeth of Mtsensk"** at the Greek National Opera.
- Accessibility Sponsor of the Thessaloniki Film Festival
- **MOYSA** – Megaro Youth Symphony Orchestra





**ANNEX**

## 9.1 ACHIEVEMENT OF OBJECTIVES IN 2019

2019 Corporate Responsibility Objectives	Performance - Relevant Section
<b>ALPHA BANK AND CORPORATE RESPONSIBILITY</b>	
Strengthening the involvement of members of the Senior Management in Corporate Responsibility issues	Accomplished (Alpha Bank and Corporate Responsibility)
Identifying and assessing material issues (materiality analysis) for Alpha Bank's responsible operation	Accomplished (Identification of Material Issues)
Enriching the Corporate Responsibility web pages on the Bank's website in order to provide its Stakeholders with more comprehensive information	Accomplished (Alpha Bank and Corporate Responsibility)
Enhancing the content and improving information recording for the 2019 Corporate Responsibility Report	Accomplished (Corporate Responsibility Report Methodology)
<b>THE BANK</b>	
Carrying out controls to confirm the proper implementation of the "Group Environmental and Social Responsibility Risk Management Policy on Legal Entities Lending" by Bank Units	Accomplished (Risk Management)
Launch of works for developing an Occupational Health and Safety Management System, conforming with the ISO 45001:2018 standar	Accomplished (Alpha Bank Group System Management)
<b>RESPONSIBLE BANKING</b>	
Further promoting Socially Responsible Investments (SRIs) through informative events	Accomplished (Responsible Investments and Financing)
Creating a banking product in collaboration with a charity, which can be issued using the bleep application	Accomplished (Social Contribution)
Extension of the special layout (digital corner) in the Alpha Bank Network Branches, where Customers can use digital e-Banking services	Accomplished (Access to Financial Services)
Enhancing the promotion and support of the Social Contribution Program "Bonus in Love" and enriching the Program with even more charities and NGOs	Accomplished (Social Contribution)



2019 Corporate Responsibility Objectives	Performance - Relevant Section
<b>EMPLOYEES</b>	
Further recording and enhancing actions in relation to Occupational Health and Safety	Accomplished (Occupational Health and Safety)
Supporting programs and actions for Employees and their children, enhancing their further personal development as well as team spirit	Accomplished (Employee Communication and Benefits)
Increasing the visits of Human Resources Division Executives to all Bank Units and Branches, aimed at meeting with Employees to further comprehend their operational and personal needs	Suspended
Increasing Employee participation in the Employee Satisfaction Survey	Not achieved
To steadily seek the modernization of operations and the upgrading of provided services by further utilizing the relevant know-how, technology and systems	Accomplished (Employee Communication and Benefits)
To have participation of Employees outside Attica in the Development Centers	Accomplished (Attracting, Developing and Retaining Employees)
To develop actions allowing faster identification of persons with exceptional skills (talent pool)	Accomplished (Attracting, Developing and Retaining Employees)
To apply the “360 degrees” Performance Assessment Program to Senior Executives of the Bank	Accomplished (Attracting, Developing and Retaining Employees)
To have more Personnel participate in the coaching programs	Not achieved
To enhance the Bank’s presence in employment organization events	Accomplished (Attracting, Developing and Retaining Employees)
To develop and apply a standard for the more rational staffing of the Branch Network	In progress (Access to Financial Services)
To enhance the Bank’s presence in social media and to further cultivate its reputation as an “employer of choice”	Accomplished (Attracting, Developing and Retaining Employees)

2019 Corporate Responsibility Objectives	Performance - Relevant Section
<b>ENVIRONMENT</b>	
To obtain an Environmental Management System Certification in accordance with the ISO 14001 standard by an external body	Accomplished (Environment)
To improve the calculation method of environmental performance indicators/data	Not achieved
To further reduce the environmental footprint of the Bank following a series of appropriate actions and activities, the priority being to reduce electricity consumption by 2%	Accomplished (Energy Consumption and Management of Climate Change)
To improve the monitoring of energy consumption of the Bank Branches and Buildings	Accomplished (Energy Consumption and Management of Climate Change)
To reduce paper use and monitor said use with the relevant quantitative indexes	Accomplished (Management of other environmental impacts from Alpha Bank's operation)
To increase the recycling percentage for tones and ink cartridges (2018: 22%)	Accomplished (Management of other environmental impact from Alpha Bank's operation)
<b>SOCIETY</b>	
To design a Corporate Responsibility strategy for the Bank's response to natural disasterse	Not achieved
To create collaborations to implement actions supporting culture, health and society	Accomplished (Support for Social Needs)
To further extend the initiatives and programs supporting learning and education	Accomplished (Support of Culture)

## 9.2 TABLES CORRELATING CONTENTS WITH NON-FINANCIAL REPORTING STANDARDS

### **GRI Standards**

In the preparation of the present Report, the Reporting Standards for sustainability report publications of the GRI (GRI Standards), were taken into account. The Corporate Responsibility Report 2019 has been prepared "in accordance" with the "Core" option of the GRI Standards. In addition to references to the present Report, the table below also contains references to Alpha Bank's Annual Financial Report

[n: See 2019 Annual Financial Report](#)

ΚΩΔΙΚΟΣ GRI	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
<b>GRI 101 FOUNDATION 2016</b>		
<b>GRI 102 GENERAL DISCLOSURES 2016</b>		
<b>ORGANIZATION PROFILE</b>		
<b>102-1</b>	Name of the Organization	Alpha Bank S.A.
<b>102-2</b>	Activities, primary products and/or services	Access to Financial Services η π.: 104, 227-229, 365, 460-461
<b>102-3</b>	Organization Seat	40 Stadiou Str., 102 52 ATHENS
<b>102-4</b>	Number of countries where Organization operates	Alpha Bank and Corporate Responsibility <a href="https://www.alpha.gr/el/omilos/alpha-bank/etairies-omilou/trapezikes-ergasies">https://www.alpha.gr/el/omilos/alpha-bank/etairies-omilou/trapezikes-ergasies</a> η π.: 211-215, 227-229, 460-461
<b>102-5</b>	Ownership and legal form	Societe Anonyme. The Bank is a polymetic Organization
<b>102-6</b>	Markets served	Access to Financial Services <a href="https://www.alpha.gr/el/omilos/alpha-bank/-diktuo-katastimaton">https://www.alpha.gr/el/omilos/alpha-bank/-diktuo-katastimaton</a> η π.: 227-229
<b>102-7</b>	Scale of the reporting Organization	Financial Performance Access to Financial Services Attracting, Developing and Retaining Employees <a href="https://www.alpha.gr/el/omilos/enimerosi-ependuton/plirofories-gia-tin-metoxi/metoxiki-sunthesi">https://www.alpha.gr/el/omilos/enimerosi-ependuton/plirofories-gia-tin-metoxi/metoxiki-sunthesi</a> <a href="https://www.alpha.gr/el/omilos/alpha-bank/sxetika-me-tin-trapeza">https://www.alpha.gr/el/omilos/alpha-bank/sxetika-me-tin-trapeza</a> <a href="https://www.alpha.gr/el/omilos/enimerosi-ependuton">https://www.alpha.gr/el/omilos/enimerosi-ependuton</a> η π.: 87-92, 351-355
<b>102-8</b>	Information on Human Resources	Attracting, Developing and Retaining Employees
<b>102-9</b>	Supply Chain of the Organization	Responsible Supplies and Outsourcing

ΚΩΔΙΚΟΣ GRI	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
102-10	Significant changes during the reporting period regarding the Organization's size, structure or ownership	Financial Performance Access to Financial Services π.π.: 200, 453 <a href="https://www.alpha.gr/el/omilos/enimerosi-ependuton/plirofories-gia-tin-metoxi/metoxiki-synthesi">https://www.alpha.gr/el/omilos/enimerosi-ependuton/plirofories-gia-tin-metoxi/metoxiki-synthesi</a>
102-11	Report whether and how the precautionary approach or principle is addressed by the Organization	Alpha Bank and Corporate Responsibility Corporate Governance Business Conduct and Compliance Risk Management Responsible Investments and Financing Environment
102-12	Report externally developed economic, environmental and social charters, principles or other initiatives to which the Organization subscribes or which it endorses	Collaboration and establishment of relationships to achieve the Group's strategy Responsible Investments and Financing <a href="https://www.alpha.gr/el/omilos/etairiki-upeuthunotita/politiki-etairikis-upeuthunotitas">https://www.alpha.gr/el/omilos/etairiki-upeuthunotita/politiki-etairikis-upeuthunotitas</a>
102-13	Associations (e.g. industry associations) and national or international advocacy organizations in which the Organization is a member	Collaboration and establishment of relationships to achieve the Group's strategy Contribution to the Achievement of the United Nations Sustainable Development Goals Responsible Investments and Financing <a href="https://www.alpha.gr/en/group/corporate-responsibility/corporate-responsibility-policy">https://www.alpha.gr/en/group/corporate-responsibility/corporate-responsibility-policy</a>
<b>STRATEGY AND ANALYSIS</b>		
102-14	Statement from the most Senior Decision Maker of the Organization	Letter from the CEO Business Review: <b>Letter from the Chairman</b>
<b>ETHICS AND INTEGRITY</b>		
102-16	Values, principles, standards and norms of behaviour of the Organization, such as codes of conduct and codes of ethics	Corporate Governance Business Conduct and Compliance Human Rights and Fair Labour Practices
<b>GOVERNANCE</b>		
102-18	Governance structure of the Organization	Responsible Business Model Corporate Governance
<b>STAKEHOLDER ENGAGEMENT</b>		
102-40	List of Stakeholder groups engaged by the Organization	Stakeholders

GRI CODE	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
120-41	Total Human Resources covered by Collective Bargaining Agreements	Human Rights and Fair Labour Practices
102-42	Basis for identification and selection of Stakeholders	Stakeholders
102-43	Stakeholder engagement	Identification of Material Issues Stakeholders
102-44	Key topics and concerns that have been raised through Stakeholder engagement	Stakeholders
<b>REPORTING PRACTICES</b>		
102-45	Organizations included in the consolidated financial statements	Corporate Responsibility Report Methodology p p.: 31-33, 211-215
102-46	Process for defining the Report's content and the Boundaries of the Aspects	Corporate Responsibility Report Methodology Tables Correlating Contents with Non-Financial Reporting Standards
102-47	Material Issues	Identification of Material Issues
102-48	Effect of any restatements of information provided in previous Reports, and reasons for such restatements	In footnotes in the tables and in explanations within the text (where such exist) Corporate Responsibility Report Methodology
102-49	Significant changes from previous reporting periods	In footnotes in the tables and in explanations within the text (where such exist) Corporate Responsibility Report Methodology
102-50	Reporting Period	FY 2019 (1.1.2019-31.12.2019)
102-51	Date of most recent previous Report	<b>28.6.2019</b> (for the period 1.1.2018-31.12.2018)

GRI CODE	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
102-52	Reporting Cycle	Annual
102-53	Contact point for questions regarding the Report or its contents	Corporate Responsibility Report Methodology
102-54	"In accordance" option the Organization has chosen	Corporate Responsibility Report Methodology
102-55	GRI Content Index	Tables Correlating Contents with Non-Financial Reporting Standards
102-56	Organization's policy and current practice with regards to seeking external assurance for the Report	Corporate Responsibility Report Methodology Independent Limited Assurance Report to Alpha Bank S.A.
<b>MATERIAL ISSUES</b>		
<b>FINANCIAL PERFORMANCE</b>		
103-1	Explanation of the material issue and its scope	The issue has an impact on the operation of the Bank and the wider market in which it operates, while it may primarily affect its Customers, Shareholders and Suppliers. Financial Performance 2019 Performance and 2020 Corporate Responsibility Targets Business Conduct and Compliance- Basic Codes, Policies and Compliance Regulations applied by Alpha Bank <b>Business Review:</b> Letter from the Chairman - Letter from the CEO - Main Corporate Events in 2019
103-2	Reference to the Management's approach	
103-3	Evaluation of the Management's approach	
201-1	Direct economic value generated and distributed	Financial Performance <b>Business Review:</b> Key Indicators - Operating Segment and Geographical Sector Analysis - Capital Adequacy

GRI CODE	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
<b>EMPLOYMENT - ATTRACTING, DEVELOPING AND RETAINING EMPLOYEES</b>		
103-1	Explanation of the material issue and its scope	The issue has an impact on the operation of the Bank and mainly affects its Employees. Attracting, Developing and Retaining Employees 2019 Performance and 2020 Corporate Responsibility Targets Business Conduct and Compliance- Basic Codes, Policies and Compliance Regulations applied by Alpha Bank
103-2	Reference to the Management's approach	
103-3	Evaluation of the Management's approach	
401-1	Total number and rates of new Employee hires and Employee turnover by age group, gender and region	Attracting, Developing and Retaining Employees
404-1	Average hours of training per year, per Employee, by gender and Employee category	Attracting, Developing and Retaining Employees
<b>LOCAL COMMUNITIES - INNOVATION AND DIGITAL TRANSFORMATION</b>		
103-1	Explanation of the material issue and its scope	The issue has an impact on the operation of the Bank and the market in which it operates, while it may primarily affect its Customers and Shareholders.  Innovation and digital transformation 2019 Performance and 2020 Corporate Responsibility Targets  Business Conduct and Compliance- Basic Codes, Policies and Compliance Regulations applied by Alpha Bank
103-2	Reference to the Management's approach	
103-2	Evaluation of the Management's approach	
<b>There is no GRI Index</b>	Alpha Bank index: Percentage of monetary transactions made through all Digital Networks throughout the year (%)	Innovation and digital transformation  Index calculated by the Number of transactions carried out via Digital Networks divided by Total number of transactions



GRI CODE	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
<b>CUSTOMER PRIVACY - DATA PROTECTION</b>		
103-1	Explanation of the material issue and its scope	and the wider market, while it mainly affects its Customers. Data Protection 2019 Performance and 2020 Corporate Responsibility Targets Business Conduct and Compliance- Basic Codes, Policies and Compliance Regulations applied by Alpha Bank
103-2	Reference to the Management's approach	
103-3	Evaluation of the Management's approach	
418-1	Total number of substantiated complaints regarding breaches of Customer privacy and losses of Customers' personal data	Data Protection
<b>SOCIO-ECONOMIC COMPLIANCE - BUSINESS CONDUCT AND COMPLIANCE</b>		
103-1	Explanation of the material issue and its scope	The issue has an impact on the operation of the Bank and the wider business community in which it operates, while it may primarily affect its Customers and Shareholders.
103-2	Reference to the Management's approach	
103-3	Evaluation of the Management's approach	Business Conduct and Compliance- Basic Codes, Policies and Compliance Regulations applied by Alpha Bank 2019 Performance and 2020 Corporate Responsibility Targets
419-1	Non-compliance with laws and regulations in social and economic issues	Business Conduct and Compliance
<b>RISK MANAGEMENT</b>		
103-1	Explanation of the material issue and its scope	The issue has an impact on the operation of the Bank and the wider market in which it operates, while it may primarily affect its Customers and Shareholders. Risk Management 2019 Performance and 2020 Corporate Responsibility Targets Business Conduct and Compliance- Basic Codes, Policies and Compliance Regulations applied by Alpha Bank
103-2	Reference to the Management's approach	
103-3	Evaluation of the Management's approach	

GRI CODE	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
<b>CUSTOMER SERVICE AND SATISFACTION</b>		
103-1	Explanation of the material issue and its scope	The issue has an impact on the operation of the Bank and the wider market in which it operates, while it may primarily affect its Customers and Shareholders. Customer Service and Satisfaction 2019 Performance and 2020 Corporate Responsibility Targets Business Conduct and Compliance- Basic Codes, Policies and Compliance Regulations applied by Alpha Bank
103-2	Reference to the Management's approach	
103-3	Evaluation of the Management's approach	
<b>There is no GRI Index</b>	Alpha Bank index: Alpha Bank Customer Satisfaction Index (TRI*M Index)	Customer Service and Satisfaction (Customer Satisfaction Surveys)
<b>NON-MATERIAL ISSUES</b>		
<b>ENERGY - ENERGY CONSUMPTION AND MANAGEMENT OF CLIMATE CHANGE</b>		
302-1	Energy Consumption within the Organization	Energy Consumption and Management of Climate Change
<b>EMISSIONS - ENERGY CONSUMPTION AND MANAGEMENT OF CLIMATE CHANGE</b>		
305-1	Direct GHG emissions (Scope 1)	Energy Consumption and Management of Climate Change
305-2	Indirect GHG emissions (Scope 2)	Energy Consumption and Management of Climate Change

### Athens Stock Exchange ESG Reporting Guide

The following table presents the content corresponding to the indicators of the Athens Stock Exchange ESG Reporting Guide

#### ATHEX NON-FINANCIAL ESG METRICS

ATHEX INDICATOR	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
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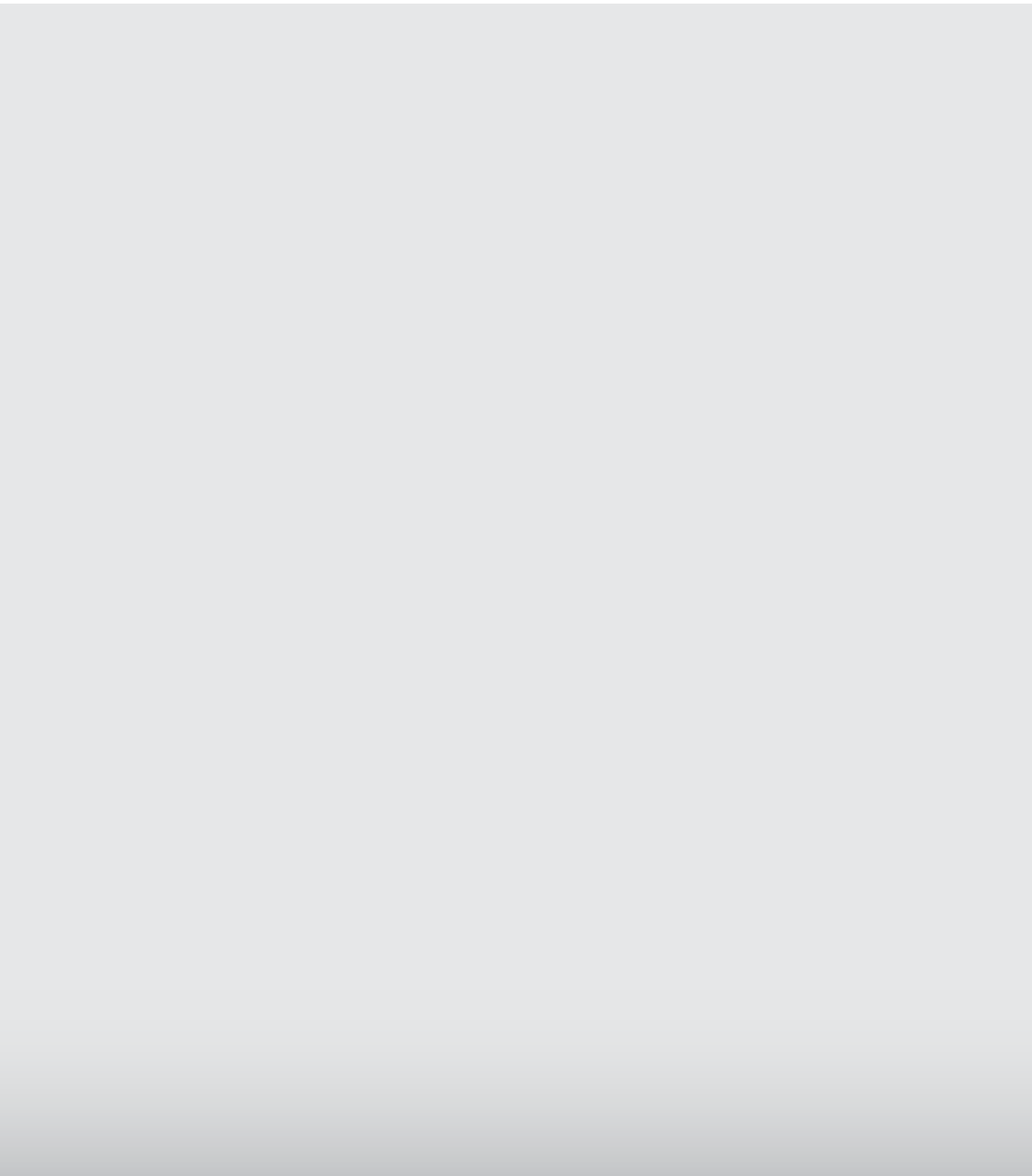
#### ENVIRONMENT

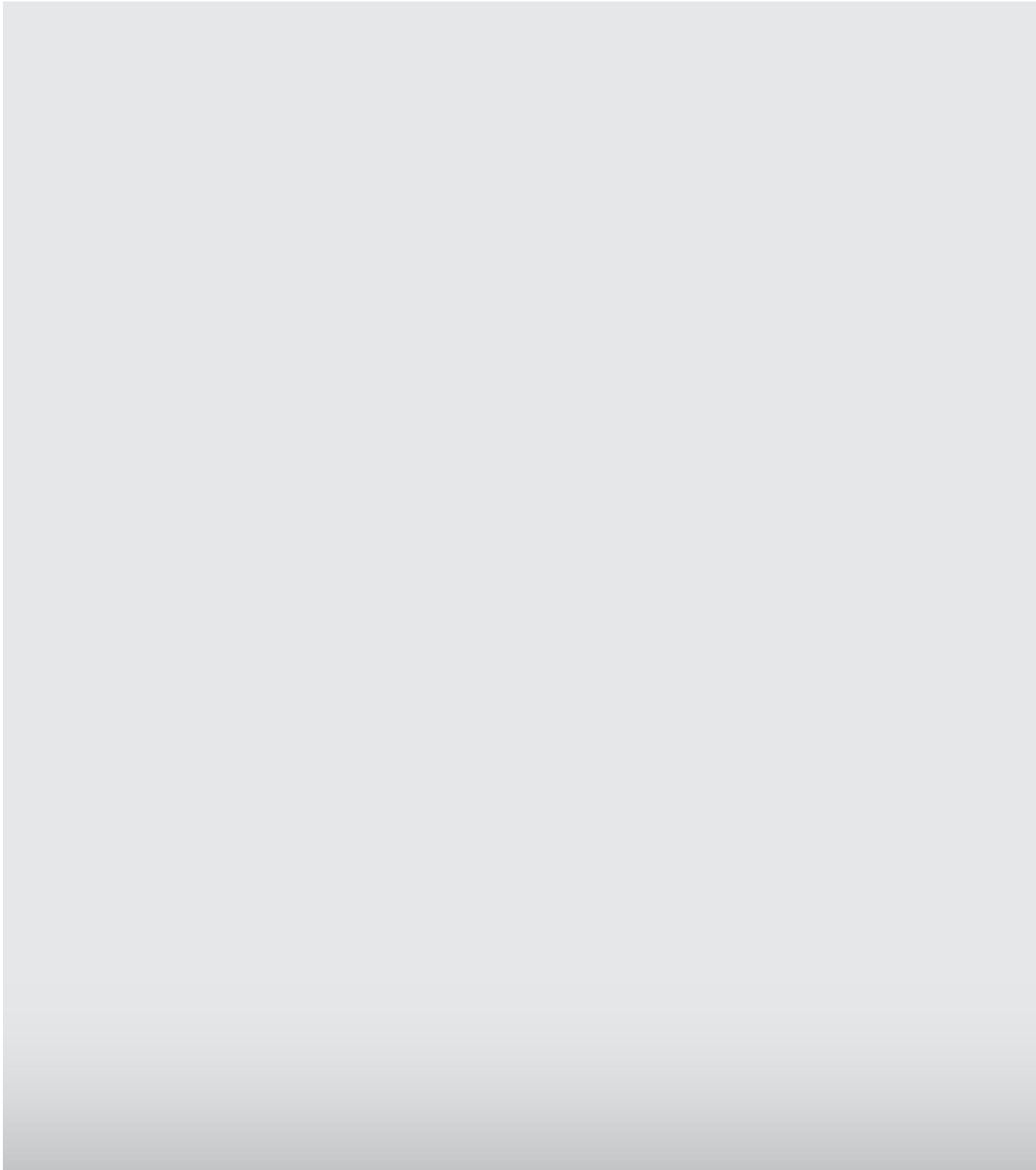
<b>C-E1</b>	Direct emissions (Scope 1)	Energy Consumption and Management of Climate Change
<b>C-E2</b>	Indirect emissions (Scope 2)	Energy Consumption and Management of Climate Change
<b>C-E3</b>	Energy consumption within the organization	Energy Consumption and Management of Climate Change
<b>A-E1</b>	Other indirect emissions (Scope 3)	Energy Consumption and Management of Climate Change
<b>A-E2</b>	Risks and opportunities from climate change	Risk Management Energy Consumption and Management of Climate Change

#### SOCIETY

<b>C-S1</b>	Women employees	Attracting, Developing and Retaining Employees
<b>C-S2</b>	Women in managerial positions	Attracting, Developing and Retaining Employees
<b>C-S3</b>	Staff turnover rates	Attracting, Developing and Retaining Employees
<b>C-S4</b>	Employee training	Attracting, Developing and Retaining Employees
<b>C-S5</b>	Human rights policy	Human Rights and Fair Labour Practices
<b>C-S6</b>	Collective Labour Agreements	Human Rights and Fair Labour Practices
<b>C-S7</b>	Evaluation of suppliers	Responsible Supplies and Outsourcing
<b>A-S1</b>	Stakeholder participation	Stakeholders
<b>A-S2</b>	Employee training expenses	Attracting, Developing and Retaining Employees

ATHEX INDICATOR	DESCRIPTION	LOCATION OF THE RELEVANT INFORMATION, ADDITIONAL COMMENTS
<b>SOCIETY</b>		
<b>A-S3</b>	Gender pay gap	Human Rights and Fair Labour Practices
<b>A-S5</b>	Sustainable product revenue	Responsible Investments and Financing
<b>A-S7</b>	Marketing practices	Responsible Information
<b>SS-S10</b>	Integration of ESG factors in business activities	Responsible Investments and Financing
<b>CORPORATE GOVERNANCE</b>		
<b>C-G1</b>	Sustainable development supervision	Alpha Bank and Corporate Responsibility
<b>C-G2</b>	Business conduct policy	Business Conduct and Compliance
<b>C-G3</b>	Data safety policy	Data Protection
<b>A-G1</b>	Business model	Responsible Business Model
<b>A-G2</b>	Material issues	Identification of Material Issues
<b>A-G3</b>	ESG objectives	2019 Performance and 2020 Corporate Responsibility Targets Achievement of Objectives in 2019
<b>A-G5</b>	External assurance	Independent Limited Assurance Report to Alpha Bank S.A.
<b>SS-G1</b>	Business Conduct Breach	Business Conduct and Compliance
<b>SS-G2</b>	Malfunction reporting policy	Business Conduct and Compliance





## **INDEPENDENT ASSURANCE STATEMENT BY DELOITTE CERTIFIED PUBLIC ACCOUNTANTS S.A. TO THE MANAGEMENT OF ALPHA BANK S.A.**

The Corporate Responsibility Report 2019 (“CSR Report”) of Alpha Bank S.A. (“the Bank” or “Alpha Bank”) has been prepared by the Bank’s Management based on GRI Sustainability Reporting Standards (GRI Standards), which is responsible for the collection and presentation of the information contained therein. Our responsibility is limited in carrying out a limited assurance engagement on specific scope of the CSR Report.

### **Scope of Work**

1. The provision of limited assurance on the accuracy and completeness of quantitative data and the reasonability of statements related to the GRI General Disclosures that are required as a minimum prerequisite for the “In accordance core” option, according to the GRI 102 Standard.
2. The provision of limited assurance on the accuracy and completeness of quantitative data and the reasonability of statements that correspond to the following seven (7) most material topics, as resulted from the Bank’s materiality analysis, against the requirements of the respective GRI Standards for the Specific Disclosures and the requirements of GRI 103 Standard “Management Approach” (“MA”):
  - Financial Performance – Direct economic value generated and distributed (MA and GRI 201-1)
  - Employment – Attracting, developing and retaining employees – Total number and rate of new employee hires and employee turnover by age group, gender and region & Average hours of training per year, per employee, by gender and employee category (MA and GRI 401-1 and GRI 404-1)
  - Local communities – Innovation and digital transformation – Percentage of monetary transactions made through all Digital Networks throughout the year (MA and relevant Alpha Bank index)
  - Customer privacy – Data protection – Total number of substantiated complaints regarding breaches of customer privacy and losses of customers’ personal data (MA and GRI 418-1)
  - Socio-economic compliance – Business Conduct and compliance – Non-compliance with laws and regulations in social and economic area (MA and GRI 419-1)
  - Risk Management (MA – GRI Standard not available)
  - Customer service and satisfaction – Alpha Bank Customer Satisfaction Index (TRI\*M Index) (MA and relevant Alpha Bank index)
3. The provision of limited assurance on the accuracy and completeness of quantitative data and the reasonability of statements that correspond to the following two (2) topics, against the requirements of the respective GRI Standards for the Specific Disclosures:
  - Energy – Energy consumption and management of climate change – Energy Consumption within the Organization (GRI 302-1)
  - Emissions – Energy consumption and management of climate change – Direct GHG emissions (Scope 1) & Energy indirect GHG emissions (Scope 2) (GRI 305-1 and GRI 305-2)
4. The provision of limited assurance on the CSR Report’s “In accordance core” adherence against the GRI Standards’ requirements.

Our work concerned the operations and activities of the Bank (parent company) in Greece and did not include any information included in the CSR Report relating to other entities of Alpha Bank Group. Also, our work was related to assurance on data and information for the period 1 January 2019 – 31 December 2019 and we do not provide assurance over any prior reporting period data or information presented in the CSR Report.

The GRI General and Specific Disclosures, under the scope of our engagement, are indicated in the CSR Report's GRI Content Index, included in section 9.2 of the CSR Report.

We performed assurance services in accordance with the provisions of "International Standard on Assurance Engagements ISAE 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information" ("ISAE 3000"), issued by the International Auditing and Assurance Standards Board (IAASB). Our procedures for collecting evidence were designed in order to obtain a limited level of assurance. The procedures in a limited assurance engagement in accordance with ISAE 3000, vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained, had a reasonable assurance engagement been performed.

#### **Our key assurance procedures**

In order to form our conclusions, we undertook the following procedures:

- Reviewed the Bank's processes for identifying and determining material topics to be included in the CSR Report and the coverage of these material topics within the CSR Report. Also, we performed media review for topics relevant to the Bank regarding issues of corporate responsibility and sustainable development and we compared the results from media review with the material topics identified by the Bank;
- Reviewed the accuracy and completeness of quantitative data related to the results from the materiality analysis conducted by the Bank and the reasonability of statements that pertain to the application of the Materiality Principle;
- Performed interviews with personnel of the Bank responsible for managing, collecting and processing data relating to the GRI General and Specific Disclosures, under the scope of our engagement, in order to obtain an understanding of the processes applied for the preparation of the relevant Disclosures of the CSR Report;
- Performed analytical review procedures on the quantitative data related to the GRI General and Specific Disclosures, under the scope of our engagement, and pertinent inquiries with responsible personnel. In addition, we tested, on a sample basis, the accuracy of the quantitative data against corresponding supporting documentation;
- Performed interviews with the relevant personnel in order to obtain an understanding of the Bank's corporate responsibility and sustainable development policies and activities for the reporting period and the statements related to the GRI General and Specific Disclosures, under the scope of our engagement. We also assessed the reasonability of the statements related to the GRI General and Specific Disclosures, under the scope of our engagement, by obtaining for a sample of statements, corresponding supporting documentation.
- Reviewed the CSR Report for the appropriate presentation of the GRI General and Specific Disclosures, under the scope of our engagement, including discussions with the relevant personnel about limitations and assumptions relating to the way these data are presented.
- Reviewed the GRI Content Index, included in section 9.2 of the CSR Report, as well as the relevant references included therein, against the GRI Standards' requirements for the "In accordance core" option.

#### **Limitations**

- Our assurance services were limited to the Greek version of the CSR Report. In the event of any inconsistency between the English and Greek versions, as far as our conclusions are concerned, the Greek version prevails.
- Where, under the scope of our engagement, financial information was used from the Annual Report 2019 and other published information of the Bank, our work was limited to check the accuracy of the transfer of the relevant information to the CSR Report.
- Our assurance procedures did not include testing the Information Technology systems from which data was extracted and aggregated by the Bank for the CSR Report.



- The scope of our work did not include any procedures on the accuracy of the survey results assigned to third parties, nor Information Technology systems used by third parties, but was instead limited to the proper transposition of the final results to the CSR Report.
- We do not provide any assurance relating to future performance, such as estimates, expectations or targets, or their achievability.

#### **Our independence and quality control**

- Deloitte applies International Standard on Quality Control 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.
- We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. We have confirmed to the Bank that we have maintained our independence and objectivity and, in particular, that there were no events or prohibited services provided which could impair our independence and objectivity

#### **Roles and responsibilities**

##### Bank

The Bank's Management is responsible for the preparation of the CSR Report and for the information and statements contained therein. In addition, the Bank's Management is responsible for establishing and maintaining appropriate performance management and internal control systems used for the production of the reported information.

##### Deloitte

Our responsibility is to independently express our conclusion to the Bank's Management in relation to the assurance services defined in the Scope of Work above, in accordance with our letter of engagement. Our work has been undertaken in order to inform the Bank's Management on the results of the limited assurance engagement and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Bank for our work, for this statement or for the conclusions we have reached.

##### Our conclusions

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the GRI General and Specific Disclosures, under the scope of our engagement, are materially misstated.

In addition, nothing has come to our attention that causes us to believe that the CSR Report does not meet the GRI Standards' requirements of the "In accordance core" option.

Athens, July 3, 2020

#### **Dimitrios Katsibokis**

Reg. No. SOEL: 34671  
Deloitte Certified Public Accountants S.A.  
3a Fragoklissias & Granikou Str.  
151 25 Maroussi  
Reg. No. SOEL: E120



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The image features a dark blue background with several abstract, geometric shapes in a vibrant pink color. In the top left, there is a small right-angled triangle. A larger right-angled triangle is positioned in the middle right section. On the far right edge, a semi-circle is partially visible. In the bottom left, there is another right-angled triangle, and a large right-angled triangle extends from the bottom left towards the center. The overall composition is minimalist and modern.

40 STADIOU STREET, GR-102 52 ATHENS