

**Annual Financial Report  
for the year  
January 1 - December 31, 2024**

**The information contained in this Annual Financial Report has been translated from the original Annual Financial Report that has been prepared in the Greek language. In the event that differences exist between this translation and the original Greek language Annual Financial Report, the Greek language will prevail over this document.**

**TABLE OF CONTENTS**

I. Statement of the members of the Board of Directors ..... 1

II. Board of Directors’ Annual Report..... 3

    Board of Directors’ Annual Report for the period ended 31 December 2024..... 4

    Statement of Corporate Governance ..... 38

    Alternative performance measurement indicators (‘APMs’) at Group level ..... 94

    Board of Directors’ explanatory report of Optima bank S.A. .... 95

    Optima bank’s Group Sustainability statement ..... 98

III. Independent Auditor’s limited assurance Report on Sustainability Statement..... 246

IV. Independent Auditor’s Report..... 252

V. Financial statements for the year ended December 31, 2024 ..... 262

**I. Statement of the members of the Board of Directors**

**Statement by the members of the Board of Directors pursuant to Article 4 par. 2 of Law 3556/2007**

It is hereby certified and stated that, to the best of our knowledge:

- The annual financial statements of the société anonyme "Optima bank S.A." and its Group, for the year ended 31 December 2024, were prepared in accordance with the applicable accounting standards, present in a true and fair manner the assets and liabilities, the net worth and the profit and loss account of Optima Bank SA and the undertakings included in the consolidation taken as a whole.
- The annual report of the Board of Directors for 2024 gives a true and fair view of the development, performance and position of Optima Bank SA, as well as of the companies included in the consolidation taken as a whole, including a description of the main risks and uncertainties they face and was prepared in accordance with the sustainability reporting standards referred to in 154A of Law 4548/2018 and with the specifications approved pursuant to paragraph 4 of article 8 Regulation (EU) 2020/852.

Athens, 20 March 2025

**The Chairman of the Board of  
Directors**

**Georgios I. Taniskidis**

**The Chief Executive Officer**

**Dimitrios A. Kyparissis**

**Executive Member of the  
Board of Directors**

**Angelos N. Sapranidis**



## **II. Board of Directors' Annual Report**

## **Board of Directors' Annual Report for the period ended 31 December 2024**

Dear shareholders,

We hereby submit the annual report of the Board of Directors for the financial year from 1/1/2024 to 31/12/2024. This report briefly describes information of the Optima bank S.A. Group, financial information aimed at providing shareholders with general information on the financial situation and results, the overall course and the changes that occurred during the financial year (1/1/2024 to 31/12/2024), as well as significant events that took place and their impact on the financial statements of the year. It also describes the main risks and uncertainties that the Group and the Bank may face in the future and lists the most important transactions concluded between the Bank and its related parties.

### **International environment | 2024**

Despite the successive crises (wars, extreme weather events and the largest pandemic of the 21st century), the global economy is showing remarkable resilience. The immediate consequences of the crises have been mitigated, with governments and monetary authorities having to take unprecedented measures to address the crises in energy, public health, and supply chains, yet the effects regarding prices, income and public finances remain.

Global GDP is estimated to have slowed marginally in 2024 but to remain at satisfactory levels, while inflation continued to decelerate in the course of 2024, as a result of the restrictive monetary policy and the gradual fight against the effects of the energy crisis. Overall, global GDP is estimated by the IMF (October 2024) to have increased by 3.2% per year in 2024, up from 3.3% in 2023, and is projected to remain at this level also in 2025 (3.2%). Major economies in 2024 experienced heterogeneity in GDP developments, as advanced economies are estimated to have accelerated, while emerging and developing economies have slowed down. According to IMF estimates, growth for 2024 as a whole accelerated slightly in advanced economies to 1.8% from 1.7% in 2023, as the US economy slowed less than initially projected and the UK recovery was stronger than projected<sup>1</sup>. Japan's economy slowed significantly, while Germany's economy is estimated to have recorded zero growth for the year as a whole, acting as a drag on euro area GDP. In emerging and developing economies as a whole, GDP growth is estimated to have slowed to 4.2% in 2024 from 4.4% in 2023, mainly due to lower growth in China and India. Real GDP growth for 2025 is expected, according to the IMF, to remain

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<sup>1</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

stable and to stand at 1.8% for advanced economies in 2025, and at 4.2% for emerging and developing economies<sup>2</sup>.

**Global inflation**, after having been estimated to have declined to 5.8% in 2024, from 6.7% in 2023, is expected to decline further to 4.3% in 2025 according to the IMF (October 2024). According to estimates in emerging and developing economies, inflation remained high at 7.9% in 2024, slightly down from 8.1% in 2023. In advanced economies, where central banks took decisive action, it is estimated to have declined to 2.6% in 2024 and to reach 2.0% in 2025. Inflation fell significantly in 2024, with goods inflation close to zero, while services inflation remains high, with monetary authorities in many economies in the process of lowering key interest rates. For 2025, amid uncertainty mainly about international trade, a further decline in advanced economies' inflation, stronger real incomes and a change in economic policy are expected, with fiscal policy tightening and monetary policy easing<sup>2</sup>.

In the **United States**, GDP increased by 3.0% in the second quarter of 2024 from 1.6% in the first quarter of 2024. This improvement was driven mainly by strong private consumption, due to declining inflation and rising real incomes, and investment. In the third quarter of 2024 growth declined slightly to 2.8%, mainly driven by a decline in private inventories and residential investment. Annual CPI inflation increased to 2.7% in November 2024, after six months of decline leading to 2.4% in September 2024, its lowest level since February 2021. Further disinflation is expected, but at a slow pace. For the whole of 2024, according to the IMF forecast (October 2024), GDP growth for the United States is estimated at 2.8%, supported by growth in real wages, consumption and investment, while in 2025 it is expected to decline to 2.2%, due to a weakening labour market. More generally, in the US, growth is expected to benefit from the commitment to extend the tax breaks decided in 2017, while geopolitical tensions in the Middle East and trade disputes, combined with uncertainty due to possible changes in the new US leadership's international trade policy, appear to have a downward effect<sup>2</sup>.

**In China**, the economic slowdown is expected to continue in 2025, as GDP growth is estimated to slow down to 4.5%, from 4.8% in 2024<sup>3</sup>. The recovery in industrial production and exports does not seem to be able to compensate for the weakness in private consumption, which is weighed down by the correction in the real estate sector.

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<sup>2</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

<sup>3</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

In **Japan**, the agreement in early 2024 to increase wages annually by more than 5% contributed to the temporary rise in wages in June and July 2024, against successive reductions since March 2022. Wage increases have supported private consumption since the second half of 2024, partly offsetting the impact of restrictive fiscal and monetary policies. However, in August and September wages declined again, amid inflationary pressures, while in October they remained stable. According to the IMF (October 2024), growth is estimated to have declined to 0.3% in 2024, from 1.7% in 2023, due to temporary disruptions in the automotive industry and the downturn in tourism, and to strengthen to 1.1% in 2025, reflecting rising wages and consumption<sup>3</sup>.

In the **United Kingdom**, after contracting in the second half of 2023, GDP grew at a decelerating pace in the course of 2024, by 0.7% in the first quarter, 0.5% in the second quarter and 0.1% in the third quarter (quarter on quarter), as a result of the recovery in business investment and consumer spending. The easing of monetary policy is expected to further boost business investment in the coming quarters. Based on the IMF forecast (October 2024), GDP growth will strengthen to 1.1% in 2024 and 1.5% in 2025, from 0.3% in 2023. The factors driving this increase are stronger investment and consumption amid lower inflation and more favourable financial conditions. Annual consumer price index (CPI) inflation remained stable at 3.8% in February and March 2024, having declined markedly from high levels in 2023. Services inflation increased in August and declined in September. In October, it rose slightly, driving inflation to 3.3%. According to the IMF (October 2024), inflation is expected to be 3.1% for 2024 and 2.4% for 2025. The unemployment rate declined to 4.0% in August 2024, but reached 4.3% in September due to an increase in short-term unemployment<sup>3</sup>.

The **Eurozone** economy rebounded in 2024 with resilience, driven mainly by the energy crisis and geopolitical developments. In the first half of 2024, the improvement in foreign demand and international trade led to GDP growing at an accelerated pace in the third quarter (0.4% quarter on quarter)<sup>3</sup>, supported by a recovery in domestic demand. While services supported growth, industry contributed negatively. The labour market remains resilient, but employment growth is declining as there are fewer job vacancies. Employment growth was low in 2024, standing at 0.1% in the second quarter and 0.2% in the third quarter, and is projected by Eurosystem staff (December 2024) to be 0.8% in 2024 and 0.4% in 2025, compared with 1.4% in 2023. The unemployment rate stood at a historical low of 6.4% in 2024 and is expected to be around the same level of

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6.5% in 2025. In the Eurosystem staff baseline scenario (December 2024), GDP is estimated to have increased to 0.9% for 2024, from 0.5% in 2023, mainly on account of improving foreign demand and international trade. It is projected to increase further to 1.1% in 2025, supported by rising real incomes, stronger external demand and weakening monetary policy effects<sup>4</sup>.

Inflation in the euro area continues to decelerate. Following its expected temporary increase in the fourth quarter of 2024, it is estimated to gradually decline to below 2.0% in 2026. According to the Eurosystem staff forecasts (December 2024), inflation will be 2.4% in 2024 and 2.1% in 2025, from 5.4% in 2023. The easing of pressures stemming from labour costs, as well as the unwinding of secondary pressures stemming from the energy crisis and the pandemic, will contribute to this decline in inflation. The disinflation in the euro area is expected to continue, but to be higher than overall inflation<sup>4</sup>.

### **Greek Economy | 2024**

The Greek economy continued to grow at a satisfactory pace in 2024, despite international geopolitical turbulence and natural disasters, outpacing the euro area growth rate. Growth was mainly driven by private consumption, exports of services and investment, while exports of goods contributed negatively. Headline inflation in the course of 2024 de-escalated, but nevertheless remained above the euro area, as persistently high services inflation limited its de-escalation. As regards the labour market, employment continues to show positive rates of change in 2024, unemployment is declining further, but job vacancies are increasing.

The fiscal policy pursued in recent years by the Greek economy and efforts to combat tax evasion seem to pay off, as high primary surpluses are achieved without the need for restrictive measures leading to the reduction of public debt as a percentage of GDP. Risks to public debt sustainability appear to be contained over the medium term, subject to a commitment to fiscal targets and an efficient use of European resources. However, in the longer term, there is increased uncertainty, as the gradual refinancing of debt obligations will increase the exposure of the Greek State to interest rate and market risk, which eliminates the scope for fiscal easing.

The Greek economy should continue with commitment to a fiscal path within the framework of European rules and to further strengthen fiscal sustainability in the long term. At the same time, reforms should be pursued, the extroversion of the economy strengthened and the use of NextGeneration EU (NGEU) resources accelerated, in order to boost the productivity and growth rates of the Greek economy.

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<sup>4</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

More specifically, GDP continued to grow in the nine-month period of 2024 by 2.3% compared to the same period of 2023, with private consumption and to a lesser extent investment contributing positively and increasing domestic demand while government consumption recorded a significant decline. The external sector made a negative contribution to GDP change, although exports of services were positive, as exports of goods declined significantly and imports of goods and services increased at the same time<sup>5</sup>.

Inflation fell in December 2024 to 2.7% from 3.5% in 2023<sup>6</sup>. The main characteristics of inflation for the available period of 2024 are that it started in January from lower levels (3.2%) than the average of the previous year (4.2%), but also compared to December 2023 (3.7%), and that it mainly moved horizontally. All its main components contributed to its de-escalation. However, the marginal decline in the average rate of increase in services prices was essentially an obstacle to a faster disinflation of headline inflation<sup>5</sup>.

Private consumption continued to grow in the nine months of 2024 (1.8% year-on-year) and to be a key component of the pick-up in economic activity, driven by the strengthening of households' real income supported by continued employment growth, nominal wage growth and lower inflation, while government consumption recorded a significant decline<sup>5</sup>. Consumer expenditure continued to increase in the nine months of 2024 as reflected in the annual increase in retail trade volume by 1.7% in September 2024 compared to the corresponding index of September 2023<sup>7</sup>.

In the nine-month period of 2024, investment continued to grow, but at relatively low pace. More specifically, gross fixed capital formation increased by 2.2% in 2024, compared with an increase of 9.3% in the same period of 2023. Investment in "Engineering equipment and weapon systems" contributed positively to this increase (8.1%) while investment in "Other construction", which increased by 5.6% did also have a secondary positive contribution. By contrast, "Housing" investment fell by 4.6%, following a strong increase in 2023, while "Transport equipment" fell by 1.3%. Finally, investment in "Information Communications Technology Equipment" decreased by 1.8% and investment in "Other products" increased by 1.7%.

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<sup>5</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

<sup>6</sup> Source: ELSTAT Consumer Price Index, December 2024

<sup>7</sup> Source: ELSTAT Turnover Index of Retail Trade, November 2024

The decline in the share of gross fixed capital formation in GDP was a consequence of the economic crisis and has not yet been overcome. Before the crisis, this share was higher in Greece than the euro area average and in 2019 it reached its lowest level, 11% of GDP, compared to 21.9% of GDP in the euro area. Since then, the share has continuously increased and stood at 14.4% in the nine-month period of 2024, but well below the euro area average (20.9% of GDP in the nine-month period of 2024) <sup>8</sup>.

As regards the current account balance, its deficit widened in the nine months of 2024 relative to the corresponding period of 2023 as, despite an increase in the period April-September 2024, exports of goods decreased and imports of goods increased. Primarily, the deficit of the balance of goods was widened by a deterioration in the balance of other goods and, to a lesser extent, in the fuel balance. More specifically, the value of exports decreased by 2.7% despite the increase recorded (mainly non-fuel exports of goods) in the period April-September 2024, while the value of imports increased by 1.9%. The decline in both fuel exports and imports reflects to some extent the decline in their international prices. For the year as a whole, the current account balance is expected to deteriorate slightly compared to 2023 as a percentage of GDP (0.3%)<sup>8</sup>.

The labour market has shown strong growth in recent years, resulting in a decline in the unemployment rate to 11.1% in 2023, while further de-escalation continued in 2024 with the unemployment rate reaching 10.3% in the nine months of 2024. It is noteworthy that in the second and third quarters of 2024 the unemployment rate reached a single-digit level for the first time since 2009. The unemployment rate declined for both men and women, but remained significantly higher for women than for men. It was 8.1% for men and 13% for women. At the same time, the unemployment rate for young people aged 20-29 fell to 18.1% and the long-term unemployment rate to 5.5%<sup>8</sup>.

Employment increased by 1.9% in the nine-month period of 2024, compared to the same period of 2023 when it rose by 1.3%. More specifically, self-employed with staff contributed positively with an increase of 3.4%, while salaried personnel, who make up about two-thirds of employees, grew at a milder rate of 1.8%. It should be noted that at sectoral level employment growth in the nine months of 2024 was mainly driven by an increase in the number of persons employed in construction (13.5%), tourism (5.5%) and wholesale and retail trade (2.4%). By contrast, a decrease in employment was observed in public administration/defense and education<sup>9</sup>.

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<sup>8</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

According to data from the ERGANI information system, the balance of salaried employment flows in the nine-month period of 2024 remained at high levels, although it was slightly lower than in the corresponding period of 2023. Figures show 302,744 new jobs created in 2024 compared to 312,112 in 2023. The largest hiring increase occurred in tourism as the industry performed higher than in 2023. Finally, hirings in flexible forms of employment outpaced those in full-time employment, accounting for 53.2% of all hirings (compared to 52.0% in the nine months of 2023) <sup>9</sup>.

In December 2024, the economic sentiment index declined slightly to 106.0 from 106.2 in November 2024, according to the latest IOBE data. This marginal weakening comes from the industrial and retail sectors, while construction, services and consumer confidence improved. Overall for 2024, the average of the index is close to 108 points, a level higher than the corresponding 107.6 in 2023 and at the same time the highest since the economic crisis that started in 2008<sup>10</sup>.

According to forecasts by the Bank of Greece, the growth momentum of the Greek economy will continue in the coming years and growth rates will be about double the euro area average. The growth rate of the Greek economy is expected to be 2.2% in 2024, to accelerate to 2.5% in 2025 and to decline slightly to 2.3% in 2026 and 2.0% in 2027<sup>9</sup>. Consumption will continue to be the main driver of economic activity in the coming years, while investment and exports will continue to make a positive contribution.

### **Greek Economy | developments and outlook 2024**

The growth momentum of the Greek economy in 2024 is expected to continue in the coming years, as the Greek economy will continue to recover from the long-term crisis, according to the Bank of Greece forecasts. The growth rate of the Greek economy is estimated to have stood at 2.2% in 2024, and is expected to accelerate to 2.5% in 2025 and to decline slightly to 2.3% in 2026 and to 2% in 2027. The main driver of growth in the coming years is private consumption, while investment and exports will continue to make a positive contribution. On the other hand, the contribution of the external sector is expected to be marginally negative, as strong investment activity is expected to drive up imports at rates similar to exports<sup>11</sup>.

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<sup>9</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

<sup>10</sup> Source: Economic Conjunctural Survey Results (December 2024), IOBE

<sup>11</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece



Inflation continued to slow in 2024 but stood at a higher level in Greece than in the euro area, as service inflation, which remained at high levels, limited its decline. According to the Harmonised Index of Consumer Prices (HICP), it is estimated to have stood at 3% in 2024, up from 4.2% in 2023, reflecting the large slowdown in food inflation. Inflation in Greece is projected to converge towards the European Central Bank's 2 percent target by 2026, but will remain marginally above it. However, in 2027, due to the integration of the impact of the Emissions Trading System into the energy component of the HICP, a temporary acceleration of the index to 2.5% is expected. Services inflation is expected to be more persistent due to expected increases in wages. Finally, core inflation is expected to decline significantly to 3.5% in 2024 and 3.1% in 2025, driven mainly by the disinflation of non-energy industrial goods <sup>11</sup>.

Private consumption is expected to grow in the coming years on average at a rate close to 2.1%, supported by a strengthening of households' real disposable income, as employment is expected to continue to recover, wages to rise and inflation to gradually decline. However, there are risks surrounding developments in private consumption associated with heightened uncertainty. Sources of uncertainty could be a worsening of the geopolitical crisis in Ukraine and the Middle East and possible disruptions in international value chains, which would have a negative impact on commodity prices and thus on the cost of living for households. At the same time, as a result of the climate crisis, prices may rise, negatively affecting the purchasing power of households<sup>11</sup>.

Domestic investment is projected to continue growing at high rates, averaging 6.5% until 2026. For 2027, however, a significant reduction in the pace of total investment is expected as there will be a large reduction in government investment, as the end of grants from the Resilience and Development Fund (RRF) is expected in 2026. Private investment is projected to grow at a rate of around 7.8%, supported primarily by available European<sup>11</sup> funds. Housing investment is expected to continue to grow at high rates in the coming years, as it is still much lower in size than in the pre-crisis period. It is noteworthy that although high, the investments of the last decade are not enough for Greece to approach the European average in terms of investment as a percentage of GDP at the end of 2027. Efforts must therefore be stepped up to attract more, mainly productive, investment in order to maintain the country's growth potential.

Total exports of goods and services in the coming years are projected to continue growing at an average rate of 3.3%, combined with the enhanced competitiveness of Greek products and the expected increase in foreign demand. However, the external sector's contribution to GDP is estimated to be marginally negative in the coming years, owing to strong investment activity, which will drive import growth rates close to export growth ones. Finally, the composition of imports should be carefully monitored, as excessive import growth in the coming years risks seriously deteriorating the current account balance<sup>12</sup>.

Unemployment is estimated to have stood at 10.6% in 2024 according to the ELSTAT Labour Force Survey, while it will gradually decline to 8.5% by 2027. This reflects the ongoing economic recovery. Regarding labour costs, the Bank of Greece estimates that in the coming years, for the economy as a whole, nominal wages per employee will increase at rates of around 4.5% per year, as a result of the tightening labour market and recent collective bargaining agreements in various branches of the private sector. By contrast, labour productivity for the economy as a whole is expected to grow at a lower rate. These trends will put pressure on business margins and the competitiveness of the Greek economy<sup>12</sup>.

### **The Greek Banking System | 2024**

The Bank of Greece's Monetary Policy Report for 2024 states that the main factors that shaped and positively impacted the prospects of Greek banks are the good performance of the Greek economy and the upgrade of Greece's credit rating to the Investment Category (hereinafter referred to as the "upgrade") in 2023. Credit rating agencies upgraded significant banks to investment grade in 2024, keeping the outlook positive.

In this favourable environment, the Greek banking sector strengthened profitability, liquidity and capital adequacy ratios in the nine months of 2024, while the quality of their loan portfolio improved on an annual basis. In the nine months of 2024, the Greek banking system was characterized by the following: a) an increase in deposits, b) a decrease in lending rates and c) an increase in lending.

Profitability of Greek banks remained high in 2024, but remained almost unchanged from the nine-month period of 2023, on the one hand, due to higher net interest and commission income and, on the other hand, due to an increase in other provisions, mainly due to non-recurring factors, while credit risk provisions declined. The capital ratios of Greek banks improved in the nine months of 2024 compared to the end of 2023, mainly due to an increase in core profitability and the issuance of securities taken into account regarding capital adequacy, while risk-weighted assets remained almost unchanged. In the nine months of 2024, the non-

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<sup>12</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

performing loan ratio of Greek banks declined significantly, mainly due to the securitization of loans under the Hercules government guarantee scheme and the reduction in the share of Stage 2 loans. As regards bank liquidity, Greek banks' liquidity coverage ratios (LCR) and net stable funding ratios (NSFR) increased further year-on-year, remaining above the mandatory regulatory requirement and higher than those of euro area banks. It is noteworthy that Greek banks maintain sufficient liquidity, despite a further reduction in Eurosystem funding (repayment of TLTRO operations). In addition, the loan-to-deposit ratio is significantly lower in Greek banks compared to banks in the eurozone.

More specifically, in the nine months of 2024, the profitability and return on equity of Greek banks remained almost unchanged, on an annual basis, as banks recorded profits after taxes and discontinued operations of €2.98 billion compared to €3.02 billion in the corresponding period of 2023<sup>13</sup>.

As shown in the table below, Greek banks' operating income increased by 10% compared to the same period of the previous year. Net interest income increased by 8.1%, mainly due to higher loan interest income. Interest income increased by 19.4% to €12 billion due to high interest rates (despite the ECB's decreases within 2024) and credit expansion. Interest payment expenses increased to €5.5 billion compared to around €4 billion in the corresponding period of 2023, a 36.8% change. An increase of 16.5% can be observed in net commission income as well as in income from financial operations, which shows a large increase of 106.1%<sup>13</sup>.

As regards operating expenses, they increased by 4.7%, due to an increase in personnel costs of 11.7%, and depreciation which increased by 6.6%, while the cost of administrative expenses decreased by 5.2%<sup>13</sup>.

In the nine months of 2024, the cost of credit risk declined significantly from last year. Specifically, provisions were made for credit risk totaling EUR 843 million, compared with EUR 1.2 million in the nine months of 2023<sup>14</sup>.

Taking all of the above into account, banks' profitability remained almost unchanged in the nine months of 2024, as the strengthening of net interest and commission income was offset by an increase in other provisions due to non-recurring factors. Significant euro area banks recorded an increase in net profitability and return on equity, mainly driven by an increase in net interest income but at a lower pace than in 2023. They also increased their credit risk provisions, reflecting the marginal deterioration in the quality of the loan portfolio in

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<sup>13</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

<sup>14</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

some countries and the low level of credit risk coverage. For Greek banks, the increase in the financing of the economy is expected to offset the pressure on the net interest margin from the reduction in key Eurosystem interest rates. Finally, banks' financial results may be positively affected by enhanced competition in the domestic banking market.

Below is the profit and loss account of Greek banks:

### Profit and loss account of the Greek banking sector

| <i>amounts in EUR million</i><br><i>(Nine months 2024)</i> | <b>9M 2024</b> | <b>2023</b>   | <b>9M 2023</b> | <b>% change 9M<br/>23-24</b> |
|------------------------------------------------------------|----------------|---------------|----------------|------------------------------|
| <b>Operating income</b>                                    | <b>8,750</b>   | <b>11,006</b> | <b>7,955</b>   | <b>10.0%</b>                 |
| <b>Net interest income</b>                                 | 6,719          | 8,505         | 6,213          | 8.1%                         |
| - interest income                                          | 12,177         | 14,196        | 10,202         | 19.4%                        |
| - interest costs                                           | -5,457         | -5,692        | -3,988         | 36.8%                        |
| <b>Net income from non-interest-bearing operations</b>     | 2,031          | 2,501         | 1,742          | 16.6%                        |
| - net commission income                                    | 1,537          | 1,798         | 1,319          | 16.5%                        |
| - revenue from financial operations                        | 299            | 307           | 145            | 106.1%                       |
| - other revenue                                            | 195            | 396           | 278            | -29.7%                       |
| <b>Operating costs</b>                                     | <b>-2,961</b>  | <b>-3,896</b> | <b>-2,828</b>  | <b>4.7%</b>                  |
| <b>Personnel costs</b>                                     | -1,490         | -1,920        | -1,334         | 11.7%                        |
| <b>Administrative costs</b>                                | -986           | -1,361        | -1,040         | -5.2%                        |
| <b>Impairment</b>                                          | -485           | -616          | -455           | 6.6%                         |
| <b>Net income (operating income - operating expenses)</b>  | <b>5,790</b>   | <b>7,109</b>  | <b>5,127</b>   | <b>12.9%</b>                 |
| <b>Provisions for credit risk</b>                          | -843           | -1,690        | -1,178         | -28.5%                       |
| <b>Other impairment losses<sup>1</sup></b>                 | -1,006         | -381          | -208           | 384.4%                       |
| <b>Non-recurring gains/losses</b>                          | 3              | 96            | 113            | 97.1%                        |
| <b>Profit/loss before tax</b>                              | <b>3,944</b>   | <b>5,135</b>  | <b>3,854</b>   | <b>2.3%</b>                  |
| <b>Taxes</b>                                               | -1,017         | -1,219        | -863           | 17.9%                        |
| <b>Profit/loss from discontinuing operations</b>           | 54             | 82            | 25             | 113.7%                       |
| <b>Profit/loss after tax</b>                               | <b>2,980</b>   | <b>3,834</b>  | <b>3,016</b>   | <b>-1.2%</b>                 |

Source: processed data from the Interim Monetary Policy Report (December 2024) of the Bank of Greece where financial statements were used for the 4 major banks (SIs) and regulatory data for less significant banks (LSIs).

<sup>1</sup> Impairment of securities and tangible and intangible assets

On the liquidity side, conditions for the Greek banking system improved further in 2024. **Customer deposits** continued their upward trend, albeit at a reduced pace compared to 2023, reflecting good economic growth. The increase in deposits contributed significantly to keeping the liquid assets of Greek credit institutions at a high level, despite the repayment of the amounts raised through the TLTRO III operations.

More specifically, the **balance of private sector deposits (households and businesses)** amounted to €203.8 billion in December 2024 (a new high since February 2011 amounting to €202.9 billion), of which €150.4 billion were deposits from individuals and non-profit institutions (INPIs), €49.1 billion were deposits from non-financial undertakings (NFUs), €0.6 billion were deposits from insurance companies and professional insurance funds and €3.7 billion were deposits from financial institutions. More specifically, the stock of private sector deposits recorded a cumulative increase of approximately €9 billion, due to the recovery of business deposits (NFUs) by €5.1 billion, while the increase of deposits of households and non-profit institutions (INPIs) was more limited and recorded a cumulative increase of €3.7 billion. Finally, General Government deposits also increased by 4.7% year-on-year, reaching €211 billion (an increase of €9.5 billion)<sup>15</sup>.

The comparatively small increase in household and INPI deposits relative to businesses is due to the pressure on family budgets due to the increase in the cost of living, and the shift of their saving behavior towards alternative investments that offer higher returns. Banks' deposits continue to consist predominantly of liquid assets held in overnight accounts, accounting for 78% of private sector deposits in December 2024. In December 2024, the balance of overnight deposits increased by 15% for NFUs compared with December 2023, while for households the corresponding increase was 3%. For the remaining deposits, the change compared to 2023 was 1% for NFUs and 1% for households and INPIs<sup>15</sup>.

In the period ahead, demand for deposits is expected to increase, in line with GDP developments. In addition, disinflation will boost individuals' saving incentives and thus demand for deposits, even when nominal deposit rates start to fall, should further reductions in ECB policy rates be decided. Moreover, it should not be overlooked that the yields of many of the alternative investments that currently compete with deposits will also decline. Of course, lowering deposit rates in real terms would also reduce the attractiveness of bank deposits in relation to, for example, cash as a means of holding wealth.

Total **financing of the private sector (households and businesses)** in the Greek banking system amounted to €122.7 billion in December 2024, of which financing to businesses amounted to €83.7 billion, accounting for approximately 68% of total private sector financing by Greek credit institutions. The largest concentration concerns non-financial undertakings (NFUs) €74.3 billion, which account for 89% of total financing to enterprises. More specifically, private sector financing recorded a cumulative increase of

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<sup>15</sup> Source: <https://www.bankofgreece.gr/statistika/nomismatikh-kai-trapezikh-statistiki/katatheseis-twn-pistwtikwn-idrymatwn>

approximately EUR 4.7 billion<sup>16</sup>, amounting to an increase of EUR 7.4 billion in financing to enterprises and a decrease of EUR 2.2 billion in financing to individuals and private non-profit institutions. Funding to individuals and private non-profit institutions amounted to €34.9 billion, accounting for 28% of total private sector funding, while funding to self-employed persons, farmers and sole proprietorships amounted to €4.1 billion (3% of total funding)<sup>17</sup>.

The acceleration of financing to firms is linked to the strengthening of demand for bank loans, mainly from large firms. As regards the supply of bank loans, in 2024 Greek banks maintained their liquidity at levels that support their ability to lend to the private sector, despite the reduction in the outstanding amount of credit received from the Eurosystem – as a result of the repayment of the TLTROs. Greek credit institutions have drawn resources from inflows of retail deposits, through bond issuance and from the foreign interbank market. Also, the provision of business credits was reinforced by the co-financing and guarantee programmes of development agencies as well as the bank loans co-financing the investment projects that are part of the Recovery and Resilience Facility (RRF).

The decline in financing to private non-profit institutions is mainly due to mortgage loans, as bank interest rates on housing loans remained at a higher average level in 2024 than in 2023 and their impact on demand for housing credit was negative. However, demand on the part of households for housing needs, as well as total financing, whether bank or public, exists and this is shown more specifically by the loans channeled through the “My Home” programme, which are mostly financed from public funds (and only by a quarter from banks). These loans were quickly absorbed and amounted to €339 million, of which the bank participation was €85 million. Also, in 2025, the extension of this programme is expected to begin, the “My House II” housing programme, with a total budget of €2 billion, of which €1 billion in borrowed funds will come from the Recovery and Resilience Facility (RRF) and €1 billion from banks. 50% of the loan financed by the RRF will be interest-free and the rest will be provided with interest-bearing bank loans. As regards consumer loans and other loans, they decreased by €0.2 million compared to 2023<sup>18</sup>.

Looking ahead to credit growth, the annual growth rate of financing to NFUs is expected to remain high in the near term. GDP growth is expected to continue to support credit growth, while the high level of bank lending rates should continue to weigh on it in the months ahead. Furthermore, the positive contribution to bank credit from banks’ participation in the co-financing of investment projects under the Recovery and Resilience Facility (RRF) is projected to increase, as the value of already concluded contracts is already high, given that

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<sup>16</sup> Source: <https://www.bankofgreece.gr/statistika/nomismatikh-kai-trapezikh-statistiki/xrhmatodothsh-ths-ellhnikhs-oikonomias>

<sup>17</sup> Source: <https://www.bankofgreece.gr/statistika/nomismatikh-kai-trapezikh-statistiki/xrhmatodothsh-ths-ellhnikhs-oikonomias>

<sup>18</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

more loan disbursements will be expected, provided of course that the implementation of the relevant investment projects is also accelerated. Finally, the positive effect on credit growth is expected to be maintained from the financing resources of the credit institutions and the EIB Group that will be channeled under the 2021-2027 Regional Development Partnership (NSRF), as well as from the funds managed by the Hellenic Development Bank.

In 2024, the quality of the loan portfolio of Greek banks improved even further. The decline in **non-performing exposures (NPEs)** continued, resulting in a ratio of non-performing exposures to total loans of 4.6% in the nine-month period of 2024, compared with 7.9% in the nine-month period of 2023 (6.7% in the 12-month period of 2023). The factors that led to the reduction in non-performing exposures were the securitisation of loans under the Hercules government guarantee scheme and the decrease in the share of Stage 2 loans in total loans on an individual basis.

The NPE ratio in Stage 2 stood at 7.9% in the nine-month period of 2024, compared with 9.6% in the nine-month period of 2023 and 9.3% in the 12-month period of 2023<sup>19</sup>.

The **capital adequacy of Greek banks**, according to the Bank of Greece's Monetary Policy Report, increased significantly in 2024, due to an increase in regulatory capital. Regulatory own funds were strengthened mainly through internal capital creation and the issuance of capital instruments included therein, while risk-weighted assets remained virtually unchanged. Specifically, the Common Equity Tier 1 ratio (CET1 ratio) on a consolidated basis remained stable at 15.5% in the nine months of 2024 compared to December 2023, while compared to September 2023 it increased to 14.3%. The Total Capital Ratio (TCR) stood at 19.4% in September 2024 from 17.6% in September 2023 and increased compared to December 2023 (18.8%). It is worth noting that the regulatory capital of Greek banks so far consists by 40% of final and liquidated deferred tax credits (DTCs), however, the quality of capital is expected to improve over the medium term amid banks' expected high profitability, based on banks' announcements to accelerate the amortisation of DTC<sup>19</sup>.

Regarding the liquidity of Greek banks, it remained at high levels both on an annual basis and at the level of nine months 2024, surpassing the mandatory requirements and the corresponding indicators of banks in the Eurozone for the same periods. According to the latest available data from the Bank of Greece, the liquidity coverage ratio of Greek banks stood at 219.5% in the nine-month period of 2024, from 215,6% in the nine-month period of 2023 and 220.7% for the whole year 2023, while the ratios for the corresponding periods in

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<sup>19</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

the euro area amounted to 159.4% (nine-month period of 2024) against 158% (nine-month period 2023) and to 164.3% (for the whole of 2023)<sup>20</sup>.

The priorities for banks in Greece in 2025 will be the following:

- a) the effort to achieve further consolidation of banks' assets, leading to further convergence towards the average of eurozone banks.
- (b) the avoidance of new net inflows of non-performing loans, which should contribute to further improving capital ratios.
- (c) the maintenance of high profitability that is expected to be achieved by increasing the financing of the economy, which will offset possible pressures on the net interest margin.

### **Developments concerning the Optima bank SA Group | 2024**

#### **Ordinary General Meeting of the shareholders of OPTIMA BANK S.A.**

Optima bank held on 23/05/2024 the 1<sup>st</sup> Ordinary General Meeting of its shareholders after the admission of its shares to trading on the Athens Stock Exchange. The General Meeting approved the financial statements for 2023, where net profits for the bank of €103 million were presented and it was decided to distribute a dividend of €0.44 per share, which corresponds to 32% of the profits for the year 2023. The same General Meeting also mentioned the expansion of Optima bank's branch network with the addition of a new branch in Crete and specifically in the city of Chania. The branch started its operation in September 2024.

#### **Announcement of dividend distribution of profits for the year 2023**

The Ordinary General Meeting on 23/05/2024 decided to distribute a dividend from the profits of the fiscal year 2023 amounting to €0.44 per share (gross), before withholding statutory tax, i.e. a total amount of €32,425,422.48.

For the distribution of dividends, the General Meeting approved the dates of the ex-dividend right, the identification of the beneficiaries of the dividend and the start of the payment of the dividend for the fiscal year 2023 as follows:

- i. Ex-dividend entitlement date: Tuesday 25 June 2024
- ii. Date of identification of dividend beneficiaries: Wednesday 26 June 2024
- iii. Dividend payment start date: Monday 1 July 2024.

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<sup>20</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece



The payment of the dividend for the financial year 2023 was made through the Bank itself, acting as the paying bank.

The same General Meeting authorized the Board of Directors to take any necessary or appropriate action in the context of the implementation of the aforementioned decision of the Ordinary General Meeting.

**Free distribution of shares, through capitalization of profits for the year 2023 and distribution of part of the profits for the year 2023 to members of the Board of Directors and staff**

The General Meeting of Shareholders decided the free distribution of shares of the Bank through the capitalization of part of the profits of the year 2023, up to the amount of €1,035,000.00, with an equal share capital increase, divided by the amount of the increase, into up to 300,000 new nominal, ordinary, voting shares, with a nominal value of €3.45 each (the "New Shares"), in order for the New Shares to be distributed free of charge, under the conditions of the Law, to members of the Board of Directors, to senior executives of the Bank (Executive Committee Members), as well as to the regular staff of the Bank ("Beneficiaries"). It also authorized and instructed the Board of Directors to take all necessary actions for the share capital increase by capitalization of profits and to determine the specific terms for the free distribution of shares to the Beneficiaries.

Finally, the General Meeting approved the distribution of part of net profit of the financial year 2023 as a one-off extraordinary remuneration (Bonus) of a total amount of up to €4,000,000.00 to members of the Board of Directors and the Bank's staff, as a reward for their contribution to the achievement of the Bank's profitability and objectives during the financial year 2023, and provided the relevant authorizations to the Board of Directors to determine the specific terms of distribution of the above amounts and to deal with the procedural issues for the payment of the extraordinary remuneration (Bonus).

**Capitalisation of profits / Share capital increase of the Bank**

Accordingly, for the purpose of the Free Shares Programme under Article 114 of Law 4548/2018 in the current financial year, the Ordinary General Meeting of 23/05/2024 decided to increase the share capital of the Bank by the amount of two hundred and seventy-six thousand (€276,000) Euros, by issuing eighty thousand (80,000) new, ordinary, registered voting shares, with a nominal value of €3.45 each, by capitalization of an equal part of undistributed profits for the financial year 2023 and amending Article 5 of the Bank's Articles of Association.

At the same time, it authorized and instructed the Board of Directors to take all necessary actions for (i) the implementation of the above share capital increase of two hundred and seventy-six thousand (€276,000) Euros with capitalization of profits, and (ii) the determination of the specific terms and conditions of the Program, at

its discretion and in compliance with the applicable legislation, as well as to take any relevant action and take any relevant decision regarding the purpose of implementation and application of the program.

In the context of the above decision, the New Shares were allocated to a total of twelve (12) Beneficiaries, in accordance with the terms of Article 114 of Law 4548/2018.

The nominal share capital of the Bank amounts, after the above share capital increase, to two hundred and fifty-four million five hundred and twenty thousand seven hundred and eighty-nine euros and ninety cents (€254,520,789.90) and is divided into seventy-three million seven hundred and seventy-four thousand one hundred and forty-two (73,774,142) registered shares, each with a nominal value of three euros and forty-five cents (€3.45). The New Shares are of the same class as the Bank's shares already traded on the Main Market of the Athens Exchange (the "ATHEX").

The Bank followed the procedure for the listing of the New Shares on the Athens Stock Exchange (the "ATHEX"), in accordance with the provisions of the ATHEX Regulation and the relevant decisions of the Board of Directors of the ATHEX. The New Shares were listed on the second business day following the approval of their listing by the ATHEX. The starting price of the Bank's shares on the ATHEX on the date of beginning of trading was formed in accordance with the ATHEX Regulation and Decision No. 26 of the Board of Directors of the ATHEX, as in force. The New Shares were registered on the date of beginning of trading in the records of the Hellenic Central Securities Depository (ELKAT) and in the shares and accounts held by the Beneficiaries in the Dematerialized Securities System (DSS) of the ATHEX, in accordance with the applicable legislation.

### **Addition of a Non-Executive Member to the Board of Directors**

The Ordinary General Meeting of the shareholders of Optima bank approved the election and addition of Mr. Nikolaos Giannakakis to the Board of Directors of the Bank as a Non-Executive Member, for the remainder of the term of office of the current Board of Directors elected by the Ordinary General Meeting of the Shareholders on 23/03/2023, i.e. by 10 September 2027 at the latest.

### **New acquisitions of performing loans**

#### **1. Acquisition of part of Tethys' performing loan portfolio**

Optima bank completed the acquisition of part of the Tethys loan portfolio in January 2024. This performing portfolio acquired by the Bank concerns loan obligations from four hotel units in Crete, Santorini and Kos. After the necessary restructuring process of these business loans, these loans return to the banking system on a performing basis through Optima bank, in order for these companies to have access to financing and, above all, to restart from a sound basis the implementation of their business plans in the tourism market.

## **2. Acquisition of performing loans / Project Onassis**

Optima bank in December 2024 considered the acquisition of a portfolio of performing and secured loans under the name Project Onassis.

More specifically, in implementation of the Bank's strategy for the acquisition of loans in the secondary market, the Bank, ensuring the prudent assessment of borrowers, proceeded to the acquisition of loans of 4 borrowers-hotels (1 in Kefallonia, 1 in Mykonos, 1 in Heraklion, Crete and 1 in Zakynthos) from the total perimeter of this portfolio. 10 borrower cases were examined, of which 4 were selected on the basis of banking criteria and on the basis of the EBA guidelines on the classification of loans as performing. This transaction was completed in 2024.

### **Expansion of Optima bank branch network**

In 2024, Optima bank continued the expansion of its branch network with the opening of a new bank branch in Crete.

Specifically, the management of Optima bank inaugurated on Thursday, September 26, 2024 its new branch in Chania, the second branch in Crete, and specifically on 1866 Square, as part of its growth strategy in the region, substantially expanding its presence in the largest cities of Greece. With the new branch in Chania, Optima bank has a network of a total of 29 branches, 8 of which are located in cities outside Athens.

### **Change in the composition of the Board of Directors**

On 31 October 2024, Ms Clio Lymberi resigned from her position as Independent Non-Executive Member of the Board of Directors of the Bank, as well as from her position as Chairman of the Risk Management Committee and member of the Audit Committee and the Remuneration and Nominations Committee.

Following the above resignation, the Board of Directors of the Bank, at its meeting of 08/11/2024, decided, pursuant to Article 82 of Law 4548/2018 and Article 10(2) of the Bank's Articles of Association, to continue the management and representation of the Bank, without replacing Ms. Lymberi temporarily, until her replacement by a new Board member, who will meet the criteria of individual and collective suitability, in accordance with the applicable legislation and the Adequacy Policy of the Bank's Board Members. In this context, the BoD was reconstituted as follows:

1. Georgios Taniskidis of Ioannis and Olga, Chairman, Non-Executive Member,
2. Petros Tzannetakis of Tzannibeis and Maria, Vice-Chairman, Non-Executive Member,
3. Dimitrios Kyparissis of Apostolos and Fotini, Chief Executive Officer, Executive Member,
4. Angelos Sapranidis of Nikolaos and Fotini, Executive Member,
5. Theofanis Voutsaras, of Christos and Eleni, Non-Executive Member,
6. Nikolaos Giannakakis of Konstantinos and Maria, Non-Executive Member,

7. Theodoros Efthis of Elias and Malama, Independent Non-Executive Member,
8. Pavlos Kanellopoulos of Dimitrios and Eleni, Independent Non-Executive Member,
9. Georgia Kontogianni of Vasilios and Anastasia, Independent Non-Executive Member and
10. Georgios Kyriakos of Konstantinos and Nadia, Independent Non-Executive Member.

In addition, at the above meeting of 08/11/2024, the Board of Directors decided to reconstitute the Bank's Board of Directors committees as follows:

#### **Audit Committee**

It was decided to reconstitute the Audit Committee by appointing Mr Theodoros Efthis as a new member of the Committee in replacement of Ms Lyberi. Following this, the composition of the Audit Committee was defined as follows:

1. Theodoros Efthis, Independent Non-Executive Member,
2. Pavlos Kanellopoulos, Independent Non-Executive Member and
3. Petros Tzannetakis, Non-Executive Member.

#### **Risk Management Committee**

It was decided to reconstitute the Risk Management Committee with the remaining three members, namely:

1. Theodoros Efthis, Independent Non-Executive Member,
2. Pavlos Kanellopoulos, Independent Non-Executive Member and
3. Georgia Kontogianni, Independent Non-Executive Member

as it is not required, under its Rules of Procedure, to replace the resigning Member.

#### **Business activity**

Optima bank is active in the private and corporate finance market in Greece. The Bank, which is the Group's parent company (see below 3.7 "Organizational Structure"), through its customer service network as well as through its cooperation with the Group's individual companies, offers, from the fourth quarter of 2019 onwards, a wide range of products and services covering the following areas:

- **Private Banking or Retail Banking**

The Bank includes in the activities of **private banking** all individuals, including freelancers and sole proprietorships, focusing mainly on high-income clients (Affluent / Private clients), who hold significant funds under management. Both Affluent customers and Private customers are served by relationship managers, while enjoying preferential pricing on a variety of products and services. In addition, Affluent and Private clients have the ability to receive exclusively investment analyses and strategies issued by specialized sections,

with the aim of better informing them and shaping their portfolio. The basic banking relationship is initiated either by physical presence in the Bank's branch network or through the digital on boarding and includes the provision of a deposit account, a debit card and access to the e-banking services offered. The Bank provides retail clients with deposit accounts, debit/credit cards and loan products, payment services and investment and stock exchange services.

- **Corporate Banking**

The Bank includes in its **corporate banking activities legal** persons of any kind, whether Greek or foreign, focusing mainly on companies with an annual turnover of more than €2.5 million. The focus, in terms of corporate banking, is on: (a) small businesses (Business Banking), with a turnover of over €2.5 million up to €7.5 million, (b) small and medium-sized enterprises (SMEs), with a turnover of €7.5 million up to €50 million, as well as (c) large companies (Large Corporates) with a turnover of at least €50 million.

This includes companies with an export character and with significant profitability characteristics that are active in various sectors of the economy. The Bank offers corporate banking customers a set of products and services with a view to fully serving the trading activity of the company, as well as covering its borrowing needs, of any kind and form. Small businesses are assigned to relationship managers in the branch network who are solely responsible for serving the relevant customers, while small and medium-sized enterprises and large enterprises with specialized needs for more complex financing solutions / products are assigned to relationship managers of the Company's competent unit. The Bank provides its clients, who are legal entities, with products and services that meet the needs of a modern business, such as working capital and investment (short and long-term), in the form of loan agreements and credit agreements with an open current account, the opening of secured credits, the issuance of letters of guarantee of any kind, as well as bond loans and factoring services, etc., and other banking services, including investment and stock exchange services. These forms of financing are often accompanied by the provision of collateral by the Bank's borrower/counterparty, such as the assignment of claims, the provision of collateral on dematerialised securities, the assignment of invoices, personal or corporate guarantees and the pledging of deposits.

- **Other services**

**Digital Banking:** The Bank allows the customer to carry out transactions and receive services remotely via the internet, with platforms such as "Optima e-banking" and "Optima mobile app". The possibilities of e-banking include:

- Transfers within Optima bank and to other banks in Greece and abroad
- Payments to public & private entities
- Updating personal data of private clients through "eGov KYC"
- Push notifications for the secure approval of e-banking transactions and online purchases

- Trading with the digital wallets "Google Pay" and "Apple Pay"
- Online opening of a term deposit (e-term deposit)
- Digital card facilities such as card activation, card loss and re-issue, PIN sending, temporary locking/unlocking
- Easy access to digital statements (e-statements) of products
- "Live chat" for real-time communication with a representative of the bank

**Regular update:** The Bank provides free quarterly information to all its customers on balances and movements of deposit, investment and loan accounts, through e-banking services. Cases of customers without relevant access, receive the quarterly update via physical mail or e-mail.

**Call Center:** The call center representatives are at the disposal of customers to inform them about the use of the Bank's services and products as well as about how to make seamless use of upgraded digital services.

**ATMs:** Every branch of the Bank's network has an external ATM for customers who wish to make cash withdrawals or account balance queries with their debit/credit cards.

- **Asset Management and Business Factoring**

The Group **manages mutual funds**, which belong to the bond, equity, mixed and fund of funds categories. It sells its products under the name Optima mainly through the branch network and the Private Banking of Optima bank. It places particular emphasis on the design and development of investment products according to the expected performance, time horizon and risk that each client wishes to assume. In addition to the Optima fund series, it has developed two white label funds for two investment firms operating in the Greek market. The fund management services are provided through the subsidiary Optima asset management, owned by 99.44%, which is licensed by the Hellenic Capital Market Commission to offer its clients advisory and discretionary portfolio management services.

- **Business Factoring**

The Group provides a range of services in the field of factoring, developing synergies with the credit sections of the Optima bank Group with the aim of universally meeting the needs of businesses. The factoring services are provided through the 100% subsidiary Optima factors.

## **Evolution of Optima bank S.A.'s aggregates and results | 2024**

During the financial year 01/01/2024 – 31/12/2024, the Group's key figures and results, as well as their change, were as follows:

### **Balance sheet**

On 31/12/2024, the **total Assets** of the Optima bank Group amounted to €5,540.9 million from €3,868.3 million, increased by €1,672.6 million compared to 31/12/2023. This change is further broken down into an

increase in customer credit claims as a result of an increase in deposit funding as well as an increase in cash holdings.

Total **loans and advances to customers** before accumulated impairments amounted to €3,657.5 million on 31/12/2024 (including equity margin accounts), increased by €1,199 million compared to €2,458.5 million on 31/12/2023. The **accumulated impairments** appear to be increased by €17,3 million compared to 31/12/2023 and amounted to €44,9 million for the 12 months of 2024 compared to €27,6 million on 31/12/2023, due to the growth mainly of the Bank's loan portfolio.

In Liabilities, on 31/12/2024, total **due to customers** amounted to €4,643.4 million (recording an increase of €1,451.6 million compared to 31/12/2023).

The **ratio of loans to deposits after provisions as at** 31/12/2024 stood at 0.78% (compared to 0.76% as at 31/12/2023).

**Total equity** in the 12 months of 2024 amounted to €620.3 million compared to €510.1 million in 2023, improved by €110.2 million. The improvement is mainly due to the formation of profits for the Optima bank group of approximately €140.2 million after taxes, increased by €37.2 million compared to the year 2023.

#### **Statement of profit and loss**

Regarding the Group's profit and loss account:

Optima bank Group's **net interest income** amounted to €189.9 million from €142.2 million, an increase of 33.54% compared to 31/12/2023 mainly due to the increase of interest on loans in amortised cost due to the Bank's credit expansion.

**Net Fee and commission income** on 31/12/2024 amounted to €41.3 million from €32.1 million in the corresponding period last year, showing an increase of 28.66% mainly due to an increase in net commissions related to the granting / renewal of loans, stock exchange commissions and letters of guarantee.

Optima bank Group's **total operating expenses** for the reporting period amounted to €57.9 million from €56.9 million in the corresponding period of 2023, recording an increase of 1.76%. The increase in operating expenses resulted from the increase in remuneration and personnel costs (+7.42%) due to the increase in human resources (the number of employees gradually increased from 500 on 31/12/2023 to 575 on 31/12/2024 at Group level) with the biggest part of hiring taking place in order to meet the Bank's operational needs. At 31/12/2024 impairment is also increased compared to 31/12/2023 (+13.69%) and amounted to €8.3 million from €7.3 million at Group level mainly due to impairment of buildings-installations with a right of use and impairment of multi-annual impairment costs.

The amount of new investments (additions) in fixed assets of Optima bank Group amounted to €1.8 million at the end of 2024 compared to €1.5 million at the end of 2023 at the consolidated level. Accordingly, the

amount of new investments (additions) in intangible assets amounted to €3.7 million in 2024 compared to €3 million in 2023, at a consolidated level <sup>21</sup>.

As a result of the above, **the profit before provisions and taxes** for 31/12/2024 amounted to €196.8 million compared to €136 million on 31/12/2023 for the Optima bank Group. Taking into account the provisions for credit risk, **the profit before tax** of Optima bank Group for the year that ended on 31/12/2024 amounted to €176.6 million compared to the profit before tax for the corresponding year 2023 which amounted to €125.9 million. The **profit after tax** for the 12-month period of 2024 of the Optima bank Group amounts to €140.2 million compared to 103 million in the 12-month period of 2023.

### **Regulatory indicators**

At the end of December 2024, the Bank's total regulatory capital amounted to €559.48 million (€574.2 million for the Group) while the risk-weighted assets (RWAs) amounted to €3,880.7 million (€3,988.2 million for the Group) resulting in Optima bank's Total Requirement Capital Ratio of 14.42% (14.40% for the Group), influenced by the expansion of the Bank's loan and investment portfolio as well as the overall results of this year. As of 1/1/2025, the CRR III regulatory framework marks a revision of the existing Basel III standards. The aim of this package is to ensure that EU banks become more resilient to potential future economic shocks, while contributing to the recovery of the European economy from the COVID-19 pandemic and the transition towards climate neutrality. The revised framework introduces key amendments to ensure adequate minimum capital requirements by revising the RWA calculations for credit and operational risk (from 1/1/2025) and market risk (from 1/1/2026). Optima bank is examining the above impacts on the capital adequacy ratio with the help of a specialized consultant, a project that is ongoing.

At the Bank level, the liquidity coverage ratio (LCR) stood at 242.14% (against the minimum threshold: 100%) and the net stable funding ratio (NSFR) stood at 121.57% (against the minimum threshold: 100%) on 31/12/2024.

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<sup>21</sup> The item "Other Intangibles" includes the recognition of intangible assets attributable to customer relationships and trademarks from the acquisitions of the subsidiaries Optima Factors and Optima asset management (AEDAK).



The regulatory indicators for both the Bank and the Group are summarized in the table below for both the reference period 31/12/2024 and the corresponding period of the previous year (31/12/2023):

|           | Bank        |            | Group       |            |
|-----------|-------------|------------|-------------|------------|
|           | 31/12/2024* | 31/12/2023 | 31/12/2024* | 31/12/2023 |
| CET-1 (%) | 14.42%      | 17.82%     | 14.40%      | 17.67%     |
| TRCR (%)  | 14.42%      | 17.82%     | 14.40%      | 17.67%     |
| LCR (%)   | 242.14%     | 242.07%    | 251.44%     | 248.88%    |
| NSFR (%)  | 121.57%     | 127.99%    | 124.83%     | 131.83%    |

Source: Financial Department Optima bank

\* The amounts have been calculated by including the period profits and the distribution of dividend on the 2024 profits, which is subject to the approval of the competent bodies.

### **Conclusion on the going concern**

The Board of Directors of the Bank, after taking into account the main business risks related to Optima bank, which stem mainly from the macroeconomic environment in which Optima bank operates and develops in conjunction with its strategy, liquidity and capital position, concluded that for the Bank and the Optima bank Group the principle of going concern does apply.

In addition, for the smooth implementation of its business plan, the Bank's management and its shareholders are considering the most appropriate options for strengthening its capital base in the short and long term, so that its regulatory capital and ratios exceed the requirements set by the regulatory authorities.

### **Employees**

Employees are particularly important for Optima bank's course. The Bank continues to be staffed with the appropriate staff in order to have the critical mass for the achievement of its operational objectives and to establish long-term and mutually beneficial cooperation relations with them.

The number of employees of Optima bank on 31/12/2024 amounted to 550 people (575 for the Group), compared to 500 for the Group and 478 for the Bank on 31/12/2023.

Out of this figure, at Group level, 49% are women and 89% of employees have a higher education and post graduate diploma.

## Number of branches / Central services

On 31/12/2024 the Bank operated 29 branches. More specifically, out of the 29 branches, 21 operate in Athens, 3 in Thessaloniki, 1 branch in Corinth, 1 branch in Larissa, 1 branch in Patras and 2 branches in Crete.

From the point of view of central services, until October 2024, there was no need to lease new space. The central services remained in the building of 32 Aigialeias Street and on the 4th floor of the Paradise building, both in the area of Maroussi, Attica.

At the same time, in October 2024, in order to serve the Bank's operational needs, the Bank's competent bodies decided to lease additional office space in Maroussi, Attica. In particular, additional space was leased for the transfer of part of the central services to Kifissias Avenue, No 44, on the 3rd floor of the second building complex Monumental Plaza. The date of beginning of operations of the new office spaces was December 16, 2024.

## Share capital

The share capital on 31/12/2024 amounts to €254,521 thousand divided into 73,774,142 shares with voting rights with a nominal value of €3.45. On 31/12/2024 the bank owned 9,193 own shares.

|                                                                                                 | <u>Number of shares</u> |                             |
|-------------------------------------------------------------------------------------------------|-------------------------|-----------------------------|
|                                                                                                 | <u>Company</u>          | <u>Group</u>                |
|                                                                                                 | <u>Issued shares</u>    | <u>Net number of shares</u> |
| <b>Balance 1 January 2023</b>                                                                   | <b>7,524,840</b>        | <b>7,524,840</b>            |
| Decrease of share capital by offsetting losses                                                  | (7,524,840)             | (7,524,840)                 |
| Decrease in the nominal value of a share while increasing the number of shares (1 old to 5 new) | 37,624,200              | 37,624,200                  |
| Equity increase through conversion of a bond loan                                               | 14,084,435              | 14,084,435                  |
| Capitalisation of profits                                                                       | 985,507                 | 985,507                     |
| Share capital increase                                                                          | 21,000,000              | 21,000,000                  |
| Purchases of own shares                                                                         |                         | (107,972)                   |
| Sales of own shares                                                                             |                         | 84,674                      |
| <b>Balance 31 December 2023</b>                                                                 | <b>73,694,142</b>       | <b>73,670,844</b>           |
| <b>Balance 1 January 2024</b>                                                                   | <b>73,694,142</b>       | <b>73,670,844</b>           |
| Capitalisation of profits                                                                       | 80,000                  | 80,000                      |
| Purchases of own shares                                                                         |                         | (302,174)                   |
| Sales of own shares                                                                             |                         | 316,279                     |
| <b>Balance 31 December 2024</b>                                                                 | <b>73,774,142</b>       | <b>73,764,949</b>           |

The share capital on January 1st 2023 amounted to €160,279 thousand divided into 7,524,840 shares with voting rights with a nominal value of €21.30 per share.

In March 2023, by decision of the Extraordinary General Meeting ("EGS"), the share capital was reduced by offsetting losses of previous years by €30,476 thousand and the nominal value of the share was reduced from €21.30 to €17.25. After offsetting, the share capital amounted to €129,803 thousand divided into 7,524,840 shares. The same decision of the General Meeting reduced the nominal value of a share (share split) from €17.25 to €3.45 with a simultaneous increase in the number of shares (1 old to 5 new). As a result, the share capital amounted to €129,803 thousand divided into 37,624,200 voting shares with a nominal value of €3.45 per share.

In addition, it was decided to convert the Convertible Bond Loan into share capital by €48,591 thousand divided into 14,084,435 shares with a nominal value of €3.45 and into a premium reserve by €11,409 thousand.

By decision of the Ordinary General Meeting dated 07/6/2023, the share capital of the Bank was increased on 26/7/2023, through the capitalization of part of the profits of the year 2022, amounting to €3,399,999.15 with the issuance of 985,507 new registered, ordinary, voting shares.

On Friday, September 29, 2023, the share capital increase of Optima bank was successfully completed through a public offer for the listing of its shares on the Athens Stock Exchange. The final disposal price was €7.2 per share and the total amount of funds raised was €150.9 million. A total of 21,000,000 new ordinary registered shares of the Bank were issued.

On 23/05/2024, the Ordinary General Meeting of the Bank decided to increase the share capital (of the Bank) by the amount of €276,000, by issuing 80,000 new, ordinary, registered shares with voting rights, with a nominal value of €3.45 each, capitalizing an equal part of undistributed profits for the year 2023. The nominal share capital of the Bank amounts, after the above share capital increase, to €254,520,789.90 and is divided into 73,774,142 registered shares, with a nominal value of each share of three euros and forty-five cents (€3.45). The trading of the new shares on the Athens Stock Exchange started on 20/06/2024.

## **Important events after 2024**

### **Launch of Optima Leasing**

Optima bank, on January 13, 2025, announced the launch of Optima Leasing S.A. Optima Leasing S.A. is a 100% owned leasing subsidiary of the Optima bank Group and offers specialized solutions for growth-oriented

businesses and professionals. It is addressed to all sectors of the economy, such as industry, commerce, transport, tourism, service provision and construction.

Optima Leasing S.A. introduces modern services and leasing products for real estate, movable assets and equipment for businesses and freelancers, adapted to the Greek market, focusing on the needs and business objectives of each business. The solutions provided cover investment projects, liquidity enhancement and the ability to adjust rents to the company's seasonal flows. In addition, active participation in development laws is covered for the utilization of investment programs that maximize the potential of the business.

### **Related party transactions**

In accordance with the relevant regulatory framework, this report should include the most important related party transactions. All transactions of related parties are made in the context of normal business activities, are carried out under market conditions and terms, are approved by the competent bodies and beyond what is detailed below (note 39 of the financial statements) are not considered significant for the size and results of the Group.

### **Risk management**

The Group recognizes that the risk management it undertakes in the context of its activities is a strategic tool of business tactics and philosophy that distinguishes its operation. Therefore, its management has established a specific Risk Appetite Framework (RAF) and ensures that risk management is carried out within its limits. In this Policy, the timely identification of risk, its measurement and management methods are compatible with the Group's strategic choices and are based on day-to-day business decisions.

By carefully monitoring the dynamic nature of the economic and institutional environment in which it operates, the Group adapts and develops its risk management mechanisms, in terms of organisational structure, policies, procedures and IT systems, in such a way that these mechanisms remain effective in terms of day-to-day banking operations, compatible with the principle of independence and functional for internal and institutional supervision purposes.

### **Governance**

The Risk Management Committee (RMC) of the Board of Directors (BoD) supports the BoD in defining a risk management strategy, based on the applicable Business Plan and Risk Tolerance Policy.

The RMC recommends to the Board of Directors the current and future risk-taking strategy of the institution, defines the principles that should govern the management of risks in terms of identifying, anticipating, measuring, monitoring, controlling and addressing them, based on the current business strategy and the adequacy of available resources.

In addition, the RMC guides the Risk Management Department (hereinafter also referred to as the RMD) in the implementation of the risk appetite strategy, including compliance with the relevant capital adequacy regulatory framework, and checks the independence, adequacy and effectiveness of the operation of this Department.

The RMC shall ensure that the Board of Directors of the Bank is adequately informed of all matters relating to the risk undertaking strategy, the tolerance level and the risk undertaking level in the performance of its strategic and regulatory tasks.

### **Risk tolerance policy**

The process of adapting to the evolving institutional environment and the concern to upgrade the functions that determine the level of risk management (policies, systems, etc.) requires the investment of significant resources, which the Group uses through transparent evaluation procedures, so that the produced result corresponds to the intended and the relevant expenditure stays within the framework of the budget.

All risks are defined by the Bank's Risk Tolerance Policy, which (like all policies) has been approved by the Board of Directors. This Policy distinguishes the levels of maximum risk tolerance, the desired degree of risk undertaking and its actual level, orienting and coordinating the work of individual units so that it converges in the direction of management's strategic choices. To serve this objective, the Risk Tolerance Policy provides for the observance of specific values for an important number of ratios, which reflect the structural image of all areas of high interest, both for the Bank and for the regulatory authorities (capital adequacy, liquidity, loan portfolio quality, profitability, etc.). This policy shall be updated on an annual basis and on an ad hoc basis whenever deemed appropriate.

### **Credit risk**

Credit risk is defined as the potential risk of losses that may arise from the breach of a counterparty's contractual obligations to the Bank and the Group.

In addition to the credit risk arising from all forms of lending, the Group, as part of its overall credit risk management, recognises that the following risks are also managed:

- Concentration risk
- Counterparty risk

At the lending level, the Bank assesses each credit risk undertaking, determining the creditworthiness of its customers, both by applying one of the most reliable models of independent credit rating, and by using a series of techniques and criteria compatible with the current institutional framework. These tools are described and implemented in the context of the Credit Risk Management Policy, the Credit Policy and the Credit Risk Management Policy of Institutional Counterparties. In this context, the approval process and the approval levels are also clearly defined, while the role of the credit committees is clearly delimited.

### **Operational risk**

Operational Risk (OR) is defined as the risk of losses due to:

- the inadequacy or failure of internal procedures;
- a human factor,
- IT systems, as well as
- external events.

In addition, it includes legal risk, as well as credit or market risk events with operational causes.

The Bank has established appropriate policies and procedures for the management of operational risk. In addition, the Bank maintains an application for keeping a log of operational risk events. (Operational Loss Database). In addition, Key Risk Indicators (KRIs) have been set in business units. By monitoring the course of indicators, mainly in cases of sharp fluctuations, the Risk Management Department monitors the reasons for the change and, if it identifies operational risks, it sets measures to reduce them. Finally, the Bank uses the Risk and Control Self Assessment (RCSA) method annually.

### **Market risk**

Market risk is defined as the potential loss that may be caused to the Bank's portfolio by unexpected fluctuations in market value in individual areas of that portfolio. The portfolios facing this possibility are those exposed to interest rate and/or monetary and/or price risk.

Through its activity in financial products, the Bank is exposed to market risk, which may cause capital losses from changes in interest rates, stock/bond prices, equity indices and exchange rates. It therefore seeks to effectively control market risks arising from all its activities through a risk management framework consisting of policies, procedures and methodologies for assessment, measurement, monitoring and risk management, as well as limit structures, which are compatible with the requirements of the regulatory authorities.

In view of the effective management of market risk, the Risk Management Department calculates on a daily basis the Value at Risk (VAR) using the variance-covariance method with a 99% confidence level and a holding period of one day, and informs the competent units and the Bank's Management accordingly. Based on the composition of the portfolios, the methods used for hedging open positions, the day-to-day measurement, monitoring and analysis of results, as discussed below, it is established that the Bank's exposure to market risk is within the tolerance level of undertaking of that risk, which has been determined by the Risk Management Committee through a well-defined limit framework (RAF).

**Liquidity risk**

Liquidity risk is defined as a risk for a Bank, albeit solvent, to not have sufficient financial resources to meet its obligations when they fall due, or to be able to secure them only with high borrowing costs.

The Treasury & Capital Markets Department shall ensure the management of the Bank's liquidity through monitoring and management of basic accounts, loan capital and capital market investments, in accordance with the desired level of risk assumed as determined by the Assets-Liabilities Committee (ALCO) of the Risk Management Committee and the Board of Directors of the Bank. The Risk Management Department controls the liquidity of the Bank in relation to the established limits.

**Climate and Environmental Risks**

The Bank recognizes the importance of risks stemming from environmental factors, in particular climate change. In line with the EBA guidelines on climate-related and environmental risks, it has started the process of working on this type of risk along with the integration of the other elements of the ESG (Environmental, Social, Governance) triptych, which is social and corporate governance.

The bank is aware that ESG factors can affect the organization positively or negatively, while at the same time increasing compliance requirements add complexity. In addition, ESG risks may have a direct impact on the operations and/or performance of the Bank, may lead to potential capital needs to address them, and may have an impact on its reputation.

Climate-related and environmental risks include two key risk determinants:

- Physical hazard: It refers to the financial impact of climate change, including more frequent extreme weather events and gradual changes in climate, as well as environmental degradation. Classified as:
- Acute: when it stems from specific extreme events, in particular weather-related events such as droughts, storms, floods, fires or heatwaves;

- Chronic: when it stems from progressive long-term climate changes, such as temperature changes, sea level rise, reduced water availability, biodiversity loss, changes in soil productivity and resource scarcity.
- Transitional: It refers to the financial loss that can occur, directly or indirectly, from the process of adaptation to a more environmentally sustainable economy.

In line with regulatory guidelines, the bank recognizes that climate-related and environmental risks directly affect other key risks to which it is exposed, such as credit, market, operational and liquidity risks. Indicatively, the following should be mentioned:

- Credit risk: Default probabilities and loss in case of default regarding exposures within sectors or geographical areas vulnerable to physical risk may be affected, for example, through lower collateral valuations in real estate portfolios due to increased flood risk;
- Market risk: Severe natural events may lead to changes in market expectations and could result in a sharp repricing, an increase in volatility and a decrease in the value of assets in some markets;
- Operational risk: The activities of the institution may be disrupted by a natural disaster at its premises, branches and data centres due to extreme weather events.
- Liquidity risk: Liquidity risk may occur if customers withdraw money from their accounts to fund damage repairs.

The liability risks of institutions' counterparties can arise not only from environmental and climate-related risks, but also from social and governance factors. The latter concern the following:

- Social Responsibility: It is the impact and relationship of a business or investment with stakeholders such as people and communities. The impact and consequences on labour practices, human rights, diversity and social inclusion;
- Corporate Governance: It relates to how an organisation is run and managed in relation to risk management, sustainability opportunities, leadership and transparency.

At this stage, the bank, assessing credit risk as the most significant risk that can be directly affected by climate change, initially conducted a materiality assessment to identify the sectors of the economy where its outstanding loan balances are most sensitive to climate-related and environmental risks, taking into account both physical and transitional risks.



The Bank also estimates that the market risk arising from the implementation of climate risk policies/regulations is insignificant, since most of the securities included in its liquidity buffer are Greek/sovereign bonds and its exposure to corporate bonds is insignificant.

**Other risks**

At regular intervals, as specified in the Risk Appetite Framework, the Bank calculates and monitors risk tolerance indicators based on financial results and confirms that it operates in accordance with the risk levels provided for by the Board of Directors. If a breach of one of the indicators is observed, the activity that burdens the indicator is identified and appropriate actions are applied to bring the risk back to acceptable levels. It is worth noting that the RMD under the supervision of the RMC has launched an extensive programme to meet the requirements of Regulation (EU) 2024/1623 31.05.2024 (CRR 3). In addition, in the context of the implementation of Regulation (EU) 2022/2554, in cooperation with the competent units, a programme has been launched to meet its requirements, as well.

The relevant regulatory reports shall summarise and systematise the risk management framework, in all its aspects. Financial risk management is described in detail in note 4 to the Financial Statements and Consolidated Financial Statements 31.12.2024.

**Outlook | 2025****Global economy**

The global economy proved to be more resilient than expected in 2024 as it faced successive crises such as the most severe pandemic of the last century, wars and extreme weather events. Since 2020, monetary authorities and governments have taken important measures to address public health, energy and supply chain crises. The immediate effects of the crises were mitigated, but the effects on income, prices and the public economy remained.

Global GDP growth, although estimated to have decelerated marginally in 2024 to 3.2%, from 3.3% in 2023, continues to be at satisfactory levels. For 2025 it is estimated to remain stable at 3.2%. There is, however, considerable disparity between the major economies. Advanced economies are estimated to have accelerated, while emerging and developing economies have slowed down. According to IMF estimates, growth in 2024 in advanced economies is projected to increase slightly to 1.8%, from 1.7% in 2023, and is expected to remain at this level also in 2025. The US economy slowed down less than expected, the UK recovery was stronger than forecast, the euro area economy showed signs of recovery and Japan's economy slowed down considerably. As regards emerging and developing economies, GDP growth is projected by the IMF to slow to 4.2% in 2024, from 4.4% in 2023, and is expected to remain at this level also in 2025, mainly due to lower

growth rates in China and India. In China, the economic slowdown is projected to continue into 2025, mainly due to weaker private consumption<sup>22</sup>.

Global inflation continued to decline in the course of 2024, mainly on account of a tightening monetary policy and the gradual unwinding of the impact of the energy crisis on aggregate supply. Advanced economies experienced a larger decline in price growth despite a marginal pick-up in their growth rate, while inflation declined more slowly, driven by services inflation, which remains high in several major economies. Global inflation is expected to decline to 5.8% in 2024 and 4.3% in 2025 from 6.7% in 2023. Its de-escalation will be faster in advanced economies because of monetary policy's determination to fight inflation<sup>23</sup>.

Risks to growth and inflation in the global and European economies remain severe and are likely to continue to have a negative impact on economic activity in 2025. In particular, heightened geopolitical uncertainty (the war in Ukraine and the conflicts in the Middle East), geo-economic fragmentation and the eventual strengthening of trade protectionism may lead to a renewed increase in import prices, harming international trade and investment and undermining the productivity and resilience of economies in the long term. In addition, extreme weather events and climate change in general could lead to higher food prices. Rising real interest rates as well as the deflationary effort may have a larger than projected impact on employment and growth. Serious challenges for the economic policy of most economies are a return to fiscal stability to ensure the sustainability of public finances, and the build-up of sufficient reserves to address potential risks in the future. Mainly for the EU, major challenges will be implementing structural reforms and boosting investment in research and innovation to tackle low productivity growth and increase competitiveness. In contrast to the above risks, a gradual increase in real incomes may have a positive impact, as it will contribute to strengthening consumer confidence and private consumption.

### **Greek economy**

According to the Bank of Greece's current forecast, GDP growth in 2024 is expected to be 2.2%, to accelerate in 2025 to 2.5% and to decline slightly to 2.3% in 2026. According to the same source, inflation will continue to decline and is expected to stand at 2.9% in 2024, 2.2% in 2025 and 2.1% in 2026<sup>23</sup>.

In the Greek economy, risks to growth are mainly on the downside. In particular, risks to the prospects of the Greek economy according to the forecasts of the Bank of Greece are: any worsening of the geopolitical crisis in Ukraine and the Middle East and the resulting impact on the international economic environment, (b) the

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<sup>22</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

<sup>23</sup> Source: Monetary Policy - Interim Report 2024, (December 2024), Bank of Greece

lower than expected rate of absorption and utilisation of the Recovery and Resilience Facility funds, (c) the delay in the implementation of reforms, which would slow down the process of enhancing the productivity of the economy and the competitiveness of businesses, (d) extreme weather events (floods and fires, as happened in 2023), (e) the strengthening of trade protectionism internationally, and (f) labour market tightness and possible wage pressures. In the near future, risks to public debt sustainability appear to be contained, provided that fiscal targets are met and European funds are used efficiently. In the longer term, however, uncertainty is estimated to remain increased, as the gradual refinancing of debt obligations will increase the exposure of the Greek State to interest rate risk and market risk, which reduces the scope for fiscal easing.

For 2025, Optima bank aims to continue the successful course of the previous years, having as a guide the prospects of the market in which it operates, but mainly its business plan for the period 2025-2027. Optima bank's main strategic objectives continue to be to increase business volumes, strengthen market shares, increase revenues through the utilization of all alternative channels of customer outreach, find new sources of revenue, rigorously control operating costs, with the aim of further enhancing profitability and increasing shareholder value.

Optima bank's management constantly assesses the macroeconomic environment in which it operates in order to achieve its goals in the long term.

Maroussi, 20 March 2025  
FOR THE BOARD OF DIRECTORS

The Chairman of the  
Board of Directors

The Chief Executive Officer

Georgios Taniskidis

Dimitrios Kyparissis

## Statement of Corporate Governance

### 1. Introduction

In accordance with Article 152(1) and Article 153(3) of Law 4548/2018, Law 4706/2020 and the Greek Corporate Governance Code, the Annual Management Report of the Board of Directors of "Optima bank S.A." (hereinafter the "Bank") includes the Corporate Governance Statement for the fiscal year 01.01.2024-31.12.2024. The reference date of the Statement is December 31, 2024 (hereinafter referred to as the 'Reporting Date').

This Consolidated Corporate Governance Statement concerns the Bank and the companies in which the Bank participates directly or indirectly and which are included in its consolidated financial statements as defined in IFRS 10 "Consolidated Financial Statements", and includes the Bank itself (hereinafter the "Group").

The information required under Article 4(7)(c), (d), (e), (g) and (h) of Law 3556/2007 shall be set out in detail in the Annual Management Report of the Board of Directors.

### 2. Overview | 2024

During 2024, inter alia, the following events related to corporate governance took place:

- ❖ the granting of a license for the establishment and operation of a leasing company under Law 1665/1986, a wholly owned subsidiary of the Bank, under the name "Optima Leasing Single-member Société Anonyme" and the distinctive title "Optima Leasing S.A."
- ❖ The extension of the number of members of the Board of Directors of the Bank from ten (10) to eleven (11), with the election and addition of Mr Nikolaos Giannakakis as a Non-Executive Member whose term of office will expire at the same time as the term of office of its other Members, and therefore the reconstitution of the Board of Directors.
- ❖ The amendment of the Bank's Articles of Association following the increase of the Bank's share capital through the capitalization of part of the profits of the year 2023 and the free allocation of the new shares issued to the Chairman and the Executive Members of the Board of Directors (excluding the Independent Non-Executive Members) as well as to the Bank's senior management (Executive Committee Members), in accordance with the provisions of article 114 of Law 4548/2018 through a Share Free Allocation Program.

- ❖ The approval of the Program for the free distribution of shares to members of the Board of Directors and staff, in accordance with the provisions of Article 114 of Law 4548/2018, through the capitalization of profits for the year 2023.
- ❖ The amendment of the Adequacy Policy of the members of the Board of Directors of the Bank.
- ❖ The amendment of the Bank's Staff Remuneration Policy.
- ❖ The establishment of an operational Sustainable Development Management Committee and the approval of its Rules of Procedure.
- ❖ The resignation of the member of the Board of Directors, Ms Clio Lymberi, and the reconstitution of the Board of Directors with the other Members, without the replacement of the resigned member temporarily, in accordance with Article 10(2) of the Bank's Articles of Association.
- ❖ The reconstitution of the Committees of the Board of Directors of the Bank, i.e. the Audit Committee, the Risk Management Committee and the Remuneration and Nominations Committee, following the resignation of Ms Clio Lyberi, acting Chair of the Risk Management Committee and Member of the Audit Committee and Remuneration and Nominations Committee of the Bank.
- ❖ Approval of the revised Rules of Procedure of the Audit Committee.
- ❖ Approval of the revised Rules of Procedure of the Risk Management Committee.
- ❖ The approval and submission to the Bank of Greece of the revised Action Plan (ESG Roadmap) for the gradual integration of the first four out of the thirteen expectations included in a guidance document of the Single Supervisory Mechanism (SSM) for the effective management of ESG risks, which credit institutions are required to implement in order to meet the objectives set in the Paris Agreement with the United Nations Framework Convention on Climate Change.
- ❖ Informative presentation – training for the members of the Board of Directors on ESG issues.

### 3. General meeting of shareholders

In accordance with Article 116 of Law 4548/2018 and Article 22 of the Bank's Articles of Association, as last amended by the resolution of the Ordinary General Meeting of the Bank's shareholders of 23.05.2024 and posted \_\_\_\_\_ on \_\_\_\_\_ the \_\_\_\_\_ Bank's \_\_\_\_\_ website ([https://www.optimabank.gr/media/mqrfsf4i/katastatiko\\_optima\\_bank\\_tgs\\_230524\\_akrives\\_antigrafo\\_gemi.pdf](https://www.optimabank.gr/media/mqrfsf4i/katastatiko_optima_bank_tgs_230524_akrives_antigrafo_gemi.pdf)), the Bank's supreme body is the General Meeting of its Shareholders.

The General Meeting has the exclusive responsibility to decide on the following matters:

- (a) to amend the Articles of Association, including to increase or reduce the share capital;
- (b) to elect the members of the Board of Directors and the auditors;
- (c) to approve the overall management in accordance with the legislation in force and the discharge of auditors,
- (d) to approve the annual and any consolidated financial statements of the Bank;

- (e) to dispose of annual profits;
- (f) to approve the remuneration or advance payment pursuant to Article 109 of Law 4548/2018 and approve the remuneration policy pursuant to Article 110 et seq. of Law 4548/2018;
- (g) to decide on a merger, division, conversion, revival, extension of the duration or dissolution of the Bank;
- (h) to appoint the liquidators; and
- (i) to decide on any other matter provided for by law or by these Articles of Association.

The procedures and rules of convening, participation and decision-making by the General Meeting, its responsibilities as well as the rights of shareholders at the General Meetings of the Bank are regulated in detail by the provisions of the Bank's Articles of Association, as in force from time to time and Law 4548/2018.

## 2024 General Meetings

During 2024, the General Meeting convened once, in ordinary session on May 23, 2024, in which shareholders representing 68.29% of the Bank's share capital participated either in person or through a proxy, with the following agenda items for which the following decisions were taken:

| S/N | AGENDA ISSUES                                                                                                                                                                                                                                                                         | DECISIONS                                                                                                                                                                                                                                                            | VOTING RESULTS                                              |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 1   | Submission and approval of the Annual Financial Report (Bank & Group) in accordance with the International Financial Reporting Standards for the fiscal year 01.01.2023 to 31.12.2023, following the relevant Reports of the Board of Directors and the Certified Public Accountants. | The General Meeting approved the Annual Financial Report of the Bank and the Group for the fiscal year 01.01.2023 until 31.12.2023, following the relevant Reports and Statements of the Board of Directors and the Audit Report of the Certified Public Accountant. | IN FAVOR: 99.96%<br><br>AGAINST: 0.04%<br><br>ABSTENTION: - |
| 2   | Approval of the overall management that took place during the financial year 01.01.2023 – 31.12.2023, in accordance with Article 108 of Law 4548/2018 and discharge of the Certified Public Accountants for the same financial year, in accordance with Article 117 of Law 4548/2018. | The General Meeting approved the overall management carried out by the Board of Directors during the fiscal year 2023 and the discharge of the Certified Public Accountants of the Bank from any liability for the activities of that fiscal year.                   | IN FAVOR: 99.96%<br><br>AGAINST: 0.04%<br><br>ABSTENTION: - |

| S/N | AGENDA ISSUES                                                                                                | DECISIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | VOTING RESULTS                                              |
|-----|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 3   | Election of Certified Public Accountants for the audit of the Financial Statements for the fiscal year 2024. | <p>The General Meeting decided to assign the regular audit of the Bank's annual financial statements for the fiscal year 2024, the tax audit for the same fiscal year as well as the reports of pre-agreed procedures for the remuneration report of the members of the Board of Directors, the Hellenic Deposit and Investment Guarantee Fund (TEKE) and the Guarantee Fund to the company of Certified Public Accountants "DELOITTE SOCIETE ANONYME OF CERTIFIED AUDITORS ACCOUNTANTS", which is based in Maroussi, Attica, 3a Fragokklissia str. &amp; Granikou, with No. G.E.MI. 001223601000, Tax Identification Number 094394788, SOEL Reg. No: E120, for a total fee of EUR 390 000.00 plus VAT, broken down as follows:</p> <ul style="list-style-type: none"> <li>➤ € 287,000 for the regular audit of the financial year 2024,</li> <li>➤ €78 000 for the tax audit for the period 01.01.2024 to 31.12.2024,</li> <li>➤ € 15,000 for the remuneration report of the members of the Board of Directors as well as</li> <li>➤ €10,000 for the pre-agreed procedure reports for TEKE and the Guarantee Fund.</li> </ul> <p>After consultation of the Bank with the said auditing company, the Ordinary Auditor and the Alternate Auditor of the Bank will be appointed. Furthermore, the General Meeting authorised the Board of Directors of the Bank to negotiate with the audit firm any deviations from the above mentioned remuneration relating to any additional audit work that may be required and to send the written notice/order to the selected audit firm within five (5) days from the date of its selection.</p> | <p>FOR: 100%<br/>AGAINST: -<br/><br/>ABSTENTION: -</p>      |
| 4   | Approval of distribution of profits and distribution of dividend for the year 2023.                          | <p>The General Meeting approved the distribution of profits for the year 2023 up to the total amount of € 38,175,422.48, for the distribution of dividend for the year 2023 amounting to € 0.44 per share and for the purposes set for discussion and voting under items 10 and 11 of the Agenda below. It also decided that the total cost to be borne by the Bank for items 10 and 11 of the Agenda should not exceed a total of €5,750,000.</p> <p>For the distribution of dividends, the General Meeting approved the dates of the ex-dividend right, the identification of the beneficiaries of the dividend and the start of the payment of the dividend for the fiscal year 2023 as follows:</p> <p>i. Ex-dividend entitlement date: Tuesday, June 25, 2024</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>IN FAVOR: 100%<br/>AGAINST: -<br/><br/>ABSTENTION: -</p> |

| S/N | AGENDA ISSUES                                                                                                                                                                                                                                                      | DECISIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | VOTING RESULTS                                                     |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|     |                                                                                                                                                                                                                                                                    | <p>ii. Date of identification of dividend beneficiaries: Wednesday, June 26, 2024</p> <p>iii. Dividend payment start date: Monday, July 1<sup>st</sup> 2024.</p> <p>The payment of the dividend for the financial year 2023 must be made through the Bank itself, acting as the paying bank. Finally, the General Meeting authorized the Board of Directors to take any necessary or appropriate action in the context of the implementation of the present decision of the Ordinary General Meeting.</p> |                                                                    |
| 5   | Decision to extend the number of members of the current Board of Directors of the Bank from ten (10) to eleven (11), with the election and addition of a new Member, whose term of office will expire at the same time as the term of office of its other Members. | The General Meeting approved the election and addition of Mr. Nikolaos Giannakakis to the Board of Directors of the Bank as a Non-Executive Member, for the remainder of the term of office of the current Board of Directors elected by the Ordinary General Meeting of Shareholders on 23.03.2023, i.e. by 10 September 2027 at the latest.                                                                                                                                                             | <p>IN FAVOR: 91.38%</p> <p>AGAINST: 8.62%</p> <p>ABSTENTION: -</p> |
| 6   | Submission of the Audit Committee's activity report for 2023, in accordance with Article 44(1), point Law 4449/2017.                                                                                                                                               | The BoD took note of the Audit Committee's activity report for 2023, in accordance with Article 44(1), point (i). Law 4449/2017.                                                                                                                                                                                                                                                                                                                                                                          | WITHOUT VOTE                                                       |
| 7   | Submission of the Report of the independent non-executive members of the Board of Directors in accordance with Article 9(5) of Law 4706/2020.                                                                                                                      | The BoD took note of the Report of the independent non-executive members of the Board of Directors in accordance with Article 9(5) of Law 4706/2020.                                                                                                                                                                                                                                                                                                                                                      | WITHOUT VOTE                                                       |
| 8   | Submission for discussion of the Remuneration Report for the financial year 2023, in accordance with Article 112 of Law 4548/2018.                                                                                                                                 | The BoD voted in favor on the Remuneration Report for the financial year 2023, in accordance with Article 112 of Law 4548/2018, without expressing any comment or remark on its content.                                                                                                                                                                                                                                                                                                                  | <p>IN FAVOR: 93.47%</p> <p>AGAINST: 6.53%</p> <p>ABSTENTION: -</p> |
| 9   | Approval of the fees of the Members of the Board of Directors for the year 2023 and determination of the amount of these fees through participation in                                                                                                             | The BoD decided to approve the fees and expenses in general and any kind of compensation paid to the members of the Board of Directors for the period 01.01.2023 to 31.12.2023 and to determine the amount and pre-approve these fees for the year 2024 and until the Annual General Meeting for the year 2025, in accordance with the relevant                                                                                                                                                           | <p>IN FAVOR: 94.58%</p> <p>AGAINST: 5.42%</p> <p>ABSTENTION: -</p> |



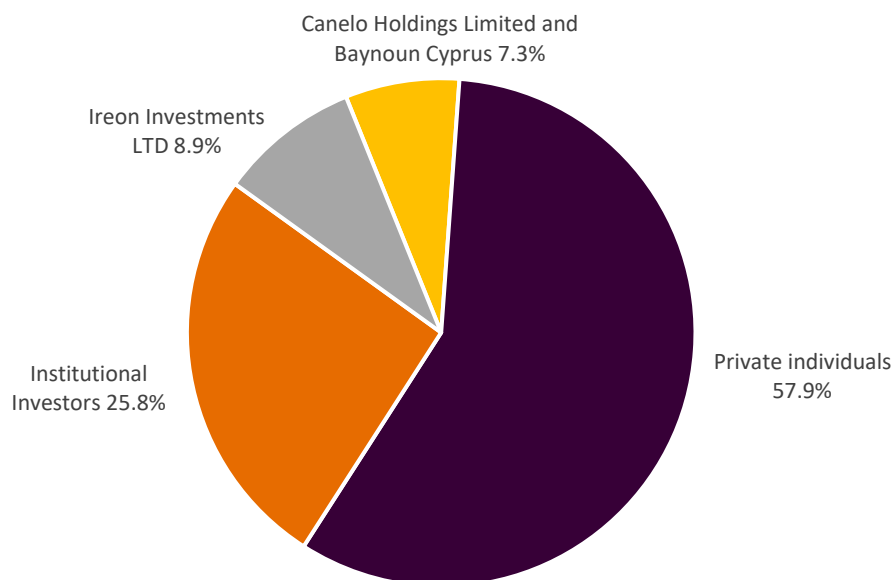
| S/N | AGENDA ISSUES                                                                                                                                                                                                                                                                                                            | DECISIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | VOTING RESULTS                                                     |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
|     | the profits for the year 2024 until the Annual General Meeting for the year 2025, in accordance with the provisions of article 109 of Law 4548/2018.                                                                                                                                                                     | recommendation of the Board of Directors, which the General Meeting accepted and approved in full.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                    |
| 10  | Free distribution of shares to members of the Board of Directors and staff, in accordance with the provisions of article 114 of Law 4548/2018, through capitalization of profits for the year 2023 (Program of Free distribution of shares). Corresponding amendment to Article 5 of the Bank's Articles of Association. | <p>(a) The BoD approved the relevant recommendation of the Remuneration and Nominations Committee of the Bank and decided the free distribution of shares of the Bank through capitalization of part of the profits of the year 2023, up to the amount of € 1,035,000.00, with an equal share capital increase, divided by the amount of the increase, to up to 300,000 new registered, common, voting, shares, with a nominal value of each share of € 3.45 (the "New Shares"), in order for the New Shares to be distributed free of charge, under the conditions of the Law, to the Chairman and the executive members of the Board of Directors (excluding the Independent Non-Executive Members) as well as to the senior management of the Bank (Executive Committee Members) ("Beneficiaries"), in accordance with the provisions of Article 114 of Law 4548/2018, as in force and subject to the receipt of the relevant approvals from the competent regulatory authorities. Specifically, it approved a free share allocation program in accordance with Article 114 of Law 4548/2018 with the following features:</p> <p>Number and class of shares available: up to 300,000 new registered, common, voting, shares, with a nominal value of each share of €3.45.</p> <p>Origin of the shares available: capitalization of part of the profits for the year 2023 up to the amount of € 1,035,000.00, with an equal share capital increase.</p> <p>Beneficiaries / Categories of Beneficiaries: Chairman, Executive Members of the Board of Directors, senior executives of the Bank (Executive Committee Members), as follows:</p> <p>a) Chairman: up to 45,000 shares</p> <p>b) Executive Members of the Board of Directors:</p> <p>(ba) Managing Director: up to 5,000 shares,</p> <p>(bb) Executive Member of the BoD/CFO: up to 3,000 shares</p> <p>c) Senior Management of the Bank (Executive Committee Members): up to 3,000 shares each.</p> <p>Specifically with regard to the Chairman of the Bank, in accordance with Article 86 of Law 4261/2014, it approved a higher than 100% maximum ratio between the fixed and variable components of</p> | <p>IN FAVOR: 91.03%</p> <p>AGAINST: 8.97%</p> <p>ABSTENTION: -</p> |

| S/N | AGENDA ISSUES                                                                                                                                                                                                          | DECISIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | VOTING RESULTS                                                      |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|     |                                                                                                                                                                                                                        | <p>his/her remuneration, amounting to two hundred percent (200%).</p> <p>(b) Consequently, due to the share capital increase with capitalization of profits, for the purpose of offering free shares in accordance with Article 114 of Law 4548/2018, the BoD decided to amend Article 5 on share capital (amendment of paragraph 1 and addition of paragraph 1.13) of the Bank's Articles of Association.</p> <p>(c) The BoD authorized and instructed the Board of Directors to take all necessary actions to increase the share capital by capitalization of profits, up to the amount of € 1,035,000,00, to draft the new text of the Bank's Articles of Association and to determine the specific terms for the free distribution of shares to the Beneficiaries, in accordance with the Law and the applicable Remuneration Policy of the Bank's Board of Directors Members and Personnel, respectively.</p> |                                                                     |
| 11  | Distribution of part of the profits for the year 2023, as a one-off special fee (Bonus) due to the achievement of objectives to members of the Board of Directors and staff of the Bank – Provision of authorisations. | Following the decision taken on the 4th item of the Agenda, the BoD approved the distribution of part of the net profits of the year 2023 as a one-off extraordinary remuneration (Bonus) of a total amount of up to Euro 4,000,000.00 to members of the Board of Directors (excluding independent non-executive members) and the Bank's staff, as a reward for their contribution to the achievement of the Bank's profitability and objectives during the year 2023 and granted the relevant authorisations to the Board of Directors to determine the specific terms of allocation of the above amounts and to deal with the procedural issues for the payment of the extraordinary remuneration (Bonus).                                                                                                                                                                                                       | <p>IN FAVOR: 94.47%</p> <p>AGAINST: 5.53%</p> <p>ABSTENTION: -</p>  |
| 12  | Approval of the amendment of the Adequacy Policy of the Members of the Board of Directors.                                                                                                                             | The BoD approved the amendment of the Adequacy Policy of the members of the Board of Directors of the Bank.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>IN FAVOR: 95.31%</p> <p>AGAINST: 4.69%</p> <p>ABSTENTION: -</p>  |
| 13  | Update of the Bank's Remuneration Policy.                                                                                                                                                                              | The BoD approved the amendment of the Bank's Staff Remuneration Policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>IN FAVOR: 87.76%</p> <p>AGAINST: 12.24%</p> <p>ABSTENTION: -</p> |
| 14  | Other matters - Miscellaneous                                                                                                                                                                                          | There were no other issues or announcements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | WITHOUT VOTE                                                        |

#### 4. Shareholders

The shareholding structure of the Bank (for descriptive, non-regulatory purposes) was as follows at the Reporting Date:

Shareholders' Composition 31.12.2024



#### 5. Administrative, Management and Regulatory Bodies and Senior Management

In accordance with Article 9 of the Bank's Articles of Association and Article 77(1) of Law 4548/2018, the Bank is governed by the Board of Directors.

The Bank's Administrative, Management and Regulatory Bodies are the Board of Directors and its committees (i.e. the Remuneration and Nominations Committee, the Audit Committee and the Risk Management Committee), the Executive Committee and the Head of the Internal Audit Department, Ms Aphrodite Samara. In addition, all members of the Executive Committee are members of the senior management of the Bank.

##### Implementation of an institutional framework for corporate governance

The Bank has adopted and complies with the legal framework on corporate governance of companies with securities listed on a Regulated Market as well as credit institutions in accordance with Law 4261/2014, Law 4706/2020 and Article 44 of Law 4449/2017 as in force for the Audit Committee, and the delegated acts and decisions of the competent authorities. In this context, the Bank has adopted the Greek Corporate Governance

Code for listed companies drawn up by the Hellenic Corporate Governance Council (HCGC) as published in June 2021 and meets the requirements of the applicable regulatory framework as the HCGC has been recognised as a body of recognised prestige in accordance with Article 17 of Law 4706/2020 and Decision 2/905/3.3.2021 of the Board of Directors of the Hellenic Capital Market Commission. The above Corporate Governance Code is posted on the Bank's website ([http://www.optimabank.gr/media/0ehjz5zv/esed\\_kodikas\\_etairikis\\_diakybernis\\_2021.pdf](http://www.optimabank.gr/media/0ehjz5zv/esed_kodikas_etairikis_diakybernis_2021.pdf)).

In addition, the Bank features the Rules of Procedure, in accordance with the provisions of Article 14 of Law 4706/2020. A summary of the Bank's Rules of Procedure is posted on the Bank's website ([https://www.optimabank.gr/media/2w1hv32k/c33\\_kanonismos\\_leitoyrgias\\_perilipsi.pdf](https://www.optimabank.gr/media/2w1hv32k/c33_kanonismos_leitoyrgias_perilipsi.pdf)). The Bank's Rules of Procedure include, in accordance with par. 3 of the same article, the organisational structure, the objects of the units and committees operating in the Bank, as well as the duties of their heads and their reporting lines, the description of the main features of the internal audit system, including the operation of the Internal Audit Department, the Risk Management Department and the Regulatory Compliance Department, as well as all the policies and procedures referred to in paragraph 3 of article 14 of Law 4706/2020. In addition, the Rules of Procedure include the Policy and Procedure with adequate and effective mechanisms for communication with shareholders, in order to facilitate the exercise of their rights and the active dialogue with them (shareholder engagement), which has been drafted in accordance with article 13 par. 1 (b) of Law 4706/2020, as well as the procedure for the evaluation of the Bank's corporate governance system prepared in accordance with Article 4 of Law 4706/2020. By virtue of the decision of the Board of Directors of the Bank dated 16.01.2025, the Bank has already adopted a Sustainable Development Policy, which is included in the Rules of Procedure. At the same meeting of the Board of Directors, the updated Rules of Procedure of the Bank were approved following the incorporation of the Sustainable Development Policy and the amendment of the following procedures that form part of the Rules of Procedure:

- 1) the compliance procedure for persons exercising managerial responsibilities and persons with close links to them, as defined in points 25 and 26, respectively, of Article 3(1) of Regulation (EU) No 596/2014, which include the obligations arising from the provisions of Article 19 of Regulation (EU) No 596/2014; and
- 2) the procedure for managing inside information and properly informing the public.

It is noted that according to the assessment carried out by the Board of Directors at its meeting of 20.03.2025 on the basis of the financial data of the subsidiaries at the Reporting Date, it was found that no subsidiary is considered to be a Significant Subsidiary, in accordance with Article 2 of Law 4706/2020

The Bank features an Internal Audit Department headed by Mrs. Aphrodite Samaras, appointed by the 11.04.2013 decision of the Bank's Board of Directors, a Regulatory Compliance Department headed by Mr. Alexandros Diolis as appointed pursuant to the decision of the Board of Directors of the Bank dated 10.08.2023,

as well as the Risk Management Department, headed by Mr. Sotirios Papakonstantinou, as appointed by the decision of the Board of Directors of the Bank dated 30.06.2022. At the same time, the Bank also features an Investor Relations, Shareholder and Corporate Communications Section, headed by Mr Konstantinos Vatousis, appointed by decision of the Bank's Board of Directors of 16 May 2023 as the person responsible for communicating with shareholders and investors, and whose details are posted on the Bank's website (<http://www.optimabank.gr/en/about-us/investor-relations>).

Finally, by virtue of the resolution of the Extraordinary General Meeting of Shareholders dated 22.03.2023, the Bank has approved and has since then implemented a Remuneration Policy for the Members of its Board of Directors, with a four-year validity period, which is subject to periodic reassessment for updating purposes in accordance with the applicable regulatory framework. Similarly, it has adopted and applies an Adequacy Policy for the Members of the Board of Directors, which has been drawn up and updated in accordance with the provisions of: a) Article 3 of Law 4706/2020 and the guidelines of the Hellenic Capital Market Commission (Circular No. 60/18.9.2020), b) it was updated in the Act of the Executive Committee of the Bank of Greece No. 224/1/21.12.2023 on the procedure for the adequacy assessment for the position of a member of the Board of Directors and Head of Critical Functions and c) the Joint Guidelines of the European Banking Authority and the European Securities and Markets Authority on the adequacy assessment of members of the management body and key function holders in accordance with Directive 2013/36/EU and Directive 2014/65/EU (EBA/GL/2021/06), Law 4261/2014. The policies can be found on the Bank's website (<http://www.optimabank.gr/about-us/corporate-governance/principles>).

The Bank maintains the following documents posted on the website (<https://www.optimabank.gr/about-us/corporate-governance/principles>), in accordance with the provisions of Law 4706/2020: the current Articles of Association, the Remuneration Policy and the Adequacy Policy of the Members of the Board of Directors, the Rules of Procedure of its Committees, a summary of its Rules of Procedure, the CVs of the members of the Board of Directors of the Bank, as well as the contact details of the Head of the Investor Relations, Shareholder and Corporate Communications Section for communication with the Bank's shareholders and investors.

## **Board of Directors**

### **Composition and functioning of the Board of Directors**

According to the Bank's Articles of Association (Article 9), the Bank is governed by a Board of Directors consisting of three (3) to fifteen (15) members. The Board of Directors consists of executive, non-executive, and independent non-executive members, in accordance with Law 4706/2020 on corporate governance, as in force. The status of the members of the Board of Directors as executive or non-executive is defined by the

Board of Directors. The independent non-executive members are elected by the General Meeting of the Bank's shareholders or appointed by the Board of Directors, in accordance with Article 9(4) of Law 4706/2020, as in force, they must not be less than one third (1/3) of the total number of members of the Board of Directors and, in any case, they may not be less than two (2). In case of a fraction, it shall be rounded to the nearest whole number.

The members of the Board of Directors are elected for a four-year term, which starts from their election and ends with the election of a new Board of Directors by the ordinary General Meeting that meets in the year of the end of their term. The term of office may not be extended beyond five (5) years.

The Board of Directors of the Bank was elected by the decision of the Extraordinary General Meeting of 22.03.2023, with a four-year term, ending with the election of the new Board of Directors by the Ordinary General Meeting in the year of the end of their term (i.e. until 10.09.2027) and was constituted as a body by its decision of 23.03.2023. Pursuant to the decision of the Ordinary General Meeting of May, 23, 2024, the number of members of the Board of Directors of the Bank was extended from ten (10) to eleven (11), with the election and addition of Mr Nikolaos Giannakakis as a Non-Executive Member, for the remainder of the term of the Board of Directors elected by the Ordinary General Meeting of Shareholders on March, 23, 2023, i.e. by 10 September 2027 at the latest, and the Board of Directors was reconstituted as a body by its decision of May, 27, 2024. On 31.10.2024, Ms. Clio Lymberi resigned from her position as Independent Non-Executive Member of the Board of Directors of the Bank, as well as from her positions as Chairman of the Risk Management Committee and member of the Audit Committee and the Remuneration and Nominations Committee. Following this, the Board of Directors of the Bank, at its meeting of 08.11.2024, decided, pursuant to Article 82 of Law 4548/2018 and Article 10(2) of the Bank's Articles of Association, to continue the management and representation of the Bank, without the temporary replacement of Ms. K. Lyberi, until her replacement by a new member of the Board of Directors, who will meet the criteria of individual and collective adequacy, in accordance with the applicable legislation and the Adequacy Policy of the Members of the Board of Directors of the Bank and was reconstituted as a body with its other Members. Therefore, on the Reporting Date, the Board of Directors of the Bank consisted of ten (10) members, namely eight (8) non-executive members, of which four (4) are independent non-executive members, and two (2) executive members.

The Remuneration and Nominations Committee of the Bank, having completed the steps to identify a person suitable for acquiring the status of member of the Board of Directors of the Bank in replacement of the resigning member Ms. Klio Lymberis at its meeting of 18.02.2025, nominated Ms. Ioanna Zour as candidate for the position of Independent Non-Executive Member of the Board of Directors of the Bank. Subsequently, the Board of Directors of the Bank at its meeting of March 20, 2025 elected Ms. Ioanna Zour as Independent Non-Executive Member of the Board of Directors in replacement of the resigned member and was reconstituted into a body and now consists of eleven (11) members, namely nine (9) non-executive members, of which five

(5) are independent non-executive members, and two (2) executive members. In the person of Mrs. Ioanna Zour, the independence criteria are met, as well as the conditions of individual and collective suitability, in the context of the application of the provisions of Article 9 of Law 4706/2020, the Act of the Executive Committee of the Bank of Greece No. 224/1/21.12.2023 and the Policy of Adequacy of the members of the Board of Directors of the Bank. The election of the new Independent Non-Executive member of the Board of Directors will be announced at the next General Meeting of the Bank's Shareholders.

**Consequently, the current Board of Directors of the Bank consists of the following Members:**

| <b>Name and surname</b>                                 | <b>Position on the Board of Directors</b> | <b>Status</b>                    |
|---------------------------------------------------------|-------------------------------------------|----------------------------------|
| <b>Georgios Taniskidis, father's name Ioannis</b>       | Chairman                                  | Non-Executive Member             |
| <b>Petros Tzannetakis, father's name Tzanibeis</b>      | Vice-Chairman                             | Non-Executive Member             |
| <b>Dimitrios Kyparissis, father's name Apostolos</b>    | Chief Executive Officer                   | Executive Member                 |
| <b>Angelos Sapranidis, father's name Nikolaos</b>       | Member                                    | Executive Member                 |
| <b>Theophanis Voutsaras, father's name Christos</b>     | Member                                    | Non-Executive Member             |
| <b>Nikolaos Giannakakis, father's name Constantinos</b> | Member                                    | Non-Executive Member             |
| <b>Theodoros Efthis, father's name Ilias</b>            | Member                                    | Independent Non-Executive Member |
| <b>Ioanna Zour, father's name Christos</b>              | Member                                    | Independent Non-Executive Member |
| <b>Pavlos Kanellopoulos, father's name Dimitrios</b>    | Member                                    | Independent Non-Executive Member |
| <b>Georgia Kontogianni, father's name Vasileios</b>     | Member                                    | Independent Non-Executive Member |
| <b>Georgios Kyriakos, father's name Konstantinos</b>    | Member                                    | Independent Non-Executive Member |

According to article 13(2) of the Bank's Articles of Association, the Chairman, when absent or impeded, is replaced by the Vice-Chairman and in the event that more than one are elected, by one of them, according to a decision of the Board of Directors. In the event of absence or impediment of the Vice-Chairmen, the Chairman shall be replaced by another member of the Board of Directors appointed by it.

The Independent Non-Executive Members of the Board of Directors met on the date of their election and continue to meet the independence requirements of Article 9 of Law 4706/2020. Two (2) women participate in the Board of Directors of the Bank, i.e. a percentage corresponding to 25% of its total members, after rounding, in accordance with Article 3(1)(b) of Law 4706/2020.



Furthermore, it is noted that the above composition of the Board of Directors is in accordance with the provisions of the Adequacy Policy of the members of the Board of Directors, which was amended in accordance with the provisions of Article 3(1) of Law 4706/2020, with the decision of the Board of Directors of 30.04.2024 and submitted for approval to the Ordinary General Meeting of the Shareholders of 23.05.2024 in accordance with Article 3(3) of the same Law and is available on the Bank's website ([https://www.optimabank.gr/media/troekoet/p56\\_politiki\\_katallilothtas\\_melon\\_ds\\_optima\\_bank.pdf](https://www.optimabank.gr/media/troekoet/p56_politiki_katallilothtas_melon_ds_optima_bank.pdf)). In addition, the CVs of the members of the Board of Directors are posted on the Bank's website, <http://www.optimabank.gr/en/about-us/corporate-governance/board-of-directors>.

The Board of Directors exercises its responsibilities in accordance with the Bank's Articles of Association, the provisions of Law 4548/2018, Law 4261/2014 and Law 4706/2020 and the relevant national legislation in general, the Bank's Rules of Procedure and the Board of Directors' Rules of Procedure.

The CVs of the members of the Board of Directors are as follows:

- **Georgios Taniskidis, Chairman of the Board of Directors, Non-Executive Member:** With 30 years of experience in banking, Georgios Taniskidis holds the position of Optima bank's Chairman since July 2019. He began his career as a lawyer at Rogers & Wells Law Firm in New York City. Returning to Greece, he joined Motor Oil Hellas. His career in banking began in 1990 at Xiosbank, as Head of Consumer Business Group and Branch Network. Following the acquisition of Xiosbank (end of 1998) by Piraeus Bank, Mr. Taniskidis took over the position of General Manager and participated in the Strategic Planning Committee. From 2002 to June 2010, in his capacity as Chairman and CEO of Millennium bank Greece, Mr. Taniskidis led the Bank to the achievement of its objectives much earlier than expected. At the same time, he led the acquisition of a banking institution in Turkey that was renamed Millennium bank Turkey and served as a member of its Board of Directors. From late July to October 2011, Mr. Taniskidis served as Interim CEO of Proton Bank during the transition period, where he successfully maintained the bank's liquidity and market access amid the turbulent period until its break-up. From 2003 to 2005, he was a Member of the Board of Directors of Visa International Europe. He has been a member of the Board of Directors of the Hellenic Bank Association for many years. Today he participates in Boards of Directors in various companies in the fields of commerce, manufacturing and shipping. He played a key role in the acquisition of Marfin Bank Romania (now VISTA BANK). He envisioned the creation of a bank not carrying the weight of the past in Greece. He pursued his goal and eventually succeeded in acquiring the Investment Bank of Greece (now Optima bank). Already in its more than five years of operation, the Bank has an admirable course and is a reference bank in the Greek banking scene. Mr Taniskidis holds a Law degree from the Law School of the University of Athens, where he graduated first in class, and a Master of Laws (LL.M.) from the Law School of the University of Pennsylvania.



- **Petros Tzannetakis, Vice-Chairman, Non-Executive Member:** Mr Petros Tzannetakis holds the position of Deputy CEO of Motor Oil. He has over 34 years of experience in the private sector. His career began in 1986 at Motor Oil, as a Senior Financial Analyst. In 1991 he assumed the position of Chief Financial Officer (CFO) and in 2005 the position of Deputy Chief Executive Officer of the Motor Oil Group of Companies. He is a Member of the Board of Directors and the Executive Committee of the Group. He leads all Corporate, Financial, Cash, Banking and Investor Relations functions and participates in all corporate decisions, in addition to financial ones. Among his significant achievements are the initial public offering of Motor Oil (Greece) in the years 1999 – 2001, the introduction of the Group into the Greek, European and American investment community, the placement of Motor Oil (Greece) shares, which doubled the company's free float by attracting institutional investors abroad in September 2005, when Saudi Aramco sold its stake. He is a Member of the Boards of Directors of all subsidiaries of Motor Oil Hellas Corinth Refineries S.A. (Avin Oil Industrial Commercial & Maritime Oil Company S.A., Motor Oil Holdings LTD, Coral S.A. (formerly Shell Hellas S.A.), Coral Gas S.A., LPC S.A., Petroventure Holdings Limited). He is also Chairman of the Board of Korn Ferry International S.A. He was a Member of the Board of Directors of M.J. Mailis S.A. (packaging company), Incadea Group GmbH (company providing solutions in the retail car market), and Olympic DDB Holding S.A. (advertising company). Mr Tzannetakis holds a BA in Economics from the University of Surrey (UK) and a MA in European Union Economics from the University of Sussex (UK).
- **Dimitris Kyparissis, Managing Director, Executive Member:** With over 25 years of experience in the banking sector, Mr Dimitris Kyparissis holds the position of CEO of the Bank. He began his career at Xiosbank in 1993, where he set up the car financing section before taking responsibility for the entire retail credit. In 2000, Mr Kyparissis, as a member of the founding team of the newly established Novabank, created the credit sections of the bank. In 2002 he was in Turkey where he launched Novabank's newly established subsidiary, BankEuropa. Returning in 2004, he held various positions at Millennium bank and became a member of the board of directors responsible for credit and operations. In 2010 he became General Manager of the Hellenic Post Bank, responsible for the retail banking sector. Between 2016 and 2018, he headed Eurobank's retail branch network. Since January 2019, he has been involved in the acquisition of the Investment Bank of Greece, with the aim of transforming it into a successful commercial bank, the current Optima bank, in which he holds the position of Managing Director. Mr Dimitris Kyparissis holds a B.Sc. in Accounting & Finance from the American College of Greece and an MBA in Financial Services Management from the University of Sheffield, UK.

- **Angelos Sapranidis, Executive Member of the Board of Directors:** With over 35 years of experience in banking, Mr. Angelos Sapranidis currently holds the position of Chief Financial Officer of Optima bank. He started his career in 1981 in the Finance & Accounting Department of the Bank of Macedonia-Thrace S.A. and left it in 1991 as Deputy Director of the Finance & Accounting Department. In 1991 he joined the founding team of Egnatia Bank as Head of the Financial Services Department. He was then promoted to Deputy General Manager, reporting directly to the Managing Director, taking additional responsibility for the Departments of Central Works and Administrative Services. In 2007 he became a CFO of the Marfin Egnatia Bank Group. In 2013 he moved to the Financial Services Department of Piraeus Bank Group, responsible for the proper transfer and financial liquidation of the transferred assets of the Greek activities of the Cypriot Banks. In 2018 he became Deputy Managing Director at Investment Bank of Greece S.A. (currently Optima bank). Mr Sapranidis holds a degree in Economics from the Faculty of Law and Economics of the Aristotle University of Thessaloniki.
  
- **Theofanis Voutsaras, Non-Executive Member:** He was born in 1963. He is a graduate of Boston College (USA) and holds a Master's degree (MSc) from the London School of Economics (UK) specializing in Industrial Relations & Personnel Management. He has 30 years of experience in managerial positions (Banking, Construction). He has been working for Motor Oil since 2010.
  
- **Nikolaos Giannakakis, Non-Executive Member:** He was born in 1971. He holds a Bachelor's degree in Physics, a Master's degree in Industrial Systems Organisation and Management and a degree from the International Institute for Management Development – IMD (Lausanne, Switzerland). He has 15 years of international experience in positions of Director and General Manager of Informatics in distinguished Multinational Groups. He was named one of the Top 100 Chief Information Officers for 2019. He has been working for Motor Oil since November 2019.
  
- **Theodoros Efthys, Independent Non-Executive Member:** With over 30 years of experience in the banking sector, Mr Theodoros Efthys holds the positions of non-executive member of the Board of Directors of Optima bank, Chairman of the Audit Committee and member of the Risk Management Committee. He began his career in 1990 at Merrill Lynch International Bank in London as a Financial Advisor, where he remained for 13 years and left as Vice Chairman. He then moved to Geneva, Switzerland, where he worked for 2 years at EFG International Bank as First Vice Chairman, responsible for Portfolio Management. In 2005 he was in Greece, where he worked as an independent advisor. In 2008 he joined the Hellenic Post Bank, in the position of Deputy Treasurer & Bond trader,

while after the merger of Hellenic Postbank with Eurobank, he worked in the Asset Management & Depository sectors. Since 2019, Mr. Efthys has been a non-executive member of the Board of Directors of VISTA Bank Romania, a member of the Nominations Committee and Chairman of the Bank's Internal Audit & Risk Management Committee. Mr Efthys holds a B.Sc. in Economics from Queen Mary College, University of London. He also holds an FSA (UK Capital Markets), Series 3 & 7 (NASD USA), a level C certification (Bank of Greece) & a certificate from the Board of Directors of the National Bank of Romania.

- **Ioanna Zour, Independent Non-Executive Member:** Ms. Zour has over 30 years of experience in banking, specializing in strategic marketing, corporate communication and business transformation. She started her career in 1989 at Procter & Gamble Hellas S.A. in the field of marketing and financial analysis, and held senior positions in leading multinational companies (PepsiCo IVI S.A., Stet Hellas S.A.) From 1999-2004 she served as Deputy General Manager & Marketing Director at Novabank, while from 2004 to 2006 she held the position of Assistant General Manager and Head of Strategic Marketing at EFG Eurobank Ergasias. Afterwards, she worked at the National Bank of Greece initially as Assistant General Manager of Retail Banking and then from 2012 to 2019 as Assistant General Manager of Communications and Marketing of the Group. She has been distinguished for her pioneering initiatives in digital banking and corporate social responsibility. In addition, she has received multiple Marketing Excellence Awards for product innovation and the effectiveness of the campaigns she led. Ms Zour holds a bachelor's degree in Economics from the University of Bristol, a master's degree from the London School of Economics and has completed doctoral studies in Economics at the University of Oxford (Thesis: Greek Banking Policy from 1958 to 1980).
- **Pavlos Kanellopoulos, Independent Non-Executive Member:** Mr Kanellopoulos has more than 25 years of experience in accounting and finance, mainly at a senior level. He started his career in 1996 in the International Banking Department of Bank of Tokyo-Mitsubishi in London. Since 2003 he has served as a CFO in various companies listed on the Athens Stock Exchange and the New York Stock Exchange, which are active in various sectors, such as manufacturing, shipping and TMT. In 2017 he was appointed Chief Financial Officer of Stoiximan, a betting company based in Greece, which is considered to be one of the leading online gambling platforms in Europe and is a subsidiary of OPAP S.A. Mr. Kanellopoulos holds a degree in Economics from the Athens University of Economics, a Master's degree from the University of Warwick and a Master's degree in Behavioural Science from the London School of Economics.

- **Georgia Kontogianni, Independent Non-Executive Member:** With over 10 years of experience in banking and investment, Ms Georgia Kontogianni currently holds the positions of non-executive member of the Board of Directors of Optima bank and member of the Risk Management Committee. She started her career in 2008 in the Capital Markets Department of Alpha Bank responsible for covering corporate clients in the bond, interest rate and foreign exchange markets and continued in the Capital Markets Departments of Marfin Egnatia Bank in Greece and England. In 2013 she moved to Zurich where she joined Tallon Trading Group as Director of Global Markets, specializing in oil and emissions trading products. Since 2018 she has been in London continuing her successful career at Tallon Commodities as Director of Trading, Head of Energy Commodity Derivatives Trading and Corporate Customer Risk Management. Ms Kontogianni holds a postgraduate degree from the London School of Economics and Political Sciences (LSE). She also holds a Level C Investment Management Certificate from the Chartered Institute of Securities & Investment (CISI), approved by the Financial Conduct Authority (FCA) in the United Kingdom and a Level C Portfolio Manager certification from the Bank of Greece & the Hellenic Capital Market Commission.
- **Georgios Kyriakos, Independent Non-Executive Member:** With 30 years of experience, Mr. Georgios Kyriakos assumed senior and senior management positions in Greek and multinational companies as well as in the banking sector, in Greece and abroad. He is currently a non-executive member of the Board of Directors of Optima bank and Chairman of the Remuneration and Nominations Committee. He served as a Secretary of the Ministry of Finance for State-Owned Enterprises and Privatizations. Born in 1961, he is a graduate of Athens College, the University of Denver and holds a Master's degree in Business Administration from Boston University, while he has attended a number of Executive Trainings at INSEAD in Business Administration.

### **Meetings of the Board of Directors in 2024**

In 2024, the Board of Directors met twenty-two (22) times. The average participation rate of the members of the Board of Directors in the meetings was 97.5%.

### **Adequacy Policy of Members of the Board of Directors**

The Bank applies an Adequacy Policy for the Members of the Board of Directors, which has been drawn up in accordance with the applicable legislative and regulatory framework, amended by decision of the Ordinary General Meeting of Shareholders of 23 May 2024 and posted as in force on the Bank's website (<http://www.optimabank.gr/en/about-us/corporate-governance/principles>).

**Policy objectives**

The objectives of the Policy are:

- i. To determine the principles and rules governing the selection or replacement of the members of the Board of Directors, as well as the renewal of the term of office of the existing members.
- ii. To assist the Remuneration and Nominations Committee in the performance of its duties regarding the selection, control and formulation of nominations of BoD Members of the Bank for their election by the General Meeting (or by the BoD), in accordance with the Bank's Articles of Association and the law, as well as regarding the replacement of BoD Members by establishing a transparent, effective and time-efficient procedure for the adequacy and nomination of candidates.
- iii. To define transparent and effective criteria for the selection and assessment of the adequacy of applications and the internal adequacy assessment process.
- iv. To ensure that the composition of the Board of Directors of the Bank meets high standards of adequacy (both individually and collectively), moral prestige and competence.
- v. To define the diversity criteria for the selection of Board Members.

**Individual and Collective Adequacy**

The Bank seeks to staff the Board of Directors with persons who have guarantees of morality, reputation and increased reliability and this is the responsibility of the Board of Directors and in particular the Remuneration and Nominations Committee. Members of the Board of Directors have a good reputation and possess sufficient knowledge, skills and experience to be able to understand the Bank's activities, while at the same time having the necessary time to perform their duties.

The composition of the Board of Directors as a whole covers a sufficiently wide range of knowledge and experience per subject, so that the Board of Directors can collectively understand the Bank's activities, including the main risks to which it is or may be exposed. The principles governing the Policy are compliance with the legislative and regulatory framework, transparency, diversity and meritocracy. In particular:

**Individual adequacy**

The individual adequacy of Board Members shall be assessed in particular on the basis of the extent to which a person is deemed to have:

- i. adequate knowledge, skills, experience;
- ii. reputation, honesty, integrity and morality guarantees;
- iii. independence of judgment;

- iv. the absence of a conflict of interest for the performance of his/her duties, and
- v. sufficient time to carry out his/her duties at the Bank.

### **Collective adequacy**

The adequacy of the Board Members as a whole constitutes the collective adequacy. The Board of Directors should be adequate for the exercise of its responsibilities and its composition should ensure the effective management of the Bank and a balanced decision-making. BoD Members collectively should be able to take appropriate decisions taking into account the business model, risk appetite, strategy and markets in which the Bank operates, in order to effectively monitor and judge the decisions of senior management.

### **Succession plan**

In compliance with the current legislative and regulatory framework governing its operation and in order to ensure the smooth continuity of the management of its affairs and the decision-making after withdrawals or other cases of loss of the status of members of its Board of Directors and its committees, the Bank has established and applies an appropriate procedure (succession plan) for members of the Board of Directors and Board of Directors committees. The selection of new BoD members and committees is carried out in accordance with the specific provisions of the Bank's BoD Members' Adequacy Policy and the applicable legal and regulatory framework, in order to meet all the criteria of individual and collective adequacy.

The succession framework of the BoD members varies depending on the categorization and the basic qualities of the BoD members as a) Executive BoD Members, b) Non-Executive BoD Members and c) Independent Non-Executive BoD Members. Especially with regard to the Managing Director, the Committee ensures that the required qualitative characteristics that should in any case be met in the person of the Managing Director are identified. Regarding the identification and nomination of candidates for Independent Non-Executive BoD Members (which, in addition, participate as a majority in the BoD committees of the Bank) and in order to identify persons who meet the conditions of independence, the Committee, in cooperation with the Human Resources Department, may appoint a qualified expert consultant with expertise in identifying senior management.

The succession procedure and any amendment thereto shall be approved by the Board of Directors on the recommendation of the Remuneration and Nominations Committee.

### **Diversity and Representation regardless of gender**

The Bank gives priority to diversity in the Board of Directors and at all levels, in accordance with the applicable legislative and regulatory framework, in order to promote independent opinions and sound decision-making in the Board of Directors.

In particular, measures shall be taken to ensure that there is no exclusion on the grounds of discrimination based on sex, race, colour, ethnic or social origin, religion or belief, property, birth, disability, age, sexual orientation or any other aspect not related to employment. The individual adequacy criteria specified in the Adequacy Policy shall play an exclusive role regarding selection. Achieving substantial and not only formal diversity within the Board of Directors is an important guarantee for the overall effectiveness of the Board of Directors.

The Bank is committed to promoting equality and diversity within the Board of Directors, as well as promoting a culture that values and respects diversity and recognises that people from diverse backgrounds and experiences can make valuable contributions to the work of the Board of Directors. The Bank's broader objective is to be an inclusive organisation that provides equal opportunities in all aspects of employment within the Bank, including recruitment, training and development of Board Members and employees

In this context, provision is also made for adequate representation by gender at least as defined by the relevant legislation in terms of a percentage on the total number of BoD Members. In particular, each gender shall be adequately represented in the BoD, at least by 25 per cent (25%). If this number is a fraction, it shall be rounded down to the nearest whole number. The Committee will lay down the objectives for achieving the diversity of the BoD and will recommend their adoption by the BoD, which will take care of the improvement of one or more diversity elements and evaluate the corresponding progress.

More generally, the criteria of diversity concern not only the BoD members but also the top or senior managers. In fact, the Remuneration and Nominations Committee, in cooperation with the Human Resources Department, shall submit proposals and the BoD shall approve specific representation targets by gender, as well as timetables for achieving them.

Information on the diversity applied by the Bank in its administrative, management and regulatory bodies in terms of gender representation, as well as at all levels, can be found in the sustainability report of the Optima bank Group management report for the year 2024.

#### Approval of the Adequacy Policy of the members of the Board of Directors – Policy Review – Implementation at Group level

The Policy is approved by the Board of Directors and submitted for approval to the General Meeting of the Bank. Amendments to the Policy shall be approved by the Board of Directors and, if they are material, shall be submitted to the General Meeting for approval in accordance with Article 3(3) of Law 4706/2020. The Policy and any substantial amendments thereto shall enter into force upon its approval by the General Meeting.

The Policy that applies each time is posted on the Bank's website.

The Policy is in line with the general corporate governance framework, corporate culture and risk appetite set by the Bank.

The Policy is adopted at the level of the Bank's group, i.e. it is also adopted and applied to the extent possible (based on their size, internal organization, scale and complexity of their operation) by the subsidiaries appearing in the Bank's consolidated financial statements.

#### Implementation of the Adequacy Policy

The composition of the Board of Directors as a whole covers a wide range of knowledge and experience per subject and ensures the effective management of the Bank and a balanced decision-making. For the individual and collective adequacy of the members of the Board of Directors, the following were taken into account:

- their detailed CVs, which record their knowledge, skills, experience and other qualifications;
- other professional obligations and commitments;
- their cooperation and their functioning as a whole in the performance of their duties;
- general assessment of their individual and collective abilities; and
- the provisions of the applicable legislative and regulatory framework, the approved Adequacy Policy of the Bank and the Greek Corporate Governance Code.

Furthermore, it was established that in 2024:

- the number of independent non-executive members of the Board of Directors at the Reporting Date was higher than the number set by the applicable legislation, which ensures a high level of independence of the Board of Directors and its Committees (4 out of 10 BoD Members, i.e. 40%, were independent ones);
- by 30.10.2024, each gender was adequately represented on the Board of Directors, by at least twenty-five percent (25%), with the female gender being represented with the participation of two (2) women in the Board of Directors (10 members x 25% = 2,5 rounded up to the previous smaller whole number, in accordance with Article 3(1b) of Law 4706/2020).

Following (i) the resignation of Ms Clio Lyberi from the position of Independent Non-Executive Member of the Board of Directors, as well as from all her responsibilities and in particular from the position of Chair of the Risk Management Committee and Member of the Audit Committee and Remuneration and Nomination Committee with effect from 31.10.2024, as well as (ii) the decision taken at the meeting of the Board of Directors No 435 of 08.11.2024, following the relevant recommendation of the Remuneration and Nomination Committee, to continue the management and representation of the Bank with the other members of the Board of Directors, without the replacement of Ms K. Lyberi temporarily, until her replacement by a new member of the Board of Directors, the Remuneration and Nomination Committee immediately initiated actions in accordance with the approved current Policy on the Adequacy of Members of the Board of Directors of the Bank to identify a person adequate for



obtaining the status of member of the Board of Directors of the Bank in replacement of the resigned member.

The Remuneration and Nominations Committee of the Bank, having completed the actions to identify a person adequate for acquiring the status of member of the Board of Directors of the Bank in place of the resigned member Ms. Klio Lyberis, at its meeting of 18 February 2025, nominated Ms. Ioanna Zour, father's name Christos, as a candidate for the position of Independent Non-Executive Member of the Board of Directors of the Bank, who was elected as an Independent Non-Executive Member of the Board of Directors at its meeting of 20 March 2025. Given this, each gender is adequately represented on the Board of Directors, by at least twenty-five percent (25%), with the female gender being represented with the participation of two (2) women on the BoD, in accordance with Article 3(1b) of Law 4706/2020.

- the number of independent non-executive members of the current Board of Directors of the Bank is higher than the number set as a mandatory minimum by the current legislation, which ensures a high level of independence of the Board of Directors and its Committees (5 out of the 11 BoD Members, i.e. 45%, are independent ones) and
- the adequacy criteria set out in the current legislative and regulatory framework and in the Bank's Adequacy Policy have been met and continue to be met in full.

## **Committees**

### **Committees of the Board of Directors**

#### ***Audit Committee***

The Audit Committee has been established on the basis of BoG Governor's Act 2577/2006 and Article 44 of Law 4449/2017, as amended by Law 4706/2020. The type of the Audit Committee, the term, the number and the capacities of its members are defined by the General Meeting. The resolution of the Extraordinary General Meeting of the Bank's Shareholders of 22.03.2023 stipulated that the Audit Committee of the Bank shall be a committee of the Board of Directors, consisting of three non-executive members of the Board of Directors, independent in their majority, within the meaning of Article 9 of Law 4706/2020 and its term shall coincide with the term of office of the Board of Directors of the Bank, i.e. it shall be four years, automatically extended until the first ordinary General Meeting after the end of their term, but not exceeding five years.

The members of the Audit Committee were appointed by decision of the Board of Directors of 23.03.2023 of the BoD, and the Committee was constituted by its decision of 30.03.2023. Its composition is as follows:

- Pavlos Kanellopoulos, father's name Dimitrios, Independent Non-Executive Member of the Board of Directors, Chairman of the Audit Committee;

- Clio Lymberi, father's name Konstantinos, Independent Non-Executive Member of the Board of Directors, Member of the Audit Committee and
- Petros Tzannetakis, father's name Tzanibeis, Non-executive member of the Board of Directors, Member of the Audit Committee.

Following the resignation of the Independent Non-Executive Member of the Board of Directors and Member of the Audit Committee Ms. Klio Lymberi with effect from 31.10.2024, the Board of Directors at its meeting of 08.11.2024 decided to reconstitute the Audit Committee by appointing Mr. Theodoros Efthys as a new member of the Committee in replacement of Ms. Lymberi and the Committee was reconstituted by its decision of 11.11.2024 as follows:

1. Theodore Efthys, father's name Elias, Independent Non-Executive Member, Chairman of the Audit Committee;
2. Pavlos Kanellopoulos, father's name Dimitrios, Independent Non-Executive Member, Member of the Audit Committee and
3. Petros Tzannetakis, father's name Tzanibeis, Non-Executive Member, Member of the Audit Committee.

The above members are all non-executive, while two of the three, namely Theodoros Efthys and Pavlos Kanellopoulos, are independent. The above members of the Audit Committee have sufficient knowledge in the field in which the Bank operates, i.e. in the field of banking operations, due to their professional status and experience, as can be seen from the above CVs (see section "*Board of Directors*"/"*Composition and functioning of the Board of Directors*").

In addition, the Chairman of the Audit Committee, Mr Theodoros Efthys, has sufficient knowledge and experience in auditing and accounting, as can be seen from his CV above.

Therefore, the composition of the Audit Committee meets the requirements of Article 44 of Law 4449/2017, as amended and in force.

The Rules of Procedure of the Audit Committee are currently in force as amended by the decision of the Audit Committee of 17.12.2024 and the decision of the Board of Directors of the Bank of 20.12.2024 and have been posted on the Bank's website [http://www.optimabank.gr/media/tpbmqtty/c3\\_kanonismos\\_leitourgias\\_epitropis\\_elegxou.pdf](http://www.optimabank.gr/media/tpbmqtty/c3_kanonismos_leitourgias_epitropis_elegxou.pdf).

#### **Meetings of the Audit Committee in 2024**

In 2024, the Audit Committee met sixteen (16) times. The average attendance rate of Members of the Committee at meetings was 94%. According to its rules of procedure, the Audit Committee meets six (6) times a year or extraordinarily, if circumstances so require.

**Proceedings of the meetings of the Audit Committee for the year 2024**

During 2024, the Audit Committee met sixteen (16) times and all its decisions were taken unanimously, based on a thorough review of the supporting material and further clarifications of the meetings provided by the Chief Financial Officer, the Chief Internal Audit Officer, the Chief Compliance Officer, relevant managers, statutory auditors and other external auditors. The Audit Committee reviewed and submitted to the Board of Directors for approval the updated terms governing its rules of procedure.

In addition, the Audit Committee:

Has reviewed the interim quarterly, interim six-month and annual financial statements before publication. It reviewed and proposed to the BoD Deloitte's remuneration for audit and non-audit work for the year ended 31 December 2024 and was informed about Deloitte's audit plan and procedures.

Has approved the assignment to the audit firm Mazars of the reports on (a) the three-year evaluation of the Internal Audit System, in accordance with BoG Governor's Act 2577/2006 and (b) the annual audit on the safekeeping of financial instruments and client funds and the product monitoring obligations based on the Act of the Executive Committee Act 147/2018 of the Bank of Greece, on the findings of which it was informed.

It took note of the 2023 annual report of the Regulatory Compliance Department and the 2023 annual report of the Internal Inspection Unit assessing the adequacy of the Internal Audit System.

It has monitored the implementation of the Internal Audit Annual Programme for the year 2024. It took note of the analysis of the Internal Audit Annual Plan for the year 2025. It pre-approved its implementation and submitted it for further approval to the Bank's Board of Directors.

It has monitored the implementation of the annual Regulatory Compliance programme for the year 2024 and was informed about the annual Regulatory Compliance work plan for the year 2025.

It was informed about the important audit findings (from regular and specific audits) and the replies of the directions in relation to the timetable and the actions taken to resolve the findings.

It reviewed and pre-approved the Annual Report of the Responsible Manager on Money Laundering, Countering Money Laundering and Terrorist Financing for 2023 submitted to the Bank of Greece.

It commissioned the audit firm Deloitte to prepare an assurance report on the sustainability information to be included in the sustainability report of Optima bank group's management report for the financial year 2024 and approved a remuneration for it.

### ***Remuneration and Nominations Committee***

The Remuneration and Nominations Committee of the Bank shall consist of at least three (3) members, appointed by the Board of Directors. These members are all non-executive members of the Board of Directors and in their majority independent within the meaning of Article 9 of Law 4706/2020. An independent non-executive member of the Board of Directors shall be appointed Chairman of the Committee. By decision of the Board of Directors of 23.03.2023, a single Remuneration and Nominations Committee was established, in accordance with Article 10(2) of Law 4706/2020 and its members were appointed, and then by decision dated 31.03.2023 the Remuneration and Nominations Committee was constituted as follows:

- Georgios Kyriakos, father's name Konstantinos, Independent Non-Executive Member of the Board of Directors, Chairman of the Remuneration and Nominations Committee;
- Theofanis Voutsaras, father's name Christos, Non-executive member of the Board of Directors, Member of the Remuneration and Nominations Committee;
- Pavlos Kanellopoulos, father's name Dimitrios, Independent Non-Executive Member of the Board of Directors, Member of the Remuneration and Nominations Committee and
- Clio Lymberi, father's name, Konstantinos, Independent non-executive Member of the Board of Directors, Member of the Remuneration and Nominations Committee.

Following the resignation of the Independent Non-Executive Member of the Board of Directors and Member of the Remuneration and Nominations Committee Ms. Klio Lymberi with effect from 31.10.2024, the Board of Directors at its meeting of 08.11.2024 decided to reconstitute the Remuneration and Nominations Committee of the Bank with its remaining three (3) Members and the Committee was reconstituted by its decision of 21.11.2024 as follows:

- Georgios Kyriakos, father's name Konstantinos, Independent Non-Executive Member of the Board of Directors, Chairman of the Remuneration and Nominations Committee;
- Theofanis Voutsaras, father's name Christos, Non-executive member of the Board of Directors, Member of the Remuneration and Nominations Committee and
- Pavlos Kanellopoulos, father's name Dimitrios, Independent non-executive Member of the Board of Directors, Member of the Remuneration and Nominations Committee.

The above members are all non-executive, while two of the three members including its Chairman are independent. Therefore, the composition of the Remuneration and Nominations Committee is in accordance

with Article 10 of Law 4706/2020. The term of office of the members of the Remuneration and Nominations Committee coincides with the term of office of the Board of Directors of the Bank, i.e. it is four years, automatically extended until the first ordinary General Meeting after the end of their term, but may not exceed five years.

The current Rules of Procedure of the Remuneration and Nominations Committee were approved by decision of the Remuneration and Nominations Committee dated 21.04.2023 and by decision of the Board of Directors of the Bank dated 02.05.2023 and have been posted on the Bank's website [http://www.optimabank.gr/media/cuslmnfi/kanonismos\\_leitourgias\\_epitropis\\_apodoxon\\_ypopsifiotiton.pdf](http://www.optimabank.gr/media/cuslmnfi/kanonismos_leitourgias_epitropis_apodoxon_ypopsifiotiton.pdf).

### **Meetings of the Remuneration and Nominations Committee in 2024**

In 2024, the Remuneration and Nominations Committee met seven (7) times. The average attendance rate of Members of the Committee at the meetings was 97%.

### **Proceedings of the meetings of the Remuneration and Nominations Committee in 2024**

In 2024, the Remuneration and Nominations Committee made recommendations to the competent corporate bodies on the following issues:

- the granting of a special childbirth allowance to Bank employees, as a measure to support the family in accordance with the Bank's current Staff Remuneration Policy;
- the extension of the number of Members of the Board of Directors of the Bank from ten (10) to eleven (11), with the election and addition of a new Member (Mr Nikolaos Giannakakis), whose term of office will expire at the same time as the term of office of its other Members;
- the approval of the fees of the Members of the Board of Directors for the fiscal year 2023 and the determination of the amount of these fees through participation in the profits for the fiscal year 2024 until the Annual General Meeting for the year 2025, in accordance with the provisions of article 109 of Law 4548/2018;
- the free distribution of shares to members of the Board of Directors and to staff executives (Senior Management, in accordance with the provisions of Article 114 of Law 4548/2018, through the capitalization of profits for the financial year 2023 (Program of free distribution of shares) and provided clarifications setting out the basic characteristics and the main terms of the Program of free distribution of shares to members of the Board of Directors and staff, in accordance with the provisions of Article 114 of Law 4548/2018, through the capitalization of profits for the financial year 2023
- the distribution of part of the profits of the financial year 2023, as a one-off special fee (Bonus) due to the achievement of objectives to Executive Members of the Board of Directors and Bank staff
- the modification of the Adequacy Policy of the Members of the Board of Directors; and

- the update of the Bank's Remuneration Policy
- the creation of a Variable Remuneration scheme for the payment of variable remuneration approved by the Ordinary General Meeting to the Executive Members of the BoD and senior staff of the Bank as a one-off extraordinary remuneration (Bonus) for the 2023 profit and loss;
- the adjustment of the variable remuneration system of the Bank's Brokerage General Department;
- the salary adjustment of the Chairman and Non-Executive Member of the Board of Directors of the Bank;
- the adjustment of the remuneration of the Chief Executive Officer and Executive Member of the Board of Directors of the Bank;
- following the resignation of the Member of the Board of Directors, Ms. Klio Lymberi, it recommended
  - i) the continuation of the management and representation of the Bank temporarily without the replacement of the resigned member in accordance with paragraph 2 of Article 10 of the Bank's Articles of Association and the reconstitution of the Board of Directors with its remaining members and ii) the reconstitution of the Committees of the Board of Directors.

Furthermore, the Remuneration and Nominations Committee:

- expressed its agreement to the Board of Directors to submit to the Ordinary General Meeting of the Bank's Shareholders the Remuneration Report for the financial year 2023, in accordance with Article 112 of Law 4548/2018;
- was reconstituted after the change of its composition by the Board of Directors;
- attended an information session on the provisions of the new Act of the Executive Committee of the Bank of Greece No 231/15.07.2024 adopting the guidelines of the European Banking Authority (EBA) on sound remuneration policies.

Finally, the Remuneration and Nominations Committee, at its meeting of 18 February 2025:

- established the Procedure (plan) for the succession of Board Members and Committees of the Board of Directors in accordance with the Bank's Board of Directors Adequacy Policy and recommended its approval to the Bank's Board of Directors; and
- assessed the individual adequacy of the candidate member of the Board of Directors Ms. Ioanna Zour and the collective adequacy of the Board of Directors and recommended to the Board of Directors the election of a new member of the Board of Directors to replace the resigned member Ms. Klio Lyberi and, in particular, recommended the nomination of Ms. Ioanna Zour for the position of Independent Non-Executive Member of the Board of Directors.

### ***Risk Management Committee***

The Risk Management Committee of the Bank shall consist of at least three (3) non-executive members of the Board of Directors, who shall be appointed by decision of the Board of Directors. Members of the Risk Management Committee shall have appropriate knowledge, skills and expertise to understand and monitor the institution's risk-taking strategy. The Chairman of the Committee shall be appointed by the Board of Directors.

By decision of the Board of Directors of 10.08.2023, the composition of the Risk Management Committee as initially appointed pursuant to the decision of the Board of Directors of 23.03.2023 was amended, the term of office of its members was renewed and its Chairman was appointed, while at its meeting on 05.09.2023, the Risk Management Committee was reconstituted as follows:

- Clio Lymberi, father's name Konstantinos, Independent Non-Executive Member of the Board of Directors, Chairman of the Risk Management Committee;
- Theodoros Efthys, father's name Ilias, Independent Non-Executive Member of the Board of Directors, Member of the Risk Management Committee;
- Pavlos Kanellopoulos, father's name Dimitrios, Independent Non-Executive Member of the Board of Directors, Member of the Risk Management Committee and
- Georgia Kontogianni, father's name Vassilios, Independent Non-Executive Member of the Board of Directors, Member of the Risk Management Committee.

Following the resignation of the Independent Non-Executive Member of the Board of Directors and Chairman of the Risk Management Committee Ms. Klio Lymberi with effect from 31.10.2024, the Board of Directors at its meeting of 08.11.2024 decided to reconstitute the Bank's Risk Management Committee with its remaining three (3) Members and the Committee was reconstituted by its decision of 11.11.2024 as follows:

- Pavlos Kanellopoulos, father's name Dimitrios, Independent Non-Executive Member of the Board of Directors, Chairman of the Risk Management Committee;
- Theodoros Efthys, father's name Ilias, Independent Non-Executive Member of the Board of Directors, Member of the Risk Management Committee and
- Georgia Kontogianni, father's name Vassilios, Independent Non-Executive Member of the Board of Directors, member of the Risk Management Committee.

All the above members of the Committee have appropriate knowledge, skills and expertise to understand and monitor the Bank's risk-taking strategy.

The Rules of Procedure of the Risk Management Committee, as amended and in force by decision of the Bank's Board of Directors of 10 August 2023, were amended again by decision of the Bank's Board of Directors of 20 December 2024 and have been posted on the Bank's website at [https://www.optimabank.gr/media/nzhfmpzq/c5\\_epitropi\\_diaxeirisis\\_kindinon.pdf](https://www.optimabank.gr/media/nzhfmpzq/c5_epitropi_diaxeirisis_kindinon.pdf).

The term of office of the members of the Risk Management Committee coincides with the term of office of the members of the Board of Directors.

### **Meetings of the Risk Management Committee in 2024**

In 2024, the Risk Management Committee met sixteen (16) times. The average attendance rate of Members of the Committee at the meetings was 98%.

### **Executive Committee**

The Executive Committee consists of executives of the Bank with the following qualities and its current composition is as follows, following the decision of the Board of Directors of 09.03.2020:

| <b>Name and surname</b>                                 | <b>Member of the Board of Directors / non-member</b> | <b>Position at the Bank</b>                                                             |
|---------------------------------------------------------|------------------------------------------------------|-----------------------------------------------------------------------------------------|
| <b>Dimitrios Kyparissis, father's name Apostolos</b>    | Member of the Board of Directors                     | Chief Executive Officer (CEO), Executive Member of the Board of Directors               |
| <b>Angelos Sapranidis, father's name Nikolaos</b>       | Member of the Board of Directors                     | Executive Member of the Board of Directors, Head of Financial Services Sector (Finance) |
| <b>Theodoros Georgakopoulos father's name Nikolaos</b>  | <u>Non-Member of the Board of Directors</u>          | Head of Credit & Recoveries Department                                                  |
| <b>Ioannis Parnis, father's name Dimitrios</b>          | <u>Non-Member of the Board of Directors</u>          | Head of Human Resources Department                                                      |
| <b>Konstantinos Vatousis, father's name Charalambos</b> | <u>Non-Member of the Board of Directors</u>          | Head of Strategy, Shareholder Relations and Sustainable Development                     |
| <b>Alexandros Vlagoulis, father's name Panagiotis</b>   | <u>Non-Member of the Board of Directors</u>          | Head of Marketing & Products Sector                                                     |



|                                                            |                                             |                                                                 |
|------------------------------------------------------------|---------------------------------------------|-----------------------------------------------------------------|
| <b>Paschalis Giouchas, father's name Pelopidas</b>         | <u>Non-Member of the Board of Directors</u> | Head of Technology & Operations Sector                          |
| <b>Paris Economou, father's name Polycarpus</b>            | <u>Non-Member of the Board of Directors</u> | Head of Wholesale Banking                                       |
| <b>Dimitrios Papageorgopoulos, father's name, Georgios</b> | <u>Non-Member of the Board of Directors</u> | Head of Retail Network                                          |
| <b>Anastasia Petsinari, father's name Theocharis</b>       | <u>Non-Member of the Board of Directors</u> | Head of Corporate Governance & Legal Services (General Counsel) |
| <b>Antonios Mouzas, father's name Athanasios</b>           | <u>Non-Member of the Board of Directors</u> | Head of Brokerage                                               |

The Executive Committee has its Rules of Procedure, which were approved by the decision of the Board of Directors of the Bank dated 12.12.2019 and updated by the decision of the Board of Directors of the Bank dated 16.05.2023.

According to the Rules of Procedure of the Executive Committee:

- The Executive Committee shall meet regularly every fifteen days and extraordinarily whenever the needs of the Bank so require, at the invitation of its Chairman. A quorum requires the participation of more than fifty percent (50%) of the members of the Committee in person or by means of videoconferencing. In the absence of the Chairman, he or she shall be substituted by a member of the Committee appointed by decision of the Chairman and acting as Chairman of the Executive Committee.
- Its decisions shall be taken by an absolute majority of the participating members. In the event of a tie, the Chairman of the Committee shall have the casting vote.
- Following the authorization of the Board of Directors of the Bank, the Executive Committee has i) the responsibilities of Administrative Planning, i.e. indicatively: monitoring the implementation of the Bank's Business Plan and taking the necessary decisions to achieve the objectives included therein, pre-approving the budget guidelines and recommending the budget to the Board of Directors and (ii) approval responsibilities (within its responsibilities and within its respective approval limits), i.e. indicatively: approval of the marketing strategy, the Rules of Operation of the Units, the Bank's Basic Policies, in accordance with the applicable institutional and regulatory framework (indicatively: File Management Policy, Customer Complaint Management Policy, Customer Asset Safekeeping Policy, Procurement Policy, Outsourcing, etc.), expenses, investments, liquidations and strategic or non-strategic ventures (acquisition, change, exit) within a budget of EUR 300 000 to EUR 1 000 000, excluding expenses and investments for IT systems or matters which fall under the approval

competence of another committee. The above responsibilities may be delegated or assigned by decision of the Executive Committee to administrative committees, members of the Committee or executives of the Bank.

The CVs of the members of the Executive Committee (other than the members of the Executive Committee who are also members of the Board of Directors, for which see Section "*BoD/Composition and functioning of the Board of Directors*") are as follows:

- **Theodoros Georgakopoulos, Head of Credit & Recoveries:** With over 25 years of experience in the banking sector and particularly in Corporate & Retail Credit Risk Management, Mr. Theodoros Georgakopoulos holds the position of Head of the Credit & Recoveries Section of Optima bank. He started his career in 1994 in Ergasias Bank, where he worked in the Business Banking sector as a Senior Credit Analyst in the areas of Small and Medium Enterprises and Small Business Loans. In 2001 he joined the Novabank team, where he designed and implemented the design and creation of the Bank's Credit Sector. From 2005 to 2008 he was Head of Business Banking Credit at Millennium Bank. He was subsequently promoted to Deputy Chief Credit Officer of the Bank and remained in that position until 2012. In 2012 he created from scratch the Corporate Recovery & Collections Unit of Millennium Bank. After the merger of Millennium Bank with Piraeus Bank in 2013, he became Director of the Mortgage Credit Sector of Piraeus Group. In 2018 he moved to Romania, where he assumed the position of Deputy CEO of Marfin Bank Romania (now Vista Bank) following the acquisition of the Bank by the Vardinoyannis Group. Since May 2019, he participated in the acquisition of the Investment Bank of Greece, now Optima bank. Mr Georgakopoulos holds a degree in Economics from the National and Kapodistrian University of Athens.
- **Ioannis Parnis, Head of Human Resources:** With over 35 years of experience in banking, Mr. Yannis Parnis holds the position of Head of Human Resources at Optima bank. He started his career at Barclays PLC Shipping Branch in 1984, where he worked in various positions in the Customer Service Sector. In 1991 he joined Xiosbank as Branch Manager, while in 1996 he moved to the Personal Banking Section, where he remained until 2000. In 2000 he briefly moved to Telesis Investment Bank as Director of the Private Network and Personal Banking. Later in 2001, Mr Parnis joined Millennium bank where he remained for almost 13 years, initially as Regional Retail Network Manager. He then moved to the Human Resources sector where he took the position of Head, contributing to the awarding of the 3rd "Best Working Environment" Award to the Bank (2009), giving the impetus for an organizational structure of transparency and meritocracy, combined with a pleasant everyday

environment. At the end of 2013, when Millennium bank merged with Piraeus Bank, he assumed the position of Senior Director Group Human Resources & Organizational Health. Since April 2019, he has been involved in the transformation of the Investment Bank of Greece into Optima bank as responsible for all Human Resources issues. Mr Parnis holds a degree in Surveying Engineering from the University of West Attica.

- **Konstantinos Vatousis, Head of Strategy, Shareholder Relations and Sustainable Development:** With over 20 years of experience in the financial sector (Investment Banking), Mr Konstantinos Vatousis holds the position of Head of Strategy and Shareholder Relations at Optima bank. He started his career in 2000 at KPMG Advisors, where he was an executive in the Corporate Finance section, specializing in mergers and acquisitions, valuations and fairness opinions, due diligence and debt restructurings. In 2007 he became Head of Investment Banking at Millennium bank, where he successfully completed a series of transactions in the field of mergers and acquisitions, valuations and capital market operations. In 2011 he joined the independent financial consulting firm Core Capital Partners as a Senior Investment Banker, specializing in the design and execution of complex transactions, including the acquisition of the Investment Bank of Greece (now Optima bank) in an international tender. In 2019, Mr. Vatousis joined the executive team of Optima bank (formerly IBG) as Head of Strategy & IR, leading the development of the Bank's long-term strategic plan and the transformation of the Investment Bank of Greece from a brokerage bank to a modern commercial bank (Optima bank) as well as the Bank's relationship with its investors/shareholders. Mr Vatousis holds a degree in Economics from the University of Macedonia (Thessaloniki) and a Master's degree in Money, Banking & Finance from the University of Sheffield.
  
- **Alexandros Vlagoulis, Head of Marketing & Products:** With 20 years of experience in the fields of Asset Management and Retail Banking, Mr. Alexandros Vlagoulis is currently Head of Marketing & Products at Optima bank. He started his career at Citibank International Plc in 2000, as a Citigold executive and took on various roles within Citibank Greece in the following years. In 2005 he was appointed as a member of the Asset Management Committee. In 2008 he became Vice Chairman and Head of Citigold. In 2014 he joined Eurobank Ergasias S.A. as Head of Personal Banking Business Development. In 2016 he was appointed Head of Personal Banking and in 2018 he became Head of Affluent segment & Analysis with the task, among other things, to design and implement the Strategy for Affluent Customers. Since February 2019, he participated in the transformation of the Investment Bank of Greece into a commercial bank. Mr Vlagoulis holds a Bachelor's degree in Business Economics from the University of East London and a Master's degree in Management from the University of Surrey.

- **Paschalis Giouchas, Head of Technology & Operations:** With over 20 years of experience in the banking sector, Mr Akis Giouchas holds the position of Chief Operating Officer of Optima bank. He started his career at Accenture (Germany) in 1995, where he participated in major transformation and reorganization projects of major German banks and credit card processing companies. In 2001 he joined the founding team of the then newly established Proton Bank (Greece) as a CIO, installing the bank's IT systems and expanding its (investment) services and branch network. In 2013, he returned to Accenture (Greece), where he was responsible for providing technology advice in the context of Accenture's financial services, and in that capacity, he implemented several strategic IT projects. Later, he became Head of Infrastructure, Operations and Security for all branches. In June 2019, he joined Optima bank's executive team with a mandate to turn IT operations and systems into the bank's digital driving force. Mr. Giouchas holds a Master's degree in Computer Science from the Technical University of Berlin.
  
- **Paris Economou, Head of Wholesale Banking:** With over 15 years of experience in the financial sector, Paris Economou is currently Head of Wholesale Banking at Optima bank. In 2004 he joined Laiki Bank of Cyprus as an analyst in the Section of Large Enterprises. In 2006 he assumed the position of Relationship Manager in the Corporate & Investment Banking section of Millennium Bank, where he remained until 2013. In 2013 after the merger of Millennium Bank with Piraeus Bank, he joined the Large Corporations Section in which he served as Head and which he represented in a number of important transactions and debt restructurings in various sectors. In 2017 he joined Ernst & Young as Associate Partner of Transaction Advisory Services and worked on a number of restructuring and consulting projects. He joined Optima bank's management team in March 2019 as Head of Wholesale Banking. Mr Economou holds a Master's degree in Economics from the University of Aberdeen and a Master's degree in Economics and Finance from the University of Warwick.
  
- **Dimitrios Papageorgopoulos, Head of Retail Networks:** With over 30 years of experience in banking, Mr Dimitris Papageorgopoulos currently holds the position of Head of Retail Networks at Optima bank. He started his banking career at the National Real Estate Bank of Greece in 1989. From 1990 to 2006, he worked at XiosBank and Piraeus Bank, where he held the position of Branch Manager for 10 years. In 2006 he joined Millennium Bank as Head of Housing Credit and Network Manager of Southern Greece until 2011. In 2011 he assumed the position of Deputy General Manager at Hellenic Postbank, where he was responsible for the Bank's retail banking activities. Between 2013 and 2018, he was Head of the Hellenic Postbank Branch Network and Eurobank Network Manager in Athens and Western Greece. From February 2019 to July 2019, he participated in the acquisition of the Investment

Bank of Greece. Mr Dimitris Papageorgopoulos holds an Advanced Diploma in Business Administration from London City College.

- **Anastasia Petsinari, Head of Corporate Governance & Legal Services:** With over 25 years of significant experience in the banking sector, Ms Anastasia Petsinari is currently Head of Legal & Corporate Governance at Optima bank, as well as Corporate Secretary. Since the beginning of her professional career in 1997 she has been involved in financial law, providing her legal services to domestic and foreign credit institutions. Since 2003 she held important positions as a bank legal officer, such as Head of the Legal Service of Omega Bank (2003-2006), Proton Bank (2006-2011) and then New Proton Bank (2011-2013). In 2013 she joined Eurobank and took over the position of Deputy Director in the Legal Services Department and then in 2014 she was hired at Alpha Bank, where she remained until 2019, initially as Deputy Director and then as Director in the Senior Legal Services Division of Alpha Bank, with responsibilities for the legal support of the entire range of Alpha Bank's banking operations. In the past she also provided legal services as Of Counsel, mainly in investment, construction of large projects, claims management, and specializes in information and communication technologies. She has extensive experience in formulating organizational and business strategies based on corporate governance principles, as well as in-depth knowledge of Greek and European banking legislation, having a deep knowledge both of the legal and business specificities of banking. Ms Anastasia Petsinari holds a Law degree and a Master's in Law (LL.M) in Banking & Finance from the Faculty of Law, Economics and Political Sciences of the Aristotle University of Thessaloniki and in International Trade & Investment Law from the Panteion University of Social & Political Sciences. She also holds an MBA from the National Technical University of Athens and the Athens University of Economics and Business and finally a Master of Science (MSc) in Management in Science & Technology from the Athens University of Economics and Business. She is also trained and certified in Negotiations, at the Harvard Law School, Program on Negotiations, and is an Accredited Mediator of the Ministry of Justice, Transparency & Human Rights.
- **Antonios Mouzas, Head of Brokerage Services:** Mr Mouzas has a long experience in management positions in banks and multinationals and as a member of the Boards of Directors of Greek and foreign banks. He currently holds the position of Chief Brokerage Officer of Optima bank. He started in the banking sector from the Consumer Credit Section of XiosBank in 1994, and then worked in the Toyota Hellas Group. In 2000 he moved to Millennium Bank as Director of Credit Products, Head of Housing Credit, and in 2013 after his return from abroad, as General Manager of Corporate and Investment Banking. From 2006 to 2013, he has worked as General Manager and BoD member at Millennium Bank in Turkey and Romania with different responsibilities, such as Large and Small Business

Financing, Credit, I.T., Branch Network, Restructuring and Arrears. Between 2014 and 2017 he has worked in investment banking transactions (Core Capital Partners & Fedra Capital) mainly in syndicated loan restructurings and acquisitions of companies in Greece, Turkey and Romania, with a total transaction value of over 1 billion euros. In 2017 he joined the Vardinoyannis Group team that acquired Marfin Bank Romania (later Vista Bank), where he worked as CEO until 2020. Mr Mouzas holds a degree in Economics from the Faculty of Economics & Law of the Aristotle University of Thessaloniki, an MBA from the ALBA Business School and a postgraduate education from INSEAD.

### **Professional obligations & number of shares of members of administrative, management and regulatory bodies, Senior Management**

The following shall apply to the members of the Board of Directors of the Bank, the members of the Audit Committee, the Head of the Internal Audit Department, Ms Aphrodite Samaras, the members of the Remuneration and Nomination Committee and the Risk Management Committee, which are the administrative, management and regulatory bodies of the Bank, as well as the senior management of the Bank, as set out above in the '*Administrative, Management and Regulatory Bodies and Senior Management*' section, on the Reporting Date:

1. Apart from their activities related to their status and position in the Bank, and their activities related to participations in administrative, management and regulatory bodies referred to in point 2 of this Section, they shall not engage in any other professional activities, other than those of the Bank and its subsidiaries, that are significant to the Bank, with the exception of the following:
  - Mr Petros Tzannetakis, Vice-Chairman, Non-Executive Board Member and Member of the Audit Committee, holds the position of Deputy CEO of Motor Oil.
  - Mr Theofanis Voutsaras, Non-Executive Member of the BoD and member of the Remuneration and Nominations Committee, holds the position of General Manager of Human Resources of Motor Oil Group (MOH Group).
  - Mr Nikolaos Giannakakis, Non-Executive Member of the BoD, holds the position of General Manager of Informatics of Motor Oil Group (MOH Group).
2. On the Reporting Date, they were members of administrative, management and regulatory bodies of another company or legal person, with the exception of subsidiaries of the Bank, according to the following table:

| NAME                                               | S/N | NAME OF LEGAL PERSON                               | CAPACITY                                       |
|----------------------------------------------------|-----|----------------------------------------------------|------------------------------------------------|
| <b>Georgios Taniskidis, father's name Ioannis</b>  | 1   | CORE CAPITAL PARTNERS S.A.                         | Chairman of the Board of Directors             |
|                                                    | 2   | LOULIS FOOD INGREDIENTS S.A.                       | Independent Non-Executive Member of the BoD    |
|                                                    | 3   | EUROSEAS LTD                                       | Director                                       |
|                                                    | 4   | EURODRY LTD                                        | Director                                       |
| <b>Petros Tzannetakis, father's name Tzanibeis</b> | 1   | MOTOR OIL (HELLAS) CORINTH REFINERIES S.A.         | Executive Member of the Board of Directors     |
|                                                    | 2   | MOTOR OIL INVESTMENTS LIMITED (CYPRUS)             | Director                                       |
|                                                    | 3   | MOTOR OIL HOLDINGS LTD (CYPRUS)                    | Director                                       |
|                                                    | 4   | PETROVENTURE HOLDINGS LIMITED (CYPRUS)             | Director                                       |
|                                                    | 5   | AVINOIL SINGLE MEMBER AVENEP                       | Non-executive member of the Board of Directors |
|                                                    | 6   | CORAL S.A.                                         | Non-executive member of the Board of Directors |
|                                                    | 7   | CORAL GAS SINGLE MEMBER AEVEY.                     | Non-executive member of the Board of Directors |
|                                                    | 8   | LPC SINGLE MEMBER S.A.                             | Non-executive member of the Board of Directors |
|                                                    | 9   | MOTOR OIL RENEWABLE ENERGY (MORE) SINGLE MEMBER SA | Executive member of the Board of Directors     |
|                                                    | 10  | Wind RES SINGLE MEMBER S.A.                        | Executive Chairman of the BoD                  |
|                                                    | 11  | MOTOR OIL MIDDLE EAST DMCC (HAE)                   | Director                                       |
|                                                    | 12  | MOTOR OIL FINANCE PLC (UK)                         | Director                                       |
|                                                    | 13  | MEDPROFILE LIMITED (CYPRUS)                        | Director                                       |
|                                                    | 14  | KORN FERRY INTERNATIONAL S.A.                      | Chairman of the BoD Non-executive              |
|                                                    | 15  | NRG SUPPLY & TRADING S.A.                          | Non-executive member of the Board of Directors |
|                                                    | 16  | CORINTHIAN OIL LIMITED (UK)                        | Director                                       |
|                                                    | 17  | TALLON COMMODITIES LTD (UK)                        | Director                                       |



| NAME                                                    | S/N | NAME OF LEGAL PERSON                                                  | CAPACITY                                                                                  |
|---------------------------------------------------------|-----|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
|                                                         | 18  | VERNT SINGLE-MEMBER SUSTAINABLE PRODUCTS AND SERVICES SOCIETE ANONYME | Member of the Board of Directors                                                          |
| <b>Demetrios Kyparissis, father's name Apostolos</b>    | 1   | HELLENIC BANK ASSOCIATION                                             | Member of the Board of Directors                                                          |
| <b>George Kyriakos, father's name Constantinos</b>      | 1   | NOTOS COM HOLDINGS S.A.                                               | Member of the Board of Directors                                                          |
|                                                         | 2   | OTROPAY PAYMENT FOUNDATION SINGLE MEMBER SA                           | Non-Executive Chairman of the BoD                                                         |
|                                                         | 3   | Faros Advisor (IKE)                                                   | Sole Partner and Manager                                                                  |
|                                                         | 4   | GREEK WINERY SOCIETE ANONYME                                          | Member of the Board of Directors                                                          |
|                                                         | 5   | GAMING SUPERVISION AND CONTROL COMMITTEE (EEEP)                       | Member                                                                                    |
| <b>Pavlos Kanellopoulos, father's name Dimitrios</b>    | 1   | KAIZEN DIGITAL SERVICES S.A.                                          | Chief Executive                                                                           |
|                                                         | 2   | KAIZEN GAMING LTD                                                     | Chief Executive                                                                           |
|                                                         | 3   | DIGIFY INTERNATIONAL LTD                                              | Member of the Board of Directors                                                          |
| <b>Theodore Efthis, father's name Ilias</b>             | 1   | VISTA BANK (ROMANIA) SA                                               | Independent Non-Executive Member of the BoD; Chairman of the Joint Audit & Risk Committee |
| <b>Theofanis Voutsaras, father's name Christos</b>      | 1   | AVINOIL SINGLE MEMBER AVENEPP                                         | Member of the Board of Directors                                                          |
|                                                         | 2   | MOTOR OIL RENEWABLE ENERGY (MORE) SINGLE MEMBER S.A.                  | Member of the Board of Directors                                                          |
|                                                         | 3   | KORAKIA S.A.                                                          | Vice-Chairman                                                                             |
|                                                         | 4   | LPC SINGLE MEMBER S.A.                                                | Member of the Board of Directors                                                          |
|                                                         | 5   | KTIMA S.A.                                                            | Member of the Board of Directors                                                          |
|                                                         | 6   | CORAL GAS SINGLE MEMBER AEVEY.                                        | Member of the Board of Directors                                                          |
| <b>Nikolaos Giannakakis, father's name Constantinos</b> | 1   | MOTOR OIL RENEWABLE ENERGY (MORE) SINGLE MEMBER S.A.                  | Non-Executive Member of the BoD                                                           |



| NAME                                                    | S/N | NAME OF LEGAL PERSON                                 | CAPACITY                                     |
|---------------------------------------------------------|-----|------------------------------------------------------|----------------------------------------------|
|                                                         | 2   | NOVA INFORMATION AND COMMUNICATION TECHNOLOGIES S.A. | Non-Executive Member of the BoD              |
|                                                         | 3   | THREATSCENE GREECE SINGLE MEMBER SOCIETE ANONYME     | Chairman of the BoD Non-executive            |
| <b>Theodoros Georgakopoulos, father's name Nikolaos</b> | 1   | TEIRESIAS SA                                         | Member of the Board of Directors             |
| <b>Antonios Mouzas, father's name Athanasios</b>        | 1   | ELTON INTERNATIONAL TRADE AEE                        | Independent Member of the Board of Directors |

3. At the reporting date of 31 December 2024, the following persons from the Bank's administrative, management and regulatory bodies held shares in the Bank:

| NAME                                             | CAPACITY                                                            | NUMBER OF SHARES |
|--------------------------------------------------|---------------------------------------------------------------------|------------------|
| Georgios Taniskidis, father's name Ioannis       | Chairman, Non-Executive Member                                      | 595,000          |
| Petros Tzannetakis, father's name Tzanibeis      | Vice Chairman, Non-Executive Member of the BoD                      | 40,000           |
| Dimetrios Kyparissis, father's name Apostrolos   | Executive Member of the BoD, Managing Director                      | 122,707          |
| Angelos Sapranidis, father's name Nikolaos       | Executive Member of the BoD, Head of Financial Services Sector      | 19,000           |
| Theofanis Voutsaras, father's name Christos      | Non-executive member of the Board of Directors                      | 8,728            |
| Pavlos Kanellopoulos, father's name Dimitrios    | Independent Non-Executive Member of the BoD                         | 7,000            |
| Konstantinos Vatousis, father's name Charalambos | Head of Strategy, Shareholder Relations and Sustainable Development | 25,205           |
| Alexandros Vlagoulis, father's name Panagiotis   | Head of Product & Communications Sector                             | 29,008           |
| Theodoros Georgakopoulos, father's name Nikolaos | Head of Credit & Recoveries                                         | 22,268           |

|                                                    |                                               |        |
|----------------------------------------------------|-----------------------------------------------|--------|
| Paschalis Giouchas, father's name Pelopidas        | Head of Central Operations and Technology     | 42,303 |
| Antonios Mouzas, father's name Athanasios          | Head of Brokerage Services                    | 34,000 |
| Dimitrios Papageorgopoulos, father's name Georgios | Head of the Retail Network                    | 48,000 |
| Ioannis Parnis, father's name Dimitrios            | Head of Human Resources                       | 29,600 |
| Anastasia Petsinari, father's name Theocharis      | Head of Corporate Governance & Legal Services | 28,522 |
| Aphrodite Samara, father's name Vasilios           | Head of Internal Audit Department             | 290    |
| Paris Economou, father's name Polycarpus           | Head of Wholesale Banking                     | 53,917 |

## 6. Evaluation of the corporate Governance System

Given the Bank's listing on the Athens Stock Exchange in 2023, the first review of the Corporate Governance System (CGS) will take place with a reporting date of 31.12.2025.

## 7. Group Internal Audit System

The responsibility the operation of an adequate and effective Internal Audit System is carried out by the Audit Committee and the Board of Directors of the Bank.

The Internal Audit System (IAS) according to BoG Governor's Act 2577/9.3.2006 is a set of audit mechanisms and procedures that covers on a continuous basis every activity of the Bank and contributes to its effective and safe operation. The IAS shall also be adopted and applied on the basis of the size, internal organisation, scale and complexity of operation by the Group's subsidiaries.

In particular, it aims to ensure the following objectives:

- The effective operation of the Internal Audit Department.
- Consistent implementation of the operational strategy with effective use of available resources.
- Identify and address all types of risks taken, including operational risk.

- Ensuring the completeness and reliability of the data and information required for the accurate and timely determination of the Bank's financial position and the production of reliable financial statements.
- Compliance with the institutional framework governing its operation, including internal regulations and ethical rules.
- The prevention and avoidance of misconduct and irregularities that could endanger the reputation and interests of the Bank, its shareholders and its business partners.

In order to ensure the IAS, the Bank has delegated responsibilities to independent units (Risk Management, Internal Audit and Regulatory Compliance) and to the BoD Committees. For the implementation of the IAS, the Bank shall apply the 'Three Lines Model'.

**First line of defense:** It concerns operational and functionally responsible units, which in their day-to-day operations manage risks. They are also responsible for developing procedures and control points to effectively address risks and for implementing corrective actions in cases of recognized weaknesses in procedures and control points.

**Second line of defense:** It concerns the operational functions defined and staffed by the Management for the supervision of risks, in order to support the further strengthening and/or monitoring of procedures and checkpoints developed by the first line of defense. Such functions are the Department: Risk Management and Regulatory Compliance.

The Risk Management Department of the Bank approaches methodically the risks related to its activity, in order to contribute to the continuation of its activities and its sustainable development. The Risk Management Department has the relevant Rules of Procedure. The purpose of the Risk Management Department's procedures is to evaluate and highlight all types of risks that may affect the smooth operation and viability of the Bank, to identify and clearly allocate roles and limits of responsibility in risk management, to effectively manage risks and take immediate measures to eliminate them where necessary, to timely report and consult with the Management or Supervisor on critical issues, as well as to continuously communicate and inform on new potential risks.

At the same time, the Bank has a Regulatory Compliance Department which reports to the Bank's Board of Directors. Compliance refers to compliance with the letter and especially the spirit of laws, institutional and regulatory rules and principles, codes of conduct, market best practices, in order to minimize the risk of non-compliance, financial or reputational damage that the Bank may suffer as a result of its failure to comply with a rule.

**Third line of defense:** Having a high degree of independence, the Internal Audit Department provides objective assurance on the effectiveness of the internal audit system, including how the first and second lines of defense achieve their purpose.

The Internal Audit Department operates in the manner defined by the Code of Conduct and the International Professional Practices Framework (IPPF) of the Institute of Internal Auditors, Law 4706/2020 and the relevant decisions of the Hellenic Capital Market Commission and has the relevant Rules of Procedure.

### **Internal Audit Department**

The Internal Audit Department is an objective, independent organizational unit for the purpose of monitoring and improving the Bank's operations and policies regarding the Internal Audit System. It shall be operationally subordinate to the Audit Committee of the Bank and administratively subordinate to the Managing Director.

The Department has its Rules of Procedure, which are approved by the Audit Committee and the Board of Directors. The Internal Audit Department's Rules of Procedure are attached as an Annex to the Bank's Rules of Procedure and form an integral part thereof, and any amendment thereto does not entail any amendment to the Bank's Rules of Procedure.

### **Responsibilities**

Indicatively, the Department has the following main responsibilities:

- monitoring, control and evaluation of implementation of the following:
  - 1) the Bank's Rules of Procedure and
  - 2) the adequacy and effectiveness of the Internal Audit System of the Bank and the Group's subsidiaries;
  - 3) quality assurance mechanisms; and
  - 4) the corporate governance mechanisms and compliance with the commitments contained in the Bank's prospectuses and business plans regarding the use of funds raised from the regulated market and the submission of reports to the Audit Committee at least every three (3) months on the most important issues and its proposals for the above;
- drafting reports to the audited units with any findings, and the risks arising from them and proposals for improvement, if any.
- Adoption and establishment of a unified audit methodology of the Internal Audit Department.
- Carrying out all kinds of audits on all units, activities and providers of essential activities of the Bank's Group.
- Informing the Board of Directors, through the Audit Committee and the Management, of the progress and results of the audits.

- Informing on the results of the audits carried out by the statutory auditors for the year, the statutory auditors who carry out every three years the assessment of the adequacy of the internal audit system, as well as other annual reports submitted to the Regulatory Authorities.
- Recommendation to the Audit Committee for the selection of external auditors to carry out the three-yearly assessment of the adequacy of the internal audit system for the Bank and the Group and informing the Bank of Greece of the scope of the audit.
- Conduct of audits as defined by the Hellenic Capital Market Commission.

### **Head of Internal Audit Department**

The Head of the Internal Audit Department is appointed by the Board of Directors of the Bank, on a proposal from the Audit Committee, is a full-time employee, personally and functionally independent and objective in the performance of his/her duties and has the appropriate knowledge and relevant professional experience. He/she is administratively subordinate to the Chief Executive Officer and functionally subordinate to the Audit Committee. As Head of the Internal Audit Department, he/she may not be a member of the Board of Directors or a voting member of committees of a permanent nature of the Bank and have close links with anyone holding one of the above capacities in the Bank or in a Group company.

His/her main responsibilities are described in the Department's Rules of Procedure.

The Board of Directors of the Bank, at its meeting on 11.04.2013, on the recommendation of the members of the Audit Committee, appointed Ms Aphrodite Samara, father's name Georgios, head of the Internal Audit Department, in accordance with the applicable legal framework. Ms. Aphrodite Samaras is a full-time employee of the Bank, personally and operationally independent and objective in the performance of her duties, she has the appropriate knowledge and relevant professional experience and does not have close links with any member of the Board of Directors of the Bank, as well as any Group company, or a member with voting rights in committees of a permanent nature.

Ms Aphrodite Samara has many years of professional experience in financial and investment services and has been the Internal Auditor of the Bank since 2004. She is registered with the Economic Chamber, in the register of internal auditors of the private sector under Law 4849/21, with registration number 604. She started her career in 1991 in the company Exelixis Investment, where she worked in the field of Stock Exchange Investments and then in 1995 she joined ABN AMRO Bank N.V., where she took up positions of responsibility until 1999. From 2000 to 2004 she worked as Operations Manager at ARTION A.X.E.P.E.Y., while in 2004 she was appointed Head of Internal Audit at the Investment Bank of Greece S.A. (now Optima bank), a position she holds to this day. Ms Samara holds significant expertise and professional training certifications in audit

methods, best international internal audit practices and housing credit issues, and has been assessed for her competence and suitability as Head of Internal Audit of the Bank by the regulatory authority (Bank of Greece).

### **Regulatory Compliance Department**

The Regulatory Compliance Department shall be administratively independent in order to ensure the prevention of conflicts of interest in the exercise of its responsibilities and shall be able to have unhindered access to all data and information necessary for the fulfilment of its mission.

The Regulatory Compliance Department consists of the following sections:

- Prevention and Suppression of Money Laundering & Terrorist Financing and Reporting (AML/CFT & Authorities Investigations) and
- Monitoring of the institutional framework (Regulatory Compliance).

Each section is led by a head.

The Regulatory Compliance Department reports operationally to the Bank's Board of Directors through the Audit Committee, while for administrative matters it reports to the Chief Executive Officer.

The Department has its own Rules of Procedure, which are approved following a recommendation of the Audit Committee by the Board of Directors. The Rules of Procedure of the Regulatory Compliance Department are attached as an Annex to the Bank's Rules of Procedure and form an integral part thereof, and any amendment thereto does not entail any amendment to the Bank's Rules of Procedure.

#### *Responsibilities*

The Regulatory Compliance Department (RC) ensures that the Bank and its subsidiaries comply with the applicable institutional, legal and regulatory framework, codes of conduct, ethics and standards of good practice in the provision of the banking and investment services for which they are licensed. In addition, the Regulatory Compliance Department identifies, assesses and monitors the risks that the Bank and its subsidiaries may face in the event of non-compliance and assists, supports and advises the Management, the business units and the BoD officers of the subsidiaries in fulfilling the obligations arising from the above framework. The main responsibilities of the Department are:

- Ensuring the Bank's compliance with the legal and regulatory framework related to the prevention and suppression of money laundering and terrorist financing.
- To provide assistance and appropriate guidance to the Departments in dealing with matters within its remit.
- The establishment and implementation of appropriate procedures and the preparation of an annual programme in order to achieve full and continuous compliance of the Bank with the applicable

regulatory framework and internal regulations in a timely manner and to have at all times a complete picture of the extent to which this objective has been achieved.

- Making recommendations to the Management on issues related to the formulation and implementation of policies and procedures of the Bank, taking into account the regulatory framework for the supervision of the financial system.
- Ensuring that staff are constantly informed of developments in the regulatory framework relevant to their responsibilities and providing relevant instructions for the corresponding adaptation of the regulations and internal procedures applied by the Bank's Management and its subsidiaries, in the event of amendments to the applicable regulatory framework.
- The position on issues of conflict of interest.
- Supervision of compliance with the deadlines for fulfilling the obligations provided for by the above regulatory framework.
- Monitoring and checking the compliance of the Departments with the applicable regulatory framework, Codes and Policies of the Bank, relating to the provision of the services for which it is licensed.
- Informing the Management and the Board of Directors of the Bank of any identified significant breach of the regulatory framework or any significant deficiencies.
- The participation (at least by providing advice) in the design of new procedures on issues related to business decision-making, together with the other Departments of the Internal Audit System.
- Receiving information from the competent Departments on deviations from the regulatory framework identified during audits carried out by Regulatory Authorities, Internal and External Auditors, and monitoring the implementation of the required corrective actions.
- Communicating and maintaining good relations with regulatory authorities. The Regulatory Compliance Department has been appointed by the Bank's Management as the central point of contact with regulatory bodies.

### **Head of Compliance**

The Head of the Regulatory Compliance Department is a selected person with sufficient knowledge in banking and investment activities, the placement and replacement of which is carried out by the Board of Directors of the Bank and communicated to the Bank of Greece (hereinafter the "BoG"), together with his/her contact details.

The Head of the Regulatory Compliance Department has also been appointed as the Bank's Competent Manager within the meaning of Article 38 of Law 4557/2018 on the "Prevention and Suppression of Money Laundering (ML) and Terrorist Financing (TF)". This competent Manager, as well as his/her alternate, are

appointed by the Board of Directors of the Bank on the basis of their morality, integrity, prestige, scientific competence, experience in corresponding work and knowledge of the Bank's operations.

The competent Manager, as well as his/her alternate, shall not hold any other position in the Bank that conflicts with the obligations arising from their position.

Thus, the Head of the Department has the following duties:

A) As head of the Regulatory Compliance Department, among others:

- He/she exercises supervision, control and is responsible for the proper performance of the duties of the Compliance Officers and the proper functioning of the Department.
- He/she shall make recommendations in order to meet the identified needs in terms of material and human resources.
- He/she supervises and monitors compliance with the regulatory framework regarding banking and investment services, for which the Bank and its subsidiaries have been licensed. He/she notifies the Management of any significant breach of the regulatory framework or significant deficiencies in compliance with it.
- He/she draws up an annual programme with the aim of achieving full and continuous compliance of the Bank with the applicable regulatory framework and its internal regulations in a timely manner.
- He/she acts as a liaison with the regulators.
- He/she draws up an annual Action Plan and a Plan for Regulatory Compliance Audits, which is approved by the Board of Directors after prior information and assessment by the Audit Committee.

B) As the responsible manager:

- He/she evaluates the effectiveness of the applicable regulations in the area of ML & TF and submits, through the Audit Committee, to the Board of Directors of the Bank an annual report on issues of Combating Money Laundering and Terrorist Financing. This report, after evaluation by the members of the Audit Committee, is sent to the BoG.
- He/she supervises, coordinates, monitors and manages the effective response to money laundering and terrorist financing risks.
- He/she evaluates the findings of the Internal Audit Department, the external auditors and the regulatory authorities and recommends corrective measures in matters of prevention and



suppression of ML and TF. He/she submits Suspicious/Unusual Transactions Reports to the Anti-Money Laundering Authority under Article 47 of Law 4557/2018.

- He/she maintains direct contact with the Anti-Money Laundering Authority under Article 47 of Law 4557/2018.
- He/she assesses the adequacy of knowledge on ML & TF issues of the Bank's Associated Representatives.
- He/she investigates the training needs of staff in ML and TF and cooperates with the competent Department to prepare and implement an appropriate annual training programme.
- He/she oversees the organisation of appropriate training sessions or seminars on ML.
- The duties of the Head of the Regulatory Compliance Department are detailed in the Department's Rules of Procedure.
- The Board of Directors of the Bank, at its meeting on 10.08.2023, appointed Mr. Alexandros Diolis, father's name Vassilios as Head of the Regulatory Compliance Department, in accordance with the applicable legal framework. Mr. Diolis had been appointed as the Responsible Manager within the meaning of Article 38 of Law 4557/2018 and Coordinator as per Article 38(2) of Law 4557/2018 of the Group's Responsible Managers at the meeting of the Board of Directors on 23.03.2023. He has been assessed for his adequacy and appropriateness by the regulatory authority (Bank of Greece).

### **Risk Management Department**

The Risk Management Department shall have the following sections, the operation and responsibilities of which shall be specified in its Rules of Procedure:

- Credit Risk
- Market & Liquidity Risk
- Operational Risk
- Capital Adequacy Management.
- Regulatory Relations
- Models.

The Risk Management Department reports directly to the Risk Management Committee and through it to the Bank's Board of Directors. The Risk Management Department is administratively part of the Bank's Credit & Recoveries Sector.

The Department has its Rules of Procedure, which are approved following a recommendation of the Risk Management Committee by the Board of Directors of the Bank. The Rules of Procedure of the Risk Management Department are attached as an Annex to the Bank's Rules of Procedure and form an integral part thereof, and any amendment thereto does not entail any amendment to the Bank's Rules of Procedure.

### **Responsibilities**

The Risk Management Department is responsible for the design, specification and implementation of the risk management and capital adequacy policy, in accordance with the guidelines of the BoD. More specifically and indicatively, the Department:

- uses appropriate methods to manage the risks that the Bank generally assumes or to which it may be exposed, including the use of models to predict, recognise, measure, monitor, hedge, reduce and report them.
- specifies (with the cooperation of the competent departments/sections) the risk limits of the Bank by identifying/determining the individual parameters by type of risk and by category of counterparty, industry, country, currency, type of lending, form of financial securities, shares, derivatives, business space, operation, activity, product, system, etc. and monitors their compliance, establishing the appropriate procedures.
- defines early warning system criteria in individual and overall portfolios and recommends appropriate procedures and measures for increased monitoring, continuously or periodically, depending on the nature of the risks.
- recommends to the Risk Management Committee the appropriate techniques for adjusting risks to acceptable levels.
- periodically assesses the adequacy of risk identification, measurement and monitoring methods and systems and proposes corrective measures where appropriate.
- carries out annual stress tests (with end-of-year or half-year data) with scenarios adapted to the nature of the Bank's activities and/or following instructions from the Bank of Greece for all types of risks, in particular credit, market, interest rate and liquidity, analyzes their results, recommends appropriate policies and submits the relevant results to the Bank of Greece (Credit System Supervision Department) as defined from time to time.
- draws up the reports required for the adequate information of the Management and the Board of Directors on matters within its competence, at least every three months. It identifies the capital requirements and the general development of methodologies for their assessment to cover all the risks to which the Bank is exposed and recommends their management policies.

### **Head of Risk Management**

The Head of the Department is appointed by the Board of Directors (on the recommendation of the Risk Management Committee) and his/her appointment and any replacement thereof are notified to the Bank of Greece.

Regarding the responsibilities of the Head of the Risk Management Department, indicatively, he/she:

- is involved in the decision-making process to determine the terms of financing that is not subject to predefined or general parameters.
- reports annually to the BoD, through the Risk Management Committee, on the matters falling within the Department's remit.
- participates in the formulation of recommendations and proposals directly to the Management and through the Risk Management Committee of the Board of Directors for changes in the composition of the Bank's portfolios for the restructuring/regulating of existing loans and the diversification of the provisioning policy.
- is involved in the process of assessment by the regulatory authorities of the adequacy of financial and regulatory capital.
- supervises and coordinates the activity of the risk management sections in the group companies.
- contributes to the prevention of incidents and generally failures and malfunctions, related to risks.
- participates in the development of quantitative and qualitative metrics, analysis, control and management to monitor all forms of risk.

His/her detailed responsibilities are described in the Department's Rules of Procedure.

The Board of Directors of the Bank, at its meeting on 30.06.2022, following a recommendation from the members of the Risk Management Committee, has appointed Mr. Sotirios Papakonstantinou, father's name Ilias as head of the Risk Management Department, in accordance with the applicable legal framework. Mr Papakonstantinou has been assessed for his competence and adequacy by the regulatory authority (Bank of Greece).

### **Evaluation of the Internal Audit System**

The Bank has established a Policy and a procedure for carrying out a periodic evaluation of the Internal Audit System (IAS), which is included in its Rules of Procedure, in accordance with the relevant legislative framework (Article 14(3) of Law 4706/2020), which describes how to assess the adequacy of the IAS. The Policy and procedure shall include a description of the audit topics, the periodicity of the IAS evaluation, the scope of the evaluation, and the assignment and monitoring of its results.

The latest Group Internal Audit System Adequacy Assessment Report for the three-year period 2021 – 2023, which was carried out in accordance with the provisions of BoG Governor's Act 2577/2006, in June 2024 by Forvis Mazars S.A., was submitted to the Bank's Board of Directors through the Audit Committee and subsequently to the Bank of Greece. As a result of the evaluation based on the audit procedures carried out, nothing came to the attention of Forvis Mazars S.A. that would lead to the conclusion that there are material weaknesses in the adequacy of the Internal Audit System of the Bank and its two subsidiaries, "Optima Factors S.A." and "Optima asset management".

## **8. Remunerations Policy**

The Bank has established a Remuneration Policy for the Members of its Board of Directors in accordance with the provisions of articles 109-112 of Law 4548/2018, as in force, which has been approved by the Extraordinary General Meeting of 22.03.2023 and fully complies with the provisions of Law 4548/2018. The Remuneration Policy applies to the payment of fees from the fiscal year 2023 and onwards with a validity of four years, is subject to periodic reassessment for updating purposes, in accordance with the applicable regulatory framework and is posted, as in force, on the Bank's website [https://www.optimabank.gr/media/bzkpmf0r/p43\\_politiki\\_apodoxon\\_melon\\_ds.pdf](https://www.optimabank.gr/media/bzkpmf0r/p43_politiki_apodoxon_melon_ds.pdf). The Remuneration Policy is gender neutral, as defined in Article 84(2) of Law 4261/2014.

The Remuneration Report of the members of the Board of Directors of the Bank for each financial year is posted and remains available on the Bank's website for a period of ten years, in accordance with the applicable law.

## **9. Environment, Society and Governance (ESG)**

In the context of the implementation of the Bank's action plan for the gradual integration of the expectations set out in Annex 1 to the Single Supervisory Mechanism's (SSM) guidance on the effective management of ESG risks (ESG Roadmap):

A. In 2024, the Bank took the following actions with regard to the first four of the thirteen expectations:

### **I. Strengthening existing governance to integrate climate and environmental risk management (CR&E risks)**

#### **A. Establishment of a Sustainable Development Management Committee**

Pursuant to the decision of the Board of Directors of the Bank of 03.10.2024, a Sustainable Development Management Committee was established at executive level as the Bank's operational committee and its Rules of Procedure were approved and posted on the Bank's website [https://www.optimabank.gr/media/I55cyso2/c35\\_epitropi\\_diaxeirisis\\_viosimis\\_anaptyxis.pdf](https://www.optimabank.gr/media/I55cyso2/c35_epitropi_diaxeirisis_viosimis_anaptyxis.pdf).

The purpose of the Committee is:

- To provide strategic direction to the Board of Directors for the ESG (Environmental, Social and Corporate Governance) initiatives of the Bank and the Group.
- The evaluation of the ESG Strategy before its adoption.
- The integration of the elements of the ESG Strategy into the business plan and operations of the Bank and the Group's companies.
- Ensuring the proper implementation of the Bank's and Group's policies and procedures related to ESG, in accordance with regulatory requirements and relevant best practices.

### ***Composition of the Committee***

The current composition of the Sustainable Development Management Committee is as follows:

| <b><u>Name and surname</u></b>                            | <b><u>Member of the BoD/ non-member</u></b> | <b><u>Position at the Bank</u></b>                                                      | <b><u>Position in the Sustainable Development Management Committee</u></b> |
|-----------------------------------------------------------|---------------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| <b>Dimitrios Kyparissis, father's name Apostolos</b>      | Member of the BoD                           | Chief Executive Officer (CEO), Executive Member of the Board of Directors               | Chairman                                                                   |
| <b>Angelos Sapranidis, father's name Nikolaos</b>         | Member of the Board of Directors            | Executive Member of the Board of Directors, Head of Financial Services Sector (Finance) | Permanent Member                                                           |
| <b>Theodoros Georgakopoulos, father's name Nikolaos</b>   | Non-Member of the Board of Directors        | Credit & Recoveries                                                                     | Permanent Member                                                           |
| <b>Ioannis Parnis, father's name Dimitrios</b>            | Non-Member of the Board of Directors        | Head of Human Resources                                                                 | Permanent Member                                                           |
| <b>Konstantinos Vatousis, father's name Charalambos</b>   | Non-Member of the Board of Directors        | Head of Strategy, Shareholder Relations and Sustainable Development                     | Permanent Member                                                           |
| <b>Alexandros Vlagoulis, father's name Panagiotis</b>     | Non-Member of the Board of Directors        | Head of Marketing & Products                                                            | Permanent Member                                                           |
| <b>Paschalis Giouchas, father's name Pelopidas</b>        | Non-Member of the Board of Directors        | Head of Technology & Operations                                                         | Permanent Member                                                           |
| <b>Paris Economou, father's name Polycarpus</b>           | Non-Member of the Board of Directors        | Head of Wholesale Banking                                                               | Permanent Member                                                           |
| <b>Dimitrios Papageorgopoulos, father's name Georgios</b> | Non-Member of the Board of Directors        | Head of Retail Networks                                                                 | Permanent Member                                                           |

|                                                       |                                      |                                                                 |                                   |
|-------------------------------------------------------|--------------------------------------|-----------------------------------------------------------------|-----------------------------------|
| <b>Anastasia Petsinari, father's name Theocharis</b>  | Non-Member of the Board of Directors | Head of Corporate Governance & Legal Services (General Counsel) | Permanent Member                  |
| <b>Antonios Mouzas, father's name Athanasios</b>      | Non-Member of the Board of Directors | Head of Brokerage                                               | Permanent Member                  |
| <b>Sotirios Papakonstantinou, father's name Ilias</b> | Non-Member of the Board of Directors | Head of Risk Management                                         | Ordinary Participant (non-voting) |

The Chairman of the Committee may invite to its meetings any member of the Board of Directors, a member of the Bank or a subsidiary of its Group, or any other person (employee, associate) whom the Committee considers able to assist it in carrying out its work.

### ***Responsibilities of the Committee***

The main tasks and responsibilities of the Committee are as follows:

1. To evaluate the ESG strategy and recommend to the Board of Directors initiatives related to ESG, in line with the strategic orientations set out in the overall Business Plan of the Bank as well as of the Group.
2. Ensuring regulatory compliance and alignment of the Bank and the Group with the applicable legislation at Greek and European level on ESG issues (e.g. the EU Taxonomy, the ECB's expectations for CR&E, the Corporate Sustainability Reporting Directive (CSRD), the ESG Pillar 3 Report, and the National Climate Action Plan of Greece, etc.).
3. Approval and monitoring of the implementation of specific ESG action plans and projects, which must be in line with the Bank's and the Group's ESG strategy and objectives, as well as assignment of tasks to the appropriate Departments/Units on ESG-related issues.
4. Adoption of relevant ESG policies, such as the Sustainability Policy, amendments to credit policies incorporating ESG factors, etc.
5. Regularly review ESG-related performance indicators (KPIs), monitor the progress of ESG targets and performance and ensure that all relevant commitments are met.
6. Adherence to the terms of the Cooperation on Alignment with International Standards and Initiatives (e.g. Sustainable Development Goals (SDGs), UN Principles for Responsible Banking (UNPRB), UN Global Compact, etc.) when the Committee so decides or where appropriate.
7. Assess and approve ESG reports and ensure that ESG reports comply with the relevant Standards and Guidelines (Sustainability Report, Environmental Report, etc.).
8. Evaluation and adoption of ESG-related education and information initiatives.
9. Establish any ESG-related KPIs associated with variable remuneration schemes and performance incentives and submit them to the relevant committees of the Bank for final approval.

10. Update the risk management frameworks and policies of the Bank and the Group to incorporate processes for identifying, measuring and effectively managing climate-related and environmental risks (CR&E risks) and identifying activities and assets of the Bank and the Group exposed to CR&E risks, as well as measuring impacts. The Risk Management Department is ultimately responsible for this planning, but the Committee will provide support and input when needed.
11. Approval of the import of Green Products and Services.
12. Development of Sustainability Communications through reporting and external communication campaigns.

### ***Functioning of the Committee***

The Committee shall meet regularly four times a year and/or on an ad hoc basis when necessary.

### ***Meetings of the Sustainable Development Management Committee in 2024***

In 2024, the Sustainable Development Management Committee met once (1). The participation rate of the Members of the Committee in the above meeting was 92%.

### **B. Participation of the Risk Management Committee and the Audit Committee**

The Bank's Risk Committee oversees climate-related and environmental risks (C&E risks), while the Bank's Audit Committee assesses the effectiveness of internal audit, governance and risk management practices in relation to ESG risks.

### **C. Department for Strategy, Shareholder Relations and Sustainable Development**

The Strategy & Shareholder Relation Department, which was renamed to Strategy, Shareholder Relation and Sustainable Development Department, was assigned the responsibilities of planning, meeting targets related to sustainable development, as well as the monitoring of key performance indicators (KPIs) for ESG issues, and consequently the Department's Rules of Procedure were updated.

An independent **Sustainable Development Section** was established with main responsibility for formulating and recommending to the senior management and the Board of Directors of the Bank and the Group companies, the sustainable development strategy (i.e. the alignment of the Bank's business objectives with the creation of value for society and the environment) and the alignment of initiatives undertaken with best good practices.

The Section of Sustainable Development of the Bank's Strategy, Shareholder Relations and Sustainable Development Department, indicatively and not restrictively, has the following individual responsibilities:

- The development of the Group's sustainable development strategy.

- The design of targets in line with the sustainable development strategy and the ESG (Environment-Society- Governance) criteria set for their monitoring.
- The monitoring of best practices at national and international level on sustainable development issues and corresponding ESG criteria.
- The submission of recommendations and the internal coordination for the integration of the Bank into non-financial indicators and international initiatives.
- The drafting of regulatory or other non-financial reports on matters within its remit.
- The drafting, in cooperation with the relevant departments/sections of the Bank, of communication content and reports on sustainable development issues and ESG indicators.
- The coordination of the involved sections, departments and Group companies for the collection of non-financial data.
- To respond to requests/questions received from investors or other interested parties regarding the Bank's performance on sustainable development issues and ESG indicators.
- The coordination of the development of training material for employee training programs on sustainable development issues.

#### **D. Definition of specific roles**

##### ***i. ESG Coordinator***

A position of ESG Coordinator was established in the Department for Strategy, Shareholder Relations and Sustainable Development with responsibilities, inter alia, to participate in the formulation and recommendation of the Group's sustainable development strategy, to manage ESG initiatives, to monitor the broader ESG framework with a view to submitting proposals for integrating standards or best practices, to ensure alignment with regulatory and preventive requirements, to promote the Bank's sustainable development to its stakeholders (investment community, customers, shareholders, etc.), to communicate with institutional bodies and regulatory authorities on ESG issues, to coordinate employee training programmes on sustainable development issues, to cooperate with the competent Department to identify any risks related to environmental, social or governance issues (ESG), as well as opportunities that the Bank could take advantage of, etc. The responsibilities of the ESG Coordinator are detailed in the Department's revised Rules of Procedure, which were approved by the Bank's Executive Committee at its meeting on 06-12-2024.

##### ***ii. ESG Risk Officer***

A position of ESG Risk Officer was also established in the Regulatory Relations Section of the Risk Management Department, with the following responsibilities described in the revised Rules of Procedure of the Risk Management Department, which were approved by decision of the Board of Directors of 16.01.2025:



- To work closely with other sections of the Department and internal teams, including regulatory compliance, legal services, Credit & Recoveries and sustainable development, in order to ensure smooth integration of ESG requirements.  
To prepare risk reports for internal and external stakeholders, highlighting trends, vulnerabilities and proposed mitigation actions.
- To review and update risk policies, procedures and limits by integrating CR&E risks and aligning them with the Bank's broader strategic objectives.
- To support the design and implementation of scenario analysis exercises, stress testing, development of ICAAP / ILAAP sections and assist wherever required with ESG risks.

### **E. Sustainable Development Policy**

By decision of the Board of Directors of 16.01.2025, following a relevant recommendation of the Sustainable Development Management Committee, the Bank adopted a Sustainable Development Policy which is included in its Rules of Procedure and is posted on its website: [https://www.optimabank.gr/media/wegdtzyo/p60\\_politiki\\_viosimis\\_anaptyxis.pdf](https://www.optimabank.gr/media/wegdtzyo/p60_politiki_viosimis_anaptyxis.pdf)

This Policy was drawn up on the basis of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14<sup>th</sup> of December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting, which was already transposed into Greek law by Law 5164/2024 and in accordance with Article 14(3)(I) of Law 4706/2020.

The purpose of the Policy is to lay the foundations for the integration of sustainability into all of the Bank's operations, with the aim of creating value for the protection of the environment, promoting social welfare and strengthening governance practices.

## **II. Training of the Board of Directors and senior management on CR&E risks.**

A. On November 8, 2024, a specialized external consultant of the Bank conducted an informative presentation - training program for the members of the Board of Directors on ESG issues. The programme included a full presentation of climate-related and environmental risks, how CR&E risk assessments should be integrated into decision-making, the importance of CR&E risk management and integration into strategy development, and the role of the BoD in overseeing CR&E risk management.

B. In addition, a special training session for the Executive Committee (ExCo) and other senior management executives was held on 6 December 2024 to provide the above persons with the necessary knowledge and tools to effectively oversee any ESG-related issues and address CR&E risks within their strategic and operational responsibilities.

### **III. Carrying out high-level analysis scenarios**

The Bank completed a Qualitative Materiality Assessment, in the context of which a comprehensive qualitative materiality assessment was carried out to assess the potential magnitude of the impact of climate-related and environmental risks (CR&E) on all other existing risk categories of the Bank and the associated risks were assessed. In addition, the Bank has already started and is carrying out a quantitative analysis exercise of CR&E risk scenarios.

### **IV. Business environment analysis**

The Bank has adopted a structured approach to the analysis of the business environment taking into account climate-related and environmental risks (CR&E). In this context, a business environment analysis report assessing the potential impact of CR&E risk on Greece, the financial services sector, the Bank itself, as well as its customers was finalised in 2024, and a process was further defined to review the completeness and timeliness of the analysis in the future (with the analysis being assessed at least annually). Under this approach, the Bank ensures that information on its CR&E risks is kept up-to-date and aligned with evolving factors.

B. In January 2025, the Bank submitted a progress report to the Bank of Greece on the progress made in implementing the Bank's updated action plan (ESG Roadmap).

C. In February 2025, the Sustainable Development Management Committee at its meeting of 21 February 2025:

- Decided to extend the roadmap in order to meet the expectations of SSM No 5,6,7,8,9,11 on the effective management of ESG risks (ESG Roadmap). In this context, it approved a timeline for the implementation of these expectations through which the Bank seeks to improve its understanding of the impact of environment and climate-related risks (CR&E) on its business model and on existing risks. The Bank aims to integrate climate-related and environmental (CR&E) risks into its risk management framework by identifying existing risk management processes that should take into account CR&E risk. In addition, the distribution of responsibility across all three lines of defense is planned, for the holistic monitoring of climate and environmental risks. This action plan (ESG Roadmap) incorporating the above expectations of the SMM was approved by the Board of Directors of the Bank at its meeting on 05.03.2025 and was subsequently submitted to the Bank of Greece.

- Recognized, in accordance with the guidelines of the European corporate sustainability reporting directive (CSRD), through the Double Materiality Analysis process, the following issues as the most important for the sustainable operation of the Bank:

Identified Material Topics 2024:

- E1 - Climate Change
- E5 - Circular Economy
- S1 - Own Workforce
- S4- Consumers and end-users
- Sector Specific - Innovation and Digitalization
- G1 - Business Conduct

Based on these issues, the Bank makes specific disclosures within the sustainability report that is part of the Optima bank Group's annual management report for the year 2024.

- It has adopted a comprehensive sustainable development strategy (with specific commitments, targets and performance indicators) to monitor the implementation of the objectives set in the fields of the environment (E), society (S) and corporate governance (G), as formulated by the Department for Strategy, Shareholder Relations and Sustainable Development, in cooperation with the relevant business areas and the guidance of an external consultant. The above targets are based on 2024, are planned to be implemented on a two-year horizon (2026) and are incorporated in the sustainability report that is part of the Optima bank Group's annual management report for the year 2024.

Other information on ESG matters can be found in the sustainability report that is part of the Optima bank group management report for the year 2024.

## **10. Transactions with Related Parties**

The Bank has established and applies policies and procedures regarding Transactions with Related Parties in order to properly identify, assess, approve and disclose its Related Party transactions. Detailed information is included in note 39 to the financial statements.

## Alternative performance measurement indicators ('APMs') at Group level

In conjunction with the financial information reported under IFRSs, this Board of Directors Report also includes financial indicators that are alternative performance measurement indicators that seek to follow the orientations of the APMs issued by the European Securities and markets Authority ('ESMA'). In accordance with the definition of ESMA, a non-IFRS size is a measure for the calculation of historical or future financial performance, financial position or financial flows that excludes or incorporates amounts that would not have the corresponding adjustments to the comparative IFRS.

The following AIMA shall include or exclude amounts non defined by IFRSs, with the aim of a consistent basis for comparison between economic periods or uses and the provision of information on events of non recurring nature. However, performance measurement indicators not defined in IFRSs are not a substitute for IFRSs.

Amounts in EUR 000

| Name                                                                   | Description                                                                                                                                                                                                                                                                                                               | 2024      | 2023      |
|------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| <b>Loans and receivables from pre-provisions customers</b>             | Loans and receivables from clients measured at amortised cost before provisions for impairment of loans and other receivables from clients - Calculation: Loans and receivables from customers + Provisions for impairment of loans and other receivables from customers                                                  | 3,657,499 | 2,458,509 |
| <b>Provisions for write-downs of loans and other claims by clients</b> | Provisions for write-downs of loans and other claims by clients                                                                                                                                                                                                                                                           | 44,901    | 27,595    |
| <b>Obligations to customers</b>                                        | Customer deposits and checks payable - Calculation: Demand Deposits + Savings Deposits + Term Deposits + Restricted Deposits + Other Deposits + Checks Payable                                                                                                                                                            | 4,643,412 | 3,191,804 |
| <b>Index of loans after provisions to deposits (LDR)</b>               | Carrying amount of loans and receivables from clients measured at amortised cost after provisions to customer deposits and checks payable - Calculation: Loans and receivables from customers / (Cash deposits + Savings deposits + Term deposits + Restricted deposits + Other deposits + checks payable)                | 77.80%    | 76.16%    |
| <b>Total operating costs</b>                                           | Total operating costs                                                                                                                                                                                                                                                                                                     | 57,879    | 56,939    |
| <b>Profit or loss before tax</b>                                       | Total results before provisions and taxes                                                                                                                                                                                                                                                                                 | 196,844   | 136,018   |
| <b>Risk weighted assets (RWAs)</b>                                     | Assets and off-balance sheet items, determined on a risk-weighted basis, in accordance with Regulation (EU) 575/2013                                                                                                                                                                                                      | 3,988,249 | 2,685,788 |
| <b>Common Equity Tier 1 capital ratio (CET 1)</b>                      | Common equity Tier 1 capital, under Regulation (EU) 575/2013, including the profit in the period and the supervisory transitional arrangements for the effect of IFRS 9 on risk-weighted assets.*                                                                                                                         | 14.40%    | 17.67%    |
| <b>Total capital adequacy ratio (TCR)</b>                              | Total supervisory capital, applying the provisions of Regulation (EU) 575/2013 and the supervisory transitional arrangements for the effect of IFRS 9, in respect of risk-weighted assets, integrating period profits.*                                                                                                   | 14.40%    | 17.67%    |
| <b>Liquidity coverage Ratio (LCR)</b>                                  | The liquidity coverage ratio as defined by Directive (EU) No 2015/61 (amended by Directive (EU) No 2018/1620) is the amount of the pool of unencumbered high-quality liquid assets held by a credit institution, toward the projected net cash outflows, in order for a bank to survive a one-month stress test scenario. | 251.44%   | 248.88%   |
| <b>Net stable funding ratio (NSFR)</b>                                 | The net stable funding ratio is defined as the amount of available stable funding in relation to the amount of fixed funding required.                                                                                                                                                                                    | 124.83%   | 131.83%   |

\* The funds have been calculated by including the profits of the period by incorporating a dividend distribution provision, which is under the approval of the regular General Assembly.

## **Board of Directors' explanatory report of Optima bank S.A.**

This Explanatory Report of the Board of Directors of Optima bank S.A. (hereinafter the "Bank") on the 2024 financial year submitted to the Ordinary General Meeting of the Bank's shareholders contains detailed information with reference date 31.12.2024, in accordance with Article 4(7) of Law 3556/2007 and following the order of presentation in that provision.

### **A) Structure of the Bank's share capital**

On December, 31<sup>st</sup> 2024, the Bank's share capital amounted to two hundred and fifty-four million five hundred and twenty thousand seven hundred and eighty-nine euros and ninety cents (EUR 254.520.789.90), divided into seventy-three million seven hundred and seventy-four thousand one hundred and forty-two (73.774.142) common registered voting shares with a nominal value of three euros and forty-five cents (EUR 3.45) each.

The Bank's shares are registered, dematerialized and admitted to trading on the Main Market of the Athens Exchange in their entirety.

Each share incorporates all the rights and obligations arising from Law 4548/2018 and the Bank's Articles of Association.

Each share confers the right to one vote at the General Meeting of the Bank's shareholders. The shares are indivisible.

### **B) Restrictions on the transfer of shares of the Bank**

The Bank's shares are admitted to trading on the Main Market of the Athens Stock Exchange and may be transferred in accordance with the Law.

The Bank's Articles of Association do not provide for any restrictions on the transfer of its shares.

### **C) Significant direct or indirect participations within the meaning of Law 3556/2007**

As of 31 December 2024, the Bank had been notified, in accordance with the provisions of Law 3556/20027, of the following significant shareholdings in its share capital:

|                         | Note | Number of shares | Participation rate |
|-------------------------|------|------------------|--------------------|
| MOTOR OIL (HELLAS) S.A. | 1    | 6,602,168        | 8.95%              |
| IOANNIS VARDINOYANNIS   | 2    | 5,355,525        | 7.26%              |

1. The above 6,602,168 shares of the Bank are indirectly held by MOTOR OIL (HELLAS) CORINTH REFINERIES S.A., through its 100% owned subsidiary IREON INVESTMENTS LTD,
2. The above 5,355,525 shares of the Bank are held indirectly by Mr Ioannis V. Vardinoyannis, through his controlled companies within the meaning of Article 3(1c) of Law 3556/2007:
  - CANELO HOLDINGS LIMITED (holder of 4,298,167 shares of the Bank, i.e. 5.83%) and
  - BAYNOUN LIMITED (owner of 1,057,358 shares of the Bank, i.e. 1.43%).

#### **D) Shares conferring special control rights**

There are no shares of the Bank which confer special control rights on their holders.

#### **E) Restrictions on the right to vote**

The Bank's Articles of Association shall not contain any restrictions on the voting rights attached to the shares of the Bank or on the time limits for their exercise.

#### **F) Agreements of the Bank's Shareholders**

No agreements between the Bank's shareholders involving restrictions on the transfer of shares or on the exercise of voting rights resulting from them have been notified to the Bank.

#### **G) Rules for the appointment and replacement of members of the Board of Directors and amendment of the Articles of Association**

The rules set out in the Bank's Articles of Association for the appointment and replacement of members of the Board of Directors, as well as for the amendment of its provisions, do not differ from the relevant provisions laid down in Law 4548/2018 and Law 4706/2020, as in force.

#### **H) Competence of the Board of Directors to issue new or purchase own shares**

According to the Bank's Articles of Association:

- a) A decision of the General Meeting is required for the capital increase;
  - b) By decision of the General Meeting and for a period not exceeding five years, the Board of Directors may be granted the right to decide by a majority of at least two thirds of its members to increase the share capital, in whole or in part, by issuing new shares for an amount not exceeding three times the capital existing at the date when the relevant authorization was granted to the Board of Directors. This authorization to the Board of Directors may be renewed by decision of the General Meeting for a period not exceeding five years for each renewal. Each renewal shall take effect on the expiry of the period of validity of the previous one. The above shall apply mutatis mutandis in the case of a decision to issue a bond loan with convertible bonds in accordance with Article 71 of Law 4548/2018.
- The Bank did not establish an own share purchase programme in 2024.

**I) Significant agreements that enter into force, are amended or expire in the event of a change of control following a public offering**

There are no significant agreements of the Bank which enter into force, are amended or expire in the event of a change in the control of the Bank following a public offering.

**J) Agreements concluded by the Bank with members of the Board of Directors or its staff providing for compensation in the event of resignation or dismissal without valid reason or termination of their term or employment due to a public offering**

According to clause 5.4. of the approved Remuneration Policy of the Bank, contracts with members of the Board of Directors of the Bank may include special terms providing for specific compensation in the event of their termination without good reason, setting the reasonable amount thereof that may not exceed the total of 24 gross monthly earnings.

In this context, the Bank has concluded agreements with Members of its Board of Directors (Chairman, Managing Director) providing for the payment of compensation equal to the total of 24 gross monthly earnings in the event of termination of the contract by the Bank without good reason.

Finally, there are no agreements concluded by the Bank with members of the Board of Directors or its staff that provide for compensation in the event of resignation or termination of their term or employment due to a public offering.

## Optima bank's Group Sustainability statement

### General Information

#### **ESRS 2 General Disclosures**

##### **Basis for Preparation**

###### **BP-1 – General basis for preparation of Sustainability Statement**

The current Sustainability Statement outlines Optima bank's Group ("Group") performance in the Environment, Social and Governance (ESG) field covering the period from 1 January 2024 to 31 December 2024. The Sustainability Statement has been prepared on a consolidated basis, at the Group level, same as the financial statements. The Group consists of Optima bank S.A. ("Bank" or "Optima bank") and its subsidiaries.

The Double Materiality Assessment ("DMA"), which has been conducted for the identification of Impacts, Risks and Opportunities ("IROs") extended to Group's entire value chain, where feasible. The Sustainability Statement covers the Group's own operations and the upstream and downstream value chain. More specifically, the Group's upstream activities encompass services and products that are provided by its suppliers, and financing, geographical and regulatory environments in general. Moreover, Group's own operations (downstream) include all activities of the Bank and its subsidiaries, such as corporate banking, retail banking, investment banking, asset management, factoring and leasing services. The Group's downstream activities are also scrutinized, primarily involving corporate and retail customers.

No subsidiary included in the consolidation exempted from consolidated or individual sustainability reporting. No information that corresponds to intellectual property, know-how, or innovation related has been omitted. Furthermore, the Group doesn't exempt from disclosure impending developments or matters that are currently under negotiation.

###### **BP-2 – Disclosures in relation to specific circumstances**

The Group applies the definitions of the short-term, medium-term and long-term time-horizons as defined by the European Sustainability Reporting Standards ("ESRS").

The Sustainability Statement doesn't include metrics related to upstream and/or downstream value chain data or sources of estimation and outcome uncertainty.

The Sustainability Statement is the Group's first sustainability related report, so there are no applicable changes in preparation or presentation of sustainability information compared to the previous reporting periods, nor any identification of reporting errors in prior periods. The Sustainability Statement discloses information according to the Corporate Sustainability Reporting Directive ("CSRD") which was incorporated into the Greek legislation by Law 5164/2024. The Group also used a disclosure from the GRI Standards in ESRS S4 (GRI 418-1 b).



*Incorporation by reference*

| Disclosure Requirement                                                                   | Reference                         |
|------------------------------------------------------------------------------------------|-----------------------------------|
| GOV-1 – The role of the administrative, management and supervisory bodies (GOV-1 21 c)   | Statement of Corporate Governance |
| GOV-1 – The role of the administrative, management and supervisory bodies (G1.GOV-1 5 b) | Statement of Corporate Governance |

Even though the Group's average number of employees does not exceed the average number of 750 employees during the fiscal year 2024, the Sustainability Statement discloses information as required by ESRS S1 and ESRS S4, which have been assessed to be material from the DMA, due to the Group's commitment to enhance accountability and transparency.

**Governance**

**GOV-1 – The role of the administrative, management and supervisory bodies**

In accordance with Article 9 of the Articles of Association of Optima bank and Article 77 par. 1 of Law 4548/2018, Optima bank is governed by the Board of Directors ("BoD" or "Board"). The BoD, which operates in compliance with Greek legislation and the Bank's Articles of Association, was elected by the Extraordinary General Meeting decision dated 22.03.2023 for a four-year term, ending upon the election of the new Board of Directors by the Ordinary General Meeting in the year of its expiration (i.e., until 10.09.2027), and was constituted into a body by its decision dated 23.03.2023. Pursuant to the decision of the Ordinary General Meeting of May 23, 2024, the number of BoD was increased from ten (10) to eleven (11) with the election and addition of a Non-Executive Member for the rest of the Board's term, which has been elected by the Ordinary General Meeting of Shareholders of 23.03.2023, i.e. until 10.09.2027 at the latest, and the Board was reconstituted into a body by its decision dated 27.05.2024, is comprised of eleven (11) members elected by the General Meeting of Shareholders. Following the resignation of a female Independent Non-Executive Member of the Board of Directors, as of 31st.10.2024, the Board of Directors unanimously resolved pursuant to article 82 of Law 4548/2018 and article 10 par. 2 of the Bank's Articles of Association, to continue the management and representation of the Bank, without replacing the resigned Member temporarily, until its replacement by a new Board member who meets the individual and collective suitability criteria in accordance with the applicable legislation and the Suitability Policy for Members of the Board of Directors of the Bank, and was reconstituted into a body with the remaining members. Therefore, on 31.12.2024, the Board of Directors consisted of ten (10) members, two (2) executives and eight (8) are non-executives, of whom four (4) are independent, making up to 40% of the total.

The CVs of the BoD members are available on the corporate site of Optima bank and the Statement of Corporate Governance, providing detailed information about their relevant experience in the sector. Moreover, even though there is no employee representation at the BoD, trade unions do hold co-determination rights. For any substantial operational changes, it is required to inform or consult with the most representative trade unions, adhering to the applicable legislative framework in effect at that time.

To monitor, manage and oversee impacts, risks, and opportunities, during the reporting period, responsibilities and roles have been developed throughout the Group, at the Board, Management, and operational level. This governance structure enables sustainability issues to be embedded in the key business processes and ensures the oversight of ESG related issues (including impacts, risks and opportunities) across three levels: Board Level, Management level and operational level.

The administrative, management and supervisory bodies are the BoD and its committees: the Remuneration and Nominations Committee, the Audit Committee the Risk Management Committee ("RMC"), the Executive Committee ("ExCo") and the Head of the Internal Audit. More specifically, regarding

the oversight of impacts, risks and opportunities, the Risk Management Committee, oversees climate-related and ESG risks, the Audit Committee reviews the sustainability- related statements and directs the internal audit of climate-related and ESG risks framework implementation and the Remuneration and Nominations Committee, which is responsible for aligning the performance objectives of senior management with the sustainable development strategy and risk appetite. For more information regarding the administrative, management and supervisory bodies (expertise and relevant expertise), please refer to the Corporate Governance Statement.

At senior management level, the Sustainability Management Committee ("SMC") reviews, approves, and monitors the implementation of Sustainability Strategy. At operational level, the Strategy, Investor Relations ("IR") and Sustainable Development Division, defines and leads any sustainability- related initiatives. The Sustainable Development Department, that belongs to the aforementioned Division, develops and recommends the sustainability strategy to senior management and the Board, ensuring business goals align with social and environmental value creation while following best practices. On top of this, the ESG Coordinator ensures the effective implementation of ESG objectives. Finally, there is a cross functional ESG Community, which is responsible for incorporating climate-related and environmental risks ("CR&E") considerations into daily operations, decision-making and performance management.

### **Board of Directors**

The BoD has the ultimate responsibility for overseeing the sustainability strategy and any CR&E related issues, performance, and reporting. The Board also ensures that the sustainability strategy is aligned with the Group's vision, mission, and values. ESG elements are included in the Board meetings agenda, as per the best international practices.

The Senior management is accountable for implementing the CR&E policies and procedures, and the CR&E risks' integration into the core business functions and operations of the Group. Senior management also establishes a clear governance structure and assigns roles and responsibilities for CR&E at different levels of the entity. Finally, senior management is fostering a culture of climate and environmental awareness and commitment among the employees and stakeholders. The Management Body approves the institutions' environmental strategy and risk management framework along with the corresponding policies and oversees their implementation.

In specific, the Risk Management Committee oversees ESG risks, advises the Board on setting and monitoring risk tolerance levels and assesses the application of the risk strategy by senior management. RMC, also reviews the entity's solvency and liquidity profile and submits for final approval to BoD the Risk Appetite Framework (RAF). The Audit Committee provides assurance to the Board of Directors regarding ESG risks thus it assesses the effectiveness of internal controls and governance framework, and reviews established risk management practices with respect to ESG risks.

### **Sustainability Management Committee**

In the context of the enhanced Corporate Governance structure for ESG issues, a Sustainability Management Committee was established in 2024. The SMC consists of the Chief Executive Officer who chairs the committee, and heads of departments as permanent members such as Strategy, IR and Sustainable Development, Legal and Corporate Governance, Credit and Recoveries, Technology and Operations, Retail Networks, Wholesale banking, Brokerage, Finance, Human Resources ("HR"), Products and Marketing, and the Head of Risk Management (as a non-voting attendee). The Chairman may invite any Board member, executive, or other relevant individuals to attend the meetings. SMC members must act in the Group's best interest, maintain confidentiality, disclose conflicts of interest, prepare for and attend meetings, and align their operation with ESG targets.

Main duties and responsibilities include:

- Evaluating and suggesting ESG strategies to the BoD.
- Ensuring regulatory compliance with national and European ESG legislation.
- Approving and monitoring ESG action plans and projects.
- Approving ESG policies and amendments.
- Reviewing ESG performance indicators and goals.
- Engaging with international ESG standards and initiatives.
- Evaluating and approving ESG reports.
- Approving ESG-related training and awareness initiatives.
- Setting ESG-related Key Performance Indicators ("KPIs") to be linked to remuneration schemes.
- Updating risk management frameworks to integrate climate-related and environmental risks.
- Approving the introduction of Green Products and Services.
- Developing sustainability-related communications.

The SMC meets regularly on a quarterly basis or as needed. Meetings require a quorum of half plus one of its members. Decisions are made by absolute majority vote of the present members, with the Chairman having a casting vote in case of a tie. The SMC is supported by a secretary, who manages meeting logistics, prepares agendas, and documents minutes. The SMC reports significant issues to the Executive Committee and submits quarterly reports to the Board of Directors. It has full access to necessary information and resources, including external advisors, to fulfill its mandate.

### **Strategy, IR and Sustainable Development Division**

The **Strategy, IR and Sustainable Development Division** reports to the Chief Executive Officer ("CEO") of the Bank and is supervised by the Head of Strategy, IR and Sustainable Development Division. Its key responsibilities include defining the strategic direction of the Group, developing strategic and business plans aligned with the Group's vision, driving business growth, managing shareholder relations and investor communications, while also setting sustainability goals and monitoring ESG performance.

The **Sustainable Development section** of the Strategy, IR and Sustainable Development Division, formulates and proposes the sustainable development strategy to senior management and the Board of Directors, ensuring the alignment of business objectives with value creation for society and the environment. It monitors best practices at national and international levels regarding sustainable development, designs specific goals aligned with the strategy, and oversees their implementation. The Sustainable Development Department coordinates the inclusion of the Group in non-financial KPIs and international initiatives and prepares supervisory and regulatory non-financial reports.

The ESG Coordinator position has been assigned to the Strategy, Investor Relations and Sustainable Development Division, with the aim of overseeing all sustainability initiatives and ensuring the faster, more effective adoption of ESG practices, in collaboration with the Head of Strategy, Investor Relations, and ESG. The ESG Coordinator proposes actions on sustainable development issues in cooperation with the relevant departments and monitors the KPIs related to the targets set. Moreover, the ESG Coordinator participates in the formulation of the sustainable development strategy and responds to requests from investors or other interested parties regarding the Group's ESG performance. The ESG Coordinator is also responsible for the development of non-financial reports that arise as a legislative or regulatory requirement. The ESG Coordinator collaborates with the relevant divisions (especially the Risk Management Division) to identify any risks related to environmental, social, or governance (ESG) issues, as well as opportunities that the Group could exploit. Communication with institutional bodies and supervisory authorities on ESG issues, initiating the Group's participation in international bodies and non-financial indicators, and coordinating employee training programs on sustainable development issues to ensure that all employees are aware of sustainability best practices, is among the coordinator's responsibility as well.

### **Other business units**

The business units and functions are responsible for incorporating ESG considerations into their daily operations, decision-making and performance management.

It should be noted that there has been a definition of roles and responsibilities for CR&E risks management within the Group at the individual level. Clear lines of communication throughout the Bank (committees) are created, by reviewing the existing committee structure and producing alternative proposal / amended committee structures and reporting lines (where appropriate) to support CR&E risk oversight including allocation of responsibility for CR&E risk oversight to the relevant committees. The management of impacts, risks, and opportunities is dynamically embedded in the organizational structure and continuously integrated with internal functions and units. This ensures a comprehensive approach to ESG governance, effective risk assessment, mitigation measures if needed and enhanced decision-making. The Group is also continuously working on integrating dedicated controls and procedures into the management of ESG-related issues to ensure better and more effective management.

The Sustainability Management Committee endorses for approval by the Board of Directors, the sustainability goals and targets related to material impacts, risks, and opportunities. Internal experts from various departments collaborate with the Strategy, IR and Sustainable Development Division to define clear, measurable goals that align with the overall strategy. Once approved by the Sustainability Management Committee, progress is monitored through regular reviews, data analysis, and key performance indicators. This continuous evaluation enables both the Sustainability Management Committee and the Board to track advancement, modify strategies as necessary, and ensure that the targets remain pertinent. Instruments such as performance dashboards and sustainability statements offer valuable insights, thereby maintaining a sustained focus on the achievement of sustainability objectives.

Training sessions are regularly conducted in order to enhance skills and expertise related to material impacts, risks and opportunities and ESG issues in general. In 2024, two ESG related training sessions, one dedicated to the BoD members and one addressed to all ExCo members (11 members including the CEO), and the Heads of critical divisions (i.e. Risk, Regulatory Compliance and Internal Audit) for the implementation of Sustainability strategy. Participation in conferences or other training courses are also available either through the social network or other domestic and international associations that the Group is a member.

At this point, special mention should be made to the Group's dedication to adhering to the highest ethical standards and corporate governance principles, to ensure transparency and responsible operations across all aspects of its business. The goal is to enhance the effectiveness of its actions while fostering meaningful communication with shareholders and stakeholders in general. The administrative, management, and supervisory bodies are tasked with overseeing and guiding the ethical and business conduct of the Group.

The Board of Directors is responsible for evaluating the implementation and effectiveness of the Group's corporate governance system. It ensures compliance with ethical standards, legal requirements, and corporate governance principles. Also, the Board is responsible for defining the core values, strategic orientation, and business conduct, and continuously monitoring their observance. The BoD is also responsible for approving the strategy and business plan and monitoring their execution. The BoD regularly reviews and assesses the relevance of internal documents, regulations, policies, and procedures. It also evaluates the Code of Ethics and Conduct and its implementation, aiming to promote a culture of integrity and ethical behavior. This includes ensuring that the structure, responsibilities, and reporting lines of relevant departments are clearly defined, fostering accountability, and supporting efficient decision-making. Such an approach is essential for maintaining board-level accountability and strategic oversight.

Furthermore, the BoD regularly assesses potential opportunities and risks related to business conduct and examines measures to avoid or mitigate such risks. It ensures that the Group's values and strategic plans are aligned with its corporate strategy and organizational culture. The BoD and senior management set the standard for the characteristics and behaviors that define the corporate culture and exemplify its implementation. Together, they use various tools and techniques to embed the desired culture into the relevant systems and processes.

The Audit Committee is responsible for overseeing overall compliance with regulatory obligations, particularly with respect to the quarterly evaluations and reports required by regulatory authorities. These reports cover various business conduct matters, including money laundering, conflicts of interest, anti-monopoly measures, and customer/consumer protection and transparency, among others. The Remuneration and Nominations Committee ensures that the interests of the shareholders are properly protected regarding the selection and nomination of the members of BoD and the members of the Audit Committee who are not members of the BoD and their remuneration. However, the Board of Directors retains full responsibility to act and defend the interests of the Group.

The Risk Management Committee ensures the development and continuous effectiveness of the internal risk management system and its integration into the process of making business decisions in all forms of risks, including operational, across the full range of the Bank's divisions and its subsidiaries (e.g., monitoring, reporting, and addressing business conduct issues). The Executive Committee and the Internal Audit Division are responsible for implementing and enforcing policies and procedures related to business conduct, ensuring that any issues are promptly identified and addressed.

The expertise of the administrative, management, and supervisory bodies in business conduct matters is reflected in their CVs that exist in the Corporate Governance Statement. Additionally, for the Members of the Board of Directors, specifically, the individual suitability criteria are met, namely in the adequacy, knowledge, skills, and experience, as well as in the reputation, honesty, integrity, and assurances of ethical integrity, as referred to in the Suitability Policy of the members of the Board of Directors. Additionally, the Corporate Governance Statement includes the CVs of the Executive Committee Members and of the Head of the Internal Audit Division.

## **GOV-2 – Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies**

The Group began in 2024 to set the foundations of its sustainability strategy through the development of a comprehensive action plan that is about to be implemented within the reporting period and throughout 2025. To this end, and in full alignment with the CSRD requirements, the Group has identified the material ESG related impacts, risks and opportunities. Based on this, a sustainability strategy is developed with concrete goals and KPIs to monitor progress. These targets and KPIs are approved by the Sustainability Management Committee. Progress will be monitored biannually. Alongside, there has been designed and submitted to Bank of Greece an action plan for the four first expectations of the Single Supervisory Mechanism (SSM) for the management of climate-related and environmental risks. On 5.3.2025, the BoD approved the integration of the six remaining expectations, (Nos. 5, 6, 7, 8, 9.1 and 11) of the SSM into the Bank's action plan and was submitted to the Bank of Greece.

The Risk Management Division uses appropriate methods to manage and address the risks associated with business activity and the internal and external environment in a methodical manner, with a view to contributing to the business continuity and to promotion of sustainable development. The Risk Management Division suggests to the Risk Management Committee the appropriate techniques for adjusting risks to acceptable levels. The RMC is responsible for keeping the BoD updated on all matters related to the risk



strategy and the level of risk tolerance in the performance of its operational tasks. This approach ensures that all types of risks are effectively covered, controlled, managed, and coordinated across all functional levels. RMC also ensures the development and ongoing effectiveness of the internal risk management system. On top of this, RMC confirms the integration into the business decision-making process, regarding all forms of risk management risks, throughout the range of activities and the units of the Group including decisions on major transactions or/and investments. Therefore, BoD considers impacts, risks and opportunities when overseeing strategy and risk management process.

The BoD regularly addresses all the material impacts, risks and opportunities by tracking and reviewing the status and effectiveness of the management strategies and actions regarding sustainability matters. According to the Rules of Procedures of Sustainability Management Committee. The Sustainability Management Committee has the responsibility of submitting a quarterly report in writing to the BoD regarding the progress of the matters within its scope of responsibility. This includes addressing the sustainability matters identified by the DMA for the reporting period, the results and effectiveness of policies, actions, metrics and targets.

### **GOV-3 – Integration of sustainability-related performance in incentive schemes**

So far, there is no established link between remuneration and ESG criteria. The remuneration of the members of the BoD is not directly influenced by the sustainability-related performance. However, as the importance of sustainable business practices grows, Remuneration Policy for the members of the BoD will incorporate ESG criteria to align incentives with the Group's sustainability goals. This could involve setting specific ESG targets and metrics, such as reducing carbon emissions, improving energy efficiency, and enhancing social responsibility initiatives that, when achieved, would impact specific forms of variable remuneration. As such, climate-related factors have not yet been considered in determining the remuneration of members of the BoD. GHG emission reductions and other climate related considerations do not constitute relevant KPIs in performance assessments and remuneration structures. However, the Group intends to incorporate such criteria into its remuneration framework in the forthcoming years to align with its sustainability objectives. The Human Resources Division in cooperation with the Strategy, IR and Sustainable Development Division will proceed to the development of any ESG-related KPIs, which are linked to variable remuneration schemes and performance incentives. These KPIs will be approved by the relevant Committees (Sustainability Management Committee and Remuneration and Nominations Committee). The proportion of variable remuneration dependent on sustainability-related targets and/or impacts will be determined during this process.

### **GOV-4 – Statement on due diligence**

| <b>CORE ELEMENTS OF DUE DILIGENCE</b>                                        | <b>PARAGRAPHS IN THE SUSTAINABILITY STATEMENT</b>                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a) Embedding due diligence in governance, strategy and business model        | GOV-2 – Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies<br>GOV-3 – Integration of sustainability-related performance in incentive schemes<br>SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                                                          |
| b) Engaging with affected stakeholders in all key steps of the due diligence | GOV-2 – Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies<br>SBM-2 – Interests and views of stakeholders<br>IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities<br>S1-2 – Processes for engaging with own workforce and workers' representatives about impacts |

|                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                  | <p>S4-2 – Processes for engaging with consumers and end-users about impacts</p> <p>E1-2 – Policies related to climate change mitigation and adaptation</p> <p>E5-1 – Policies related to resource use and circular economy</p> <p>S1-1 – Policies related to own workforce</p> <p>S4-1 – Policies related to consumers and end-users</p> <p>G1-1 – Corporate culture and business conduct policies and corporate culture</p> <p>ES – Policies related to entity specific topic</p> |
| c) Identifying and assessing adverse impacts                     | <p>IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities</p> <p>SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model</p>                                                                                                                                                                                                                                                       |
| d) Taking actions to address those adverse impacts               | <p>E1-3 – Actions and resources in relation to climate change policies</p> <p>S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those action</p>                                                                                                                                                                                           |
| e) Tracking the effectiveness of these efforts and communicating | <p>E1-5 – Energy consumption and mix</p> <p>E1-4 – Targets related to climate change mitigation and adaptation</p> <p>E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions</p> <p>S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p> <p>S1-16 – Compensation metrics (pay gap and total compensation)</p>                                                                                  |

#### **GOV-5 – Risk management and internal controls over sustainability reporting**

Internal Control System (ICS) is composed of 3 independent Units (Internal Audit, Risk Management, Regulatory Compliance) which are being oversighted by the BoD Committees (Audit and Risk Management). They form an adequate and effective ICS, which policies and procedures are being approved by the BoD. The ICS aims to ensure, inter alia, the recognition and management of all risks undertaken, and the completeness and reliability of the data and information required to identify accurately and timely the financial situation of the Group and the production of reliable financial statements. Moreover, delegated powers have been placed to the above independent units (Risk Management, Internal Audit and Regulatory Compliance) and to the committees of the BoD. Regarding sustainability reporting, internal departments have the responsibility to prepare and collect the qualitative and quantitative data, ensuring accuracy and completeness, while collaborating with the Strategy, IR & Sustainable Development Division, which manages consolidation and oversees in detail the process to align with the sustainability strategy and CSRD requirements. The Sustainability Management Committee ensures that all sustainability-related aspects are accurately and effectively represented, prior to final approval by the Audit Committee and the BoD. Furthermore, an independent third-party assurance provides limited assurance on the information included in the Sustainability Statement to enhance its credibility, ensure compliance with ESRs, and strengthen stakeholder trust. This process underlines the Group's commitment to transparency, accuracy, and accountability in relation to sustainability reporting. The above-mentioned approval process that is followed for the Sustainability Statement is the same with the one followed for the financial statements, including endorsement by the Sustainability Management Committee, prior to final approval by Audit Committee and BoD which signs the highest level of oversight and accountability.

The Group takes a proactive approach to identifying and prioritizing sustainability risks. While an official risk assessment framework or prioritization methodology for sustainability reporting has not yet been established, the Group is committed to strengthening the risk management processes. Moving forward, the Group will continue to enhance internal controls to ensure the integrity of the sustainability reporting and effectively address any potential risks that may arise in future reporting periods. During this reporting period, the Risk Management Division oversaw the Sustainability Statement. Given that the Sustainability

Management Committee includes members from different operational areas, any findings identified during the reporting period are quickly communicated to the relevant division. This ensures that appropriate actions and measures are implemented effectively. Additionally, this approach fosters a culture of continuous improvement and proactive management across ESG pillars. Continuous monitoring enables close collaboration with the relevant divisions, addresses any issues, implementation of corrective actions, and tracking of progress.

Regarding the Sustainability Statement, the administrative and supervisory bodies receive regular updates from the Sustainability Management Committee and Risk Management Committee, in case of findings of risk assessment and internal controls. Monthly, quarterly, or annual updates outline advancements, obstacles, and new risks over sustainability reporting, keeping decision-makers well-informed.

## **Strategy**

### **SBM-1 – Strategy, business model and value chain**

The Group is actively engaged in the market for retail and business financing in Greece. As the parent company of the Group, Optima bank leverages its customer service network and collaborates closely with other group companies to deliver a comprehensive suite of products and services. The Group offers a diverse range of financial solutions designed to meet the varied needs of its customers. These offerings encompass the business activities of the parent company and its subsidiaries in the following areas: Corporate banking, Retail banking, Asset Management, Factoring and Leasing Services, and Investment banking. By offering this array of products and services, the Group aims to address and respond to the diverse financial needs of its customers, building long-term relationships of trust for the banking experience, and contributing to the economic growth and stability of the Greek market. On the same note, there are no products and services that are banned in certain markets.

The number of employees of the Group on 31/12/2024 was 575 (550 for the Bank). All employees are located in Greece.

Concerning the breakdown of total revenue by significant ESRS sectors, the European Commission has not adopted a Delegated Act specifying the list of ESRS sectors. Consequently, nonadditional significant ESRS sectors have been considered when performing the materiality assessment. Due to the Group's business activity, the disclosure requirements regarding revenues in fossil fuel, fossil gas, chemicals, controversial weapons, and tobacco are not applicable.

The Group's sustainability strategy is built on three key pillars, addressing critical sustainability-related issues. It continually works to align its sustainability goals with significant product and service groups, customer categories, and stakeholder relationships. In specific, the business model and the sustainability strategy have been updated to define sustainability-related ambitions, commitments, targets, and key performance indicators, considering the results of the Double Materiality Assessment and the current significant products, services, markets, and customer groups. The strategy outlines the following ambitions and the relevant targets that are presented in the relevant sections of the Sustainability Statement, each with corresponding commitments:

- ***Support the energy transition***

The Group is committed to supporting the energy transition by minimizing its carbon footprint through operational efficiencies and sustainable practices, integrating climate and environmental factors into business and risk management to enhance resilience, and developing transition plans. These efforts deliver positive outcomes across markets and customer segments, ensuring that offered financial products and services are aligned with the sustainability objectives.



- **Create value for people and society**

The Group is committed to creating value for people and society by maintaining high levels of employee and customer satisfaction, providing a diverse working environment and equal opportunities for all stakeholders, while safeguarding stakeholders' data privacy. Additionally, the Group focuses on enhancing customer satisfaction and improving operational efficiency through digitalization, ensuring that both employees and customers experience positive, equitable outcomes while embracing technological advancements to streamline processes.

- **Maintain a sound governance model**

The Group is committed to maintaining a sound governance model by fostering a culture of ethics, transparency, and integrity. It aims to embed sustainability within the corporate culture while strengthening policies and procedures to prevent corruption and bribery, upholding a zero-tolerance approach. The Group also ensures the protection of whistleblowers, encouraging transparency and accountability at all levels.

The updated strategy encompasses all significant impacts, risks, and opportunities while improving essential solutions as needed to address sustainability concerns. Furthermore, the strategy incorporates pertinent financial aspects, including associated revenues, thereby providing a comprehensive perspective on the Group's sustainability efforts and initiatives.

| INPUTS                                                                                                                                                       | VALUE CREATION                                                                                                                              | OUTPUTS                                                                                        | OUTCOMES                                                                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| Financial Capital<br>(Equity, Debt Instruments, Deposits)                                                                                                    | Corporate banking<br><br>Retail banking<br><br>Asset Management<br><br>Factoring services<br><br>Investment banking<br><br>Leasing Services | Net interest income<br>Net fee/Net interest/<br>Trading income<br>Total Assets<br>Market share | Climate change adaptation & mitigation                                                  |
| Manufactured Capital<br>(Branches & HQs, Data Center, Leased Vehicles)                                                                                       |                                                                                                                                             | Investments in branches, buildings & Data centers                                              | Energy/Waste<br>Working conditions                                                      |
| Natural Capital<br>(Water, Energy sources, paper)                                                                                                            |                                                                                                                                             | Energy consumption<br>Emissions<br>Waste<br>Water                                              | Equal treatment & opportunities<br>Information related impacts for consumers/end- users |
| Social capital<br>(Stakeholders engagement, Ethical Business practices)                                                                                      |                                                                                                                                             | Customer growth rate<br>Customer satisfaction<br>Financial Access                              | Innovation & Digitalization                                                             |
| Human Capital<br>(Management & Leadership, Employees' skills & capabilities, Training & Development, Employee well- being, Talent acquisition & recruitment) |                                                                                                                                             | Training hours<br>Payroll<br>Employee satisfaction & development                               | Corporate culture<br>Corruption and bribery<br>Protection of whistleblowers             |

|                                                                                            |  |                                                                    |  |
|--------------------------------------------------------------------------------------------|--|--------------------------------------------------------------------|--|
| Intellectual Capital<br>(Processes & Procedures,<br>Technology integration &<br>innovation |  | Innovation & Digitalization<br>Social networks<br>Cloud transition |  |
|--------------------------------------------------------------------------------------------|--|--------------------------------------------------------------------|--|

The Group operates within the financial sector, utilizing financial, manufactured, natural, social, human, and intellectual capital to generate value. It acquires equity, debt, and deposits while employing physical infrastructure, technology, and responsible resource management. Its operations are driven by ethical practices, stakeholder engagement, employee development, and innovation. Key outputs include net interest and fee income, asset growth, market share expansion, customer satisfaction and digital transformation. Infrastructure investment, sustainability initiatives, and human capital development support this overarching strategy. Its entire value chain involves the financial institutions, suppliers (services and products) and depositors upstream of the value chain, while serving corporate and retail customers, downstream of the value chain through branches and digital platforms. It maintains strong partnerships, regulatory compliance, and sustainability initiatives, ensuring resilience and long-term value creation.

### ***SBM-2 – Interests and views of stakeholders***

During every decision-making process, the role of stakeholders is critical. Therefore, to conduct the Double Materiality Assessment, stakeholders that participate, influence and are affected by the business activities have been redefined. Optima bank and the Group's subsidiaries maintain continuous dialogue with its stakeholders through various communication channels to ensure their views and concerns are incorporated into decision-making processes. Key stakeholders are customers and clients, employees, investors & shareholders, suppliers & partners, society & communities, and government & regulators. The Group ensures that engagement occurs regularly and systematically for all categories of stakeholders.

The engagement is organized by dedicated responsible persons depending on the stakeholder category, communication methods, and the affected area or/and activity/operation. These employees are responsible for maintaining open lines of communication with each stakeholder group by using multiple channels and methods as presented below.

| <b>STAKEHOLDER GROUP</b>      | <b>COMMUNICATION CHANNELS</b>                                                                                                                                                                                                                                                                                                            |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Customer &amp; Clients</b> | <ul style="list-style-type: none"> <li>• Customer satisfaction surveys</li> <li>• Daily communication in Bank's branches</li> <li>• Relationship Managers</li> <li>• Call center</li> <li>• "Send us your message" dedicated platform</li> <li>• Complaint form in the Bank's website</li> <li>• Materiality Analysis Process</li> </ul> |
| <b>Employees</b>              | <ul style="list-style-type: none"> <li>• Human Resources representatives' visits to Bank's branches</li> <li>• Internal portal for daily communication</li> <li>• Regular meetings with Human Resources Division</li> <li>• Training sessions</li> <li>• Materiality Analysis Process</li> </ul>                                         |

|                                     |                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Investors &amp; Shareholders</b> | <ul style="list-style-type: none"> <li>• Financial Statements</li> <li>• Annual Report</li> <li>• Roadshows</li> <li>• General meetings</li> <li>• Press releases</li> <li>• One to one meetings</li> <li>• Investor Relations events</li> <li>• Materiality Analysis Process</li> </ul>                          |
| <b>Suppliers &amp; Partners</b>     | <ul style="list-style-type: none"> <li>• One to one meetings</li> <li>• Terms of supply agreements</li> <li>• Annual Reports</li> <li>• Materiality Analysis Process</li> </ul>                                                                                                                                   |
| <b>Society &amp; Communities</b>    | <ul style="list-style-type: none"> <li>• Financial Memberships in Associations</li> <li>• Communication with representatives of the local communities via branches</li> <li>• Direct communication</li> <li>• Annual Reports</li> <li>• Donations/CSR programs</li> <li>• Materiality Analysis Process</li> </ul> |
| <b>Government &amp; Regulators</b>  | <ul style="list-style-type: none"> <li>• Communication with state authorities</li> <li>• Cooperation with the BoG and other regulatory authorities</li> <li>• Regulatory reports</li> <li>• Meetings</li> <li>• Inquiries</li> <li>• Support of public initiatives</li> </ul>                                     |

A key stakeholder group is the Group's employees, where engagement is organized through Human Resources Division visits to Bank branches, an internal portal for daily communication, regular meetings with Human Resources Division, volunteering and CSR initiatives and training sessions. Regarding the strategy and business model, while the interests, views, and rights of the Group's workforce play a crucial role in shaping them, the workforce does not directly participate in defining these areas. However, their perspectives are always taken into consideration, including in the materiality analysis process. At the same time, through various initiatives, actions, policies, and procedures, the Group is committed to ensuring favorable working conditions and promoting equal treatment and opportunities for all.

For customers and clients, engagement is organized through customer satisfaction surveys, daily communication in Bank's branches, relationship managers, call centers, a dedicated "send us your message" platform and complaints form on the Bank's website. Similarly, with the Group's own workforce, the Group's strategy and business model are also informed by a commitment to respecting its customers' human rights, particularly in the areas of privacy and access to quality information. The Group implements rigorous data protection measures to safeguard personal information. Additionally, the Group strives for transparency and provides easy access to information to all its customers. By actively engaging with consumers through feedback mechanisms, the Group consistently improves its practices.

The purpose of stakeholder engagement is to gather feedback, understand stakeholder concerns, and incorporate their views into the Group's decision-making processes to align with their expectations and enhance overall satisfaction. The Group has created a dynamic stakeholder breakdown that includes information on the various channels of communication, engagement strategies, and the frequency of communication with various stakeholder groups over the course of the year. Effective stakeholder engagement is essential to the Group's success, as it provides valuable insights through ongoing communication. The Group stays updated on changing needs, expectations, and potential risks as perceived by its stakeholders by keeping lines of communication open. The outcomes of stakeholder engagement are

considered by integrating feedback into the Group's policies, strategies, and operations. This ensures that the Group remains responsive to stakeholder needs and continuously improves its services and initiatives. This approach is consistently incorporated into the new strategy for sustainable development. To reinforce its commitment to sustainable development, a business model that aligns with the needs and expectations of its stakeholders has been developed. This is achieved through the understanding of the interests and views of its key stakeholders, which is integrated both into the strategy and the business model. The Group actively engages in a due diligence process and materiality assessment process to analyze and understand stakeholder interests and views through the above-mentioned methods. The information collected and the feedback provided during these engagements is analyzed to identify key themes and issues that are important to stakeholders and if any improvement actions, measures and initiatives are necessary to meet their expectations. By integrating these insights into the Group's business model and strategy, the Group may address any potential impact, risk and opportunity.

As the Group sets the foundation for its sustainability journey and simultaneous response to regulatory requirements and stakeholders' needs, its strategy and business model are being updated. Specifically, it has been revised to place a stronger emphasis on ESG pillars by supporting energy transition, creating value for people and society and maintaining a sound governance model. To coherently incorporate the above and to enhance sustainability reporting and transparency, the Group considers further alignment with stakeholder interests through several additional initiatives. These initiatives are expected to positively modify and enhance the engagement with stakeholders' groups. By actively addressing their concerns and incorporating their feedback into the strategy and business model, it is anticipated that increased trust and stronger partnerships will be developed.

The administrative, management, and supervisory bodies are regularly informed and updated about the views and interests of affected stakeholders regarding the sustainability-related impacts from the Sustainability Management Committee. The Sustainability Management Committee has a critical role in reviewing and addressing stakeholder feedback to the highest governance bodies through the submission of quarterly reports and updated scheduled meetings during the year, when deemed necessary.

### SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The following table represents the material impacts derived from the DMA.

| ESRS topic | ESRS sub-topic                            | Impact description                                                                                                                                                                      | Type of impact      |                    | Value chain stage |                |            |
|------------|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|--------------------|-------------------|----------------|------------|
|            |                                           |                                                                                                                                                                                         | positive / negative | actual / potential | Upstream          | Own operations | Downstream |
| E1         | Climate change mitigation                 | Contribution to climate change through its in-house operations inevitably contributes to the release of emissions.                                                                      | –                   | actual             |                   | √              |            |
| E1         | Climate change adaptation                 | Contribution to climate adaptation, through providing environmentally friendly / green financial products/services.                                                                     | +                   | actual             |                   |                | √          |
| E1         | Energy                                    | Provision of specific financial products/services that support energy consumption reduction and energy efficiency.                                                                      | +                   | actual             |                   |                | √          |
| E1         | Climate change adaptation                 | Upgrade of the data center to achieve lower energy consumption.                                                                                                                         | +                   | actual             |                   | √              |            |
| E5         | Waste                                     | Impacts through financial products/services to certain sectors that affect the ability to manage and reduce waste.                                                                      | +                   | actual             |                   |                | √          |
| E5         | Waste                                     | Impacts through using ecofriendly- recyclable activities and initiatives                                                                                                                | +                   | actual             | √                 | √              | √          |
| S1         | Working conditions                        | Positive impact which generates direct, indirect, and induced jobs across its value chain, provide competitive wages and benefits in alignment with the remuneration policy.            | +                   | actual             | √                 | √              | √          |
| S1         | Working conditions                        | Increase employee's retention through the competitive remuneration of the employees based on merit recognition.                                                                         | +                   | actual             |                   | √              |            |
| S1         | Working conditions                        | Ensuring the right to free association of the employees.                                                                                                                                | +                   | actual             |                   | √              |            |
| S1         | Working conditions                        | Improved work/life balance through specific policies and initiatives.                                                                                                                   | +                   | actual             |                   | √              |            |
| S1         | Working conditions                        | Parental support (extra family days, child allowance, family support).                                                                                                                  | +                   | actual             |                   | √              |            |
| S1         | Working conditions                        | Support employees' well-being through providing satisfying and high-quality working conditions, including adequate workspace and respect of privacy.                                    | +                   | actual             |                   | √              |            |
| S1         | Equal treatment and opportunities for all | Established policies, measures and actions regarding gender / sexual / ethnic / racial issues within its operations, potentially impacting the feeling of inclusivity in the workplace. | +                   | actual             |                   | √              |            |
| S1         | Equal treatment and opportunities for all | Impact to employees (dissatisfaction, not motivated to work) through gender pay gap.                                                                                                    | –                   | actual             |                   | √              |            |
| S1         | Equal treatment and opportunities for all | Support for training and skills development and enhancement of the potential and uniqueness of employees, including through the definition of talent management and                     | +                   | actual             | √                 | √              |            |

|                 |                                                            |                                                                                                                                                                                                                     |   |        |   |   |   |
|-----------------|------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|--------|---|---|---|
|                 |                                                            | development programs. Creation of job and professional development opportunities inside and outside the Group.                                                                                                      |   |        |   |   |   |
| S1              | Working conditions                                         | Positive impacts with access to finance through staff loans with low interest rates.                                                                                                                                | + | actual |   | √ |   |
| S4              | Information-related impacts for consumers and/or end-users | High quality of the services provided results in customer satisfaction.                                                                                                                                             | + | actual |   |   | √ |
| S4              | Information-related impacts for consumers and/or end-users | Internal management systems, cybersecurity systems and initiatives protect and ensure stakeholders' data privacy.                                                                                                   | + | actual | √ | √ | √ |
| S4              | Information-related impacts for consumers and/or end-users | Established cybersecurity systems and processes lead to zero or restricted incidents of data breach, leaks of personal data and confidential information.                                                           | + | actual | √ | √ | √ |
| Entity specific | Innovation & digitalization                                | Adopting and offering innovative services by providing fast and user-friendly banking solutions enhances customer experience and operational efficiency.                                                            | + | actual |   | √ |   |
| G1              | Corporate culture                                          | Compliance within the organization and its value chain adhere to Ethical Conduct and Ethics and ethical values results in absence of cases of human rights violations.                                              | + | actual | √ | √ | √ |
| G1              | Corporate culture                                          | Dissemination of a conscious and adequate culture of ethics and human rights by own workforce, communicates and promotes corporate ethical behavior and culture.                                                    | + | actual |   | √ |   |
| G1              | Corporate culture                                          | Positive impacts through zero or minor incidents of non-compliance with laws and regulations                                                                                                                        | + | actual | √ | √ | √ |
| G1              | Corruption and bribery                                     | Established robust anti-corruption and anti-bribery policies, results in absence of related incidents and promotes a culture of transparency, anti-competitive, anti-corruption and anti-money laundering behavior. | + | actual | √ | √ | √ |
| G1              | Corruption and bribery                                     | Absence of corruption-related incidents that could result in operational disruptions, ensuring business continuity and positively affecting day-to-day activities.                                                  | + | actual | √ | √ | √ |
| G1              | Protection of whistleblowers                               | Protection of whistleblowers results to safe and protected working environment, without fear of retaliation.                                                                                                        | + | actual |   | √ |   |

The following table represents the material risks and opportunities which have been derived from the DMA

| ESRS topic      | ESRS sub-topic                                             | Risk, opportunity description                                                                                                                                                                                                                                                                                                                                                                  | risk / opportunity | time horizon |          |           |
|-----------------|------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------|----------|-----------|
|                 |                                                            |                                                                                                                                                                                                                                                                                                                                                                                                |                    | short-term   | mid-term | long-term |
| E1              | Climate change adaptation / Energy                         | Financing environmentally friendly/green projects or products/services aligned with the growing consumer demand can attract customers who are looking for institutions who support sustainable practices.                                                                                                                                                                                      | opportunity        | √            | √        | √         |
| E1              | Energy                                                     | Decrease in energy consumption through specific initiatives/ activities reduces operating costs.                                                                                                                                                                                                                                                                                               | opportunity        |              | √        |           |
| E1              | Waste                                                      | Financing the waste management industry offers a new clientele and opportunities for profitability.                                                                                                                                                                                                                                                                                            | opportunity        |              | √        | √         |
| E1              | Climate change adaptation/ Energy                          | Lack of strategic planning related to green financing which brings environmental benefits could affect its competitiveness, market share, reputation, and profitability.                                                                                                                                                                                                                       | risk               |              | √        |           |
| S1              | Working conditions                                         | Work-life balance initiatives could strengthen the motivation to work, could increase the reputation as a family-friendly employer, could improve the retention of employees and/or attraction of future employees and increase employees' productivity.                                                                                                                                       | opportunity        | √            | √        | √         |
| S1              | Working conditions                                         | Adequate wages could increase motivation and retention rates for employees and enhance the Group's reputation and performance.                                                                                                                                                                                                                                                                 | opportunity        | √            | √        | √         |
| S1              | Equal treatment and opportunities for all                  | Promotion of gender equality, diversity, inclusion and adoption of ethical principles and behaviors that create a desirable workplace, can lead to employee attraction and retention and generally improve reputation.                                                                                                                                                                         | opportunity        | √            | √        | √         |
| S1              | Equal treatment and opportunities for all                  | A well-trained and specialized workforce leads to higher productivity and profits, encourages new and innovative ideas, and helps the Group to reach its goals.                                                                                                                                                                                                                                | opportunity        | √            | √        | √         |
| S1              | Equal treatment and opportunities for all                  | The need for continuous training to keep up the development of employees with specialized expertise and experience in a specific field creates increased training costs.                                                                                                                                                                                                                       | risk               |              | √        | √         |
| S4              | Information-related impacts for consumers and/or end-users | System failures that could lead to service disruption, unauthorized access and data breaches could cause reputational damage and affect the group's financial performance.                                                                                                                                                                                                                     | risk               | √            | √        | √         |
| S4              | Information-related impacts for consumers and/or end-users | Continuously satisfied customers lead to higher customer loyalty, trust and market share growth.                                                                                                                                                                                                                                                                                               | opportunity        | √            | √        | √         |
| Entity specific | Innovation & digitalization                                | High dependency on digitalization could lead to operational disruptions in the event of a system failure, affecting the Bank's performance.                                                                                                                                                                                                                                                    | risk               | √            | √        | √         |
| G1              | Corporate culture                                          | Sustainability regulations and trends could lead to misinformation or communications that do not clearly and fairly reflect the sustainability profile of the organization and/or the financial products and services provided. This may confuse consumers, investors, and other stakeholders for the organizations' sustainable practices, causing reputational damage and operational costs. | risk               | √            | √        | √         |

In total 74 IROs were identified and evaluated as part of the DMA. Out of these, 39 were deemed material across the ESRS topics: E1 Climate change, E5 Circular Economy, S1 Own workforce, S4 Consumers, and/or end- users and G1 Business Conduct and innovation & digitalization as entity specific topics. Specifically, regarding Impact Materiality, 26 impacts were assessed as material. In terms of Financial Materiality, 13 risks and opportunities were assessed as material, which are presented throughout the Sustainability Statement.

The DMA process and the identified material impacts, risks, and opportunities ensure that sustainability considerations are thoroughly integrated into the Group's own operations and across the entire value chain. This integration drives resilience and adaptability in a changing landscape. These factors and the underlying impacts, risks and opportunities underscore their significance for the Group's sustainability strategy. The DMA process has highlighted the critical areas where the business model, value chain, strategy, and decision-making processes are impacted by sustainability-related factors. By focusing on material impacts, risks, and opportunities, the Group is going to allocate resources effectively and monitor progress against its sustainability goals. This ensures that the actions and initiatives are both impactful and aligned with stakeholders' expectations.

The Group's material impacts inevitably affect, positively and/or negatively, people and the environment in many ways across value chain through its operations (e.g. energy consumption), financing activities (e.g. financial products and services) and the internal environment (e.g. social related matters) in short-term, mid-term and long-term. As mentioned above, these impacts are interconnected and may interact with the strategy and business model through the Group's strategic focus to support sustainable development. For example, the adoption of energy-efficient practices, eco-friendly- recyclable activities and initiatives, provision of specific financial products and services, support of wellbeing of employees etc., demonstrate a comprehensive approach to addressing sustainability-related challenges and create positive outcomes.

As of the current reporting period, the Group has found no financial effects from its material risks and opportunities on its financial position, performance, or cash flow. As per ESRS 2 SBM-3 paragraph 48 (e), the Group applies the phased-in provision as listed in Appendix C of ESRS 1.

The adaptation of the business model to address significant sustainability issues and the updated strategy that integrates ESG factors into strategic planning strengthen the Group's resilience. Considering ESG factors that affect or could affect the strategy, safeguards that the Group is prepared for a wide range of challenges and opportunities. Also, implementing a robust risk management system that encompasses all business operations and includes ESG risks according to the action plan, further enhances resilience. This comprehensive approach to risk management demonstrates the Group's preparedness for potential disruptions and its ability to mitigate risks effectively. The resilience of the business model and strategy is also enhanced by a set of documented processes, operational resources, and actions for business continuity purposes. These elements are developed and maintained to ensure the uninterrupted delivery of critical products and services in the event of foreseeable disruption. This preparedness ensures that the Group can continue to operate smoothly and meet stakeholder expectations even during challenging times.

This is the first time the Group has conducted a materiality assessment to identify material impacts, risks and opportunities.

## **Impact, risk and opportunity management**

### **IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities**

Materiality assessment is crucial for identifying and assessing the Group's priorities for sustainable development. This evaluation allows the Group to identify and manage the impacts of its operations and



its business relationships across the value chain. The first assessment was made to identify its impacts, risks, and opportunities and assess which ones are material, by conducting a DMA, based on ESRS. The exercise was implemented across two dimensions:

***Impact Materiality (inside-out perspective):*** How business affects people and/or the environment through positive and negative impacts

***Financial materiality (outside-in perspective):*** How sustainability matters can affect businesses' financial results through risk and opportunities.

To identify the IROs, the Group conducted several workshops in which 10 different divisions and departments participated.

### **Impact Materiality**

Through the impact materiality process, the Group identified, assessed, and prioritized the positive and negative, actual and potential impacts of its activities and business relationships, on people and the environment. Peer analysis, sector analysis, internationally recognized standards and ratings were also considered for identifying the impacts. This process was informed by the Group's due diligence efforts and continuous stakeholder engagement throughout the year, ensuring that the views and perspectives of stakeholders were incorporated. The impact materiality process focused on Group's activities and business relationships, which present a heightened risk of adverse impacts. The impact materiality considered impacts arising from the Group's own operations as well as those resulting from its portfolio and business relationships across the value chain. As previously mentioned, the Group has continuous engagement with affected stakeholders throughout the year. This engagement enables the Group to incorporate their views and perspectives during the impact materiality process. The impacts were evaluated using criteria such as scale, scope, and irreversibility (in case of negative impacts), collectively known as severity, along with the likelihood in case of potential impacts, as described in the ESRS. During the evaluation process, the time horizons, short-term, mid-term and long-term as indicated by the ESRS were also addressed. The impacts have been assessed based on their importance, and a materiality threshold was defined to determine which impacts are material for the Group. The impact materiality identified 26 positive & negative, actual material impacts.

### **Financial Materiality**

In the context of financial materiality, the Group considered risks and opportunities arising from impacts, dependencies, and other relevant factors. The identification process took into consideration benchmarks, using sustainability reports from peers, sector analysis by analyzing industry best practices and standards, and rating agencies. The Group considered the connections between its impacts and dependencies and the risks and opportunities that may arise from them. By understanding how these elements are interrelated, the Group identified risks and opportunities most relevant to its operations and strategic objectives. Risks and opportunities were evaluated based on their magnitude and likelihood as prescribed by ESRS. The evaluation process considered the above three-time horizons, ensuring a comprehensive understanding of the potential financial effects over different periods. The Group is integrating ESG risks into its overall risk management process to continuously improve them. Although specific risk-assessment tools were not available during the financial materiality assessment, senior level employees from the Risk Management Division, Strategy, IR and Sustainable Development Division and Financial Services Department with expertise and specialized skills prioritized sustainability-related risks by evaluating their relative severity and likelihood. Next, a materiality threshold was defined to determine which risks and opportunities are material for the Group. The financial materiality identified 13 material risks and opportunities.

### **Scoring Impacts, Risks, and Opportunities**

The evaluation of impacts, risks, and opportunities was conducted following the principles set forth in ESRS 1 and ESRS 2. Once they were identified, documented, and validated, the next step was to assign scores

based on their materiality. This approach allowed the differentiation between impact materiality and financial materiality, ensuring a thorough assessment of sustainability issues.

### **Validation of Impacts, Risks, and Opportunities**

The DMA results were reviewed and validated by members of the Sustainability Management Committee. Based on their evaluations, the materiality threshold was established. Each threshold was determined to make the final validation and approval of the material IROs by the Sustainability Management Committee.

The decision-making process for addressing identified risks and opportunities involves multiple levels of review and approval. Initially, risks and opportunities were identified and assessed. It followed a structured, multi-step approach that began with the identification and assessment of these risks and opportunities. More specifically, the Strategy, IR and Sustainable Development Division, in cooperation with internal experts, validated the descriptions and scoring of the impacts, risks and opportunities. This step ensured accuracy and clarity. The Risk Management Division and the Financial Services Department conducted a detailed review and confirmed those risks inter alia, while placing particular emphasis on Environmental, Social, and Governance (ESG) factors. The expertise of these divisions guaranteed that ESG-related risks were comprehensively evaluated and taken into consideration according to the broader risk management framework. Finally, the results of financial materiality were reviewed by the Sustainability Management Committee, ensuring all significant financial implications were addressed. The Sustainability Management Committee also approved the results, thereby verifying top-level accountability.

The process of identifying, assessing, and managing impacts and risks followed the DMA methodology, with input from experts as previously mentioned. However, it has not yet been fully integrated into the Group's overall risk management framework or used to assess its overall risk profile. The Group is actively working on incorporating climate and environmental factors into its business and risk management processes in line with ECB expectations. As part of this effort, the Bank conducts qualitative analyses to evaluate the significance of climate, environmental, and resilience risks in relation to other risk categories within its Risk Management Framework. Inter alia, the Group is assessing the impact of Climate Related and Environmental risks on credit risk and is working to integrating it into the loan process, evaluating its effect on operational metrics, analyzing market risk exposure, and reviewing its influence on various risk categories. Similarly, the identification of opportunities has been derived through the DMA process, incorporating insights from stakeholder engagements, business operations and activities, and the active participation of internal experts. The DMA for this Sustainability Statement was conducted through comprehensive research, which included references to numerous studies and reports, benchmarking along with the active engagement of both internal and external stakeholders. As it is the first time the DMA is being conducted to identify, assess and manage IROs, no comparison with previous years is applicable.

### ***Description of the Processes to Identify and Assess Material Entity Specific- related impacts, risks and opportunities***

The process of identifying material Innovation and Digitalization-related impacts, risks, and opportunities is guided by the structured methodology outlined above. This process incorporates both qualitative and quantitative analyses to identify areas of significant impact and risk, ensuring alignment with the Group's sustainability strategy. Assumptions are based on internal performance data, stakeholder input, and alignment with global standards. The approach focuses on key factors such as digital service offerings, risks related to reliance on third-party providers, and the social benefits of digital initiatives. The areas of heightened risk, particularly concerning its digital transformation initiatives. These areas are closely evaluated for their potential impacts on both people and the environment. Special attention is given to the reliance on third-party technology and service providers, particularly regarding cybersecurity risks and dependence on external systems, which could lead to business disruptions in emergencies. This process considers both the direct impacts of the operations and the indirect impacts resulting from its business

relationships. The Group also consults affected stakeholders to understand the full scope of potential effects. Engagement of various stakeholder groups ensures that their views and concerns are incorporated into decision-making processes. The Group's approach prioritizes impacts based on their relative scale, scope, and likelihood, as mentioned above.

***Description of the Processes to Identify and Assess Material Business Conduct- related impacts, risks and opportunities***

During the DMA process, the Group monitored the business conduct areas to identify material impacts, risks and opportunities. Among the key strategic areas of focus are corporate culture, where adherence to the Corporate Governance Code and ethical values ensures there are no human rights violations. The Group has also anti-corruption and anti-bribery policies that foster a culture of anti-money laundering behavior and prevent any related incidents. Additionally, the Group is dedicated to protecting whistleblowers, ensuring they can report unethical behavior without fear of retaliation. Detailed information for policies and procedures is provided in section G1.

***Description of the processes to identify and assess material environmental impacts, risks and opportunities***

The Group has thoroughly screened its assets and activities for actual and potential impacts, risks, and opportunities within its operations and along with its value chain. This assessment focuses on activities, business relationships, geographic areas, and other factors with a high risk of adverse impacts. It evaluates its direct operations as well as its role in wider business relationships to identify its direct and indirect impacts. A key element of this process involves stakeholder consultation to enable the Group to gain valuable insights from affected stakeholders and external experts.

For identifying, assessing, and prioritizing risks and opportunities with financial implications, the Group has aligned key aspects of its operations with corresponding financial risks and opportunities. Following a Double Materiality Assessment, the Group identified two actual impacts and one significant opportunity under the sub-topic of Waste.

- **Actual Impacts:** Through the financing, which is being provided to specific sectors, the Group supports its counterparties' waste management practices through the enhancement of their ability to manage and reduce waste. In its own activities, the Group promotes eco-friendly and recyclable initiatives such as recyclable debit cards and the use of digital signatures, to reduce printed documents.

- **Opportunity:** The financial waste management industry represents a new way of client acquisition and profitability, as the demand for sustainable financial services grows in this sector.

The methodologies and tools applied in this screening and analysis process are aligned with the principles of the CSRD and ESRS, ensuring robust identification of impacts as well as financial risks and opportunities.

The Group has consulted with relevant stakeholders as part of its ongoing commitment to sustainable practices regarding circular economy. Using an external stakeholder questionnaire, the Group engaged with key stakeholders to gather insights on material sustainability topics, among which is the topic of circular economy and the sub-topic of waste which lies beneath it. The questionnaire included the understanding of the stakeholders' perspectives on how the Group's operations and financial products/services align with and impact the circular economy, specifically in relation to waste reduction and management.

These consultations were conducted to ensure that the views of the stakeholders related to the circular economy align with those of the Group and have been incorporated in the DMA. The stakeholder feedback contributes to guiding the Group's strategy towards resource efficiency, waste minimization, and overall environmental impact reduction. This inclusive approach ensures that stakeholder concerns and insights are integrated into the Group's decision-making processes related to sustainability.

Also, Optima bank is a member of the Hellenic Bank Association (HBA), a key industry body that facilitates dialogue and exchange of best practices among financial institutions on sustainable practices. Through this

engagement, the Group gains insights into the developments of the sector, regulatory expectations, and collective action opportunities, aligned with circular economy principles.

Through the DMA the Group identifies and assesses its actual impacts on climate change. In alignment with ESRS E1, the Group has screened its operations and activities to identify significant sources of greenhouse gas (GHG) emissions. This screening identified three material impacts:

- Contribution to Climate Change Through In-House Operations: GHG emissions have been traced to internal operations - especially energy consumption in office spaces and branch networks. The Group's ambition for climate action is to continuously monitor and reduce emissions from these sources by improving energy efficiency in the buildings and using renewable sources where possible.
- Upgrade of Data Center to Lower Energy Consumption: Recognizing the energy intensity of data centers, the data center is being upgraded. Additionally, the use of virtual servers is also promoted in order to significantly reduce IT infrastructure energy use and contribute to GHG emissions reduction targets.
- Financial Products for Energy Efficiency: The contribution to global efforts to reduce global energy use and GHG emissions through financing oriented to energy efficient equipment and modern machinery.

Through the above, the Group has evaluated its actual contribution to climate change by reducing emissions in its own operations and through financial solutions offered to clients. Total GHG emissions are monitored and reported to keep track of the Group's climate goals and align with the Group's sustainability strategy and commitments.

Physical risks were identified as part of its CR&E Risk - Qualitative Materiality Assessment at the Bank level as the assessment applies to significant assets and business activities that concern the Bank. Physical risks are categorized into chronic risks (e.g., persistent changes in precipitation patterns, sea level rise) and acute risks (e.g., extreme weather events such as hurricanes and flash floods). These hazards were considered under high-emission climate scenarios, aligning with the Hot House World scenario from the Network for Greening the Financial System ("NGFS") framework, which represents a pathway where policy action is insufficient, leading to severe physical climate impacts. The Bank assessed how these hazards may impact its assets and business activities, determining that credit risk is the most vulnerable category, as clients' financial stability may be affected by climate-induced disruptions. Additionally, conduct, ethics, and reputational risk was identified as areas of concern due to potential stakeholder scrutiny over the Bank's handling of climate-related financial risks. The assessment has aligned with the qualitative materiality assessment approach integrated into the Bank's Risk Appetite Framework, with scenario-based quantification planned as a next step to further evaluate financial impacts.

The Bank has considered climate-related hazards over the short-term (0-1 year), medium-term (1-5 years), and long-term (>5 years) horizon, assessing whether assets and business activities may be exposed to these hazards. These time horizons align with the Group's time horizons definitions as per the CSRD, strategic planning horizons, and capital allocation plans, ensuring consistency with its broader risk management framework. A qualitative assessment was conducted to evaluate the magnitude of physical risks incorporating extreme scenario analysis based on NGFS pathways.

The Bank has identified climate-related transition risks which include policy and regulatory shifts, litigation risks, market risks due to changing demand and supply dynamics, and reputational risks tied to stakeholder perceptions of climate action. To assess exposure to these transition risks, the Bank has performed a qualitative materiality assessment using expert judgment, comparative evaluation, and an analysis of competitive data, financial statements, and environmental factors. Generally, if physical risk is higher, transition risk may be lower (as policy and regulation is insufficient to reduce physical risk) and conversely, if physical risk is lower, it is likely that transition risk is higher as policy and regulatory changes are more extreme such that they are successful in reducing the effects of climate change. In this assessment, the Bank combined at a high-level both the NGFS scenarios of Disorderly (with high transition risk and low physical risk) and Hot House World (with low transition risk and high physical risk) to identify the high

transition risk and high physical risk impacts. The assessment has identified credit risk and conduct, ethics and reputational risk as the most impacted risk categories, while other risk areas, such as market risk, liquidity risk, and Interest Rate Risk in the Banking Book (IRRBB), have been identified as lower risk, given the Group's business model. The assessment aligns with the Bank's Risk Appetite Framework and CSRD financial materiality magnitude scoring, ensuring consistency in evaluating transition risk exposure. A key next step will be the running of scenario analysis to support more granular risk rating allocation as well as beginning to quantify potential financial impacts within a defined time horizon. It is worth noting that transition risks may present opportunities for financing sustainable investments, supporting green lending products, and enhancing the Bank's reputation in sustainability within the sector.

The Bank has employed scenario analysis to assess both physical and transition risks over short-, medium, and long-term horizons. By using NGFS scenarios (Disorderly and Hot House World), the analysis ensures that high-risk impacts are considered. While this assessment remains qualitative at this stage, the next steps include quantifying potential financial impacts across different climate scenarios to refine risk ratings. Further governance processes will be undertaken to validate and incorporate the findings into the Group's strategic planning and risk management framework.

The Group has not made any critical climate-related assumptions in its financial statements for the reporting period. As a result, there is no direct compatibility between the climate scenarios used in the resilience analysis and any financial assumptions.

It is noted that during the DMA, the Group took into account the actual and potential impacts, risks, and opportunities related to pollution, water and marine resources, as well as biodiversity and ecosystems, by analysing its business activities. This was actively supported by meetings with the responsible departments and divisions.

## **IRO-2 – Disclosure requirements in ESRs covered by the Group's Sustainability Statement**

Following the results of the DMA, which identified the material impacts, risks, and opportunities, the Group assessed the information that is significant in relation to the material IROs, as well as its ability to meet the decision-making needs of its stakeholders. This includes the needs of investors, regulators, users of the Sustainability Statement and all stakeholders focused on understanding the Group's impacts, risks, and opportunities. The Group discloses that only information meeting the criteria -relevant, significant, and capable of supporting users' decision-making and the requirements of the ESRs, was disclosed. The resulting disclosures reflect both the Group's priorities and the interests of those who rely on this information. Finally, it should be noted that there is no disclosed information containing disclosure requirements related to ESRs E2, E3, E4, S2, and S3. These topical standards were considered during the Double Materiality Assessment but were deemed not material.

The following table contains a list of the Disclosure Requirements complied with in preparing the Sustainability Statement, following the outcome of the materiality assessment and their location in the Sustainability Statement

| Disclosure Requirements     |                                                                                                                                                                    | Location in the Sustainability Statement                                                                                      |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| ESRS 2 General Requirements | Disclosure Requirement BP-1 – General basis for preparation of sustainability statements                                                                           | BP-1 – General basis for preparation of Sustainability Statement                                                              |
| ESRS 2 General Requirements | Disclosure Requirement BP-2 – Disclosures in relation to specific circumstances                                                                                    | BP-2 – Disclosures in relation to specific circumstances                                                                      |
| ESRS 2 General Requirements | Disclosure Requirement GOV-1 – The role of the administrative, management and supervisory bodies                                                                   | GOV-1 – The role of the administrative, management and supervisory bodies                                                     |
| ESRS 2 General Requirements | Disclosure Requirement GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | GOV-2 – Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies |
| ESRS 2 General Requirements | Disclosure Requirement GOV-3 – Integration of sustainability-related performance in incentive schemes                                                              | GOV-3 – Integration of sustainability-related performance in incentive schemes                                                |
| ESRS 2 General Requirements | Disclosure Requirement GOV-4 – Statement on due diligence                                                                                                          | GOV-4 – Statement on due diligence                                                                                            |
| ESRS 2 General Requirements | Disclosure Requirement GOV-5 – Risk management and internal controls over sustainability reporting                                                                 | GOV-5 – Risk management and internal controls over sustainability reporting                                                   |
| ESRS 2 General Requirements | Disclosure Requirement SBM-1 – Strategy, business model and value chain                                                                                            | SBM-1 – Strategy, business model and value chain                                                                              |
| ESRS 2 General Requirements | Disclosure Requirement SBM-2 – Interests and views of stakeholders                                                                                                 | SBM-2 – Interests and views of stakeholders                                                                                   |
| ESRS 2 General Requirements | Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                                    | SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                      |
| ESRS 2 General Requirements | Disclosure Requirement IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities                                       | IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities                         |
| ESRS 2 General Requirements | Disclosure Requirement IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement                                               | IRO-2 – Disclosure requirements in ESRS covered by the Group's Sustainability Statement                                       |



|                             |                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ESRS 2 General Requirements | Minimum disclosure requirement - Policies MDR-P – Policies adopted to manage material sustainability matters          | <p>E1-2 – Policies related to climate change mitigation and adaptation</p> <p>E5-1 – Policies related to resource use and circular economy</p> <p>S1-1 – Policies related to own workforce</p> <p>S4-1 – Policies related to consumers and end-users</p> <p>G1-1 – Corporate culture and business conduct policies and corporate culture</p> <p>ES – Policies related to entity specific topic</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| ESRS 2 General Requirements | Minimum disclosure requirement - Actions MDR-A – Actions and resources in relation to material sustainability matters | <p>E1-3 – Actions and resources in relation to climate change policies</p> <p>E5-2 – Actions and resources related to resource use and circular economy</p> <p>S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions</p> <p>S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end- users, and effectiveness of those actions</p> <p>ES – Taking action on material impacts and approaches to managing material risks related to entity specific topic, and the effectiveness of these measures and approaches</p> <p>G1-4 – Confirmed incidents of corruption or bribery</p>                                      |
| ESRS 2 General Requirements | Minimum disclosure requirement – Metrics MDR-M – Metrics in relation to material sustainability matters               | <p>E1-5 – Energy consumption and mix</p> <p>E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions</p> <p>E5-5 – Resource outflows</p> <p>S1-6 – Characteristics of the Group’s employees</p> <p>S1-7 – Characteristics of non-employee workers in the Group’s own workforce</p> <p>S1-8 – Collective bargaining coverage and social dialogue</p> <p>S1-9 – Diversity metrics</p> <p>S1-10 – Adequate wages</p> <p>S1-11 – Social protection</p> <p>S1-15 – Work-life balance metrics</p> <p>S1-16 – Compensation metrics (pay gap and total compensation)</p> <p>S1-17 – Incidents, complaints and severe human rights impacts</p> <p>S4-5 – Targets related to advancing positive impacts, and managing material risks and opportunities</p> <p>ES – Targets related to advancing positive impacts, and managing material risks</p> <p>G1-4 – Confirmed incidents of corruption or bribery</p> |
| ESRS 2 General Requirements | Minimum disclosure requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets       | <p>E1-4 – Targets related to climate change mitigation and adaptation</p> <p>E5-3 – Targets related to resource use and circular economy</p> <p>S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p> <p>S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p> <p>ES – Targets related to advancing positive impacts, and managing material risks</p> <p>G1-4 – Confirmed incidents of corruption or bribery</p>                                                                                                                                                                                                                                                                                                  |

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|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| ESRS E1 Climate Change              | Disclosure requirement related to ESRS 2 E1.GOV-3 Integration of sustainability-related performance in incentive schemes                                                             | GOV-3 – Integration of sustainability-related performance in incentive schemes                              |
| ESRS E1 Climate Change              | Disclosure Requirement E1-1 – Transition plan for climate change mitigation                                                                                                          | E1-1 – Transition plan for climate change mitigation                                                        |
| ESRS E1 Climate Change              | Disclosure Requirement related to ESRS 2 E1.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                                 | E1.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model |
| ESRS E1 Climate Change              | Disclosure requirement related to ESRS 2 E1.IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities                    | IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities       |
| ESRS E1 Climate Change              | Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation                                                                                           | E1-2 – Policies related to climate change mitigation and adaptation                                         |
| ESRS E1 Climate Change              | Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies                                                                                           | E1-3 – Actions and resources in relation to climate change policies                                         |
| ESRS E1 Climate Change              | Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation                                                                                            | E1-4 – Targets related to climate change mitigation and adaptation                                          |
| ESRS E1 Climate Change              | Disclosure Requirement E1-5 – Energy consumption and mix                                                                                                                             | E1-5 – Energy consumption and mix                                                                           |
| ESRS E1 Climate Change              | Disclosure Requirement E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions                                                                                                           | E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions                                                         |
| ESRS E1 Climate Change              | Disclosure Requirement E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities                                  | phased-in                                                                                                   |
| ESRS E2 Pollution                   | Disclosure requirement related to ESRS 2 E2.IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities                  | IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities       |
| ESRS E3 Water and marine resources  | Disclosure requirement related to ESRS 2 E3.IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities | IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities       |
| ESRS E4 Biodiversity and ecosystems | Disclosure requirement related to ESRS 2 E4.IRO-1 – Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities     | IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities       |



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|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ESRS E5<br>Resource Use<br>and Circular<br>Economy | Disclosure Requirement related to ESRS 2 E5.IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities                                    | IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities                                                                                                   |
| ESRS E5<br>Resource Use<br>and Circular<br>Economy | Disclosure Requirement E5-1 – Policies related to resource use and circular economy                                                                                                                                            | E5-1 – Policies related to resource use and circular economy                                                                                                                                            |
| ESRS E5<br>Resource Use<br>and Circular<br>Economy | Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy                                                                                                                               | E5-2 – Actions and resources related to resource use and circular economy                                                                                                                               |
| ESRS E5<br>Resource Use<br>and Circular<br>Economy | Disclosure Requirement E5-3 – Targets related to resource use and circular economy                                                                                                                                             | E5-3 – Targets related to resource use and circular economy                                                                                                                                             |
| ESRS E5<br>Resource Use<br>and Circular<br>Economy | Disclosure Requirement E5-5 – Resource outflows                                                                                                                                                                                | E5-5 – Resource outflows                                                                                                                                                                                |
| ESRS E5<br>Resource Use<br>and Circular<br>Economy | Disclosure Requirement E5-6 – Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities                                                                                    | phased-in                                                                                                                                                                                               |
| ESRS S1 Own<br>Workforce                           | Disclosure Requirement related to ESRS 2 S1.SBM-2 – Interests and views of stakeholders                                                                                                                                        | SBM-2 – Interests and views of stakeholders                                                                                                                                                             |
| ESRS S1 Own<br>Workforce                           | Disclosure Requirement related to ESRS 2 S1.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                                                                           | S1.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                                                                                             |
| ESRS S1 Own<br>Workforce                           | Disclosure Requirement S1-1 – Policies related to own workforce                                                                                                                                                                | S1-1 – Policies related to own workforce                                                                                                                                                                |
| ESRS S1 Own<br>Workforce                           | Disclosure Requirement S1-2 – Processes for engaging with own workers and workers’ representatives about impacts                                                                                                               | S1-2 – Processes for engaging with own workers and workers’ representatives about impacts                                                                                                               |
| ESRS S1 Own<br>Workforce                           | Disclosure Requirement S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns                                                                                                           | S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns                                                                                                           |
| ESRS S1 Own<br>Workforce                           | Disclosure Requirement S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions |

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|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| ESRS S1 Own Workforce              | Disclosure Requirement S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-6 – Characteristics of the undertaking’s employees                                                                                   | S1-6 – Characteristics of the Group’s employees                                                                                         |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-7 – Characteristics of non-employee workers in the undertaking’s own workforce                                                       | S1-7 – Characteristics of non-employee workers in the Group’s own workforce                                                             |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue                                                                               | S1-8 – Collective bargaining coverage and social dialogue                                                                               |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-9 – Diversity metrics                                                                                                                | S1-9 – Diversity metrics                                                                                                                |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-10 – Adequate wages                                                                                                                  | S1-10 – Adequate wages                                                                                                                  |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-11 – Social protection                                                                                                               | S1-11 – Social protection                                                                                                               |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-13 – Training and skills development metrics                                                                                         | phased-in                                                                                                                               |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-15 – Work-life balance metrics                                                                                                       | S1-15 – Work-life balance metrics                                                                                                       |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-16 – Compensation metrics (pay gap and total compensation)                                                                           | S1-16 – Compensation metrics (pay gap and total compensation)                                                                           |
| ESRS S1 Own Workforce              | Disclosure Requirement S1-17 – Incidents, complaints and severe human rights impacts                                                                           | S1-17 – Incidents, complaints and severe human rights impacts                                                                           |
| ESRS S4 Consumers and/or end-users | Disclosure Requirement related to ESRS 2 S4.SBM-2 – Interests and views of stakeholders                                                                        | SBM-2 – Interests and views of stakeholders                                                                                             |
| ESRS S4 Consumers and/or end-users | Disclosure Requirement related to ESRS 2 S4.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model           | S4.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                             |

|                                                     |                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                           |
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| ESRS S4<br>Consumers<br>and/or end-<br>users        | Disclosure Requirement S4-1 – Policies related to consumers and end-users                                                                                                                                                                        | S4-1 – Policies related to consumers and end-users                                                                                                                                                                        |
| ESRS S4<br>Consumers<br>and/or end-<br>users        | Disclosure Requirement S4-2 – Processes for engaging with consumers and end-users about impacts                                                                                                                                                  | S4-2 – Processes for engaging with consumers and end-users about impacts                                                                                                                                                  |
| ESRS S4<br>Consumers<br>and/or end-<br>users        | Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns                                                                                                                 | S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns                                                                                                                 |
| ESRS S4<br>Consumers<br>and/or end-<br>users        | Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions |
| ESRS S4<br>Consumers<br>and/or end-<br>users        | Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities                                                                                   | S4-5 – Targets related to advancing positive impacts, and managing material risks and opportunities                                                                                                                       |
| Entity Specific -<br>Innovation &<br>Digitalization | Disclosure Requirement ESRS 2 ES.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                                                                                                        | ES.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model                                                                                                               |
| ESRS G1<br>Business<br>Conduct                      | Disclosure Requirement related to ESRS 2 G1.GOV-1 – The role of the administrative, supervisory and management bodies                                                                                                                            | GOV-1 – The role of the administrative, management and supervisory bodies                                                                                                                                                 |
| ESRS G1<br>Business<br>Conduct                      | Disclosure Requirement related to ESRS 2 G1.IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities                                                                                                | IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities                                                                                                                     |
| ESRS G1<br>Business<br>Conduct                      | Disclosure Requirement G1-1– Corporate culture and business conduct policies and corporate culture                                                                                                                                               | G1-1 – Corporate culture and business conduct policies and corporate culture                                                                                                                                              |
| ESRS G1<br>Business<br>Conduct                      | Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery                                                                                                                                                                 | G1-3 – Prevention and detection of corruption and bribery                                                                                                                                                                 |
| ESRS G1<br>Business<br>Conduct                      | Disclosure Requirement G1-4 – Confirmed incidents of corruption or bribery                                                                                                                                                                       | G1-4 – Confirmed incidents of corruption or bribery                                                                                                                                                                       |

The following table discloses all data points derived from other EU legislation as outlined in ESRS 2 Appendix B, specifying where these data points can be found in our report and highlighting those assessed as “Not material”.

| DISCLOSURE REQUIREMENT & RELATED DATA POINT                                                    | SFDR REFERENCE                             | PILLAR 3 REFERENCE                                                                                                                                                                                        | BENCHMARK REGULATION REFERENCE                              | EU Climate Law reference | Location in the Sustainability Statement / Not material                 |
|------------------------------------------------------------------------------------------------|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------|-------------------------------------------------------------------------|
| ESRS 2 GOV-1<br>Board's gender diversity paragraph 21 (d)                                      | Indicator number 13 of Table #1 of Annex 1 |                                                                                                                                                                                                           | Commission Delegated Regulation (EU) 2020/1816(5), Annex II |                          | GOV-1 The role of the administrative, management and supervisory bodies |
| ESRS 2 GOV-1<br>Percentage of board members who are independent paragraph 21 (e)               |                                            |                                                                                                                                                                                                           | Delegated Regulation (EU) 2020/1816, Annex II               |                          | GOV-1 The role of the administrative, management and supervisory bodies |
| ESRS 2 GOV-4<br>Statement on due diligence paragraph 30                                        | Indicator number 10 Table #3 of Annex 1    |                                                                                                                                                                                                           |                                                             |                          | GOV-4 Statement on due diligence                                        |
| ESRS 2 SBM-1<br>Involvement in activities related to fossil fuel activities paragraph 40 (d) i | Indicators number 4 Table #1 of Annex 1    | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453(6) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk | Delegated Regulation (EU) 2020/1816, Annex II               |                          | SBM-1 Strategy, business model and value chain                          |

|                                                                                                                |                                               |                                                                                                                                                                                                                             |                                                                                                     |                                         |                                                                    |
|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------------------------------|--------------------------------------------------------------------|
| ESRS 2 SBM-1<br>Involvement in activities related to chemical production paragraph 40 (d) ii                   | Delegated Regulation (EU) 2020/1816, Annex II |                                                                                                                                                                                                                             | Delegated Regulation (EU) 2020/1816, Annex II                                                       |                                         | SBM-1 Strategy, business model and value chain                     |
| ESRS 2 SBM-1<br>Involvement in activities related to controversial weapons paragraph 40 (d) iii                | Indicator number 14 Table #1 of Annex 1       |                                                                                                                                                                                                                             | Delegated Regulation (EU) 2020/1818(7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II |                                         | SBM-1 Strategy, business model and value chain                     |
| ESRS 2 SBM-1<br>Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv |                                               |                                                                                                                                                                                                                             | Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II    |                                         | SBM-1 Strategy, business model and value chain                     |
| ESRS E1-1<br>Transition plan to reach climate neutrality by 2050 paragraph 14                                  |                                               |                                                                                                                                                                                                                             |                                                                                                     | Regulation (EU) 2021/1119, Article 2(1) | Not material                                                       |
| ESRS E1-1<br>Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)                              |                                               | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2                      |                                         | Not material                                                       |
| ESRS E1-4<br>GHG emission reduction targets paragraph 34                                                       | Indicator number 4 Table #2 of Annex 1        | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics                                                    | Delegated Regulation (EU) 2020/1818, Article 6                                                      |                                         | E1-4 – Targets related to climate change mitigation and adaptation |

|                                                                                                                              |                                                                    |                                                                                                                                                                                                                                |                                                               |                                         |                                                     |
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| ESRS E1-5<br>Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38 | Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1 |                                                                                                                                                                                                                                |                                                               |                                         | Not material                                        |
| ESRS E1-5 Energy consumption and mix paragraph 37                                                                            | Indicator number 5 Table #1 of Annex 1                             |                                                                                                                                                                                                                                |                                                               |                                         | E1-5 – Energy consumption and mix                   |
| ESRS E1-5<br>Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43                  | Indicator number 6 Table #1 of Annex 1                             |                                                                                                                                                                                                                                |                                                               |                                         | Not material                                        |
| ESRS E1-6<br>Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44                                                        | Indicators number 1 and 2 Table #1 of Annex 1                      | Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1) |                                         | E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions |
| ESRS E1-6<br>Gross GHG emissions intensity paragraphs 53 to 55                                                               | Indicators number 3 Table #1 of Annex 1                            | Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics                                                       | Delegated Regulation (EU) 2020/1818, Article 8(1)             |                                         | E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions |
| ESRS E1-7<br>GHG removals and carbon credits paragraph 56                                                                    |                                                                    |                                                                                                                                                                                                                                |                                                               | Regulation (EU) 2021/1119, Article 2(1) | Not material                                        |

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| ESRS E1-9<br>Exposure of the benchmark portfolio to climate-related physical risks paragraph 66                                                                                               |                                                                                                                                                             |                                                                                                                                                                                                                                                          | Delegated Regulation (EU) 2020/1818, Annex II<br>Delegated Regulation (EU) 2020/1816, Annex II |  | Not material |
| ESRS E1-9<br>Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)<br>ESRS E1-9<br>Location of significant assets at material physical risk paragraph 66 (c) |                                                                                                                                                             | Article 449a Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47;<br>Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.                                     |                                                                                                |  | Not material |
| ESRS E1-9<br>Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)                                                                          |                                                                                                                                                             | Article 449a Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral |                                                                                                |  | Not material |
| ESRS E1-9<br>Degree of exposure of the portfolio to climate-related opportunities paragraph 69                                                                                                |                                                                                                                                                             |                                                                                                                                                                                                                                                          | Delegated Regulation (EU) 2020/1818, Annex II                                                  |  | Not material |
| ESRS E2-4<br>Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28             | Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1 |                                                                                                                                                                                                                                                          |                                                                                                |  | Not material |

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| ESRS E3-1<br>Water and marine<br>resources paragraph 9                                          | Indicator number 7 Table<br>#2 of Annex 1   |  |  |  | Not material |
| ESRS E3-1<br>Dedicated policy paragraph<br>13                                                   | Indicator number 8 Table<br>2 of Annex 1    |  |  |  | Not material |
| ESRS E3-1<br>Sustainable oceans and<br>seas paragraph 14                                        | Indicator number 12 Table<br>#2 of Annex 1  |  |  |  | Not material |
| ESRS E3-4<br>Total water recycled and<br>reused paragraph 28 (c)                                | Indicator number 6.2<br>Table #2 of Annex 1 |  |  |  | Not material |
| ESRS E3-4<br>Total water consumption in<br>m3 per net revenue on own<br>operations paragraph 29 | Indicator number 6.1<br>Table #2 of Annex 1 |  |  |  | Not material |
| ESRS 2- IRO 1 - E4<br>paragraph 16 (a) i                                                        | Indicator number 7 Table<br>#1 of Annex 1   |  |  |  | Not material |
| ESRS 2- IRO 1 - E4<br>paragraph 16 (b)                                                          | Indicator number 10 Table<br>#2 of Annex 1  |  |  |  | Not material |



|                                                                                          |                                            |  |  |  |                                                                                              |
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| ESRS 2- IRO 1 - E4<br>paragraph 16 (c)                                                   | Indicator number 14 Table<br>#2 of Annex 1 |  |  |  | Not material                                                                                 |
| ESRS E4-2<br>Sustainable land /<br>agriculture practices or<br>policies paragraph 24 (b) | Indicator number 11 Table<br>#2 of Annex 1 |  |  |  | Not material                                                                                 |
| ESRS E4-2<br>Sustainable oceans / seas<br>practices or policies<br>paragraph 24 (c)      | Indicator number 12 Table<br>#2 of Annex 1 |  |  |  | Not material                                                                                 |
| ESRS E4-2<br>Policies to address<br>deforestation paragraph 24<br>(d)                    | Indicator number 15 Table<br>#2 of Annex 1 |  |  |  | Not material                                                                                 |
| ESRS E5-5<br>Non-recycled waste<br>paragraph 37 (d)                                      | Indicator number 13 Table<br>#2 of Annex 1 |  |  |  | E5-5 – Resource outflows                                                                     |
| ESRS E5-5<br>Hazardous waste and<br>radioactive waste<br>paragraph 39                    | Indicator number 9 Table<br>#1 of Annex 1  |  |  |  | Not material                                                                                 |
| ESRS 2- SBM3 - S1<br>Risk of incidents of forced<br>labour paragraph 14 (f)              | Indicator number 13 Table<br>#3 of Annex I |  |  |  | ESRS 2 SBM-3 - Material<br>IROs and their Interaction<br>with Strategy and Business<br>Model |

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| ESRS 2- SBM3 - S1<br>Risk of incidents of child labour paragraph 14 (g)                                                                      | Indicator number 12 Table #3 of Annex I                                 |  |                                               |  | ESRS 2 SBM-3 - Material IROs and their Interaction with Strategy and Business Model             |
| ESRS S1-1<br>Human rights policy commitments paragraph 20                                                                                    | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I |  |                                               |  | S1-1 – Policies related to own workforce                                                        |
| ESRS S1-1<br>Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21 |                                                                         |  | Delegated Regulation (EU) 2020/1816, Annex II |  | S1-1 – Policies related to own workforce                                                        |
| ESRS S1-1<br>processes and measures for preventing trafficking in human beings paragraph 22                                                  | Indicator number 11 Table #3 of Annex I                                 |  |                                               |  | S1-1 – Policies related to own workforce                                                        |
| ESRS S1-1<br>workplace accident prevention policy or management system paragraph 23                                                          | Indicator number 1 Table #3 of Annex I                                  |  |                                               |  | S1-1 – Policies related to own workforce                                                        |
| ESRS S1-3<br>grievance/complaints handling mechanisms paragraph 32 (c)                                                                       | Indicator number 5 Table #3 of Annex I                                  |  |                                               |  | S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns |

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| ESRS S1-14<br>Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)  | Indicator number 2 Table #3 of Annex I                               |  | Delegated Regulation (EU) 2020/1816, Annex II                                                   |  | Not material                                                  |
| ESRS S1-14<br>Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)           | Indicator number 3 Table #3 of Annex I                               |  |                                                                                                 |  | Not material                                                  |
| ESRS S1-16<br>Unadjusted gender pay gap paragraph 97 (a)                                                   | Indicator number 12 Table #1 of Annex I                              |  | Delegated Regulation (EU) 2020/1816, Annex II                                                   |  | S1-16 – Remuneration metrics (pay gap and total remuneration) |
| ESRS S1-16<br>Excessive CEO pay ratio paragraph 97 (b)                                                     | Indicator number 8 Table #3 of Annex I                               |  |                                                                                                 |  | S1-16 – Remuneration metrics (pay gap and total remuneration) |
| ESRS S1-17<br>Incidents of discrimination paragraph 103 (a)                                                | Indicator number 7 Table #3 of Annex I                               |  |                                                                                                 |  | S1-17 – Incidents, complaints and severe human rights impacts |
| ESRS S1-17<br>Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)                 | Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I |  | Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818 Art 12 (1) |  | S1-17 – Incidents, complaints and severe human rights impacts |
| ESRS 2- SBM3 – S2<br>Significant risk of child labour or forced labour in the value chain paragraph 11 (b) | Indicator number 12 and n. 13 Table #3 of Annex I                    |  |                                                                                                 |  | Not material                                                  |

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| ESRS S2-1<br>Human rights policy commitments paragraph 17                                                                                    | Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1                |  |                                                                                                  |  | Not material |
| ESRS S2-1<br>Policies related to value chain workers paragraph 18                                                                            | Indicator number 11 and n. 4 Table #3 of Annex 1                                   |  |                                                                                                  |  | Not material |
| ESRS S2-1<br>Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19                                   | Indicator number 10 Table #1 of Annex 1                                            |  | Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Art 12 (1) |  | Not material |
| ESRS S2-1<br>Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19 |                                                                                    |  | Delegated Regulation (EU) 2020/1816, Annex II                                                    |  | Not material |
| ESRS S2-4<br>Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36                             | Indicator number 14 Table #3 of Annex 1                                            |  |                                                                                                  |  | Not material |
| ESRS S3-1<br>Human rights policy commitments paragraph 16                                                                                    | Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1 |  |                                                                                                  |  | Not material |
| ESRS S3-1<br>non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17                           | Indicator number 10 Table #1 Annex 1                                               |  | Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Art 12 (1) |  | Not material |

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| ESRS S3-4<br>Human rights issues and incidents paragraph 36                                     | Indicator number 14 Table #3 of Annex 1                                 |  |                                                                                                  |  | Not material                                                                                                                                                                                                               |
| ESRS S4-1<br>Policies related to consumers and end-users paragraph 16                           | Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1 |  |                                                                                                  |  | S4-1 – Policies related to consumers and end-users                                                                                                                                                                         |
| ESRS S4-1<br>Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17 | Indicator number 10 Table #1 of Annex 1                                 |  | Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Art 12 (1) |  | S4-1 – Policies related to consumers and end-users                                                                                                                                                                         |
| ESRS S4-4<br>Human rights issues and incidents paragraph 35                                     | Indicator number 14 Table #3 of Annex 1                                 |  |                                                                                                  |  | S4-4 – Taking action on material impacts on consumers and end- users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions |
| ESRS G1-1<br>United Nations Convention against Corruption paragraph 10 (b)                      | Indicator number 15 Table #3 of Annex 1                                 |  |                                                                                                  |  | G1-1– Corporate culture and business conduct policies and corporate culture                                                                                                                                                |
| ESRS G1-1<br>Protection of whistle-blowers paragraph 10 (d)                                     | Indicator number 6 Table #3 of Annex 1                                  |  |                                                                                                  |  | G1-1– Corporate culture and business conduct policies and corporate culture                                                                                                                                                |

|                                                                                            |                                         |  |                                                |  |                                                     |
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| ESRS G1-4<br>Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a) | Indicator number 17 Table #3 of Annex 1 |  | Delegated Regulation (EU) 2020/1816, Annex II) |  | G1-4 – Confirmed incidents of corruption or bribery |
| ESRS G1-4<br>Standards of anti-corruption and anti- bribery paragraph 24 (b)               | Indicator number 16 Table #3 of Annex 1 |  |                                                |  | G1-4 – Confirmed incidents of corruption or bribery |

## Environmental Information

### **ESRS E1 Climate Change**

#### **Strategy**

##### **E1-1 – Transition plan for climate change mitigation**

As of now, no transition plan for climate change mitigation has been established by the Group yet, but it acknowledges the need to align its business strategy with climate targets and is in the process of measuring its financed emissions and developing a transition plan. This plan will define the Group's long-term strategy to minimize Greenhouse Gas (GHG) emissions, embed climate risks and opportunities into its financial planning and support the low-carbon economy transition. The Group will complete and disclose this transition plan in the 2026 reporting cycle (for the 2025 reporting year), in accordance with regulations and best practices for climate change mitigation and will align its sustainability strategy with relevant EU and national regulations and frameworks, such as the National Climate Law, ensuring its activities support the transition to a low-carbon economy.

##### **E1.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model**

Climate-related risks might fall under either physical or transition risk categories. Physical risks can arise from extreme weather or longer-term climate change impacts to physical assets and infrastructure. Transition risks include: policy risks that come with the evolution of policies and regulations that promote the adaptation to a less carbon intensive and sustainable economy, and those that constrain actions that lead to climate instability and harm the environment, litigation risks that relate to litigation claims against institutions and their representatives who fail to mitigate and adapt to climate change, and who fail to disclose material climate-related & environmental information, market risks that arise through changing demand and supply for commodities, products and services, reputation risk that relates to the changing stakeholder (mainly customer) perception of institutions' commitments to climate and environmental action or inaction.

The Group identified one material negative climate risk in respect of climate change adaptation, related to green financing, which classifies as a transition risk. It includes a reputational risk arising from a shift in customers' preferences who tend to demand sustainable banking solutions and a risk concerning the changing market expectations regarding financial products. Since the Group recognizes those risks, it makes sure to follow market trends and adjust to market expectations to secure its reputation and avoid operational costs or possible loss in profitability. In short, the Group defines the climate risk related to green financing as a transition risk, reflecting its exposure to market changes in the context of a larger transition towards a low-carbon economy.

Furthermore, the Bank has conducted a CR&E Risk - Qualitative Materiality Assessment to evaluate the significance of climate-related and environmental risks across its existing risk categories. It is worth noting that the assessment was conducted at a Bank level as the assessment applies to significant assets and business activities that concern the Bank. This assessment considers both physical and transition risks, examining their potential impact on credit risk, market risk, liquidity risk, IRRBB, profitability risk (including strategic risk), capital risk, compliance risk, operational risk, conduct, ethics & reputational risk, and ICT risk. Given that CR&E risk is a cross-cutting risk that manifests through other existing risk categories, the analysis assesses its impact holistically, ensuring alignment with the Bank's Risk Appetite Framework. This analysis contributes to the assessment of the strengths and weaknesses of the Bank's risk policy, as it is a comprehensive approach that considers competitive data, the overall performance of the Bank, the financial

statements of counterparties, environmental factors, and a range of additional information depending on their relevance to the assessed risk.

The resilience analysis has been conducted in 2024 as part of the Bank's broader risk assessment framework, aligning with guidance from the European Central Bank and supervisory expectations from the Bank of Greece. The Bank has integrated climate-related scenario analysis based on the NGFS scenarios, specifically the Disorderly (high transition risk, low physical risk) and Hot House World (high physical risk, low transition risk) pathways. The Bank has followed this approach to ensure that all potential transition and physical risk impacts are considered in this qualitative assessment. The qualitative assessment involved expert judgment, comparative sectoral evaluation, and consideration of financial and environmental data. The Risk Management division, along with the Credit & Recoveries division and other business units, collaborated to ensure a comprehensive approach. The Bank has identified climate risks over short (0-1 year), medium (1-5 years), and long-term (>5 years) horizons and is in the process of refining this assessment through quantitative scenario analysis.

The analysis indicates that CR&E risk has the most significant impact on credit risk and conduct, ethics & reputational risk. Credit risk is particularly susceptible to both physical and transition risks, given the potential for regulatory changes, shifts in market demand, and exposure to climate-related hazards affecting counterparties and is anticipated to be potentially impacted over the short, medium, and long term. Thus, it is the credit risk that has been identified with the most potential vulnerability to CR&E risk. Market risk, liquidity risk and IRRBB risk have been assessed as lower risk, particularly from a transition risk perspective, considering the Group's business model. Shifting its products and services portfolio by addressing strategic gaps in green financing and capitalizing on emerging opportunities will be critical for long-term success and will ensure that the Group's strategy is resilient over the short, medium, and long-term. The Group continues to refine its approach to integrating climate-related considerations into financial decision-making and risk management. While this initial assessment remains qualitative, further refinement through scenario-based financial impact quantification is planned. The findings will undergo governance review, with final approval by the Risk Management Committee.

The following tables represent the results of the resilience analysis.

| TRANSITION RISK                                          |                  |       |                        |
|----------------------------------------------------------|------------------|-------|------------------------|
| Risks assessed                                           | Magnitude rating | Score | Time horizon of impact |
| Credit risk                                              | High             | 4     | S / M / L              |
| Profitability risk (inc. Strategic risk)                 | Moderate         | 3     | M / L                  |
| Market risk                                              | Low              | 2     | M / L                  |
| Liquidity risk                                           | Low              | 2     | M / L                  |
| Operational risk                                         | Moderate         | 3     | S / M / L              |
| Conduct, Ethics & Reputational risk                      | High             | 4     | S / M / L              |
| Capital risk                                             | High             | 4     | M / L                  |
| IRRBB risk                                               | Low              | 2     | M / L                  |
| Compliance risk                                          | High             | 4     | S / M / L              |
| ICT risk (Information and Communication Technology risk) | High             | 4     | M / L                  |



| PHYSICAL RISK                                            |                  |       |                        |
|----------------------------------------------------------|------------------|-------|------------------------|
| Risks assessed                                           | Magnitude rating | Score | Time horizon of impact |
| Credit risk                                              | High             | 4     | S / M / L              |
| Profitability risk (inc. Strategic risk)                 | Moderate         | 3     | M / L                  |
| Market risk                                              | Moderate         | 3     | M / L                  |
| Liquidity risk                                           | Moderate         | 3     | M / L                  |
| Operational risk                                         | Moderate         | 3     | S / M / L              |
| Conduct, Ethics & Reputational risk                      | High             | 4     | M / L                  |
| Capital risk                                             | High             | 4     | M / L                  |
| IRRBB risk                                               | Moderate         | 3     | M / L                  |
| Compliance risk                                          | Low              | 2     | M / L                  |
| ICT risk (Information and Communication Technology risk) | Moderate         | 3     | M / L                  |

The following table is an analytical view of the tables above representing the potential magnitude rating of each risk category (transition or physical risk), disaggregated by all risk sub-categories.

Potential Magnitude Ratings <sup>[1]</sup> – Summary View

| CR&E risk category | CR&E risk sub-category           | Credit risk | Profitability risk (incl. Strategic risk) | Market risk | Liquidity risk | Operational risk | Conduct, Ethics & Reputational risk | Capital risk | IRRBB (Interest rate risk in the banking book) risk | Compliance risk | ICT risk |
|--------------------|----------------------------------|-------------|-------------------------------------------|-------------|----------------|------------------|-------------------------------------|--------------|-----------------------------------------------------|-----------------|----------|
| Transition risk    | Policy and regulation            | High        | Moderate                                  | Low         | Low            | Moderate         | High                                | High         | Low                                                 | High            | Moderate |
|                    | Market sentiment                 | High        | Moderate                                  | Low         | Low            | Low              | High                                | Moderate     | Low                                                 | Moderate        | Low      |
|                    | Technology                       | Moderate    | Low                                       | Low         | Low            | Moderate         | Low                                 | Low          | Low                                                 | Low             | High     |
| Physical risk      | Floods/sea level rises           | High        | Moderate                                  | Low         | Low            | Moderate         | High                                | High         | Low                                                 | Low             | Moderate |
|                    | Droughts/extreme heat            | Moderate    | Moderate                                  | Moderate    | Moderate       | Moderate         | Moderate                            | Moderate     | Moderate                                            | Low             | Moderate |
|                    | Storms/hurricanes                | High        | Moderate                                  | Low         | Low            | Moderate         | Moderate                            | Moderate     | Low                                                 | Low             | Moderate |
|                    | Water stress                     | Moderate    | Moderate                                  | Moderate    | Moderate       | Moderate         | Moderate                            | Moderate     | Moderate                                            | Low             | Moderate |
|                    | Biodiversity loss and land usage | Moderate    | Moderate                                  | Moderate    | Moderate       | Moderate         | Moderate                            | Moderate     | Moderate                                            | Low             | Moderate |

<sup>[1]</sup> While mitigating actions/factors have been considered in allocating a potential magnitude rating, as mitigants are in development and or/are to be enhanced in the coming year(s), ratings have not been based on net risk and a prudent approach to allocation of ratings has been applied.

## **Impacts risks and opportunities management**

### **E1-2 – Policies related to climate change mitigation and adaptation**

The Group values environmental stewardship and has incorporated environmental and climate commitments into its Sustainable Development Policy. Its objectives address material impacts, risks and opportunities across the three ESG pillars, including adaptation and mitigation to climate change, improving thus internal energy efficiency, and advancing sustainable banking. To ensure its effectiveness, the Sustainability Management Committee monitors the implementation of the targets set and reports to the Board of Directors, while regular monitoring and stakeholder feedback lead to continuous improvements. The Sustainable Development Policy applies to all business partners and stakeholder groups, as well as the subsidiaries with no exclusion. It covers banking operations and extends across its value chain, ensuring sustainability considerations are integrated throughout all activities and regions where the Group operates. Moreover, the policy aligns with international standards and recognized frameworks, including the United Nations Sustainable Development Goals (SDGs). It is worth mentioning that the policy takes into consideration the interests, views, and perspectives of stakeholders in its development and implementation. To ensure transparency and accessibility, the Sustainable Development Policy is available on Optima bank's corporate website and internal Portal, making it available to all stakeholder groups.

Through the Sustainable Development Policy, there is a commitment to minimizing the carbon footprint through energy-efficient operations, responsible energy sourcing, and the adoption of technologies that reduce greenhouse gas emissions. It aims to integrate green energy considerations into the strategic orientation, in line with legal requirements and best practices. In addition, the policy highlights the commitment to financing projects that support renewable energy, energy efficiency and other sustainability goals. Climate-related considerations are also incorporated into the Group's decision making in order to align with energy-efficient and sustainable solutions. Through its financing activities, advisory services, and tailored products the Group supports SMEs and large corporations in moving to sustainable business models and clean technologies. Going forward, the Group plans to develop and adopt a dedicated and robust Environmental Policy which will be disclosed in the following reporting years. The policy will support its environmental commitments by providing a framework for addressing climate-related risks and opportunities in line with regulatory requirements and best practices.

The Sustainable Development Policy addresses climate change mitigation and adaptation, energy efficiency and renewable energy deployment. Specifically, the policy underlines the commitments to:

- Minimize its carbon footprint through energy-efficient operations,
- Responsible energy sourcing,
- Adopt technologies that reduce greenhouse gas emissions,
- Integrate green energy considerations in its strategic planning,
- Finance projects that support renewable energy, energy efficiency and other sustainability goals,
- Make resource efficiency a priority

### **E1-3 – Actions and resources in relation to climate change policies**

The Group aims to contribute effectively to climate change mitigation through concrete actions, that will mark its way to climate neutrality, in line with the goals of the Paris Agreement. Through a thorough decarbonization plan the Group contributes to the creation of a sustainable planet.

#### **Group's approach**

The Group implements effective decarbonization strategies to minimize the carbon footprint of its own operations and reduce greenhouse gas emissions to the highest extent possible. Through targeted ongoing actions across divisions, the Group significantly decreases its energy consumption, an objective that requires a multilevel and comprehensive approach. Through upgrading the data center and using virtual servers, the IT Division profoundly supports energy consumption reduction and efficiency. An innovative

solution which contributes to energy efficiency is the HPE GreenLake. A hybrid cloud by design by which resources across clouds can be managed while retaining control of data and providing flexibility on the Group's management of services.

Numerous operational activities of the Group support energy consumption reduction and energy efficiency such as the use of biological detergents as well as the use of LED lighting and daylight/motion and sensors in specific areas, to control the operating time of lighting, air conditioning and other equipment. Also, regular inspection and evaluation of mechanical equipment in central services is being conducted to control and reduce energy consumption without affecting the quality of service to consumers. A significant part of the decarbonization plan towards climate neutrality contains the use of Plug-in hybrid and electric company cars that, currently, constitute 70% of the Group's fleet.

Regarding the preventive maintenance of electrical appliances, the Group uses environmentally friendly refrigerants for its A/C units. The effort to make to a successful transition into a more sustainable era does not lie solely on the operational actions but is also imprinted on the Group's financial products. To be able to assess the impact of climate change, the Group is about to integrate climate and environmental criteria in its credit assessment process. Among others, it is currently financing environmentally friendly projects and green financial products, for instance in the renewable energy sector. More specifically, 10.99% of the Bank's loan portfolio concerns financing projects which are active in the energy and renewable energy sectors, such as Renewable Energy Sources (RES) and energy efficient buildings.

Group's key actions can be categorized into several decarbonization levers:

1. Energy Efficiency Improvements and GHG emissions reduction:

The Group has taken significant steps to reduce energy consumption and therefore reduce its emissions through upgrading its data center and using virtual servers. The IT Division's implementation of the HPE GreenLake system further enhances energy efficiency by optimizing resource management across cloud platforms. Additionally, LED lighting and daylight/motion sensors in various facilities help to control lighting, air conditioning, and other energy-consuming machines and significantly contribute to the lever's objective without affecting service quality. The use of biological detergents and regular inspections of mechanical equipment to monitor energy consumption as well as the adoption of environmentally friendly refrigerants for A/C units also support this lever.

2. Electrification:

A notable action within this category is Group's use of Plug-in hybrid and electric company cars, which currently make up around 50% of its fleet. This shift reduces reliance on traditional fossil fuels and directly contributes to lowering the Group's carbon footprint.

3. Circular Economy Practices:

By reducing waste through recyclable materials (e.g., in debit cards), and through the establishment of recycling of specific material (papers, plastic, etc) in the Group's buildings and branches, the Group is embedding circular economy principles into its operations.

4. Product and Service Innovation:

In line with the transition to more sustainable finance, the Group offers green financial products, particularly in the renewable energy sector, providing clients with funding opportunities for energy-efficient and environmentally friendly projects. The Group's financing of renewable energy projects, particularly within its loan portfolio, is a direct contribution to energy transition. Approximately 10.99% of the Bank's company loan portfolio is dedicated to financing projects in the renewable energy sector, including Renewable Energy Sources (RES) and energy-efficient buildings.

### 5. *Nature-Based Solutions:*

Through its collaboration with the circular economy movement 'Just Go Zero' by Polygreen, the Group recycled organic waste and transformed it into 664.46 kg of soil fertilizer. This initiative supports nature-based decarbonization by enhancing soil health, contributing to carbon sequestration, and reducing methane emissions from organic waste in landfills.

These actions collectively support the Group's overarching goal of transitioning to climate neutrality, aligning with its decarbonization plan and its commitment to mitigate climate change, in line with the Paris Agreement. The Group is committed to building on these efforts, aiming for continuous improvement in its sustainability journey through future key actions.

The current reporting year (2024) has been established as the base year for measuring Group's greenhouse gas (GHG) emissions. It aims to reduce its overall emissions through initiatives targeting both operational efficiency and sustainable financial product offerings. The impact of these efforts will be captured and disclosed in next year's report, where the Group plans to demonstrate measurable progress in its climate and environmental targets. These actions align with the Group's commitment to supporting climate change mitigation in line with the EU's sustainability standards under ESRS.

The implementation of the Group's climate-related actions, including its energy transition and fleet electrification plans, depends on the availability and allocation of financial resources. This is managed through an internal budgeting process, where a budget specifically related to procurement and operational adjustments is approved. Based on this approved budget, relevant departments proceed with the necessary investments. This structured approach ensures that there is an effective management of the climate mitigation and adaptation initiatives while maintaining financial stability and responding to potential supply and demand changes.

The Group's actions (taken or planned) do not require significant monetary amounts of Capital Expenditures (CapEx) and Operational Expenditures (OpEx) and therefore are not related to relevant line items or notes in its financial statements.

Capital expenditures and operating expenditures reflect the initiatives to reduce emissions from its own operations and achieve decarbonization. As part of the compliance with the EU Taxonomy regulation, required under Commission Delegated Regulation (EU) 2021/2178, Optima bank Group has started assessing the alignment of its loans with the Technical Screening Criteria (TSC), the Do No Significant Harm (DNSH) principle and the Minimum Social Safeguards (MSS). In the context of the Green Asset Ratio (GAR), the Bank aligns its loan portfolio with the EU Taxonomy requirements and analyzes the eligible and aligned assets, according to the publicly available data of its counterparties.

### ***Metrics and targets***

#### **E1-4 – Targets related to climate change mitigation and adaptation**

| Target description at Group level                   | Time frame | Base year | Base value                 |
|-----------------------------------------------------|------------|-----------|----------------------------|
| 100% renewable energy in its own operations by 2026 | 2026       | 2024      | 0%                         |
| 34% reduction of Scope 1 location-based emissions   | 2030       | 2024      | 93.244 tCO <sub>2</sub> eq |

The Group has set GHG emission reduction targets that align with its Sustainable Development Policy and its objectives regarding climate change and the environment, focusing on reducing operational emissions through renewable energy adoption and fleet electrification. The targets contribute to the Group's policy

objectives while supporting the transition to low-carbon energy sources and aligning with broader sustainability commitments. As of now, the Group's targets focus on climate change mitigation at its own operations in alignment with the Sustainable Development Policy. No additional time-bound and measurable targets related to other IROs have been set and thus until now it was not necessary to track the effectiveness of relevant actions and policies. These targets include achieving 100% renewable energy in its own operations by 2026 and replacing conventional vehicles with electric or plug-in hybrid electric vehicles (PHEVs) in its fleet by 2030, leading to a 34% reduction of scope 1 location-based emissions.

The renewable energy target applies to Scope 2 market-based emissions from electricity consumption, while the fleet electrification target addresses Scope 1 emissions from company-owned vehicles. The Group ensures consistency with its GHG inventory boundaries by following standardized reporting frameworks, and all reduction targets are gross, meaning no GHG removals, carbon credits, or avoided emissions are included in achieving them. The scope of the targets is limited to the Group's own operations, covering all locations where the Group controls energy procurement and fleet management.

The targets do not extend to the upstream or downstream value chain. The base year is 2024, and baseline values will be determined based on data collected in 2024. The base year will be updated every five years from 2030 onwards as required. The renewable energy target applies from 2024 to 2026 considering that from 2026 until 2030 market-based emissions will be zero. The fleet transition target spans from 2024 to 2030. The Group has not yet established additional interim milestones or set long-term targets for 2050. The methodology used to define these targets is based on the Group's operational energy consumption data and fleet composition, considering industry trends, regulatory requirements, and technology availability. The targets are aligned with national and EU policy goals regarding renewable energy and sustainable mobility, but further assessment will follow to confirm full alignment with international decarbonization pathways. At present, the Group has not established its targets in alignment with science-based pathways limiting global warming to 1.5°C. The framework and methodology used for target setting have included a benchmarking analysis of the banking sector and an evaluation of the Group's overall operations and activities through internal workshops with relevant departments. The targets have not been externally assured. Critical assumptions in setting these targets include expected advancements in renewable energy capacity, market availability of electric vehicles, and potential regulatory incentives or constraints. Changes in customer preferences, economic conditions, and technological progress may also impact emissions reduction efforts, and these factors will be monitored over time.

The target-setting process has primarily involved internal assessments. The Group has not yet conducted formal stakeholder consultations with external parties such as regulators, customers, or industry associations for these targets but is committed to doing so in the future.

Since 2024 is the base year, there are currently no changes to report in targets, metrics, or underlying methodologies. However, any future adjustments will be disclosed along with the rationale for such changes. Similarly, performance against these targets has not yet been assessed, but monitoring mechanisms and key metrics will be established to track progress over time.

The primary decarbonization levers include transitioning to 100% renewable energy to reduce Scope 2 emissions and replacing conventional vehicles with PHEVs or electric vehicles to reduce Scope 1 emissions. The expected impact of these measures will be quantified as data becomes available.

## E1-5 – Energy consumption and mix

Table 1: Energy consumption and mix (2024)

| ENERGY CONSUMPTION                                                                                                                                              | UNIT | AMOUNT   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|------|----------|
| Fossil energy consumption                                                                                                                                       | MWh  | 2,227.57 |
| Share of fossil sources in total energy consumption                                                                                                             | %    | 100      |
| Consumption from nuclear sources                                                                                                                                | MWh  | -        |
| Share of consumption from nuclear sources in total energy consumption                                                                                           | %    | -        |
| Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) | MWh  | -        |
| Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources                                                               | MWh  | -        |
| Consumption of self-generated non-fuel renewable energy                                                                                                         | MWh  | -        |
| Total renewable energy consumption                                                                                                                              | MWh  | -        |
| Share of renewable sources in total energy consumption                                                                                                          | %    | -        |
| Total energy consumption                                                                                                                                        | MWh  | 2,227.57 |

*Note: The Group does not consume energy from renewable or nuclear sources.*

## E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

Table 2: Gross Scopes 1, 2 and Total GHG emissions (2024)

| Emissions                                      | unit                                | amount   |
|------------------------------------------------|-------------------------------------|----------|
| Scope 1 emissions                              | tCO <sub>2</sub> eq                 | 128.32   |
| Location-based Scope 2 emissions               | tCO <sub>2</sub> eq                 | 872.01   |
| Market-based Scope 2 emissions                 | tCO <sub>2</sub> eq                 | 636.11   |
| Total GHG emissions (location-based)           | tCO <sub>2</sub> eq                 | 1,000.33 |
| Total GHG emissions (market-based)             | tCO <sub>2</sub> eq                 | 764.43   |
| Total GHG emissions (location-based) intensity | tCO <sub>2</sub> eq/net revenue K € | 0.0039   |
| Total GHG emissions (market-based) intensity   | tCO <sub>2</sub> eq/net revenue K € | 0.003    |
| Net Revenue                                    | K €                                 | 254,723  |

As there have been no significant changes in the definition of the reporting Group and its upstream and downstream value chain, there is no impact on the comparability of the reported GHG emissions between the current and previous reporting periods. The base year for reporting is the current year, and no reductions have been reported.



The calculation of GHG emissions follows the methodology outlined in the National Climate Law and ISO 14064-1:2018 Standard with emission factors sourced from the Ministry of Energy's official guidelines and the National Inventory Report (NIR). The emission factors used are derived from the NIR and DAPEEP, ensuring compliance with the national framework for climate-related data. For Scope 2 emissions, two approaches are applied:

- **Location-based method:** The remaining energy mix of the country is used, reflecting the national grid's overall emissions.
- **Market-based method:** The provider's energy mix is used, focusing on the specific emissions associated with the electricity purchased by the organization.

These methodologies were chosen to ensure accuracy and consistency with national reporting requirements, in alignment with the country's climate targets. The tools and documents used for the calculations are those provided by the Ministry of Energy.

There are no differences between the reporting periods of the Group and the entities in its value chain. Therefore, there are no significant events or changes in circumstances relevant to the GHG emissions that occurred between the reporting dates of the entities in the value chain and the date of the Group's general purpose financial statements.

The Commission Delegated Regulation (EU) 2023/2772 states in Appendix C that undertakings or groups not exceeding on their balance sheet dates the average number of 750 employees during the financial year (on a consolidated basis where applicable) may omit the datapoints on Scope 3 emissions and total GHG emissions for the first year of preparation of their sustainability statement. As the Group falls into the aforementioned category it may omit data points relevant to Scope 3 emissions.

The net revenue used to calculate the intensity of GHG emissions is fully reconciled with the Group's financial statements as it was obtained from the Group's annual report for 2024. All the above metrics of the section are not validated by an external body.

## **ESRS E5 Resource use and circular economy**

### **Impacts, risks and opportunities management**

#### **E5-1 – Policies related to resource use and circular economy**

The Group is committed to protecting the environment and has embedded its climate and environmental goals into its Sustainable Development Policy. Covering all three ESG pillars, the policy addresses key impacts, risks, and opportunities across its value chain, including waste. The policy highlights, among others, resource efficiency, waste reduction and circular economy, as core environmental objectives. The Group places significant emphasis on resource efficiency to reduce virgin resource use, decrease waste, recycle, and follow proper disposal protocols throughout its operations and value chain. Internal awareness programs are implemented to promote responsible practices within the organization, while sustainable sourcing and the use of renewable and recycled materials are being promoted.

The Group prioritizes preventing waste and reusing materials over disposal or treatment. In its own operations the Group switched to electronic documents, use of recycled materials for printed items, dropped paper-based advertising, and introduced recyclable debit cards. At Group's headquarters a recycling and upcycling system in partnership with external organizations has been placed to support waste management and circular economy initiatives. These actions represent further steps towards environmental sustainability and circular economy principles.



The Group aims to develop and implement a standalone Environmental Policy in the next reporting years. This forward-looking approach aligns the Group's operations and value chain with sustainable and responsible environmental practices.

Further information regarding the Sustainable Development Policy's Minimum Disclosure Requirements (MDRs) can be found in ESRS E1.

## **E5-2 – Actions and resources related to resource use and circular economy**

The Group has implemented various initiatives to minimize waste generation both within its own operations and throughout its upstream and downstream value chain. These efforts include:

- The adoption of a "no-paper" policy in numerous activities and interactions with clients and the exclusive use of digital signatures along with the promotion of electronic copies for accounts and contracts, where feasible, the use of recycled materials in its printed forms
- The replacement of all debit cards with recyclable ones
- The reduction and restriction of paper-based advertising materials, brochures, and printouts. Waste management is further supported by internal initiatives such as battery recycling in collaboration with AFIS (ΑΦΗΣ) company.
- Partnership with the first circular economy movement in Greece "Just Go Zero" by Polygreen and creation of a recycling and upcycling system at the Group's headquarters for paper, plastic, aluminum, glass, coffee capsules, cigarette butts, food and organic waste.
- Collaboration with GreenFence – MetalLogic Single member S.A. for the recycling of old electronic equipment, including the destruction of 1,440 kg of servers and PCs, of which 837 kg will provide a return benefit. Financing of waste management and circular economy projects in municipalities and regions.

These actions reflect the Group's commitment to waste reduction throughout its value chain.

The Group actively integrates waste prevention measures throughout its operations and value chain, focusing on minimizing waste generation at every stage. A core element of these efforts is the implementation of a "no-paper" policy, which reduces reliance on physical documents across numerous activities and client interactions. The Group has adopted digital signatures and promotes the use of electronic copies for accounts and contracts wherever feasible, thus significantly decreasing paper usage.

Further actions include the elimination of paper-based advertising materials, brochures, and printouts, as well as the incorporation of recycled materials in printed forms. Additionally, the Group has replaced all debit cards with recyclable ones, demonstrating its commitment to reducing waste from physical products. These measures reflect the Group's proactive approach to waste generation prevention across its value chain.

The Group implements a series of initiatives to optimize waste management processes across its operations. Internally, the Group has established battery waste collection points with AFIS (ΑΦΗΣ) buckets, enabling proper disposal and recycling. Through its collaboration with "Just Go Zero" by Polygreen, the Group ensures the efficient handling and recycling of various materials through the implementation of a recycling and upcycling system. Additionally, the partnership with GreenFence – MetalLogic Single member S.A.. focuses on the responsible recycling of electronic equipment, including servers and PCs, ensuring minimal electronic waste and resource recovery, wherever possible. These initiatives demonstrate the Group's commitment to streamlining waste management practices, improving recycling efficiency, and minimizing environmental impact from waste disposal.

The Group contributes to the circular economy through targeted partnerships and structured initiatives that emphasize resource recovery and waste repurpose. At the Group's headquarters, collaboration with "Just Go Zero" by Polygreen has resulted in significant outcomes, including:

- Diverting thousands of kilograms of waste from landfills
- Transforming organic waste into soil fertilizer
- Saving thousands of liters of water from paper processing and textile industries

Additionally, the responsible recycling of electronic equipment through GreenFence – MetalLogic ensures valuable materials are recovered and reintegrated into production cycles rather than being discarded. These actions reflect the Group's commitment to circularity, focusing on measurable environmental benefits and sustainable resource use across its operations and partnerships.

While the Group has not yet participated in collective actions specifically focused on circular economy and resource use, Bank's membership in the Hellenic Bank Association (HBA) provides a platform for engaging in industry-wide discussions and exploring future collaboration opportunities aligned with circular economy principles. Through this membership, the Group remains informed about sectoral developments and emerging best practices, laying the groundwork for potential collective initiatives in the future.

### E5-3 – Targets related to resource use and circular economy

The Group understands the importance of setting clear environmental targets and tracking progress to drive meaningful change. While it has not yet formally adopted an Environmental Policy, its core environmental principles are adequately described in the Sustainable Development Policy, which sets priorities for resource efficiency, waste reduction, and circular economy principles across operations and the value chain. Currently, the Group does not have a system in place to track the effectiveness of its environmental policies and actions through targets. However, it plans to develop a structured approach, including clear monitoring processes.

### E5-5 – Resource outflows

Table 1: Waste

| WASTE OVERVIEW                                     | unit | amount   |
|----------------------------------------------------|------|----------|
| Total waste generated                              | kg   | 2,240.94 |
| Non-recycled waste                                 | kg   | 470.36   |
| Percentage of non-recycled waste                   | %    | 21       |
| WASTE DIVERTED FROM DISPOSAL (non-hazardous waste) |      |          |
| Types of recovery                                  | unit | amount   |
| Preparation for reuse                              | kg   | -        |
| Recycling                                          | kg   | 1,770.58 |
| <Other recovery operations>                        | kg   | 470.36   |
| Total waste diverted from disposal                 | kg   | 2,240.94 |
| WASTE DIRECTED TO DISPOSAL (non-hazardous waste)   |      |          |
| Types of treatment                                 | unit | amount   |
| Incineration                                       | kg   | -        |
| Landfill                                           | kg   | -        |
| <Other disposal operations>                        | kg   | -        |
| Total waste directed to disposal                   | kg   | -        |

*\*Note: Due to the nature of its operations, the Group does not produce any kind of hazardous or radioactive waste. The only amount of waste measured is waste diverted from disposal. Waste directed to disposal is not being measured since its amount is not considered significant due to the nature of the Group's operations.*

The above metrics of the section have not been validated by any external body.

The waste composition primarily consists of recurring waste streams generated through its daily operations. They are predominantly non-hazardous and typical of office-based operations including administrative processes, customer service interactions, and day-to-day office functions. Key waste streams include paper waste from documentation processes, plastic and aluminum waste from packaging and consumables, and organic waste from employee facilities. These waste streams are systematically managed through the recycling and upcycling system in collaboration with 'Just Go Zero' by Polygreen. Additionally, it ensures proper disposal of battery waste through dedicated collection points (AFIS (ΑΦΗΣ) buckets) within its facilities. Specific initiatives, such as eliminating paper-based advertising materials and replacing debit cards with recyclable materials, have been implemented to reduce waste generation.

The materials present in the recurring waste streams include paper, plastic, aluminum, glass, organic matter, and small electronic components such as batteries. While electronic waste, including servers, PCs, and hard drives, is not part of the Group's regular waste streams, it is managed periodically through specialized collaborations, such as the one with GreenFence – MetalLogic Single member S.A., ensuring secure disposal and recycling of decommissioned equipment.

Since the Group does not produce any products, no criteria and assumptions were used to determine and classify products designed along circular principles. Regarding methodologies that have been used, all waste is picked up by a waste management partner and weighed in kilograms. As far as assumptions are concerned, from the total amount of waste materials, food waste, coffee, capsules, and cigarette butts are considered to undergo recovery operations from the waste management partner. Food waste, coffee and capsules are directed towards composting or biogas production and cigarette butts are directed towards energy recovery. Lastly, paper/cardboard, plastic and aluminum are led to recycling.

#### **Disclosures pursuant to Article 8 of EU Regulation 2020/852 ("EU Taxonomy Regulation")**

The EU Taxonomy Regulation, adopted by the European Parliament in 2020, establishes a unified classification system to help investors and businesses determine the environmental sustainability of specific economic activities. On June 4, 2021, the European Commission adopted Delegated Regulation (EU) 2021/2139, setting out the technical screening criteria for climate change mitigation and adaptation. Additionally, on July 6, 2021, the Commission adopted Delegated Regulation (EU) 2021/2178 ("Disclosures Delegated Act"), which supplements Article 8 of the Taxonomy Regulation and defines the content, methodology and presentation of disclosures related to the proportion of environmentally sustainable economic activities in financial and non-financial undertakings.

On July 15, 2022, a Complementary Climate Delegated Act was published in the Official Journal of the EU, expanding the Taxonomy framework to include specific nuclear and gas energy activities under strict conditions ("Complementary Climate Delegated Act"). Sequentially, in November 2023, a new Delegated Act was introduced, extending the Taxonomy to cover four additional environmental objectives: sustainable use and protection of water, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. Further amendments were made to incorporate additional economic activities that contribute substantially to climate change mitigation and adaptation and to clarify reporting requirements related to the new objectives.

As a cornerstone of the EU's sustainable finance framework, the EU Taxonomy serves as a vital market transparency tool, directing investments toward economic activities essential for achieving the European Green Deal objectives. It establishes clear criteria for identifying activities aligned with a net-zero trajectory by 2050 while also supporting broader environmental goals beyond climate change.

Under EU Taxonomy Regulation, the term "eligible" applies to economic activities covered by the relevant Delegated Acts. However, eligibility alone does not imply that an activity is environmentally sustainable. The concept of an "environmentally sustainable activity or investment" is linked to alignment, which

requires a more in-depth assessment. For an economic activity to be considered taxonomy-aligned, it should:

- i. meet all applicable Technical Screening Criteria (TSC) to at least one of the six environmental objectives;
- ii. ensure the principle of Do No Significant Harm (DNSH) to all other environmental objectives; and
- iii. comply with Minimum Social Safeguards.

In accordance with the EU Taxonomy Regulation, credit institutions are required to disclose taxonomy eligibility and alignment data for all six environmental objectives based on publicly available disclosures of counterparties. The key metric for measuring alignment is the Green Asset Ratio (GAR) for on-balance sheet covered assets, which must be reported with a detailed breakdown by environmental objective, counterparty type and category of eligible and environmentally sustainable (aligned) assets.

### **Application of the Taxonomy Regulation to the Group**

The taxonomy eligibility assessment shows the proportion of the Group's assets financed and invested in taxonomy-eligible economic activities, relative to the total covered assets. The taxonomy alignment assessment, specifically the Green Asset Ratio (GAR), reflects the proportion of the Group's assets financing and investing in taxonomy-aligned economic activities as a percentage of total covered assets. The numerator includes loans and advances, debt securities, equities and repossessed collaterals that finance taxonomy-aligned activities, based on relevant Turnover and CapEx KPIs. The following categories of exposures are excluded from the GAR ratio calculation as appropriate:

- Exposures to central governments, central banks, and supranational issuers (excluded from both the numerator and denominator of KPIs);
- Exposure in trading portfolio securities (excluded from both the numerator and denominator of KPIs);
- Exposures in derivatives (excluded from the numerator of KPIs);
- Exposures to entities not obligated to publish non-financial information under Article 19a or Article 29a of Directive (EU) 2013/34 (excluded from the numerator of KPIs);
- On-demand interbank loans (excluded from the numerator of KPIs);
- Cash and cash-related assets (excluded from the numerator of KPIs);
- Other categories of assets (e.g., Goodwill, commodities, etc.), (excluded from the numerator of KPIs).

The Group publishes the relevant KPIs based on publicly available disclosures from the financial and non-financial counterparties limited to undertakings subject to the Non-Financial Reporting Directive ("NFRD"). Therefore, the respective KPIs do not include exposures to SMEs. The information on eligible and aligned economic activities is derived from the publicly disclosed Turnover and CapEx of the counterparties. Due to the unavailability of required data for the financial year 2024, the disclosed information is based on the 2023 annual reports of the counterparties.

For specific-purpose funding, which is defined as exposures allocated to particular identified activities ("known use of proceeds"), project-specific KPIs are applied in the taxonomy-eligibility and alignment assessment. For retail exposures relevant to the EU Taxonomy, only loans collateralized by residential real estate, loans for renovation purposes and loans for purchasing vehicles have been considered for taxonomy alignment. In terms of off-balance sheet exposures, the Group included financial guarantees and assets under management for guarantee and investee non-financial undertakings. Other off-balance sheet exposures, such as commitments, are excluded from this calculation.

## Summary of KPIs

The table below contains the summary of the main KPIs according to the EU Taxonomy Regulation for the reference year 2024.

|          |                               | Total environmentally sustainable assets**** | Total environmentally sustainable assets***** | KPI**** | KPI***** | % coverage (over total assets)*** | % of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V) | % of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) |
|----------|-------------------------------|----------------------------------------------|-----------------------------------------------|---------|----------|-----------------------------------|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Main KPI | Green asset ratio (GAR) stock | 55                                           | 108                                           | 1.26%   | 2.51%    | 77.89%                            | 60.44%                                                                                                  | 22.11%                                                                                           |

|                 |                               | Total environmentally sustainable activities**** | Total environmentally sustainable activities***** | KPI**** | KPI***** | % coverage (over total assets) | % of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V) | % of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) |
|-----------------|-------------------------------|--------------------------------------------------|---------------------------------------------------|---------|----------|--------------------------------|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Additional KPIs | GAR (flow)                    | 10                                               | 56                                                | 2.13%   | 12.25%   | 8.23%                          | -                                                                                                       | -                                                                                                |
|                 | Trading book*                 | N/A                                              | N/A                                               | N/A     | N/A      |                                |                                                                                                         |                                                                                                  |
|                 | Financial guarantees          | 29                                               | 53                                                | 14.79%  | 27.43%   |                                |                                                                                                         |                                                                                                  |
|                 | Assets under management       | 6                                                | 81                                                | 1.51%   | 20.19%   |                                |                                                                                                         |                                                                                                  |
|                 | Fees and commissions income** | N/A                                              | N/A                                               | N/A     | N/A      |                                |                                                                                                         |                                                                                                  |

\* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

\*\*Fees and commissions income from services other than lending and AuM

Institutions shall disclose forwardlooking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

\*\*\* % of assets covered by the KPI over banks' total assets

\*\*\*\*based on the Turnover KPI of the counterparty

\*\*\*\*\*based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

As of year-end 2024, the Group's total GAR based on turnover stood at 1.26% of total covered assets, while GAR based on CapEx reached 2.51%. The Group intends to progressively align its goals with the EU Taxonomy.

In line with the Disclosures Delegated Act and the Complementary Climate Delegated Act, Appendix C includes the reporting templates, Annexes VI and XII respectively.

## Social Information

### **ESRS S1 Own Workforce**

#### ***Strategy***

#### **S1.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model**

The Group's impacts, risks, and opportunities regarding its own workforce, as identified in the DMA, are closely connected to its business model. These factors shape and support the Group's ongoing adaptive approach, reflected in its updated strategy, which aims to enhance positive impacts, mitigate negative ones, and effectively manage the risks and opportunities which arise from these impacts.

All people in the Group's workforce who can be materially impacted are included in the scope of disclosure under ESRS 2. The material impacts include impacts connected with the Group's own operations and related to its workforce. The Group employs a diverse workforce that includes both employees and non-employees, depending on the nature of their collaboration with the Group. The Group's employees and executives are the Group's cornerstone as their role is crucial for its daily operation and development. They are employed on fixed- or indefinite-term contracts, depending on the needs of the Group and the type of their role. Their positions cover a wide range of responsibilities, from administrative and operational tasks to strategic decisions. They also have additional employment benefits such as health care, insurance coverage and professional development programs. Non-employees of the Group are provided by third-party companies and cover specialized needs or participate in the implementation of specific projects. Non-employees are mainly engaged in projects that require technical or specialized knowledge, such as customer service, the development of digital infrastructure, the maintenance of technical systems or the provision of other support services. Although they are not part of the Group's staff, their contribution is important for the completion of projects that serve the strategic and operational needs of the Group.

Groups' operations have substantial implications for both employees and non-employees. For the former, the Group ensures professional stability and long-term career development opportunities. For the latter, the Group provides opportunities to participate in challenging projects, helping them to broaden their professional experience in a highly demanding banking institution. The human resources management strategy focuses on creating a supportive environment for the own workforce, ensuring that they contribute effectively to the achievement of the Group's goals.

The results of the DMA identified one material negative impact which refers to the gender pay gap. The negative impact is not connected to either widespread/systemic or related to individual incidents. It reflects the difference between the average pay of men and women as this is observed in specific positions.

Through the DMA, the Group identified positive impacts for its own employees and across value chain in Greece, where the Group operates. Positive impacts mainly highlight the Group's commitment to the creation of a healthy work environment, support employees' well-being and work-life balance, provide competitive remuneration based on merit recognition, ensure the right to free association for employees and implement policies for inclusivity and equal opportunities for all. The Group also contributes to job creation across its value chain by generating direct, indirect, and induced jobs across its value chain. The Group's actions focus on enhancing employee well-being, career development, financial security, and work-life balance through various activities. These include policies for parental support, remote work options, comprehensive health benefits, extra paid leaves, such as leave for blood donations. Employees are engaged through company events, athletic events, and cultural initiatives like free tickets to performances



and museums. Career growth is supported by structured performance reviews, internal job postings, and trainings. The Group also promotes diversity and women's empowerment through mentoring programs.

With regards to opportunities, arising from related impacts, work-life balance initiatives, adequate wages and promotion of equality have been identified as main opportunities since they may increase the reputation as a family-friendly employer, improve the retention of employees, attract future employees and increase employees' productivity. Simultaneously, continuous training aims to the professional development of employees with specialized expertise and experience may lead to increased training costs, which emerges as a significant risk.

None of the Group's material impacts on employees arise from transition plans concerning the reduction of negative impacts on the environment or achievement of greener and climate- neutral operations. Furthermore, due to the nature and location of the institution, the Group does not identify significant risk of incidents of forced labor, compulsory labor or child labor. In addition, there are no people with characteristics, working in specific contexts, or Group's specific activities who may be at greater risk of harm. The Group ensures a safe and inclusive working environment for all employees. Consequently, there are no material risks or opportunities arising from impacts that relate to specific groups of people.

### **Impacts, risks and opportunities management**

#### **S1-1 – Policies related to own workforce**

The Group is committed to ensuring fair and safe working conditions, as well as equal treatment of all its employees. In this context, the Group has adopted the following policies that reflect its values and commitments:

- ***Policy for the Prevention and Combating of Incidents of Violence and Harassment at Work - Complaint Management:*** The policy for the Prevention and Combating of Incidents of Violence and Harassment at Work - Complaint Management aims to prevent incidents of violence and harassment in the work environment, promoting and considering the well-being and safety of all employees. The objective of the Policy for the Prevention and Combating of Incidents of Violence and Harassment at Work - Complaint Management is to prevent and combat all forms of violence and harassment that occur in the workplace, whether it takes place in the designated workplaces or anywhere else. This includes, but is not limited to, private places where work is performed, during training activities, travel, and work-related social events, through communications using technology, etc. Regarding the procedures for monitoring incidents of violence and harassment, a whistleblowing channel is available for all employees where they can report relevant incidents with emphasis on the protection of personal data while ensuring equitable treatment for all. At the same time, this practice provides a clear procedure for managing and investigating complaints, measures to prevent, control and limit risks, and protection against retaliation to ensure fair treatment. The Group is committed to evaluating this policy in a manner consistent with the requirements of applicable laws and regulations, ensuring that it is constantly updated on relevant developments. The Policy for the Prevention and Combating of Incidents of Violence and Harassment at Work - Complaint Management applies to the Group employees regardless of their contractual status, including those employed under a contract of employment, through third-party service providers, and those attending training, including trainees and apprentices' employees. For any information, clarification, or questions regarding this policy, interested parties may contact the reference person, who is the Head of Human Resource Division and is accountable for the implementation of this policy. The Policy for the Prevention and Combating of Incidents of Violence and Harassment at Work - Complaint Management is available on the intranet and the corporate website of Optima bank.
- ***Remuneration Policy for the members of BoD:*** Defines the principles and procedures for shaping the remuneration of Board members, ensuring compliance with regulatory requirements and transparency principles. The policy aims to establish a comprehensive remuneration framework for Board Members of Optima bank, including both executive and non-executive members. Its purpose is to ensure adherence to regulatory standards. The Remuneration Policy for the members of BoD is aligned with the corporate

strategy with the intention to promote sustainable and long-term prosperity. To ensure alignment with the latest regulations and market dynamics, the policy is being reviewed and reassessed by the Remuneration and Nominations Committee and is being approved by the General Assembly of shareholders. The Remuneration Policy for the members of BoD is updated when it is necessary to comply with laws and regulations. The Remuneration Policy for the members of BoD applies to the Bank's BoD members. The Remuneration and Nominations Committee is responsible for the implementation of this policy. The Remuneration Policy for the members of BoD is aligned with the corporate strategy with the intention to promote sustainable and long-term prosperity. Moreover, this policy supports the establishment of equitable and competitive remuneration, cultivating increased motivation and company retention. The Remuneration Policy for the members of BoD is available on the intranet as well as on the Optima bank website. There is, also, Remuneration Policy for the members of BoD for Optima bank's subsidiary Optima Factors S.A., which is aligned with the Bank's Remuneration Policy for the members of the BoD.

- **Staff Remuneration Policy:** The Staff Remuneration Policy' objective is to ensure fair, competitive and transparent remuneration of staff, based on the principles of equality and meritocracy. The Staff Remuneration Policy aims to establish a comprehensive remuneration framework for senior and executive management and employees. The Staff Remuneration Policy supports the establishment of equitable and competitive remuneration, cultivating increased motivation and company retention, while generating direct, indirect and induced employment opportunities across its entire value chain by offering competitive compensation. Optima bank, as part of its overall employee framework practices, offers beneficial housing loan terms to its employees. The policy is updated when it is necessary to comply with laws and regulations. The Staff Remuneration Policy applies to all employees of the Bank and is approved by Optima bank's Board of Directors, following endorsement by the Remuneration and Nominations Committee, underlying the importance of continuous compliance with the regulatory framework and market dynamics. The Staff Remuneration Policy is available on the intranet. There is, also, the Remuneration Policy for Group's subsidiary OPTIMA ASSET MANAGEMENT A.E.D.A.K, which is aligned with the Bank's Remuneration Policy for the Employees of Optima bank.

- **Code of Ethical Conduct and Ethics:** Defines the values, principles and ethical standards that guide the behavior of the employees and the executives, promoting an environment of respect, integrity, and responsibility, while ensuring the right of free association of the organization's employees in an appropriate manner and safeguarding the company's reputation. It applies to all employees and every employee is required to adhere to it. Additionally, a declaration of acceptance and commitment to adherence to the principles outlined in the Code of Ethical Conduct and Ethics, is obtained by all staff members upon issuance or any modification of the Code of Ethical Conduct and Ethics. The Code of Ethical Conduct and Ethics outlines the relationship between the Group and its employees, clients, shareholders, associates, and competitors. It is approved by the BoD and its implementation is assigned to the Human Resources Division. The Code of Ethical Conduct and Ethics is available on Optima bank's portal, where all employees have access and is part of the onboarding materials.

- **Whistleblowing Policy:** Ensures the protection of employees who wish to report unfair practices by providing a confidential and secure framework for making and investigating such reports. In this manner, the Group ensures the well-being of all its employees by providing high quality working conditions, including adequate workspace and respect for their privacy. The Whistleblowing Policy is updated when it is necessary to comply with laws and regulations. The Whistleblowing Policy applies to all stakeholders of the Group. The Whistleblowing policy is founded on the provisions of Law 4990/2022 and is approved and overseen by Optima bank's Executive Committee. It establishes a secure environment in which employees shall confidentially report unethical practices. However, it does not encompass cases of rumors, disagreements on the Group's policies and decisions, personal disputes between employees, or customer complaints concerning service quality. The Whistleblowing Policy is available on the intranet.

- **Absenteeism Policy:** Informs the Group's employees about the most common types of entitled leave days and the conditions for granting them. The Absenteeism policy applies to all activities within the Group, covering both upstream and downstream value chains and affects all employee groups within the organization. The Heads of Departments are accountable for the implementation of this policy and



responsible for the timely planning of the annual regular leave (recreational leave) of employees in their area of responsibility. The Absenteeism policy is available on the intranet.

- **Sustainable Development Policy:** The Sustainable Development Policy prioritizes fair working conditions and equal opportunities for all. By fostering better working conditions, and supporting work-life balance, the Group demonstrates its dedication to employee well-being. More information regarding the Minimum Disclosure Requirements of the Sustainable Development Policy can be found in ESRS E1.

The above policies reinforce the Group's commitment to provide a supportive and non-discriminatory working environment that promotes equality, meritocracy, and transparency.

There is no specific human rights policy in place which is aligned with relevant internationally recognized instruments such as UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises, including processes and mechanisms to monitor compliance with the relevant internationally recognized instruments. The Group promotes equal opportunities, fair treatment, and respect for freedom of expression among its employees, through the implementation of its policies. The Sustainable Development Policy advances respect for human rights and provides an inclusive, discrimination-free work environment while ensuring that every employee feels appreciated, supported, and empowered to achieve their full potential respect for human rights. Additionally, according to the Whistleblowing Policy, employees can report violations of human rights and instances of discrimination. Finally, the adopted corporate governance practices and the Greek Corporate Governance Code which promote transparency, accountability, and sustainable operation, have set the foundations and momentum to fully integrate standards such as the UN Guiding Principles, further delving into the field of social responsibility.

The Group opposes all forms of discrimination, including harassment and unprofessional conduct. It engages with its workforce through all available communication channels, ensuring that all employees are well informed. This comprehensive engagement includes regular updates, discussions, feedback mechanisms, and secure communication channels. By maintaining open lines of communication, it can effectively identify and address potential risks of human rights violations if they occur. There are also robust measures in place to provide and/or enable remedies for human rights impacts, such as the Whistleblowing Policy. All employees are well informed about their rights and the processes available to them for reporting concerns. Each report submitted through these channels is thoroughly reviewed by the Internal Audit Division of Optima bank to ensure that appropriate actions are taken. This systematic approach not only helps in promptly addressing any human rights violations, in case they occur, but also reinforces the commitment to maintaining a safe and respectful work environment for all employees.

Regarding trafficking in human beings, forced labor or compulsory labor and child labor, the Group has not yet adopted standalone policies which address such issues, due to the nature and location of its operations, but it should be noted that the Code of Ethical Conduct and Ethics refers to the respect for human dignity and human rights and opposes child labor.

The group's business activities do not require any specific workplace accident prevention policy or management system. However, all prerequisites required by Greek legislation regarding workplace safety and security are met. Evacuation plans are designed and communicated to employees in advance, so they are aware of emergency procedures. Evacuation drills are conducted on a regular basis to train personnel and ensure readiness in the event of an emergency, occupational doctor and safety technician scheduled visits are carried out, as provided by law, ensuring the monitoring and prevention of health and safety issues.

The Group plans to develop a concrete policy to address issues related to diversity & inclusion and the elimination of discrimination. However, explicit references to discrimination issues, such as racial and ethnic origin, color, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction

or social origin, or other forms of discrimination, exist in the Sustainable Development Policy. Prevention of discrimination regarding gender is also reflected in the Policy for the Prevention and Combating of Incidents of Violence and Harassment at Work - Complaint Management, which clearly prohibits any repeated, improper behavior directed at an employee or group of employees, or at third parties (e.g., a partner, a provider, a supplier, etc.), that poses a risk to their health and safety. Although there is no specific policy commitments related to inclusion or positive action for people from groups at particular risk of vulnerability in its own workforce, the Group treats all employees equally. The forthcoming policy for diversity & inclusion and the elimination of discrimination will address specific procedures to ensure that discrimination is prevented, mitigated, and solved upon detected, as well as to advance diversity and inclusion on a broader perspective.

## **S1-2 – Processes for engaging with own workforce and workers’ representatives about impacts**

The Group engages directly with its employees through various communication methods, including general management's visits to branches, access to internal portal for daily communication, regular meetings with HR, and training sessions. This direct engagement ensures that all needs and requirements of employees are considered in decision-making processes regarding the impacts. The Group actively monitors and evaluates its workforce initiatives through structured feedback mechanisms and ongoing engagement. Key assessment methods include formal annual performance evaluations with discussions and HR reporting, and monthly catch-up meetings providing real-time feedback and issue resolution. Direct communication with HR Division is facilitated via immediate phone calls and an open email channel for concerns and requests. Employee engagement and workplace feedback are also gathered through network branch visits, where senior directors (affluent RMs, business RMs, assistant RMs) visit branches four times per year. The HR Director visits branches twice per year to collect direct employee feedback. Additionally, there is a dedicated email contact for talent acquisition concerns and workforce-related inquiries. This proactive approach ensures that any issues are promptly recognized and managed, thereby upholding commitment to protecting human rights within its workforce. These engagements provide continuous opportunities for employees to share their views and feedback and discuss actual and potential impacts. The Human Resources Division ensures that engagement happens, while the Head of Human Resources Division holds the most senior role in operational responsibility. Specifically, the Head of Human Resources Division ensures that the results of these engagements are considered in the broader context of work-related impacts management. The Group has established collective bargaining agreements with employees' representatives regarding labor rights and issues. These agreements enable the Group to gain valuable insights into the perspectives of its employees. Dialogues are held 1-2 times per year and feedback is provided by employees' representatives. The effectiveness of the engagement is assessed through regular feedback surveys, performance reviews, and follow-up meetings when deemed necessary, as those mentioned above. The outcomes of these assessments are also used to manage employees' concerns and material impacts. Any agreements or outcomes resulting from these engagements are used to ensure continuous improvement in addressing work-related issues and enhancing overall employee satisfaction.

The Group remains committed to fostering a supportive work environment for all employees. The above communication channels are also used to address any potential employees' vulnerability to impacts.

## **S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns**

Mitigating the material negative impact of gender pay gap is essential not only for promoting fairness and equality but also for sustaining a motivated, engaged, and efficient workforce. By implementing measures to eliminate the gender pay gap, the Group boosts employee satisfaction, increases motivation, and cultivates a positive workplace environment. The employee wages are aligned with the Staff Remuneration Policy and take multiple criteria into consideration such as the level of position, job specialization, personal

development and advancement opportunities, performance appraisal, value in the labor market, fixed remuneration paid by the competition for identical positions, tasks and skills, collective and company labor agreements (where applicable), and labor legislation. Gender discrimination does not exist in remuneration policy. Human Resources Division regularly performs reviews to identify disparities in compensation among male and female employees. To identify instances of gender pay gap, a monitoring process is in place to record such cases. Once a discrepancy is observed, its scope and underlying causes are assessed. This assessment contributes to the development of a comprehensive record for future strategic planning and policy adjustments. The main reason for the gender pay gap is that lower positions, especially in branches, are predominantly held by women and therefore the ratio is affected. The Group is designing targeted actions to address gender pay gap in cases where there are identified disparities in similar roles. Recruitment practices, promotion rates, performance evaluations, and other relevant factors are some of the practices being considered. This may also include salary adjustments and enhancing training and development opportunities. Salary adjustments will be communicated transparently to the affected employees, along with the rationale behind the changes.

To promote open communication at all levels, employees engage with the above methods for communication and information, including internal web resources and continuous communication with the Human Resources Division. Employees can use any method they prefer to discuss pay disparities or highlight issues they want to address.

Complaints regarding employee-related matters are handled by the HR Division. Complaints are reported through email, by phone or by one-to-one meetings with HR Representative.

At this point, it should be noted that the Group has established communication channels for reporting and raising concerns. Reports can be submitted either anonymously or via postal mail or email to a dedicated email address. The reports include, but are not limited to, the following cases: violation of Group policies, violations or behaviors that harm the reputation of the Group, violation of legal and regulatory framework, fraud, corruption, bribery, abuse of power, other unethical behavior, etc. These communication channels are always available. Any issues are directed to the Head of Internal Audit (HIA) of Optima bank and subsequently submitted to the Audit Committee.

The Group ensures that all employees are informed about the content of the Whistleblowing Policy. The information is provided through the distribution of relevant material. Additionally, information about the policy is published in a prominent place on the Optima bank's website and on the internal portal.

The complaints are promptly investigated, ensuring actions are taken to hold the party responsible accountable and to protect the person who raises concern or report, in line with legal requirements and the Group's Whistleblowing Policy. The Complaints Handling Procedure is described in the Whistleblowing Policy. More information is provided in ESRS G1. The Head of Internal Audit is responsible for receiving, investigating, registering, and maintaining a record of reports at all levels and for all Group companies. In the case of a personalized report, the confidentiality of the identity of the reporting party and any third party named in the report is ensured. Access to the report is restricted to authorized members only. The Group enhances internal communication through meetings with employees, tracks and monitors issues raised and addressed and ensures the effectiveness of the communication channels.

By promoting internal communication through regular employee meetings, the Group can effectively track and monitor issues that are raised and addressed. These internal meetings help employees raise their concerns, share feedback, and discuss any challenges they may be experiencing. This proactive approach not only facilitates the prompt identification and resolution of relative issues but also ensures that communication channels remain effective and responsive to employees' needs.

Also, the Group is committed to safeguarding the anonymity of the whistleblower and other involved parties and refraining from any actions that could reveal their identity. However, disclosure of the whistleblower's identity may be required by judicial or legal processes during the investigation. All reports are being reviewed under due diligence procedures, impartial judgment, and objectivity. If complaints are confirmed, the Group implements all necessary corrective actions. Anonymous reports are being evaluated based on the quality of their documentation and the potential to locate the reported irregularity. Individuals who submit reports in good faith are protected from any form of retaliation, discrimination, or unfair treatment, regardless of the investigation's outcome. Reports are submitted without any promise of payment or reward. If the whistleblower participated in the reported event, this does not exempt them from accountability; however, their role in uncovering and investigating the irregularity is taken into account. The Group respects the fundamental rights of individuals involved in the reporting process and ensures that actions and procedures comply with applicable legislation. Furthermore, the legal rights and protections provided under the legislative framework cannot be waived or restricted by any individual agreement, policy, form, or term of employment. This protection also extends to third parties associated with the whistleblowers who might face retaliation in a work context, such as colleagues or family members of those involved. If the whistleblower is an external partner, early termination, or cancellation of contracts for goods or services due to the report is not permitted.

#### **S1-4 – Taking action on material impacts and approaches to managing material risks and opportunities related to one's own workforce, and the effectiveness of these measures and approaches**

The Group takes proactive actions to prevent or mitigate any material negative impacts on its workforce, specifically addressing concerns related to the gender pay gap. It strictly follows its Staff Remuneration Policy across all subsidiaries to ensure equal pay for equal work, regardless of gender, thus eliminating any form of discrimination. Furthermore, it fosters a supportive and inclusive workplace across all units, where both male and female employees are equally valued.

The Group implements a variety of initiatives to deliver positive impacts for its workforce, aimed at enhancing employee well-being, career development and work-life balance. These initiatives support direct, indirect, and induced jobs across the value chain, ensure competitive wages and benefits, and contribute to employee retention and satisfaction. The key actions that took place in 2024 include:

##### ***Work-life balance & parental support:***

- Implementation of Absenteeism Policy: Additional annual leave, leave for single-parent families, cumulative maternity leave, extra leave for new fathers, and six days of paid leave for first-degree relatives' hospitalization.
- "Family Day" Initiative: Employees can choose one day in May to leave work earlier to spend time with their families.
- Remote work options based on each Division's needs and upon Head's approval.

##### ***Employee well-being & benefits:***

- Comprehensive health insurance for employees and dependents.
- Monetary gifts & financial aid (€1,000/month for 12 months upon childbirth or marriage, allowance for employees with disabilities).
- Blood donation leave day: Paid leave day for employees with an active donor card or in case of emergency donations

##### ***Employee engagement & community-building initiatives:***

- Annual Group event with the CEO, providing strategic updates and a Q&A session
- Running team participation in major events such as the 41st Authentic Marathon of Athens, the "Race for the Cure" by Alma Zois, the "Sykareios" Memorial Race

- Cultural initiatives, such as free tickets for employees to theatrical performances (Veakeio Theatre) and museums (Acropolis Archaeological Site).

***Career development & internal mobility:***

- Structured performance reviews, like annual performance evaluations with documented discussions with the Human Resources Division and goal setting, formalized through HR and monthly catch-up meetings for ongoing feedback.
- Career development opportunities, through internal mobility, as all job openings are posted internally via intranet and all internal mobility requests are tracked in the Human Resources talent database.
- Specialized external training programs for all analysts in the wholesale banking division.

***Diversity, inclusion & women empowerment:***

- Participation in Mastercard's "Live a Legacy" initiative, in collaboration with Women On Top, empowering female employees through mentoring and skills development.

The above actions didn't require significant operational or capital expenditure. These actions are applicable to all employees, with direct benefits for those in varying geographies and units, and extend to affected stakeholder groups, including families and the wider community through events and cultural initiatives. The time horizon for key actions is typically annual, with longer-term plans such as the 2025 postgraduate sponsorship policy. Specific initiatives, such as performance reviews and career mobility opportunities, are ongoing.

As mentioned above, the Group monitors its workforce initiatives through structured feedback mechanisms and ongoing engagement. This includes annual performance evaluations, monthly catch-up meetings, direct communication with HR, and branch visits by senior directors and the Human Resources Director. Employees can also reach out through a dedicated email for talent acquisition and workforce-related inquiries.

The Group ensures that its practices do not cause or contribute to material negative impacts on its workforce by investing in its employees' well-being, career development, and work-life balance. Through initiatives such as comprehensive health benefits, parental support, career advancement opportunities, and engagement in community-building activities, the Group fosters a positive and supportive work environment.

The Group allocates dedicated resources to the management of its material impacts, including specialized personnel such as the Talent Acquisition team, which focuses on addressing related actions and initiatives. Additionally, a specific annual budget is allocated for this purpose, ensuring that resources are directed toward the effective management of material impacts. A significant portion of these resources is directed to LinkedIn, providing employees with access to a wide range of training opportunities based on their individual needs and preferences.

**Metrics and targets**

**S1-5 – Targets related to addressing material negative impacts, promoting positive impacts, and managing material risks and opportunities**

Based on the outcome of the DMA and following a series of internal communications with representatives of the HR Division, Strategy, IR, and the Sustainable Development Division, specific time-bound and outcome-oriented targets have been set. To define targets related to increasing women's representation, the Group first conducted a baseline assessment of current women's representation at various levels within the organization (e.g., senior leadership, management, entry-level) to understand any barriers that might

be faced by women. To identify achievable targets, the Group then proceeded to a benchmarking analysis against peers and industry standards. Based on internal HR data, external reports (i.e. industry reports, studies conveyed by international organizations) and international standards and frameworks (i.e. SDGs, EU directives, etc) that showcase how different levels of representation may affect the organization's performance and culture, the Group proceeded to this target setting. The Group is always assuming the leadership remains committed to the creation of an inclusive working environment and that a sufficient pool of qualified candidates exists, to meet the targets set for women's representation. The Group aims, though, to assess these targets on a regular basis to ensure that their implementation is on track and remains aligned with the Group's policies, objectives and strategy. The targets are presented in the following table.

| GROUP TARGET DESCRIPTION                         | TIME FRAME | BASE YEAR | BASE VALUE |
|--------------------------------------------------|------------|-----------|------------|
| >50% of women employees                          | 2026       | 2024      | 49%        |
| >40% of women employees in top management level* | 2026       | 2024      | 34%        |

\* CEO, CISO ("Chief Information Security Officer"), Heads, Branch managers, Investment Banking Managers, Team leaders, Legal Counsel

As of now, the Group's targets focus on ensuring equal treatment and opportunities for all employees, aligning with its policies and strategy to promote gender equality and diversity at all levels. No additional time-bound and measurable targets related to IROs have been set, and thus it was not necessary to track the effectiveness of relevant actions and policies.

## S1-6 – Characteristics of the Group's employees

Table 1: Employee headcount by gender

| GENDER                    | NUMBER OF EMPLOYEES |
|---------------------------|---------------------|
| Male                      | 295                 |
| Female                    | 280                 |
| Total number of employees | 575                 |

The number of Group employees for FY 2024 is reported in head count and concerns the number at the end of the reporting period as of 31.12.2024. The Group has significant employment in Greece (headcount 575). The number of the employees is also presented in Note 10 "Staff costs" of Financial Statements.

Table 2: Employee headcount by contract type, broken down by gender

| EMPLOYEES BY CONTRACT TYPE         | FEMALE | MALE | TOTAL |
|------------------------------------|--------|------|-------|
| Number of employees                | 280    | 295  | 575   |
| Number of permanent employees      | 253    | 277  | 530   |
| Number of temporary employees      | 27     | 18   | 45    |
| Number of non-guaranteed employees | 0      | 0    | 0     |



The total number of employees who have left voluntarily, retirement, or death in service during the reporting period is 31 and the rate of employee turnover is 6% in the reporting period. During the reporting period, there were no significant fluctuations in employee headcount in the Group.

### S1-7 – Characteristics of non-employees in the Group's own workforce

To meet the predefined needs of the Group's companies, specific technical, administrative, financial and informatics support work / services are provided through third-party companies – external associates – contractors. It is hereby noted that the employees of the third companies – external associates are not controlled by the Group. The total number of non-employees of the Group for FY 2024 is 26. The number of non-employees is reported in headcount and concerns the number of non-employees at the end of the reporting period (as of 31.12.2024). There were no significant fluctuations in the number of non-employees in the Group's own workforce during the reporting period.

### S1-8 – Collective bargaining coverage and social dialogue

Collective agreements cover numerous issues enhancing equitability and productivity in the workplace. There are two collective agreements and they cover a wide range of topics including salaries, allowances, family support benefits and other benefits, additional remuneration, loans, job protection, working hours, leave, health and safety. The percentage of employees in the Group covered by collective bargaining agreements is 100%.

Social dialogue plays a significant role in facilitating communication, negotiation, and consultation between employees and management representation that advocates for their rights and interests within the Group. They ensure that employees' concerns are addressed and in a timely and effective manner. It also helps to foster a more inclusive and participatory work environment, where employees feel valued and empowered to contribute to the Group's success. 100% of Group employees are covered by workers' representatives.

Table 3: Collective bargaining coverage and social dialogue

| Coverage Rate | COLLECTIVE BARGAINING COVERAGE                                                        |                                                                                                 | SOCIAL DIALOGUE                                                                                        |
|---------------|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
|               | Employees – EEA (for countries with >50 employees representing > 10% total employees) | Employees – Non-EEA (estimate for regions with >50 employees representing >10% total employees) | Workplace representation (EEA only-for countries with >50 employees representing >10% total employees) |
| 0-19%         |                                                                                       |                                                                                                 |                                                                                                        |
| 20-39%        |                                                                                       |                                                                                                 |                                                                                                        |
| 40-59%        |                                                                                       |                                                                                                 |                                                                                                        |
| 60-79%        |                                                                                       |                                                                                                 |                                                                                                        |
| 80-100%       | Greece                                                                                |                                                                                                 | Greece                                                                                                 |

### S1-9 – Diversity metrics

Table 4: Gender distribution in number (headcount) and percentage at top management level

| GENDER | NUMBER OF EMPLOYEES | PERCENTAGE OF EMPLOYEES |
|--------|---------------------|-------------------------|
| Female | 47                  | 34%                     |
| Male   | 91                  | 66%                     |

Table 5: Distribution of employees (headcount) by age group

| AGE GROUP          | NUMBER OF EMPLOYEES | PERCENTAGE OF EMPLOYEES |
|--------------------|---------------------|-------------------------|
| under 30 years old | 96                  | 17%                     |
| 30-50 years old    | 354                 | 62%                     |
| over 50 years old  | 125                 | 22%                     |

### **S1-10 – Adequate wages**

All Group employees receive fair and competitive wages, reflecting the Group's commitment to equitable compensation practices. The wages provided are consistently above the minimum thresholds defined by Greek legislation, ensuring that all employees are compensated fairly in accordance with legal standards. This means that employees receive more than the minimum requirements negotiated through these agreements, highlighting the Group's dedication to providing superior remuneration and high-level working conditions.

### **S1-11 – Social protection**

All employees of the Group are covered by social protection through public social programs in the following events as provided by Greek legislation: sickness, unemployment starting from when the employee is working for the Group, employment injury with and acquired disability, parental leave and retirement.

The Group also provides an additional group program that offers financial assistance to employees in cases of loss of income due to illness. This approach, in conjunction with public social protection, underscores the Group's commitment to the protection and well-being of its workforce, ensuring continued financial stability for employees even during recovery periods. The Group's medical and life insurance program also covers all employees against loss of income due to occupational injury with disability effect on top of any public social security coverage. The Group's insurance program is particularly valuable during the recovery period, providing a lifeline for employees and their families. Whether dealing with a temporary injury or a long-term disability, employees can rely on the Group's support to navigate these challenges and maintain their quality of life. This approach reflects the Group's strong commitment to employee well-being, promoting a sense of security and stability during challenging situations. The Group also maintains a highly supportive approach to its employees during parental leave, ensuring that they continue to receive their full income through its payroll. This policy goes beyond compliance with legislative requirements and highlights the Group's commitment to supporting its employees, enhancing family well-being and their commitment to the organization. In this way, the Group promotes work-life balance, actively contributing, thus, to the creation of an environment that supports the development and satisfaction of its employees.

### **S1-15 – Work-life balance metrics**

All employees (100%), regardless of gender, are entitled to take family-related-parental leave through social policy or/and collective bargaining agreements.



Table 6: Entitled employees (%) that took family-related leave, and a breakdown by gender

| GENDER          | PERCENTAGE OF ENTITLED EMPLOYEES FOR FAMILY-RELATED LEAVE* |
|-----------------|------------------------------------------------------------|
| Male            | 1%                                                         |
| Female          | 3%                                                         |
| Total employees | 2%                                                         |

\*maternity and paternity leave

### S1-16 – Remuneration metrics (pay gap and total remuneration)

The Group operates a remuneration system that does not take into consideration gender discrimination. Committed to the principle of equality, the Group ensures no discrimination or pay disparities across the Bank and its subsidiaries. In 2024, the gender pay gap within the Group was 38%. As previously mentioned, there is no salary discrimination between men and women in the same positions. The gender pay gap exists due to the differing representation of men and women in positions with varying pay levels. The Group's average annual total compensation ratio is 19 and it has a structured compensation framework that aligns with performance, responsibilities, and prevails market standards. The calculation of the remuneration metrics included the gross salary and the benefits in cash and in kind. The pay level was calculated by dividing the remuneration metric by the annual working hours, as derived from the working hours specified in employee contracts.

### S1-17 – Incidents, complaints and severe human rights impacts

The Group's policies are designed to uphold ambitious standards of workplace conduct, ensuring full compliance with applicable labor law and internal codes of ethics. In line with these practices, the Group has not faced any incident, complaint or human rights issue, resulting in zero (0) fines or financial liabilities. The Group's commitment to ethical conduct includes a well-defined grievance mechanism for reporting violations, and a robust monitoring system to ensure a safe and respectful work environment. As a result of these preventative measures, the Group has avoided situations that could lead to severe human rights violations, thus ensuring that no related financial liabilities appear in its financial statements. Specifically, the Group reported zero (0) incidents of discrimination, including harassment, during the reporting period. There were zero (0) complaints from the Group's workforce and zero (0) concerns were raised (including grievance mechanisms). Consequently, no fines, penalties, or compensation for non-compliance resulted from incidents and complaints. In addition, the absence of human rights incidents and related fines, penalties and compensation connected to Group employees, reflects the Group's proactiveness on compliance and its ongoing efforts to mitigate any potential risks associated with human rights abuses in the workplace. By maintaining adherence to these standards, the Group continues to foster a fair and equitable workplace, free from human rights violations.

All the above metrics have not been validated by an external body.

## **ESRS S4 Consumers and end-users**

### **Strategy**

#### **S4.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model**

The updated business model reflects information-related impacts for customers, such as data privacy and customer satisfaction. The use of customer data in a responsible and secure manner has positive impacts.

Specifically, it enhances data security and addresses any customer concerns through transparent and secure processes. These impacts are aligned with the Group's business model, which prioritizes data-driven insights and a customer-centric approach. Furthermore, the strategy's orientation to deliver high-quality customer experiences directly improves customer satisfaction and formulates their overall experience. In addition, the Group's business model is designed to address the challenge of mitigating risks while capitalizing on opportunities. By continuously focusing on customer-centric initiatives, the Group not only reduces the likelihood of disruptions by system failures and data breaches but also strengthens its market position and enhances customer trust and loyalty over time.

All customers who are likely to be materially impacted by the Group's operations, including those affected through its value chain, its products and services, and its business relationships, have been included in the scope of this disclosure, in accordance with ESRS 2. The Group primarily serves corporate banking clients, who receive a range of products and services to support their business operations and loan requirements, as well as retail banking customers, primarily high-income individuals managing significant funds under the Group's supervision. In assessing potential material impacts, the Group has determined that certain customers may be subject to impacts related to their rights to privacy and personal data protection. However, the Group does not serve consumers or end-users of products that are inherently harmful to people or that increase the risk of chronic disease. Likewise, the Group does not have customers who could be negatively affected in terms of their rights to freedom of expression or non-discrimination, nor does it serve consumers or end-users who rely on accurate and accessible product- or service-related information, such as manuals or product labels, to avoid potentially damaging use. Additionally, the Group does not have customers who are particularly vulnerable to health impacts, privacy risks, or the effects of marketing and sales strategies, such as children or financially vulnerable individuals.

Based on the Double Materiality Assessment, no negative material impacts were identified in relation to customers, therefore, no customers with particular characteristics could be negatively affected. Conversely, the positive material impacts derive from commitment to delivering high-quality services, protecting data privacy, and ensuring robust cybersecurity measures. At the same time, internal management systems and cybersecurity initiatives safeguard stakeholders' data privacy, fostering trust and confidence. Established systems and processes further ensure minimal incidents of data breaches or leaks of personal and confidential information, creating a secure environment for all stakeholders, including customers, employees, and business partners. In addition, the continuous improvements to the service provided enhance customer satisfaction. Furthermore, the DMA identified an opportunity and a risk arising from the material impacts which are relevant to all the Group's customers. The opportunity is associated with continuous customer satisfaction, as it drives higher customer loyalty, fosters trust, and supports market share growth. Satisfied customers are more likely to remain engaged with the organization's services, strengthening long-term relationships and enhancing business resilience. In addition, through the DMA, a risk was identified that is associated with system failures, which could lead to service disruptions, unauthorized access, or data breaches. Such incidents could lead to reputational damage, a loss of customer trust, and adverse effects on the Group's financial performance.

## **Impacts, risks and opportunities management**

### **S4-1 – Policies related to consumers and end-users**

The Group is committed to protecting customers' privacy and ensuring their satisfaction by delivering high-quality services. In this context, the Group has adopted the following policies that reflect its values and commitments. There are no significant changes to policies, relating to new expectations for business customers, new or additional due diligence and remediation approaches.

- **Information Security Policy:** The Information Security Policy is designed to effectively manage essential performance metrics and mitigate risks impacting end users and customer groups. This Information Security Policy demonstrates the Group's unwavering commitment to protecting sensitive

information, maintaining customer trust, and ensuring the integrity, confidentiality, and availability of its services. The key objectives are based on the following pillars:

- Confidentiality: Ensuring customer data is accessible exclusively by authorized personnel.
- Integrity: Preventing unauthorized modifications, corruption, or destruction of data.
- Availability: Guaranteeing uninterrupted access to systems and services.

These pillars serve as the foundation for managing potential risks and delivering enhanced value to customers. The Information Security Policy proactively addresses risks such as cyber threats by implementing advanced preventive measures, including state-of-the-art security protocols, regular system updates, and rigorous stress testing. Furthermore, it ensures strict adherence to GDPR (General Data Protection Regulation) and other privacy regulations while safeguarding customer experiences from operational disruptions. The implementation of the Information Security Policy is monitored through regular internal audits, quarterly security assessments and periodic reporting to the Executive Committee. The scope of Information Security Policy, along with its supplementary policies, implementation guidelines, and procedures apply to all employees, operational units, and affiliated entities such as subsidiaries, regional offices, controlled or associated companies, external suppliers, and partners. It covers the creation, processing, communication, distribution, storage, and availability of information related to the organization, including both its internal operations and external interactions. This encompasses customer data, personal data, and other sensitive information shared with or processed by third parties, collaborators, suppliers, or contractors. The Information Security Policy applies to all systems, applications, and network infrastructure used by the organization, regardless of format (digital, physical, or otherwise), as well as any locations or facilities where information is stored. It encompasses the entire value chain, both upstream and downstream, to ensure compliance and the implementation of security measures across all affected stakeholder groups. The Executive Committee and the CISO are entrusted with the implementation and oversight of the Information Security Policy, ensuring consistent compliance across all departments, employees, and external partners. This policy aligns with European standards, as outlined by EU directives and regulations, including GDPR, PSD2, and the Basel II guidelines established by the Basel Committee. At the same time, it follows internationally recognized standards, such as ISO/IEC 27001:2013 and PCI DSS, which support compliance with EU requirements and ensure high levels of security. Stakeholders' interests, including feedback from customers and employees, are taken into consideration throughout the development of the Information Security Policy, ensuring it aligns with their expectations and concerns. The Information Security Policy is delivered to employees automatically through a dedicated platform upon their employment contract signing, requiring mandatory electronic acknowledgment and acceptance, ensuring comprehensive understanding and compliance from day one. Implementation support is provided through regular training sessions and dedicated help desk services. It is readily available on the intranet and key provisions are shared with external stakeholders through secure portals and documented procedures

• **Information Security Incident Management Policy:** The Information Security Incident Management Policy encompasses various aspects related to managing material sustainability matters. Firstly, this policy outlines its main objectives, which include the effective and efficient recording and management of security incidents, in accordance with the relevant contractual, social, and legal obligations. The Information Security Incident Management Policy covers all the activities, employees, and partners, while excluding systems that do not belong to the Group. Additionally, the Group has established a Security Incident Response Procedure, enabling timely communication with affected customers and efficient incident management. The highest level in the organization accountable for the implementation of the Information Security Incident Management Policy is the Executive Committee of the Bank, while the Chief Information Security Officer is responsible for ensuring the Information Security Incident Management Policy's implementation. This policy also references third-party standards such as ISO 27001:2013, which the Group commits to adhere to through its implementation. The Information Security Incident Management Policy takes into consideration the interests of key stakeholders in its formulation, ensuring that their needs and concerns are integrated into the incident management processes. Finally, the Information Security Incident Management Policy is made available to potentially affected stakeholders and those who need to help implement it through internal communications and training programs.

- **Communication and Networks Security Policy:** The Communication and Networks Security Policy establishes a framework for the design, management and support of the network infrastructure, with a primary focus on security and uninterrupted operation. Stringent measures to safeguard the architecture, use, and controls of its network, ensuring the confidentiality, integrity, and availability of information during transfer or transmission. This policy applies to all communication networks that interconnect the Information Systems with systems inside and outside the Bank and its subsidiaries, network applications, and related infrastructure. All users and administrators of the information systems and networks of the Bank and its subsidiaries, including employees, external partners, suppliers, and service providers, must comply with this policy. The Executive Committee serves as the sole authority for the approval and implementation of Communication and Networks Security Policy, while the CISO oversees the enforcement of this policy, conducting regular reviews to ensure its effectiveness is responsible for its continuous review and proper enforcement. The Communication and Networks Security Policy adheres to international standards such as ISO 27001 and incorporates industry best practices for network security and management Incorporating international standards. Secure data transmission channels and clear demarcation lines between network systems are prioritized to be used to minimize risks. Stakeholder interests (such as secure communication protocols and vendor accountability) are protected through robust security measures and controls. clear communication protocols are integral to the Communication and Networks Security Policy's design. Its implementation is provided through dedicated IT support teams, technical documentation, and regular training sessions. Compliance is monitored through automated network monitoring tools, regular security assessments, and periodic audits to ensure effective implementation across all systems and users. It is supported by training programs for employees and contractual agreements with external partners, ensuring consistent application across all levels.
- **Logical Access Management Policy:** The Logical Access Management Policy establishes a comprehensive framework to protect information assets through robust security measures that ensure confidentiality, integrity, and availability. The Logical Access Management Policy applies to all systems, networks, and applications, including local and remote access, and extends across the entire value chain. Accountability for the Logical Access Management Policy lies with the CISO, who is responsible for enforcing the Logical Access Management Policy and ensuring its effectiveness. Alignment with ISO 27001 underscores the Group's dedication to adhering to internationally recognized security standards and industry's best practices. The Logical Access Management Policy prioritizes stakeholder interests, including the security of employees, vendors, and customer groups. Regular training programs equip all stakeholders with the knowledge required to comply with this policy. The Logical Access Management Policy is communicated internally through the intranet and training programs, while key provisions are shared externally with vendors and customers via contractual agreements and clear documentation.
- **Acceptable Use Policy:** The Acceptable Use Policy outlines the framework for the responsible use of Group's information systems, focusing on safeguarding data, mitigating risks related to human error, and promoting a culture of security awareness. The Acceptable Use Policy applies to all users, including employees and external collaborators, across all organizational activities and geographies. The Executive Committee holds ultimate responsibility for the Acceptable Use Policy's implementation, supported by the IT Steering Committee and the CISO, who ensures its enforcement. Aligned with ISO 27001, the Acceptable Use Policy reflects the Group's commitment to adopting international best practices for information security and risk management. Stakeholders' interests are integral to the Acceptable Use Policy, which emphasizes the importance of security awareness and responsibility. Comprehensive training programs enhance stakeholders' ability to adhere to the Acceptable Use Policy effectively. The Acceptable Use Policy is delivered to employees automatically through a dedicated platform upon their employment contract signing, requiring mandatory electronic acknowledgment and acceptance. The above ensures comprehensive understanding and compliance from day one. Implementation support is provided through regular training sessions, dedicated help desk services, and detailed guidance materials.
- **Sustainable Development Policy:** The Sustainable Development Policy promotes customer satisfaction by placing innovation and digitalization at the core of the Group's mission to improve and optimize operations. By providing accessible, efficient, and tailored banking solutions, the Group ensures

outstanding customer experience. Information regarding the MDRs of the Sustainable Development Policy can be found in ESRS E1.

The above policies regarding customers are not aligned with internationally recognized instruments relevant to customers, including the United Nations (UN) Guiding Principles on Business and Human Rights. However, through these policies, the Group strengthens trust and demonstrates its commitment to its customers and employees, promoting their rights and fostering a modern and responsible operating environment. In addition, although there are no specific human rights policy commitments relevant to customers, including processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises, the Group's commitment to sustainable development incorporates human rights principles. This underscores its dedication to creating a framework where security, transparency, and respect are fundamental values.

The Group adopts a structured and customer-centric approach to engaging with customers, utilizing various methods to ensure open communication and effective problem resolution. These methods include customer satisfaction surveys, daily interactions in the Bank's branches with customers, a dedicated Call Center, the "Send us your message" online platform, and a complaint form available on the Optima bank's website. The procedure for handling complaints is systematic and thoroughly described in the Complaints Management Policy and Procedure, with oversight at the highest level of management. Specifically, the CEO of Optima bank takes cognizance of the complaints received and oversees the effective resolution of any issues addressed. Relevant divisions are tasked with direct communication with the customer to address and resolve any issues efficiently, demonstrating commitment to providing excellent customer service and fostering trust through transparent engagement practices. It is important to note that no measures are deemed necessary to provide or enable remedies for human rights impacts, as no such impacts have occurred. This conclusion has been confirmed through the Double Materiality Assessment.

#### **S4-2 – Processes for engaging with consumers and end-users about impacts**

The Products and Marketing Sector is responsible for enhancing customer experience and loyalty through the strategic design of products, services, commercial initiatives, and communication strategies. It focuses on planning and delivering optimal customer experience across all sales and communication channels. The Products and Marketing Division actively incorporates customer perspectives into its decisions and activities by engaging directly with consumers through surveys and feedback mechanisms. Customer satisfaction measurement is systematically managed by dedicated teams, using structured surveys and key performance indicators such as the Net Promoter Score (NPS). These tools enable the Group to capture the customer sentiment, identify priorities, and translate insights into actionable improvements. This engagement occurs regularly, including the evaluation period of products and services, ensuring that customer needs are identified and addressed effectively. The Products and Marketing Sector organizes and coordinates events for both employees and customers, fostering engagement and strengthening relationships. Furthermore, to better understand customer needs and enhance their experience, the Products and Marketing Sector develops innovative methods and creates models to automate the feedback analysis process, providing deeper insights into customer preferences. Feedback is gathered daily and informs improvements to the customer experience. Engagement results are communicated internally to relevant teams on a regular basis, and when deemed necessary, ensuring alignment with a customer-focused approach.

The operational responsibility for ensuring meaningful engagement with customers and utilizing its results, as well as incorporating them into the Group's strategic approach is implemented through a combined top-down and bottom-up framework across divisions with oversight at the highest level of leadership, ensuring that feedback insights are integrated into strategic decisions. Each area within the organization is accountable for safeguarding and enhancing the customer's experience, ensuring a holistic and integrated



approach. The HR Division is responsible for employee training and fostering their engagement, equipping them with the skills and mindset necessary to deliver exceptional customer experience. The Products and Marketing Sector's units have various responsibilities for the engagement with customers. The Digital Channels and Cards Division ensures optimum customer service through the call center and digital channels and the Customer Segments Division are tasked with measuring customer satisfaction through dedicated metrics and surveys. Additionally, the Retail Networks General Division safeguards the optimum customer experience within the bank's branch network. These results are regularly discussed with Executive Committee Members, ensuring alignment with strategic priorities. Furthermore, an annual presentation to the Executive Committee meeting is being deployed, providing a comprehensive review of customer satisfaction metrics and highlighting areas for improvement. Furthermore, as the CEO's office handles customer complaints at the highest level, ensuring swift resolution and strategic oversight. All these teams operate in close collaboration, with the senior management serving as the key custodian of this process. Senior leadership ensures alignment, provides strategic direction, and facilitates cross-functional cooperation to achieve consistent and effective engagement.

The evaluation of the engagement processes' effectiveness is achieved by analyzing each initiative's impact on customer satisfaction and loyalty. Dedicated to delivering exceptional customer experience, the Group follows a continuous cycle of listening, analyzing, and evolving. Customer feedback is actively gathered with every available touchpoint, serving as a foundation for enhancing, developing, and improving services. The engagement with customers is systematically assessed to ensure their feedback drives meaningful enhancements to products and services. The effectiveness of this engagement is measured through structured mechanisms as mentioned above. The increase in the NPS satisfaction score in digital channels, and the absence of negative/relevant comments highlight the positive impact of ongoing improvements. Outcomes from these engagements are used to refine internal processes, enhance communication strategies, and continually improve the overall customer experience across all interaction points, including branches and electronic channels. An indicative example relates to mobile applications, where customer feedback led to a significant reduction in login times, ensuring a smoother and faster user experience. Similarly, the customer demand for greater convenience led to enhanced features for bill and IRIS payments. Each initiative highlights the ability to transform customer input into practical, high-impact solutions that improve the overall customer experience. These enhancements are regularly reviewed to ensure their sustained relevance and effectiveness, reflecting the unwavering commitment to meeting and exceeding customer expectations. This proactive, feedback-driven approach strengthens trust and loyalty, underlining the Group's position as a responsive and forward-thinking financial institution.

No customers were identified as particularly vulnerable to impacts and/or marginalized by the Group's activities (for example, people with disabilities, children, etc.). Therefore, no specific steps were deemed applicable or necessary to gain further insight into their perspectives.

#### **S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns**

The Group has not identified any material negative impacts on customers through the Double Materiality Assessment. However, specific channels are in place for customers to raise their concerns or needs directly. The Complaint Form, available on Optima bank's corporate website, outlines the ways customers can submit complaints, including email, phone, or mail. Additionally, the website provides detailed information with regards to the complaint's submission process, including the procedure which is followed after the submission of a complaint, how the customer receives a response and any available contact method.

Customers can submit a complaint through one of the following channels:

- Visit the Optima bank branch, which is close to each customer, and fill in the Complaints Form.
- Contact the Optima bank Complaints Department either by calling on +30 210-8173199 or by e-mail ([wearelistening@optimabank.gr](mailto:wearelistening@optimabank.gr))

- Send a letter to Optima bank Complaints Department, 32 Aigialeias Str. & Paradissou, 15125 Amaroussion, for the attention of the Complaints Department.

Upon receiving the complaint, the Head of the Complaints Department contacts the customer within two working days to verify his/her identity, confirm receipt of the complaint, and provide an estimated time frame for its review. Upon collecting any relevant information and supporting documentation, the complaint is being investigated in collaboration with any other engaged divisions of the Group or, with relevant authorities (e.g. the Ombudsman), if deemed necessary. The employees who are in charge of handling, ensure a fully documented, clear, and transparent response. They strive to provide a fair solution that meets the customer's needs in accordance with the applicable regulatory framework and the Group's policies. Through the above procedure, the Group tracks and monitors complaints and any issues that may arise and proceed to any relevant actions to improve the processes if needed. As things stand, there is no need to develop a specific procedure to assess the effectiveness of the channels or customers' awareness and trust in the above processes as a means of raising their concerns or addressing their needs.

Information regarding the protection of whistleblowers and whistleblowing policy is provided in ESRS G1 and ESRS S1.

Furthermore, customers are fully informed regarding the protection of their personal data and the General Data Protection Regulation through Optima bank's corporate website, specifically through the following:

- Customer Information on the processing of personal data in accordance with the General Data Protection Regulation.
- Notice on the Processing of Personal Data through the video surveillance system (CCTV).
- Request for Exercising Rights regarding personal data recorded by the closed-circuit video surveillance (CCTV) system.
- Announcement by TIRESIAS S.A. on the implementation of the General Data Protection Regulation.

#### **S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions**

The Group remains committed to high standards of data privacy and cybersecurity, continuous investing in advanced technologies, policies, and training to safeguard sensitive information and foster trust among all stakeholders' groups. The Group implements actions to enhance data security, ensuring the protection of sensitive information and reducing the risk of unauthorized access or data breaches across all areas of operation. These actions include robust internal management systems and established cybersecurity processes, which effectively protect and ensure stakeholders' data privacy. Specialized critical systems safeguard business continuity, allowing consistent service delivery to customers and business operations. Through these actions, the Group has restricted incidents of data breaches, leaks of personal data, or exposure of confidential information. Through actions and initiatives, operational efficiency has been improved.

In 2024, the Group implemented the following actions:

##### ***File Integrity Monitoring (FIM) on critical systems***

Includes continuous tracking of essential system files to detect unauthorized changes, potential security breaches, or unexpected modifications, ensuring the integrity of core banking systems and protecting sensitive information. The scope of coverage includes monitoring and safeguarding critical system files from unauthorized modifications, with a primary focus on internal system integrity within the downstream operations. This initiative is implemented bank-wide, covering all operational regions. Affected stakeholders include internal personnel such as IT staff and system administrators, while customers benefit indirectly through enhanced protection of their data.

***Network and Application Layer DDoS protection***

Includes advanced mechanisms to detect, mitigate, and prevent Distributed Denial of Service (DDoS) attacks, ensuring the continuous availability of digital banking services and safeguarding against cyber threats. The scope of coverage includes cybersecurity defense measures targeting DDoS attacks, positioned midstream to downstream to protect both network infrastructure and customer-facing applications. This protection extends comprehensively across all of the Bank's digital touchpoints. Affected stakeholders include internal teams such as IT security personnel and network administrators, while external stakeholders, including customers, online banking users, and digital service consumers, benefit from uninterrupted and secure access to banking services.

***New Vulnerability Assessment Platform***

The action refers to an advanced platform for continuous scanning, identification, and assessment of potential security vulnerabilities across its entire digital ecosystem, enabling proactive risk mitigation. The scope of coverage includes comprehensive security vulnerability identification and management, positioned upstream and midstream to detect and address potential security risks before they impact operations. This initiative is implemented bank-wide, covering all operational regions. Affected stakeholders include internal teams such as IT security personnel and risk management departments, while external stakeholders, including customers and suppliers, benefit from enhanced security and reduced risk exposure.

***Privileged Access Management (PAM) platform***

The action concerns a sophisticated platform to manage, monitor, and control access to critical systems by high-privilege users, reducing the risk of internal security breaches and unauthorized system modifications. The scope of coverage includes stringent access control and monitoring measures, positioned upstream and midstream to enhance internal security and prevent unauthorized access. This platform is comprehensively implemented across the Bank's critical systems. Affected stakeholders include internal personnel such as employees with elevated system access and IT administrators, while external stakeholders, including customers, benefit indirectly through enhanced protection of their sensitive data.

The above actions didn't require significant operational or capital expenditure.

The Group has in place robust security procedures to safeguard customer data and maintain operational resilience. The Information Systems Monitoring Procedure aims to ensure the smooth operation and reliability of the information systems, providing the best possible services to customers and employees while maximizing their performance. At the same time, it aims to protect the integrity, confidentiality, and availability of the information processed, including personal data. Additionally, it ensures the implementation of security measures decided upon to maintain the Group's business continuity. The Security Incident Response Process ensures the effective management of information security incidents where any incidents are reported, investigated, and resolved swiftly to mitigate potential harm to consumers and end-users. The purpose of the Incident Response Procedure is to describe the necessary actions to be taken in the event of a security incident for immediate and effective response. The Logical Access Policy Implementation Control procedure further strengthens security by regulating access to sensitive data. By granting permissions only to authorized individuals and conducting regular access reviews, the possibility of unauthorized access is significantly mitigated. This process helps to mitigate risks and ensures that consumer data always remains protected. Additionally, Group's Information Systems Support Process provides exceptional service continuity and reliability, addressing technical issues promptly. This proactive approach strategy directly benefits consumers by ensuring that all services remain operational and efficient, with a focus on improving system reliability and customer service. The analysis of recurring technical issues informs ongoing improvements and system upgrades.

In addition, the Group has undertaken additional actions and initiatives aiming at a positive contribution to improved social outcomes for its customers through cybersecurity protection enhancement. The Group's current security approach is designed to ensure a secure and reliable environment for customers, leveraging advanced technologies and services to positively contribute to improved social outcomes for consumers and end-users. These measures mitigate the risk of cybersecurity threats, safeguard personal data, and



maintain trust in digital services. The framework includes the deployment of a 24/7 External Security Operations Center (SOC) and Security Information and Event Management (SIEM) systems, which monitor and respond to security threats in real time, ensuring uninterrupted service and user safety. Endpoint Detection and Response (EDR) and Antivirus (AV) solutions are implemented across all workstations and servers, alongside Managed Detection and Response services that proactively identify and mitigate potential risks. Perimeter security is reinforced through Firewalls and a Web Application Firewall (WAF), complemented by advanced email filtering and sandboxing techniques to combat email-based threats and phishing attempts. In addition, dedicated fraudulent URLs, ads, and social media pages takedown service is also in place to protect consumers from malicious online activity. The Group also conducts regular security awareness training and exercises for employees to ensure that everyone is equipped with the knowledge to recognize and respond to potential threats. It also provides "Work From Anywhere" laptops based on security best practices, ensuring employees can securely access systems and services from any location.

Furthermore, the Group implements actions to promote customer education and awareness. This approach also strengthens stakeholder engagement by providing accessible and transparent information. The digital presence supports this effort by offering critical resources and guidance on the corporate website such as:

- Online anti-fraud instructions to help customers recognize and avoid electronic fraud.
- Security guidelines for e-banking and online transactions, promoting safe digital behaviors.
- General Data Protection Regulation (GDPR) guidelines, ensuring transparency about data handling practices and customer rights.

The Group also leverages its LinkedIn platform to enhance communication with customers. Posts cover key topics such as data protection, with insights from the Data Protection Officer (DPO), and electronic fraud awareness campaigns that align with broader educational efforts. These posts serve to amplify the implemented initiatives and foster trust among its customers.

In 2024, newsletters served as another vital touchpoint, with the Group distributing three targeted editions to many e-banking users (individuals and legal entities). These communications played a pivotal role in addressing prevalent electronic fraud scenarios, offering actionable tips for online fraud prevention, and promoting safe online shopping practices. Furthermore, the newsletters showcased the digital tools and features available to customers, empowering them to navigate the banking services securely and with confidence.

To track and assess the effectiveness of these actions and initiatives in delivering intended outcomes for customers through the provision of a safe digital environment, the Group employs continuous monitoring through real-time analysis and automated reporting of security incidents. This approach helps measure system effectiveness and identify areas for improvement. Also, the Group established a Full Disaster Recovery site to ensure business continuity in critical incidents. Regular penetration and vulnerability assessments are conducted, along with periodic Red Teaming exercises that simulate real-world cyberattacks. These activities enhance preparedness against evolving threats and provide valuable insights to evaluate the success of security initiatives.

Furthermore, to continue delivering superior service, safety, and satisfaction to consumers, the Group provides a range of tailored solutions, ensuring its offerings remain responsive and aligned with customer needs. More specifically:

- **Call Center Operations:** Daily reporting ensures performance is closely monitored, allowing the Group to respond quickly to customer needs and maintain high-quality service.
- **Customer Satisfaction Tracking:** Platforms such as e-satisfaction and PowerBI gather and analyze feedback from branches, digital services, and business banking. This allows the Group to proactively enhance customer experience.

- **Campaigns:** The Group uses a specialized platform to design and execute campaigns that align with customer needs and strategic objectives, ensuring impactful communication.
- **Contact Form Monitoring:** The GA4 system tracks customer interactions through contact forms, ensuring inquiries are handled efficiently and any issues are resolved promptly.

To further mitigate the material risk associated with system failures—such as service disruptions, unauthorized access, and data breaches—that could result in reputational damage and impact on the organization's financial performance, the Group has planned the following actions for 2025:

- **Data Loss Prevention (DLP) and Azure Information Protection (AIP) implementation:** Data Classification has been conducted. The Group is exploring advanced DLP solutions to prevent unauthorized data exfiltration.
- **ISO 27001 certification:** Initial gap assessment has been completed. The group is undergoing preparation for the formal certification process.
- **DORA regulation compliance:** A DORA gap assessment has been conducted. The identified gaps are now undergoing remediation with a vendor's help.
- **Threat Intelligence Solution:** The Group is evaluating a comprehensive range of threat intelligence solutions.
- **Cybersecurity Assessment Platform:** The Group aims to enhance its continuous security capabilities and is currently evaluating various Cybersecurity Assessment solutions.
- **Firewall Management and Network Security Policy platform:** The Group evaluates few candidate platforms to determine its suitability for firewall management and network security policy requirements

Customer feedback mechanisms are being enhanced, proactively improving services, personalizing customer experience, and investing in technology and innovation to ensure continuous customer satisfaction that leads to higher loyalty, trust, and market share growth. To this end, it is noted that no severe human rights issues or incidents have ever been identified connected with customers.

The Group allocates resources to effectively manage its material impacts, ensuring that users gain a clear understanding of how these impacts are addressed. One of the key resources is a dedicated platform designed to measure customer satisfaction across all channels. This platform plays a central role in managing material impacts by providing comprehensive insights into customer experiences and satisfaction levels. By leveraging this platform, the Group ensures continuous monitoring, evaluation, and improvement of services, which is essential for addressing customer-related impacts. Additionally, the Group has assigned personnel with expertise in the Products and Marketing Sector, the Data Protection Officer and Information Security Section to oversee critical processes and services. These divisions have dedicated personnel responsible for ensuring compliance with legal and regulatory requirements, implementing operational frameworks, and managing customer-related impacts. To further support the management of these impacts, the Group allocates a budget for implementing individual measures, actions, and initiatives. This budget is tailored to the Group's needs and ensures that sufficient resources are available to address material impacts effectively.

### **Metrics and targets**

#### **S4-5 – Targets related to advancing positive impacts, and managing material risks and opportunities**

The Group uses Net Promoter Score as a metric for measuring customer loyalty and satisfaction in the banking experience. The NPS measurement is event-triggered, capturing customer experience across all service channels. Additionally, it is conducted at regular intervals to assess overall satisfaction within the Bank. The NPS is a single, easy-to-understand metric assessing customer loyalty, through the likelihood to recommend, and general satisfaction on an international scale, the NPS scale (0-10). The customers are

categorized based on their responses in detractors (0-6), passives (7-8) and promoters (9-10). The NPS is calculated as the percentage of promoters minus the percentage of detractors. The Net Promoter Score NPS ranges from -100 to +100. NPS above zero signifies that the entity has more promoters than detractors, reflecting overall customer loyalty. Conversely, NPS below zero indicates a higher number of detractors compared to promoters, suggesting potential customer dissatisfaction. An NPS of zero shows an equal balance between promoters and detractors.

For 2024, the Bank's branch NPS was 82.5. It measured customer loyalty for customers who visit a branch of Optima bank after the following services: loan disbursement, investment account opening, credit card issuance, account opening, or debit card issuance. The metric is not validated by an external body.

Based on the continuous commitment to providing the best customer experience and following the outcome of the DMA and a series of internal communications with representatives from the Products and Marketing Sector and the Strategy, IR, and Sustainable Development Division, a specific outcome-oriented and ongoing target has been set. The Group aims to continue delivering optimal customer service as outlined in the Sustainable Development Policy. To establish this target, a benchmarking analysis was conducted against peers and industry standards. This target-setting process underscores the Group's dedication to enhancing the customer experience. Customer feedback mechanisms are being strengthened to proactively improve services, personalize customer interactions, and invest in technology and innovation. These efforts ensure continuous customer satisfaction, leading to higher loyalty, trust, and market share growth. The top management regularly evaluates this target (monthly, quarterly, and annually) to ensure it remains on track and aligned with the Group's policies, objectives, and strategy.

The target is presented in the following table

| TARGET DESCRIPTION (Optima bank) | TIME FRAME | BASE YEAR | BASE VALUE |
|----------------------------------|------------|-----------|------------|
| Maintain branch NPS>80           | ongoing    | 2024      | 82.5       |

The Group has not set any measurable outcome-oriented targets regarding data privacy issues, but it continuously tracks the effectiveness of its policies and actions through the measurement of data privacy incidents and following the Security Incident Management Policy and the Security Incident Response Procedure. All employees and external partners with access to the Group's information resources must promptly report any incident or weakness affecting information security. To ensure this, employees receive training to detect and address security threats. Incidents are reported through designated channels accessible to all staff. The Head of Information Security assigns the Security Incident Response Team, comprising skilled executives based on the incident's criticality. Any medium- or high-risk incident is treated as a top priority. In confirmed cases, a Root Cause Analysis is conducted to identify causes and implement preventive measures, such as policy updates, enhanced security controls, and awareness initiatives.

For the reporting period 2024, the Group had zero number of identified leaks, thefts, or losses of customer data according to the GRI 418-1 b disclosure.

## Entity Specific ("ES")

### **Innovation & Digitalization**

#### **Strategy**

#### **ES.SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model**

The Group acknowledges the importance of digital transformation in its business plan and strategy. These continuous updates and changes aim to enhance operational efficiency while addressing key challenges such as anti-corruption, bribery prevention, and effective risk management. By integrating advanced

technologies into its operations, the Group seeks to deliver exceptional services, optimize processes, and build a framework rooted in transparency and resilience.

According to the first Group's Double Materiality Assessment, "Innovation and Digitalization" is identified as material topic with significant impact and risk. The material topic concerns the banking activity of the Group; therefore, the related disclosures pertain mainly to Optima bank. The material IROs corresponds across the business model, operations, and value chain of the Group. By leveraging digital tools and services to offer innovative solutions the Group gains multiple advantages. The Group has invested in secure digital banking platforms and AI-powered customer support systems, making sure that services are delivered seamlessly and efficiently across all digital channels. These upgrades allow the Group to meet customer needs quickly and effectively, while upholding the highest standards of security and reliability. In terms of risk management, the Group has adopted cutting-edge technologies like AI, machine learning, and blockchain to better monitor, assess, and manage risks. This helps the Group stay ahead by addressing potential issues in its upstream and downstream value chains. Through this proactive approach, the Group increases transparency and strengthens its resilience, protecting both its operations and relationships with partners. Additionally, the Group has placed a strong focus on accessibility and innovation by developing user-friendly digital services that respond to customers' changing needs. By prioritizing digital channels, the Group ensures its services are accessible to a wide range of customers, all while staying ahead of the competition in the fast-evolving banking industry.

The Group also recognizes the risk that comes with implementing innovation and digitalization. One of the main concerns is cyberattacks, which could disrupt operations, compromise sensitive data, and damage the Group's reputation. To address this, the Group has strong cybersecurity measures, such as advanced threat detection systems. Another challenge is the dependency on third-party providers, which could lead to vulnerabilities if there are disruptions or failures in the supply chain. To manage this risk, the Group has embraced advanced third-party risk management practices, such as those mentioned above. As the Group inevitably depends on digital systems like any modern organization that strives to remain continuously adapted to technological and innovation advancements, business continuity becomes a priority. To mitigate the risk of operational disruptions, the Group has developed a detailed business continuity plan. This ensures that even in the face of emergencies, critical services can continue smoothly.

The Group is actively addressing the significance of its material impacts and risks on its business model, value chain, strategy, and decision-making processes. The Group anticipates further improvements in service delivery and customer satisfaction as digital adoption increases. To respond to these positive impacts, the Group is also driving digital transformation to improve operational effectiveness. However, to address the risks, the Group is investing in emerging technologies to enhance third-party risk management processes, monitoring, and risk assessment frameworks. In terms of strategic changes, the Group plans to increase customer digital engagement by a certain percentage within a specified number of years. This initiative is expected to drive higher adoption of digital services, leading to improved customer satisfaction and loyalty. To achieve this, the Group plans to increase the use of digital services by a targeted percentage. As already stated in ESRS 2, there are no current financial effects, and the anticipated financial effects are under the phased-in provision.

The adoption and offer of innovative services through digital tools create positive impact and may significantly benefit both people and the environment. Digital banking services enable customers to access financial products and manage their finances remotely, making banking more inclusive and convenient. Moreover, innovative tools provide seamless, personalized, and efficient services, meeting diverse customer needs and increasing satisfaction. When it comes to the impact on the environment, the transition to digital services minimizes the need for paper, reducing deforestation and waste. Additionally, digital banking reduces energy consumption compared to traditional banking infrastructure, particularly by eliminating the energy demands associated with paper-based processes. The impact aligns directly with Group's strategic focus on innovation and digital transformation. The Group hopes to increase customer satisfaction, boost operational effectiveness, and foster sustainable growth by integrating digital tools and services—like digital onboarding, mobile banking apps, 24/7 customer support (connect with a bank representative anytime

through innovative features like live chat or video banking) and automated platforms, into its core business processes. These digital initiatives are integral to the Group's business model, which prioritizes leveraging technology to deliver innovative financial solutions. Adopting digital services is a clear part of the Group's strategy to satisfy changing client demands and maintain market competitiveness. This strategic focus on digital transformation not only drives the Group's operational improvements but also supports its long-term sustainability goals by reducing operational costs and increasing accessibility for customers. As a result, the Group's overall strategy and business model are closely linked to the effects of implementing and providing cutting-edge services through digital tools and services. The Group is directly involved in this impact through its core activities, as the development and the provision of digital services are central to its operations. The Group also collaborates with technology partners to make sure these innovative solutions are delivered smoothly, building a network that drives both innovation and sustainability.

The Group updates its strategy and business model to effectively manage significant impacts and risks, particularly in the context of innovation and digitalization. As already mentioned, by adopting and offering innovative services such as digital onboarding, mobile banking apps, and automated customer support platforms, the Group enhances customer satisfaction and promotes sustainable growth. Yet, as already mentioned, digitalization introduces new risks, including cyberattacks and a high dependency on third-party providers, which could lead to business discontinuity during emergencies and affect performance. To ensure resilience, the Group has developed comprehensive documented processes, operational resources, and actions for business continuity. These include detailed procedures to manage and mitigate risks, adequate resources for critical operations, and regularly reviewed actions to address potential disruptions.

### **ES – Policies related to entity specific topic**

The Group recognizes the importance of digital transformation and innovation for sustainable development and has incorporated these principles into its Sustainable Development Policy. By integrating innovation and digitalization into its Sustainable Development Policy, the Group ensures that its approach to digital transformation not only enhances customer satisfaction and operational efficiency but also contributes to environmental sustainability and robust security measures. By providing accessible, efficient, and tailored banking solutions, the Group enables customers to seamlessly access services, whether managing accounts, conducting transactions, or obtaining personalized financial insights and assistance. With a strong focus on customer needs, the Group delivers a smooth and satisfying experience at every touchpoint. Committed to innovation and digitalization, the Group invests in cutting-edge technologies to ensure efficiency and reliability. Additionally, the Group supports the environment through innovative practices, aligning digitalization and innovation with security to maintain the highest standards of protection. These are the key contents of the Sustainable Development Policy, that are related to innovation and digitalization and its material impacts and risks. More information regarding the MDRs of the Sustainable Development Policy can be found in ESRS E1.

### **ES – Taking action on material impacts and approaches to managing opportunities related to entity specific topic, and the effectiveness of these measures and approaches**

Digital transformation and innovation are the top Group's priorities. The Group implements actions in order to manage the material impacts and risks related to innovation and digitalization. In the reporting year, key actions taken include the development and enhancement of digital solutions that prioritize customer experience, aiming to simplify daily banking through advanced technologies. These actions are expected to result in the achievement of the policy objectives and targets. The Group provides seamless and innovative banking experience while prioritizing environmental sustainability, social impact, and robust governance. Here are the key actions the Group is taking to achieve the above:



- Enhanced Card Features (2023-2024): Customers can take full control of their cards with features like temporary blocks, instant activation, loss and re-issue services, PIN reminders, and tailored card controls to manage in-store purchases, online transactions, and ATM cash withdrawals.
- Smart Payment Solutions (2023-2024): They can enjoy fast, secure payment options such as contactless transactions, digital wallets (Apple Pay/Google Wallet), and standing orders for both personal and organizational needs. Recurring payments are simplified with subscription management tools.
- Proactive Security Measures (2024): Financial protection is enhanced with cutting-edge antifraud tools, including a Kill Switch, customizable daily or per-transaction limits, and the ability to block transfers abroad. Security is further reinforced through alerts delivered via push notifications, email, Viber, or SMS.
- Innovative Business Solutions (2023-2024): Businesses can leverage advanced features such as complex access rights and single sign-on for multiple users, streamlining workflows. Mass transactions, including payroll, payments, and transfers, are efficiently managed with tailored enterprise tools.
- Seamlessly Manage Accounts (ongoing): Account holders can effortlessly oversee their finances, execute secure money transfers, and track payments, including IRIS payments, through an intuitive and user-friendly interface. Real-time personalized financial insights further enhance account management.
- Sustainability and Impact (ongoing): Paper consumption is reduced, and resource utilization is optimized through digital processes, contributing to environmental sustainability. Financial inclusion and accessibility are improved, supporting underserved communities.
- Advanced Cybersecurity (ongoing): Client data is safeguarded with state-of-the-art measures, including encryption, multi-factor authentication, and real-time fraud detection, ensuring financial information remains secure.

In addition, the upcoming functionalities for future developments in 2025 include eKYB, designed exclusively for businesses, along with the launch of innovative Business Debit and Business Credit products tailored to the evolving needs of corporate clients.

These actions cover various activities including customer service, account management, transaction processing, and cybersecurity. Currently, actions are focused on the midstream value chain, specifically within the Group's operations and customer interactions. These actions are also, implemented across all regions where the Group operates. The key stakeholder groups affected include individual customers and employees.

The digital banking platform and account-opening process enhancements were implemented in the reporting year and will continue to be improved in the coming years. The above actions didn't require significant operational or capital expenditure.

### **Metrics and targets**

#### **ES – Targets related to advancing positive impacts, and managing material risks**

As for now, there haven't been any measurable, outcome-oriented targets for Innovation and Digitalization. However, the effectiveness of its actions and progress is monitored by using relevant metrics, such as the percentage of financial transactions conducted through digital networks, with FY 2024 serving as the baseline year for this metric. This approach underlines the clear level of ambition in providing and adopting innovative and digital services and solutions while enabling effective tracking and transparent reporting of results. The metric is calculated by dividing the number of financial transactions made through digital networks (web and mobile banking) by the total financial transactions conducted via both digital networks and Bank's branches without the use of cash. Financial transactions include money transfers and bill payments. In 2024, 90.9% of financial transactions were conducted through digital networks. The metric is not validated by an external body.

## Governance Information

### **ESRS G1 Business Conduct**

#### **Impacts, risks and opportunities management**

##### **G1-1 – Corporate culture and business conduct policies and corporate culture**

The Group's primary goal is to safeguard the interests of its shareholders, and all stakeholders associated with the Bank and its subsidiaries, including customers, employees, and partners. Recognizing the importance of corporate governance principles and the benefits derived from their application, the Group adopts regulations, policies, and practices that align with the regulatory framework, integrating them into its corporate culture.

Additionally, the evaluation process of the Corporate Governance System enhances the credibility of the Group among shareholders and stakeholders, showcases transparency in corporate governance and decision-making and safeguards the effective application of rules, principles, and internal mechanisms across management and shareholders. This process also ensures the development and maintenance of an efficient organizational structure and operational model that supports the Group's strategic objectives and promotes sustainable growth. It focuses on the timely identification of deficiencies or operational issues, enabling prompt corrective actions, as well as effective monitoring and management of significant risks associated with business activities and operations.

Optima bank has adopted the Hellenic Corporate Governance Code for listed companies, established by the Hellenic Corporate Governance Council (HCGC) and published in June 2021. The Hellenic Corporate Governance Code follows the "comply or explain" principle, guiding companies in adopting best practices and formulating corporate governance policies and practices tailored to their specific circumstances. In line with the Corporate Governance Principles of the Organization for Economic Co-operation and Development (OECD), a global reference and key influence on the Hellenic Corporate Governance Code, corporate governance is defined as the system of relationships between a company's management, shareholders, employees, and other stakeholders. The aim is to create, sustain, and grow strong, competitive businesses.

Furthermore, Optima bank has adopted detailed Rules of Procedure, which define the organizational structure, the roles of the units and committees, and the functions of their leaders and reporting lines. These rules outline key features of the internal control system including the Internal Audit Division, the Risk Management Division, and the Compliance Regulatory Division, as well as all the referenced policies and procedures of paragraph 3 of Article 14 of Law 4706/2020. Additionally, the Rules of Procedure include Policy and Procedure with adequate and effective communication mechanisms with shareholders, aimed at facilitating the exercise of their rights and fostering active dialogue with them, as well as the process for evaluating the Bank's corporate governance system. Already, by virtue of the decision of the Bank's Board of Directors dated 16.01.2025, a Sustainable Development Policy has been adopted, which is included in the Bank's Operating Regulation. These rules complement existing regulations and ensure the transparency, integrity, functionality, and effectiveness of the corporate governance and internal control systems. Optima bank Group promotes trust, transparency, and adaptability through its values and policies in the Bank and its subsidiaries. The daily communication between the HR Division and employees consistently reinforces its corporate culture. This culture is also conveyed by the CEO of the Bank during every corporate event. Additionally, the corporate culture is reflected in the employee benefits.

Ethical practices are embedded in every aspect of the Bank and its subsidiaries' business, spanning decision-making processes and interactions with customers, employees, business partners, and the community. The Group has implemented the following policies to foster a robust corporate culture and promote ethical business conduct:

- **Code of Ethical Conduct and Ethics:** Detailed information regarding the MDRs of the Code of Ethical Conduct and Ethics is included in ESRs S1.
- **Whistleblowing Policy:** Detailed information regarding the MDRs of the Whistleblowing Policy is included in ESRs S1.
- **Anti-Bribery and Anti-Corruption Policy:** The key components of Anti-Bribery and Anti-Corruption Policy include its purpose, governance structure, scope of application, key concepts and definitions, fundamental principles, rules for implementation, and procedures for reporting illegal activities and Anti-Bribery and Anti-Corruption Policy's violations. The Anti-Bribery and Anti-Corruption Policy aligns with applicable bribery and corruption legislation and aims to define rules of conduct on corruption issues, encourage confidential reporting of incidents or suspicions through dedicated communication channels, raise awareness among employees and partners, identify and address actions related to corruption and bribery and protect employees and safeguard the Group's reputation. Accountability for the Anti-Bribery and Anti-Corruption Policy implementation rests with heads of business units, who oversee compliance within their respective areas of responsibility. Beyond legal requirements, the Anti-Bribery and Anti-Corruption Policy adheres to international and national standards, such as the definition of a public official under the United Nations Convention. It also addresses corruption issues within the international community and considers stakeholders' interests. Continuous stakeholder engagement ensures their concerns and expectations are understood, fostering compliance with legal and ethical standards while maintaining transparency. The Anti-Bribery and Anti-Corruption Policy applies to all employees of the Bank, as well as any other individual providing services to the Bank or on its behalf. It applies to all activities and operations of the Bank, including customer relations, partnerships with third parties, and the outsourcing of tasks. The Anti-Bribery and Anti-Corruption Policy is available on the internal.
- **Policy on the Prevention and Suppression of Money Laundering:** The core elements of the Policy on the Prevention and Suppression of Money Laundering include but are not limited to definitions and key concepts, measures to prevent and suppress money laundering and terrorist financing, application of due diligence by third parties, monitoring and detection of unusual or suspicious transactions, submission of suspicious transaction reports, controls, whistleblower protections, staff training, and record-keeping. The Policy on the Prevention and Suppression of Money Laundering aims to prevent sanctions resulting from inadvertent involvement in money laundering activities. It serves as a comprehensive guide to the Bank's procedures for mitigating money laundering risks and protecting the Group's interests and reputation. The Policy on the Prevention and Suppression of Money Laundering provides a detailed record of the corporate practices and controls implemented and is reviewed and updated as necessary to comply with legal requirements. The Policy on the Prevention and Suppression of Money Laundering incorporates best practices, such as the Wolfsberg Group principles and FATF Guidelines, applying a risk-based approach. CEO has the responsibility for the implementation of Anti Money Laundering related provisions, in compliance with relevant legislation. The Policy on the Prevention and Suppression of Money Laundering applies to all employees to prevent oversights that could compromise the Group's reputation. The Policy on the Prevention and Suppression of Money Laundering is available on the intranet. Training programs educate employees and associates on relevant legislation, obligations, and procedures, including customer identification, record-keeping, and internal reporting. Key stakeholders' instructions and expectations have been taken into consideration through the application of the risk-based approach, which has been adopted in the design, development, and implementation of Anti Money Laundering procedures. The Policy on the Prevention and Suppression of Money Laundering is available on the Bank's intranet and is available to all employees.
- **Suitability Policy for Members of the Board of Directors of the Bank:** The Suitability Policy for Members of the Board of Directors of the Bank policy includes objectives, principles for BoD selection, procedures for nominating candidates, suitability assessments, succession planning, diversity and gender representation, and corrective measures. Its goals include ensuring high recruitment standards, supporting effective BoD operations aligned with the Bank's medium- and long-term business objectives and complying with legislative and regulatory obligations. The BoD monitors the implementation of the Suitability Policy for Members of the Board of Directors of the Bank, while the Internal Audit Division reviews its adequacy and effectiveness. This policy is available on the intranet and corporate website. The expectations of



stakeholders and those affected by this policy are taken into consideration during the preparation and the establishment of the policy. The Suitability Policy for Members of the Board of Directors of the Bank applies to the members of the BoD of the Bank.

- **Policy for the Prevention and Combat of Violence and Harassment in the Workplace – Complaint Management:** Detailed information regarding the MDRs of this policy is included in ESRS S1.
- **Remuneration Policy for the Bank's members of the BoD:** Detailed information regarding the MDRs of this policy is included in ESRS S1.
- **Staff Remuneration Policy:** Detailed information regarding the MDRs of this policy is included in ESRS S1.
- **Sustainable Development Policy:** The Sustainable Development Policy outlines the organization's approach to assessing how factors related to sustainable development may impact the Group, its services and products, as well as decision-making processes. The Sustainable Development Policy lays the foundation for integrating sustainability into the Group's operations, with the aim of creating value for environmental protection, promoting social welfare, and strengthening governance practices. The Group is committed to maintaining a sound governance model by fostering a strong corporate culture of ethical behavior and integrity, while maintaining a zero-tolerance culture towards corruption and bribery. Information regarding the MDRs of this policy is included in the ESRS E1.

The mechanisms for identifying, reporting, and investigating concerns about unlawful behavior or behavior in contradiction of Code of Ethical Conduct and Ethics or similar internal rules are outlined in the Complaints Handling Procedure, which is an integral part of the Whistleblowing Policy. The Head of Internal Audit is responsible for receiving, investigating, registering, and maintaining a record of reports at all levels and for all Group companies. In the case of a personalized report, the confidentiality of the identity of the reporting party and any third party named in the report is ensured. Access to the report is restricted to authorized members only. The Head of the Internal Audit Division conducts an initial investigation into the issues raised. Then, according to the procedure, the Complaints Management Committee reviews all reports submitted by the Head of the Internal Audit Division for all Group companies. During the investigation process, the Complaints Management Committee may seek assistance from the head of the reporting person or unit, other departments, or external professional support. Additional expertise may be obtained from Group executives or external partners as needed. The Complaints Management Committee provides the results of both the initial and final investigations to the Audit Committee and the Board of Directors. The Committee is also responsible for investigating any reports of retaliatory acts. The Group encourages the submission of named or anonymous reports and complaints regarding serious irregularities, omissions, or criminal acts brought to the attention of any employee, regardless of their hierarchical level. Such reports can be submitted via all communication channels by all stakeholder groups.

Reports of irregularities, omissions, or criminal offenses may include, but are not limited to, the following cases:

- Theft, embezzlement, fraud, corruption, and bribery.
- Improper use of assets, breaches of banking secrecy, and misrepresentation of data.
- Abuse of power, violations of Group policies, or conduct detrimental to the reputation or purpose of the Group.
- Violations of the legal and regulatory framework, human rights violations, or instances of discrimination.
- Other unethical conduct or deliberate concealment of information related to any of the above.

Reports are reviewed with due diligence, impartial judgment, and objectivity. In cases where complaints are confirmed, the Group is obliged to take all appropriate corrective measures. Anonymous reports are examined based on the quality of their documentation and the ability to trace the irregular action being reported.

The Group has established communication channels, available at any time, to accommodate both named and anonymous reports. Specifically, The Group has established the following dedicated reporting channels, which are available 24/7 and allow for both anonymous and named reports to be submitted:

- By postal mail, either anonymously or with identification, to P.O. Box No. 61371, maintained by the Group at ELTA Amaroussion.
- By email to a designated whistleblowing address: [whistleblowing@optimabank.gr](mailto:whistleblowing@optimabank.gr). Furthermore, if an employee receives a report through any other communication channel, it must be immediately forwarded to the Head of Internal Audit.

Corruption and bribery are recognized as critical issues of concern. The Global Program against Corruption promotes international transparency and accountability through the establishment of an audit mechanism, the provisions included in the UN Convention on Corruption of 31.10.2003, and the adoption of coherent strategies by the international community to fight corruption through shared experiences and information. Greece approved the above Convention by Law no. 3666/2008 (FEK A105/10/6/08) and signed the United Nations Convention against Corruption on 10 December 2003. Generally accepted rules of international law and international conventions, when ratified by an act and in effect, form an integral part of Greece's domestic law and override any other contrary provision of domestic law.

The Anti-Bribery and Anti-Corruption Policy is based on international banking practices and existing legal obligations. The Anti-Bribery and Anti-Corruption Policy is aligned with the principles of the United Nations Convention against Corruption, although the principles of the United Nations Convention against Corruption have not yet been officially incorporated in this existing policy. Full adherence to the UN Convention against Corruption is expected to be completed withing 2025 and disclosed in the next Sustainability Statement. The Anti-Bribery and Anti-Corruption Policy includes prohibitions, preventive measures, reporting mechanisms, and procedures for investigation and enforcement, all aimed at promoting transparency, accountability, and ethical conduct.

The reporting channels enable stakeholders to report concerns confidentially and anonymously. All employees are informed through the intranet for these reporting channels. The employees designated to receive reports are trained to handle them appropriately, ensuring confidentiality and conducting thorough investigations. Furthermore, the Human Resources Division is responsible for communicating the policy. The Group has implemented measures to protect whistleblowers who make reports in good faith and respect their anonymity, as required by applicable law transposing Directive (EU) 2019/1937 of the European Parliament and the Council. These measures include safeguarding the employment status of whistleblowers and ensuring that no adverse actions are taken against them because of their reporting.

In this context, any negative behavior directed towards someone who has made a report, such as demotion or deprivation of promotion, negative performance appraisal or negative professional recommendation, non-renewal or early termination of a temporary employment contract, coercion, intimidation, harassment, or marginalization, is forbidden, even if the report is later proven to be incorrect. The same level of protection applies to third parties associated with the whistleblower, such as colleagues or family members, who may face retaliation in the workplace. If the whistleblower is an external contractor, early termination or cancellation of contracts for goods or services because of the report is also prohibited.

The Group has specific procedures for investigating business conduct incidents promptly, independently, and objectively. Employees who become aware of a violation of regulations should report it to their supervisor. The report is then forwarded to the Head of Human Resources and the Head of Regulatory Compliance. In cases involving fraud, the Head of Internal Audit should be also informed accordingly. Additionally, if anyone becomes aware of illegal activities or policy violations, as outlined in the Anti-Bribery and Anti-Corruption Policy, reports it immediately to his/ her supervisor or uses other appropriate channels, maintaining their anonymity. The relevant information is then communicated to the top management to

implement the appropriate procedures. Furthermore, the Group has established a Complaints Policy and Procedures that describe the management and dispute resolution process for complainant banking customers or external parties, as well as the description of all procedural actions required for this purpose.

The Group's activities are carried out with integrity, transparency, and accountability. This commitment helps build trust with stakeholders and supports sustainable growth. To reinforce this, employees participate in awareness sessions related to business conduct, where necessary, along with relevant training sessions provided by the Group.

In general, the functions that are potentially most at risk of corruption and bribery are those dealing directly with customers, suppliers, providers, contractors and associates.

### **G1-3 – Prevention and detection of corruption and bribery**

The Group has established a comprehensive framework consisting of policies, procedures, and control mechanisms to mitigate the risks of corruption and bribery, as well as to prevent, detect, and address allegations related to these issues. Ensuring transparency in corporate governance and the business decision-making process is a top priority. The Group employs best practices, adhering to both national and international regulations, to promote an anti-corruption culture and maintains a firm stance against such practices. To reinforce this commitment, the Group has adopted a zero-tolerance approach to corruption and bribery, ensuring that all employees, contractors, and business partners strictly adhere to the principles outlined in the Anti-Bribery and Anti-Corruption Policy. This policy is clearly communicated at all organizational levels, and any violations are met with immediate and decisive action. The Anti-Bribery and Anti-Corruption Policy is disseminated to employees, contractors, and business partners through internal communication, training sessions, and regular updates.

Furthermore, the Internal Audit Division monitors and oversees the procedures through which anonymous or identified complaints are made via reporting mechanisms regarding potential breaches in the processes of collecting, processing, and disclosing financial information. This includes complaints related to accounting, auditing, internal financial controls, and significant allegations of misconduct. In addition, internal controls are implemented to monitor financial transactions and detect unusual or suspicious activities. Regular preventive and corrective audits, as well as compliance checks, are conducted to ensure adherence to the anti-bribery and anti-corruption policy and related procedures. This comprehensive approach helps maintain the integrity of financial information and underscores the Group's commitment to preventing and addressing corruption and bribery.

To enhance its efforts in combating money laundering and financial crime, an Anti-Money Laundering (AML) Policy has been established, along with control and reporting systems. The matrix of compliant procedures together with appropriate supervision with systems and controls, segregation of duties and appropriate staff training are the key pillars in addressing the risks of money laundering and terrorist financing. These systems are designed to detect and prevent illicit activities by monitoring transactions and identifying suspicious behavior. The Internal Audit Division conducts audits tailored to the identification, assessment, monitoring, and management of money laundering and terrorist financing risks across the units. These audits are reported to the Bank's Management, and the findings are communicated to the Regulatory Compliance Division for evaluation and action. By integrating these robust measures, the commitment to maintaining the highest standards of integrity and compliance is demonstrated, thereby safeguarding the financial system, and protecting its customers from financial crime.

Disciplinary actions may also be taken depending on the seriousness of misconduct related to corruption and bribery incidents. Non-compliance can result in disciplinary measures against the individuals involved. These actions may include written warnings, termination of employment, or, if necessary, legal action depending on the nature and severity of the incident.

Additionally, the Group applies rigorous due diligence standards to its customers, suppliers, outsourcing partners, and third parties to ensure compliance with anti-corruption and bribery standards. Anti-corruption clauses are included in contracts and agreements with business partners to minimize the risk of corruption and to ensure that all business relationships are conducted with the highest level of integrity.

The procedures in place to prevent, detect, and address allegations or incidents of corruption and bribery include the Anti-Bribery and Anti-Corruption Policy, which ensures compliance with applicable anti-corruption and anti-bribery laws. This policy sets clear guidelines for appropriate behavior in line with the Group's values and principles and raises awareness of the various forms of corruption and bribery. It also promotes confidential reporting of suspected or actual incidents, encourages vigilance among employees and partners, and ensures the protection of employees and the organization's reputation. Additionally, the Risk & Control Self-Assessment (RCSA) Methodology is implemented, outlining the process for identifying and assessing risks and conducting internal self-assessments. The Operational Risk Management Policy and the Risk Management Policy are also in place to manage and mitigate risks associated with corruption and bribery. These policies and methodologies serve as effective controls and mechanisms for detecting incidents of corruption and bribery.

The Internal Audit Division is responsible for investigating cases of bribery and corruption as dictated in the 3<sup>rd</sup> line of defense. To ensure the integrity of the Internal Audit System, the Group has delegated powers to independent units and the Committees of the Board of Directors, applying the "Three Lines of defense Model." It operates distinctively from the first and second lines of defense to ensure impartiality and objectivity. This discretion guarantees that investigations are independent from the chain of management involved in the prevention and detection of corruption or bribery. The Internal Audit Division thoroughly examines allegations of corruption and bribery, ensuring that all findings are based on factual evidence and that appropriate actions are taken, based on the investigation outcomes. Additionally, it evaluates the effectiveness of the measures and controls implemented by the first and second lines of defense in the prevention and detection of corruption and bribery.

The Internal Audit Division is also responsible for reporting the outcomes of investigations in accordance with its manuals and procedures. This process ensures that findings and recommendations are communicated to the relevant administrative, management, and supervisory bodies. By adhering to established reporting protocols, the Internal Audit Division provides assurance that investigation outcomes are transparently and effectively communicated. This reporting process ensures that appropriate actions are taken based on the investigation outcomes, while maintaining compliance with relevant laws and regulations.

Additionally, the Internal Audit Division reports monthly results to the Bank's Management, annual and half-yearly results to the Capital Market Commission and the Guarantee Fund, and annual results to the Ministry of Development. This reporting structure ensures that all relevant internal and external bodies and authorities are kept informed of investigation outcomes and the actions taken.

The Anti-bribery and Anti-corruption Policy is communicated to relevant stakeholders to ensure it is easily accessible and fully understood. Employees are informed about the policy through the intranet, internal emails, and training programs. The governance of the policy underscores its importance and involves the BoD, the ExCo, relevant divisions and departments, and business units. Specifically, the BoD holds overall responsibility for defining, approving, and overseeing the policy's implementation. It ensures that the policy aligns with the principles and values of the Group. The Regulatory Compliance Division is tasked with reviewing and amending the policy as necessary and, in collaboration with the Human Resources Division, developing training and awareness programs for staff.

The Internal Audit Division investigates reports of policies violations across all levels. It evaluates the adequacy of control mechanisms and ensures compliance with the policy through independent preventive and corrective audits. The Risk Management Division assesses the risks of corruption and bribery as part of conducting Risk and Control Self-Assessments (RCSA) within relevant units. It also coordinates the "self-assessment of corruption and bribery risk" process in collaboration with the Regulatory Compliance Division and the Internal Audit Division, with final approval by the ExCo. Business units are responsible for ensuring compliance with the policy within their areas of operation. In case of identified deviations, they are required to promptly report them to Management and the Internal Audit Division.

The Human Resources Division is responsible for disseminating, updating, and providing training to all employees regarding the Anti-bribery and Anti-corruption Policy. During the 2024 financial year, the Group conducted a seminar on Anti-Money Laundering (AML) and anti-corruption through "The Hellenic Banking Institute" via an online platform. The seminar was aligned with the Group's policy and mandatory for employees in at-risk functions, while voluntary participation was encouraged for other workers. The seminar covered the following sections: prevention and suppression of money laundering and terrorist financing and combatting corruption. On top of the theoretical training, the seminar also provided practical tips and case studies to help participants enrich their knowledge and skills, enabling them to respond more effectively to the challenges they face in their daily work. The section on combating corruption aimed to raise awareness among participants on this subject by providing a historical overview of its national and international dimensions. In this section, participants were also informed about the key points of the relevant policy. The seminar aimed to equip employees with the knowledge and practical skills necessary to identify and mitigate risks and incidents associated with corruption and bribery. It included tips, case studies, and assessments to ensure a thorough understanding of the issues. The seminar was attended by all Group employees across all levels, including those in at-risk functions. It successfully covered a significant percentage (95%) of functions-at-risk, which are identified as functions vulnerable to corruption and bribery due to their tasks and responsibilities. This ensured that employees in these functions received the necessary training to effectively manage and mitigate risks. The seminar also made reference to the members of the administrative, management, and supervisory bodies, in order to emphasize the oversight and the responsibilities of these bodies in preventing and addressing corruption and bribery.

### **Metrics and targets**

#### **G1-4 – Confirmed incidents of corruption or bribery**

During 2024, the Group recorded zero convictions for violations of anti-corruption and anti-bribery laws, and no fines were imposed for such violations. Consequently, no actions were required to address breaches in procedures and standards related to anti-corruption and anti-bribery. Therefore, there has been no need for action or further prevention measures. The Group continues to monitor the situation and implement and modify policies as necessary in the future. The Group has adopted a zero-tolerance approach to corruption and bribery but has not set measurable, outcome-oriented targets in this regard. It ensures full compliance with the principles outlined in the Anti-Bribery and Anti-Corruption Policy by all employees, contractors, and business partners, and actively monitors adherence. The Group continuously evaluates its practices and its commitment to integrity and transparency, fostering a culture of ethical behavior across the organization.

## APPENDIX

### ANNEX VI - Disclosures Delegated Act

#### 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of EU Taxonomy Regulation

The GAR summary presents the Green Asset Ratio based on alignment data from the Group's clients, including Turnover and Capital Expenditures (CapEx). It also provides additional proportions related to the scope of GAR.

|                        |                                      | Total environmentally sustainable assets****     | Total environmentally sustainable assets*****     | KPI****      | KPI*****     | % coverage (over total assets)*** | % of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V) | % of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) |
|------------------------|--------------------------------------|--------------------------------------------------|---------------------------------------------------|--------------|--------------|-----------------------------------|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| <b>Main KPI</b>        | <b>Green asset ratio (GAR) stock</b> | <b>55</b>                                        | <b>108</b>                                        | <b>1.26%</b> | <b>2.51%</b> | <b>77.89%</b>                     | 60.44%                                                                                                  | 22.11%                                                                                           |
|                        |                                      | Total environmentally sustainable activities**** | Total environmentally sustainable activities***** | KPI****      | KPI*****     | % coverage (over total assets)    | % of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V) | % of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) |
| <b>Additional KPIs</b> | <b>GAR (flow)</b>                    | 10                                               | 56                                                | 2.13%        | 12.25%       | 8.23%                             | -                                                                                                       | -                                                                                                |
|                        | <b>Trading book*</b>                 | N/A                                              | N/A                                               | N/A          | N/A          |                                   |                                                                                                         |                                                                                                  |
|                        | <b>Financial guarantees</b>          | 29                                               | 53                                                | 14.79%       | 27.43%       |                                   |                                                                                                         |                                                                                                  |
|                        | <b>Assets under management</b>       | 6                                                | 81                                                | 1.51%        | 20.19%       |                                   |                                                                                                         |                                                                                                  |
|                        | <b>Fees and commissions income**</b> | N/A                                              | N/A                                               | N/A          | N/A          |                                   |                                                                                                         |                                                                                                  |

\* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

\*\*Fees and commissions income from services other than lending and AuM

Institutions shall disclose forwardlooking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

\*\*\* % of assets covered by the KPI over banks' total assets

\*\*\*\*based on the Turnover KPI of the counterparty

\*\*\*\*\*based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used



The main EU Taxonomy table is divided into eight sections, each providing a detailed breakdown of the various components that contribute to the Green Asset Ratio (GAR).

**Table 1 - Turnover**

| 1. Assets for the calculation of GAR based on Turnover |                                                                                               | a                                | b                                                              | c         | d                        | e                     | f                 | g        | h                                                              | i                        | j                 |
|--------------------------------------------------------|-----------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------------------------------|-----------|--------------------------|-----------------------|-------------------|----------|----------------------------------------------------------------|--------------------------|-------------------|
| Million EUR                                            |                                                                                               | Total [gross]<br>carrying amount | 31 December 2024                                               |           |                          |                       |                   |          |                                                                |                          |                   |
|                                                        |                                                                                               |                                  | Climate change mitigation (CCM)                                |           |                          |                       |                   |          | Climate change adaptation (CCA)                                |                          |                   |
|                                                        |                                                                                               |                                  | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |           |                          |                       |                   |          | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |                          |                   |
|                                                        |                                                                                               |                                  | Of which environmentally sustainable (Taxonomy-aligned)        |           |                          |                       |                   |          | Of which environmentally sustainable (Taxonomy-aligned)        |                          |                   |
|                                                        |                                                                                               |                                  |                                                                |           | Of which Use of Proceeds | Of which transitional | Of which enabling |          |                                                                | Of which Use of Proceeds | Of which enabling |
|                                                        | <b>GAR - Covered assets in both numerator and denominator</b>                                 |                                  |                                                                |           |                          |                       |                   |          |                                                                |                          |                   |
| 1                                                      | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 967                              | 337                                                            | 55        | 0                        | 0                     | 9                 | 1        | 0                                                              | 0                        | 0                 |
| 2                                                      | <b>Financial undertakings</b>                                                                 | <b>171</b>                       | <b>48</b>                                                      | <b>3</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>1</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 3                                                      | Credit institutions                                                                           | 165                              | 42                                                             | 3         | 0                        | 0                     | 0                 | 1        | 0                                                              | 0                        | 0                 |
| 4                                                      | Loans and advances                                                                            | 24                               | 5                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 5                                                      | Debt securities, including UoP                                                                | 140                              | 36                                                             | 3         | 0                        | 0                     | 0                 | 1        | 0                                                              | 0                        | 0                 |
| 6                                                      | Equity instruments                                                                            | 0                                | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 7                                                      | <b>Other financial corporations</b>                                                           | <b>7</b>                         | <b>7</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>0</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 8                                                      | <i>of which investment firms</i>                                                              | 7                                | 7                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 9                                                      | Loans and advances                                                                            | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 10                                                     | Debt securities, including Up                                                                 | 7                                | 7                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 11                                                     | Equity instruments                                                                            | 0                                | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 12                                                     | <i>of which management companies</i>                                                          | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 13                                                     | Loans and advances                                                                            | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 14                                                     | Debt securities, including Up                                                                 | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 15                                                     | Equity instruments                                                                            | 0                                | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 16                                                     | <i>of which insurance undertakings</i>                                                        | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 17                                                     | Loans and advances                                                                            | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 18                                                     | Debt securities, including Up                                                                 | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 19                                                     | Equity instruments                                                                            | 0                                | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 20                                                     | <b>Non-financial undertakings</b>                                                             | <b>548</b>                       | <b>159</b>                                                     | <b>52</b> | <b>0</b>                 | <b>0</b>              | <b>9</b>          | <b>1</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 21                                                     | Loans and advances                                                                            | 463                              | 128                                                            | 50        | 0                        | 0                     | 9                 | 0        | 0                                                              | 0                        | 0                 |
| 22                                                     | Debt securities, including UoP                                                                | 85                               | 30                                                             | 2         | 0                        | 0                     | 0                 | 1        | 0                                                              | 0                        | 0                 |
| 23                                                     | Equity instruments                                                                            | 0                                | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 24                                                     | <b>Households</b>                                                                             | <b>221</b>                       | <b>130</b>                                                     | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>0</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 25                                                     | of which loans collateralized by residential immovable property                               | 130                              | 130                                                            | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 26                                                     | of which building renovation loans                                                            | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 27                                                     | of which motor vehicle loans                                                                  | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 |          |                                                                |                          |                   |
| 28                                                     | <b>Local governments financing</b>                                                            | <b>27</b>                        | <b>0</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>0</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 29                                                     | Housing financing                                                                             | 0                                | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 30                                                     | Other local government financing                                                              | 27                               | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |

| 1. Assets for the calculation of GAR based on Turnover                          |                                                                                           | a                                | b                                                              | c                        | d                     | e                 | f | g | h                                                              | i                 | j |
|---------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------------------------------|--------------------------|-----------------------|-------------------|---|---|----------------------------------------------------------------|-------------------|---|
| Million EUR                                                                     |                                                                                           | Total [gross]<br>carrying amount | 31 December 2024                                               |                          |                       |                   |   |   |                                                                |                   |   |
|                                                                                 |                                                                                           |                                  | Climate change mitigation (CCM)                                |                          |                       |                   |   |   | Climate change adaptation (CCA)                                |                   |   |
|                                                                                 |                                                                                           |                                  | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |                          |                       |                   |   |   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |                   |   |
|                                                                                 |                                                                                           |                                  | Of which environmentally sustainable (Taxonomy-aligned)        |                          |                       |                   |   |   | Of which environmentally sustainable (Taxonomy-aligned)        |                   |   |
|                                                                                 |                                                                                           |                                  |                                                                | Of which Use of Proceeds | Of which transitional | Of which enabling |   |   | Of which Use of Proceeds                                       | Of which enabling |   |
| 31                                                                              | Collateral obtained by taking possession: residential and commercial immovable properties | 0                                | 0                                                              | 0                        | 0                     | 0                 | 0 | 0 | 0                                                              | 0                 | 0 |
| 32                                                                              | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 3349                             |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 33                                                                              | Financial and Non-financial undertakings                                                  | 2813                             |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 34                                                                              | SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations                | 2768                             |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 35                                                                              | Loans and advances                                                                        | 2748                             |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 36                                                                              | of which loans collateralized by commercial immovable property                            | 0                                |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 37                                                                              | of which building renovation loans                                                        | 0                                |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 38                                                                              | Debt securities                                                                           | 20                               |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 39                                                                              | Equity instruments                                                                        | 0                                |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 40                                                                              | Non-EU country counterparties not subject to NFRD disclosure obligations                  | 45                               |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 41                                                                              | Loans and advances                                                                        | 45                               |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 42                                                                              | Debt securities                                                                           | 0                                |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 43                                                                              | Equity instruments                                                                        | 0                                |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 44                                                                              | Derivatives                                                                               | 2                                |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 45                                                                              | On demand interbank loans                                                                 | 133                              |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 46                                                                              | Cash and cash-related assets                                                              | 16                               |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 47                                                                              | Other categories of assets (e.g. goodwill, commodities etc.)                              | 384                              |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 48                                                                              | Total GAR assets                                                                          | 4316                             | 337                                                            | 55                       | 0                     | 0                 | 9 | 1 | 0                                                              | 0                 | 0 |
| 49                                                                              | Assets not covered for GAR calculation                                                    | 1225                             |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 50                                                                              | Central governments and Supranational issuers                                             | 206                              |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 51                                                                              | Central banks exposure                                                                    | 781                              |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 52                                                                              | Trading book                                                                              | 238                              |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 53                                                                              | Total assets                                                                              | 5541                             | 337                                                            | 60                       | 0                     | 0                 | 9 | 1 | 0                                                              | 0                 | 0 |
| Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations |                                                                                           |                                  |                                                                |                          |                       |                   |   |   |                                                                |                   |   |
| 54                                                                              | Financial guarantees                                                                      | 194                              | 70                                                             | 29                       | 0                     | 1                 | 1 | 0 | 0                                                              | 0                 | 0 |
| 55                                                                              | Assets under management                                                                   | 401                              | 14                                                             | 6                        | 0                     | 0                 | 0 | 4 | 0                                                              | 0                 | 0 |
| 56                                                                              | Of which debt securities                                                                  | 0                                | 0                                                              | 0                        | 0                     | 0                 | 0 | 0 | 0                                                              | 0                 | 0 |
| 57                                                                              | Of which equity instruments                                                               | 401                              | 14                                                             | 6                        | 0                     | 0                 | 0 | 4 | 0                                                              | 0                 | 0 |



| 1. Assets for the calculation of GAR based on Turnover |                                                                                               | k                                                              | l        | m                        | n                 | o                                                              | p        | q                        | r                 | s                                                              | t        | u                        | v                 |
|--------------------------------------------------------|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------|--------------------------|-------------------|----------------------------------------------------------------|----------|--------------------------|-------------------|----------------------------------------------------------------|----------|--------------------------|-------------------|
| Million EUR                                            |                                                                                               | 31 December 2024                                               |          |                          |                   |                                                                |          |                          |                   |                                                                |          |                          |                   |
|                                                        |                                                                                               | Water and marine resources (WTR)                               |          |                          |                   | Circular economy (CE)                                          |          |                          |                   | Pollution prevention and control (PPC)                         |          |                          |                   |
|                                                        |                                                                                               | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |          |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |          |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |          |                          |                   |
|                                                        |                                                                                               | Of which environmentally sustainable (Taxonomy-aligned)        |          |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |          |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |          |                          |                   |
|                                                        |                                                                                               |                                                                |          | Of which Use of Proceeds | Of which enabling |                                                                |          | Of which Use of Proceeds | Of which enabling |                                                                |          | Of which Use of Proceeds | Of which enabling |
|                                                        | <b>GAR - Covered assets in both numerator and denominator</b>                                 |                                                                |          |                          |                   |                                                                |          |                          |                   |                                                                |          |                          |                   |
| 1                                                      | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 2                                                      | <b>Financial undertakings</b>                                                                 | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |
| 3                                                      | Credit institutions                                                                           | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 4                                                      | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 5                                                      | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 6                                                      | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 7                                                      | <b>Other financial corporations</b>                                                           | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |
| 8                                                      | <i>of which investment firms</i>                                                              | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 9                                                      | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 10                                                     | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 11                                                     | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 12                                                     | <i>of which management companies</i>                                                          | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 13                                                     | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 14                                                     | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 15                                                     | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 16                                                     | <i>of which insurance undertakings</i>                                                        | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 17                                                     | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 18                                                     | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 19                                                     | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 20                                                     | <b>Non-financial undertakings</b>                                                             | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |
| 21                                                     | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 22                                                     | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 23                                                     | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 24                                                     | <b>Households</b>                                                                             |                                                                |          |                          |                   | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |                                                                |          |                          |                   |
| 25                                                     | of which loans collateralized by residential immovable property                               |                                                                |          |                          |                   | 0                                                              | 0        | 0                        | 0                 |                                                                |          |                          |                   |
| 26                                                     | of which building renovation loans                                                            |                                                                |          |                          |                   | 0                                                              | 0        | 0                        | 0                 |                                                                |          |                          |                   |
| 27                                                     | of which motor vehicle loans                                                                  |                                                                |          |                          |                   |                                                                |          |                          |                   |                                                                |          |                          |                   |
| 28                                                     | <b>Local governments financing</b>                                                            | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |
| 29                                                     | Housing financing                                                                             | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 30                                                     | Other local government financing                                                              | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |

| 1. Assets for the calculation of GAR based on Turnover                          |                                                                                            | k                                                              | l | m                        | n                 | o                                                              | p | q                        | r                 | s                                                              | t | u                        | v                 |
|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|----------------------------------------------------------------|---|--------------------------|-------------------|----------------------------------------------------------------|---|--------------------------|-------------------|----------------------------------------------------------------|---|--------------------------|-------------------|
| Million EUR                                                                     |                                                                                            | 31 December 2024                                               |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
|                                                                                 |                                                                                            | Water and marine resources (WTR)                               |   |                          |                   | Circular economy (CE)                                          |   |                          |                   | Pollution prevention and control (PPC)                         |   |                          |                   |
|                                                                                 |                                                                                            | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |                          |                   |
|                                                                                 |                                                                                            | Of which environmentally sustainable (Taxonomy-aligned)        |   |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |   |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |   |                          |                   |
|                                                                                 |                                                                                            |                                                                |   | Of which Use of Proceeds | Of which enabling |                                                                |   | Of which Use of Proceeds | Of which enabling |                                                                |   | Of which Use of Proceeds | Of which enabling |
| 31                                                                              | Collateral obtained by taking possession: residential and commercial immovable properties  | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 32                                                                              | <b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b> |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 33                                                                              | <b>Financial and Non-financial undertakings</b>                                            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 34                                                                              | <i>SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations</i>          |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 35                                                                              | Loans and advances                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 36                                                                              | of which loans collateralized by commercial immovable property                             |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 37                                                                              | of which building renovation loans                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 38                                                                              | Debt securities                                                                            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 39                                                                              | Equity instruments                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 40                                                                              | <i>Non-EU country counterparties not subject to NFRD disclosure obligations</i>            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 41                                                                              | Loans and advances                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 42                                                                              | Debt securities                                                                            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 43                                                                              | Equity instruments                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 44                                                                              | <b>Derivatives</b>                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 45                                                                              | <b>On demand interbank loans</b>                                                           |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 46                                                                              | <b>Cash and cash-related assets</b>                                                        |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 47                                                                              | <b>Other categories of assets (e.g. goodwill, commodities etc.)</b>                        |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 48                                                                              | <b>Total GAR assets</b>                                                                    | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 49                                                                              | <b>Assets not covered for GAR calculation</b>                                              |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 50                                                                              | <b>Central governments and Supranational issuers</b>                                       |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 51                                                                              | <b>Central banks exposure</b>                                                              |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 52                                                                              | <b>Trading book</b>                                                                        |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 53                                                                              | <b>Total assets</b>                                                                        | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations |                                                                                            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 54                                                                              | Financial guarantees                                                                       | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 55                                                                              | Assets under management                                                                    | 0                                                              | 0 | 0                        | 0                 | 1                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 56                                                                              | <i>Of which debt securities</i>                                                            | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 57                                                                              | <i>Of which equity instruments</i>                                                         | 0                                                              | 0 | 0                        | 0                 | 1                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |

| 1. Assets for the calculation of GAR based on Turnover |                                                                                               | w                                                              | x        | z                        | aa                | ab                                                             | ac        | ad                       | ae                    | af                |
|--------------------------------------------------------|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------|--------------------------|-------------------|----------------------------------------------------------------|-----------|--------------------------|-----------------------|-------------------|
| Million EUR                                            |                                                                                               | 31 December 2024                                               |          |                          |                   |                                                                |           |                          |                       |                   |
|                                                        |                                                                                               | Biodiversity and ecosystems (BIO)                              |          |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                       |           |                          |                       |                   |
|                                                        |                                                                                               | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |          |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |           |                          |                       |                   |
|                                                        |                                                                                               | Of which environmentally sustainable (Taxonomy-aligned)        |          |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |           |                          |                       |                   |
|                                                        |                                                                                               |                                                                |          | Of which Use of Proceeds | Of which enabling |                                                                |           | Of which Use of Proceeds | Of which transitional | Of which enabling |
|                                                        | <b>GAR - Covered assets in both numerator and denominator</b>                                 |                                                                |          |                          |                   |                                                                |           |                          |                       |                   |
| 1                                                      | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 0                                                              | 0        | 0                        | 0                 | 338                                                            | 55        | 0                        | 0                     | 9                 |
| 2                                                      | <b>Financial undertakings</b>                                                                 | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>49</b>                                                      | <b>3</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          |
| 3                                                      | Credit institutions                                                                           | 0                                                              | 0        | 0                        | 0                 | 42                                                             | 3         | 0                        | 0                     | 0                 |
| 4                                                      | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 5                                                              | 0         | 0                        | 0                     | 0                 |
| 5                                                      | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 37                                                             | 3         | 0                        | 0                     | 0                 |
| 6                                                      | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 7                                                      | <b>Other financial corporations</b>                                                           | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>7</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          |
| 8                                                      | <i>of which investment firms</i>                                                              | 0                                                              | 0        | 0                        | 0                 | 7                                                              | 0         | 0                        | 0                     | 0                 |
| 9                                                      | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 10                                                     | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 7                                                              | 0         | 0                        | 0                     | 0                 |
| 11                                                     | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 12                                                     | <i>of which management companies</i>                                                          | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 13                                                     | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 14                                                     | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 15                                                     | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 16                                                     | <i>of which insurance undertakings</i>                                                        | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 17                                                     | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 18                                                     | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 19                                                     | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 20                                                     | <b>Non-financial undertakings</b>                                                             | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>159</b>                                                     | <b>52</b> | <b>0</b>                 | <b>0</b>              | <b>9</b>          |
| 21                                                     | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 128                                                            | 50        | 0                        | 0                     | 9                 |
| 22                                                     | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 31                                                             | 2         | 0                        | 0                     | 0                 |
| 23                                                     | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 24                                                     | <b>Households</b>                                                                             |                                                                |          |                          |                   | <b>130</b>                                                     | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          |
| 25                                                     | of which loans collateralized by residential immovable property                               |                                                                |          |                          |                   | 130                                                            | 0         | 0                        | 0                     | 0                 |
| 26                                                     | of which building renovation loans                                                            |                                                                |          |                          |                   | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 27                                                     | of which motor vehicle loans                                                                  |                                                                |          |                          |                   | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 28                                                     | <b>Local governments financing</b>                                                            | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          |
| 29                                                     | Housing financing                                                                             | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 30                                                     | Other local government financing                                                              | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |

| 1. Assets for the calculation of GAR based on Turnover                                 |                                                                                            | w                                                              | x | z                        | aa                | ab                                                             | ac | ad                       | ae                    | af                |
|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|----------------------------------------------------------------|---|--------------------------|-------------------|----------------------------------------------------------------|----|--------------------------|-----------------------|-------------------|
| Million EUR                                                                            |                                                                                            | 31 December 2024                                               |   |                          |                   |                                                                |    |                          |                       |                   |
|                                                                                        |                                                                                            | Biodiversity and ecosystems (BIO)                              |   |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                       |    |                          |                       |                   |
|                                                                                        |                                                                                            | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |    |                          |                       |                   |
|                                                                                        |                                                                                            | Of which environmentally sustainable (Taxonomy-aligned)        |   |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |    |                          |                       |                   |
|                                                                                        |                                                                                            |                                                                |   | Of which Use of Proceeds | Of which enabling |                                                                |    | Of which Use of Proceeds | Of which transitional | Of which enabling |
| 31                                                                                     | Collateral obtained by taking possession: residential and commercial immovable properties  | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0  | 0                        | 0                     | 0                 |
| 32                                                                                     | <b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b> |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 33                                                                                     | <b>Financial and Non-financial undertakings</b>                                            |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 34                                                                                     | <i>SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations</i>          |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 35                                                                                     | Loans and advances                                                                         |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 36                                                                                     | of which loans collateralized by commercial immovable property                             |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 37                                                                                     | of which building renovation loans                                                         |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 38                                                                                     | Debt securities                                                                            |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 39                                                                                     | Equity instruments                                                                         |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 40                                                                                     | <i>Non-EU country counterparties not subject to NFRD disclosure obligations</i>            |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 41                                                                                     | Loans and advances                                                                         |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 42                                                                                     | Debt securities                                                                            |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 43                                                                                     | Equity instruments                                                                         |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 44                                                                                     | <b>Derivatives</b>                                                                         |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 45                                                                                     | <b>On demand interbank loans</b>                                                           |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 46                                                                                     | <b>Cash and cash-related assets</b>                                                        |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 47                                                                                     | <b>Other categories of assets (e.g. goodwill, commodities etc.)</b>                        |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 48                                                                                     | <b>Total GAR assets</b>                                                                    | 0                                                              | 0 | 0                        | 0                 | 338                                                            | 55 | 0                        | 0                     | 9                 |
| 49                                                                                     | <b>Assets not covered for GAR calculation</b>                                              |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 50                                                                                     | <b>Central governments and Supranational issuers</b>                                       |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 51                                                                                     | <b>Central banks exposure</b>                                                              |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 52                                                                                     | <b>Trading book</b>                                                                        |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 53                                                                                     | <b>Total assets</b>                                                                        | 0                                                              | 0 | 0                        | 0                 | 338                                                            | 55 | 0                        | 0                     | 9                 |
| <b>Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations</b> |                                                                                            |                                                                |   |                          |                   |                                                                |    |                          |                       |                   |
| 54                                                                                     | Financial guarantees                                                                       | 0                                                              | 0 | 0                        | 0                 | 70                                                             | 29 | 0                        | 1                     | 1                 |
| 55                                                                                     | Assets under management                                                                    | 0                                                              | 0 | 0                        | 0                 | 19                                                             | 6  | 0                        | 0                     | 0                 |
| 56                                                                                     | <i>Of which debt securities</i>                                                            | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0  | 0                        | 0                     | 0                 |
| 57                                                                                     | <i>Of which equity instruments</i>                                                         | 0                                                              | 0 | 0                        | 0                 | 19                                                             | 6  | 0                        | 0                     | 0                 |

**Table 1 - CapEx**

| 1. Assets for the calculation of GAR based on CapEx           |                                                                                                  | a                             | b                                                              | c         | d                        | e                     | f                 | g        | h                                                              | i                        | j                 |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------|----------------------------------------------------------------|-----------|--------------------------|-----------------------|-------------------|----------|----------------------------------------------------------------|--------------------------|-------------------|
| Million EUR                                                   |                                                                                                  | Total [gross] carrying amount | 31 December 2024                                               |           |                          |                       |                   |          |                                                                |                          |                   |
|                                                               |                                                                                                  |                               | Climate change mitigation (CCM)                                |           |                          |                       |                   |          | Climate change adaptation (CCA)                                |                          |                   |
|                                                               |                                                                                                  |                               | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |           |                          |                       |                   |          | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |                          |                   |
|                                                               |                                                                                                  |                               | Of which environmentally sustainable (Taxonomy-aligned)        |           |                          |                       |                   |          | Of which environmentally sustainable (Taxonomy-aligned)        |                          |                   |
|                                                               |                                                                                                  |                               |                                                                |           | Of which Use of Proceeds | Of which transitional | Of which enabling |          |                                                                | Of which Use of Proceeds | Of which enabling |
| <b>GAR - Covered assets in both numerator and denominator</b> |                                                                                                  |                               |                                                                |           |                          |                       |                   |          |                                                                |                          |                   |
| 1                                                             | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation    | 967                           | 402                                                            | 108       | 0                        | 2                     | 31                | 1        | 0                                                              | 0                        | 0                 |
| 2                                                             | <b>Financial undertakings</b>                                                                    | <b>171</b>                    | <b>64</b>                                                      | <b>11</b> | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>1</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 3                                                             | Credit institutions                                                                              | 165                           | 58                                                             | 11        | 0                        | 0                     | 0                 | 1        | 0                                                              | 0                        | 0                 |
| 4                                                             | Loans and advances                                                                               | 24                            | 8                                                              | 2         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 5                                                             | Debt securities, including UoP                                                                   | 140                           | 49                                                             | 9         | 0                        | 0                     | 0                 | 1        | 0                                                              | 0                        | 0                 |
| 6                                                             | Equity instruments                                                                               | 0                             | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 7                                                             | <b>Other financial corporations</b>                                                              | <b>7</b>                      | <b>7</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>0</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 8                                                             | <i>of which investment firms</i>                                                                 | 7                             | 7                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 9                                                             | Loans and advances                                                                               | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 10                                                            | Debt securities, including UoP                                                                   | 7                             | 7                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 11                                                            | Equity instruments                                                                               | 0                             | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 12                                                            | <i>of which management companies</i>                                                             | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 13                                                            | Loans and advances                                                                               | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 14                                                            | Debt securities, including UoP                                                                   | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 15                                                            | Equity instruments                                                                               | 0                             | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 16                                                            | <i>of which insurance undertakings</i>                                                           | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 17                                                            | Loans and advances                                                                               | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 18                                                            | Debt securities, including UoP                                                                   | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 19                                                            | Equity instruments                                                                               | 0                             | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 20                                                            | <b>Non-financial undertakings</b>                                                                | <b>548</b>                    | <b>208</b>                                                     | <b>97</b> | <b>0</b>                 | <b>2</b>              | <b>31</b>         | <b>0</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 21                                                            | Loans and advances                                                                               | 463                           | 165                                                            | 86        | 0                        | 2                     | 30                | 0        | 0                                                              | 0                        | 0                 |
| 22                                                            | Debt securities, including UoP                                                                   | 85                            | 42                                                             | 11        | 0                        | 1                     | 1                 | 0        | 0                                                              | 0                        | 0                 |
| 23                                                            | Equity instruments                                                                               | 0                             | 0                                                              | 0         |                          | 0                     | 0                 | 0        | 0                                                              |                          | 0                 |
| 24                                                            | <b>Households</b>                                                                                | <b>221</b>                    | <b>130</b>                                                     | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>0</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 25                                                            | of which loans collateralized by residential immovable property                                  | 130                           | 130                                                            | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 26                                                            | of which building renovation loans                                                               | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 27                                                            | of which motor vehicle loans                                                                     | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 |          |                                                                |                          |                   |
| 28                                                            | <b>Local governments financing</b>                                                               | <b>27</b>                     | <b>0</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>0</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |
| 29                                                            | Housing financing                                                                                | 0                             | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 30                                                            | Other local government financing                                                                 | 27                            | 0                                                              | 0         | 0                        | 0                     | 0                 | 0        | 0                                                              | 0                        | 0                 |
| 31                                                            | <b>Collateral obtained by taking possession: residential and commercial immovable properties</b> | <b>0</b>                      | <b>0</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          | <b>0</b> | <b>0</b>                                                       | <b>0</b>                 | <b>0</b>          |

| 1. Assets for the calculation of GAR based on CapEx                             |                                                                                     | a                                | b                                                              | c                        | d                     | e                 | f  | g                        | h                                                              | i | j |
|---------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|----------------------------------|----------------------------------------------------------------|--------------------------|-----------------------|-------------------|----|--------------------------|----------------------------------------------------------------|---|---|
| Million EUR                                                                     |                                                                                     | Total [gross]<br>carrying amount | 31 December 2024                                               |                          |                       |                   |    |                          |                                                                |   |   |
|                                                                                 |                                                                                     |                                  | Climate change mitigation (CCM)                                |                          |                       |                   |    |                          | Climate change adaptation (CCA)                                |   |   |
|                                                                                 |                                                                                     |                                  | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |                          |                       |                   |    |                          | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |   |
|                                                                                 |                                                                                     |                                  | Of which environmentally sustainable (Taxonomy-aligned)        |                          |                       |                   |    |                          | Of which environmentally sustainable (Taxonomy-aligned)        |   |   |
|                                                                                 |                                                                                     |                                  |                                                                | Of which Use of Proceeds | Of which transitional | Of which enabling |    | Of which Use of Proceeds | Of which enabling                                              |   |   |
| 32                                                                              | Assets excluded from the numerator for GAR calculation (covered in the denominator) | 3349                             |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 33                                                                              | Financial and Non-financial undertakings                                            | 2813                             |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 34                                                                              | SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations          | 2768                             |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 35                                                                              | Loans and advances                                                                  | 2748                             |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 36                                                                              | of which loans collateralized by commercial immovable property                      | 0                                |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 37                                                                              | of which building renovation loans                                                  | 0                                |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 38                                                                              | Debt securities                                                                     | 20                               |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 39                                                                              | Equity instruments                                                                  | 0                                |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 40                                                                              | Non-EU country counterparties not subject to NFRD disclosure obligations            | 45                               |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 41                                                                              | Loans and advances                                                                  | 45                               |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 42                                                                              | Debt securities                                                                     | 0                                |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 43                                                                              | Equity instruments                                                                  | 0                                |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 44                                                                              | Derivatives                                                                         | 2                                |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 45                                                                              | On demand interbank loans                                                           | 133                              |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 46                                                                              | Cash and cash-related assets                                                        | 16                               |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 47                                                                              | Other categories of assets (e.g. goodwill, commodities etc.)                        | 384                              |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 48                                                                              | Total GAR assets                                                                    | 4316                             | 402                                                            | 108                      | 0                     | 2                 | 31 | 1                        | 0                                                              | 0 | 0 |
| 49                                                                              | Assets not covered for GAR calculation                                              | 1225                             |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 50                                                                              | Central governments and Supranational issuers                                       | 206                              |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 51                                                                              | Central banks exposure                                                              | 781                              |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 52                                                                              | Trading book                                                                        | 238                              |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 53                                                                              | Total assets                                                                        | 5541                             | 402                                                            | 108                      | 0                     | 2                 | 31 | 1                        | 0                                                              | 0 | 0 |
| Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations |                                                                                     |                                  |                                                                |                          |                       |                   |    |                          |                                                                |   |   |
| 54                                                                              | Financial guarantees                                                                | 194                              | 118                                                            | 53                       | 0                     | 1                 | 22 | 0                        | 0                                                              | 0 | 0 |
| 55                                                                              | Assets under management                                                             | 401                              | 150                                                            | 80                       | 0                     | 0                 | 61 | 2                        | 0                                                              | 0 | 0 |
| 56                                                                              | Of which debt securities                                                            | 0                                | 0                                                              | 0                        | 0                     | 0                 | 0  | 0                        | 0                                                              | 0 | 0 |
| 57                                                                              | Of which equity instruments                                                         | 401                              | 150                                                            | 80                       | 0                     | 0                 | 61 | 2                        | 0                                                              | 0 | 0 |

| 1. Assets for the calculation of GAR based on CapEx |                                                                                               | k                                                              | l        | m                        | n                 | o                                                              | p        | q                        | r                 | s                                                              | t        | u                        | v                 |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------|--------------------------|-------------------|----------------------------------------------------------------|----------|--------------------------|-------------------|----------------------------------------------------------------|----------|--------------------------|-------------------|
| Million EUR                                         |                                                                                               | 31 December 2024                                               |          |                          |                   |                                                                |          |                          |                   |                                                                |          |                          |                   |
|                                                     |                                                                                               | Water and marine resources (WTR)                               |          |                          |                   | Circular economy (CE)                                          |          |                          |                   | Pollution prevention and control (PPC)                         |          |                          |                   |
|                                                     |                                                                                               | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |          |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |          |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |          |                          |                   |
|                                                     |                                                                                               | Of which environmentally sustainable (Taxonomy-aligned)        |          |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |          |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |          |                          |                   |
|                                                     |                                                                                               |                                                                |          | Of which Use of Proceeds | Of which enabling |                                                                |          | Of which Use of Proceeds | Of which enabling |                                                                |          | Of which Use of Proceeds | Of which enabling |
|                                                     | <b>GAR - Covered assets in both numerator and denominator</b>                                 |                                                                |          |                          |                   |                                                                |          |                          |                   |                                                                |          |                          |                   |
| 1                                                   | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 2                                                   | <b>Financial undertakings</b>                                                                 | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |
| 3                                                   | Credit institutions                                                                           | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 4                                                   | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 5                                                   | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 6                                                   | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 7                                                   | <b>Other financial corporations</b>                                                           | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |
| 8                                                   | <i>of which investment firms</i>                                                              | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 9                                                   | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 10                                                  | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 11                                                  | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 12                                                  | <i>of which management companies</i>                                                          | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 13                                                  | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 14                                                  | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 15                                                  | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 16                                                  | <i>of which insurance undertakings</i>                                                        | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 17                                                  | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 18                                                  | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 19                                                  | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 20                                                  | <b>Non-financial undertakings</b>                                                             | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |
| 21                                                  | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 22                                                  | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 23                                                  | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 | 0                                                              | 0        |                          | 0                 |
| 24                                                  | <b>Households</b>                                                                             |                                                                |          |                          |                   | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |                                                                |          |                          |                   |
| 25                                                  | of which loans collateralized by residential immovable property                               |                                                                |          |                          |                   | 0                                                              | 0        | 0                        | 0                 |                                                                |          |                          |                   |
| 26                                                  | of which building renovation loans                                                            |                                                                |          |                          |                   | 0                                                              | 0        | 0                        | 0                 |                                                                |          |                          |                   |
| 27                                                  | of which motor vehicle loans                                                                  |                                                                |          |                          |                   |                                                                |          |                          |                   |                                                                |          |                          |                   |
| 28                                                  | <b>Local governments financing</b>                                                            | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          |
| 29                                                  | Housing financing                                                                             | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |
| 30                                                  | Other local government financing                                                              | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0        | 0                        | 0                 |

| 1. Assets for the calculation of GAR based on CapEx                             |                                                                                            | k                                                              | l | m                        | n                 | o                                                              | p | q                        | r                 | s                                                              | t | u                        | v                 |
|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|----------------------------------------------------------------|---|--------------------------|-------------------|----------------------------------------------------------------|---|--------------------------|-------------------|----------------------------------------------------------------|---|--------------------------|-------------------|
| Million EUR                                                                     |                                                                                            | 31 December 2024                                               |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
|                                                                                 |                                                                                            | Water and marine resources (WTR)                               |   |                          |                   | Circular economy (CE)                                          |   |                          |                   | Pollution prevention and control (PPC)                         |   |                          |                   |
|                                                                                 |                                                                                            | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |                          |                   |
|                                                                                 |                                                                                            | Of which environmentally sustainable (Taxonomy-aligned)        |   |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |   |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |   |                          |                   |
|                                                                                 |                                                                                            |                                                                |   | Of which Use of Proceeds | Of which enabling |                                                                |   | Of which Use of Proceeds | Of which enabling |                                                                |   | Of which Use of Proceeds | Of which enabling |
| 31                                                                              | Collateral obtained by taking possession: residential and commercial immovable properties  | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 32                                                                              | <b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b> |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 33                                                                              | <b>Financial and Non-financial undertakings</b>                                            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 34                                                                              | <i>SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations</i>          |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 35                                                                              | Loans and advances                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 36                                                                              | of which loans collateralized by commercial immovable property                             |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 37                                                                              | of which building renovation loans                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 38                                                                              | Debt securities                                                                            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 39                                                                              | Equity instruments                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 40                                                                              | <i>Non-EU country counterparties not subject to NFRD disclosure obligations</i>            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 41                                                                              | Loans and advances                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 42                                                                              | Debt securities                                                                            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 43                                                                              | Equity instruments                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 44                                                                              | <b>Derivatives</b>                                                                         |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 45                                                                              | <b>On demand interbank loans</b>                                                           |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 46                                                                              | <b>Cash and cash-related assets</b>                                                        |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 47                                                                              | <b>Other categories of assets (e.g. goodwill, commodities etc.)</b>                        |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 48                                                                              | <b>Total GAR assets</b>                                                                    | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 49                                                                              | <b>Assets not covered for GAR calculation</b>                                              |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 50                                                                              | <b>Central governments and Supranational issuers</b>                                       |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 51                                                                              | <b>Central banks exposure</b>                                                              |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 52                                                                              | <b>Trading book</b>                                                                        |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 53                                                                              | <b>Total assets</b>                                                                        | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations |                                                                                            |                                                                |   |                          |                   |                                                                |   |                          |                   |                                                                |   |                          |                   |
| 54                                                                              | Financial guarantees                                                                       | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 55                                                                              | Assets under management                                                                    | 0                                                              | 0 | 0                        | 0                 | 1                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 56                                                                              | <i>Of which debt securities</i>                                                            | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |
| 57                                                                              | <i>Of which equity instruments</i>                                                         | 0                                                              | 0 | 0                        | 0                 | 1                                                              | 0 | 0                        | 0                 | 0                                                              | 0 | 0                        | 0                 |



| 1. Assets for the calculation of GAR based on CapEx |                                                                                               | w                                                              | x        | z                        | aa                | ab                                                             | ac        | ad                       | ae                    | af                |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------|----------|--------------------------|-------------------|----------------------------------------------------------------|-----------|--------------------------|-----------------------|-------------------|
| Million EUR                                         |                                                                                               | 31 December 2024                                               |          |                          |                   |                                                                |           |                          |                       |                   |
|                                                     |                                                                                               | Biodiversity and ecosystems (BIO)                              |          |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                       |           |                          |                       |                   |
|                                                     |                                                                                               | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |          |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |           |                          |                       |                   |
|                                                     |                                                                                               | Of which environmentally sustainable (Taxonomy-aligned)        |          |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |           |                          |                       |                   |
|                                                     |                                                                                               |                                                                |          | Of which Use of Proceeds | Of which enabling |                                                                |           | Of which Use of Proceeds | Of which transitional | Of which enabling |
|                                                     | <b>GAR - Covered assets in both numerator and denominator</b>                                 |                                                                |          |                          |                   |                                                                |           |                          |                       |                   |
| 1                                                   | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 0                                                              | 0        | 0                        | 0                 | 403                                                            | 108       | 0                        | 2                     | 31                |
| 2                                                   | <b>Financial undertakings</b>                                                                 | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>65</b>                                                      | <b>11</b> | <b>0</b>                 | <b>0</b>              | <b>0</b>          |
| 3                                                   | Credit institutions                                                                           | 0                                                              | 0        | 0                        | 0                 | 58                                                             | 11        | 0                        | 0                     | 0                 |
| 4                                                   | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 8                                                              | 2         | 0                        | 0                     | 0                 |
| 5                                                   | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 50                                                             | 9         | 0                        | 0                     | 0                 |
| 6                                                   | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 7                                                   | <b>Other financial corporations</b>                                                           | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>7</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          |
| 8                                                   | <i>of which investment firms</i>                                                              | 0                                                              | 0        | 0                        | 0                 | 7                                                              | 0         | 0                        | 0                     | 0                 |
| 9                                                   | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 10                                                  | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 7                                                              | 0         | 0                        | 0                     | 0                 |
| 11                                                  | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 12                                                  | <i>of which management companies</i>                                                          | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 13                                                  | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 14                                                  | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 15                                                  | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 16                                                  | <i>of which insurance undertakings</i>                                                        | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 17                                                  | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 18                                                  | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 19                                                  | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 20                                                  | <b>Non-financial undertakings</b>                                                             | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>208</b>                                                     | <b>97</b> | <b>0</b>                 | <b>2</b>              | <b>31</b>         |
| 21                                                  | Loans and advances                                                                            | 0                                                              | 0        | 0                        | 0                 | 165                                                            | 86        | 0                        | 2                     | 30                |
| 22                                                  | Debt securities, including UoP                                                                | 0                                                              | 0        | 0                        | 0                 | 42                                                             | 11        | 0                        | 1                     | 1                 |
| 23                                                  | Equity instruments                                                                            | 0                                                              | 0        |                          | 0                 | 0                                                              | 0         |                          | 0                     | 0                 |
| 24                                                  | <b>Households</b>                                                                             |                                                                |          |                          |                   | <b>130</b>                                                     | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          |
| 25                                                  | of which loans collateralized by residential immovable property                               |                                                                |          |                          |                   | 130                                                            | 0         | 0                        | 0                     | 0                 |
| 26                                                  | of which building renovation loans                                                            |                                                                |          |                          |                   | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 27                                                  | of which motor vehicle loans                                                                  |                                                                |          |                          |                   | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 28                                                  | <b>Local governments financing</b>                                                            | <b>0</b>                                                       | <b>0</b> | <b>0</b>                 | <b>0</b>          | <b>0</b>                                                       | <b>0</b>  | <b>0</b>                 | <b>0</b>              | <b>0</b>          |
| 29                                                  | Housing financing                                                                             | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |
| 30                                                  | Other local government financing                                                              | 0                                                              | 0        | 0                        | 0                 | 0                                                              | 0         | 0                        | 0                     | 0                 |

| 1. Assets for the calculation of GAR based on CapEx                             |                                                                                           | w                                                              | x | z                        | aa                | ab                                                             | ac  | ad                       | ae                    | af                |
|---------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------------------|---|--------------------------|-------------------|----------------------------------------------------------------|-----|--------------------------|-----------------------|-------------------|
| Million EUR                                                                     |                                                                                           | 31 December 2024                                               |   |                          |                   |                                                                |     |                          |                       |                   |
|                                                                                 |                                                                                           | Biodiversity and ecosystems (BIO)                              |   |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                       |     |                          |                       |                   |
|                                                                                 |                                                                                           | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |   |                          |                   | Of which towards taxonomy relevant sectors (Taxonomy-eligible) |     |                          |                       |                   |
|                                                                                 |                                                                                           | Of which environmentally sustainable (Taxonomy-aligned)        |   |                          |                   | Of which environmentally sustainable (Taxonomy-aligned)        |     |                          |                       |                   |
|                                                                                 |                                                                                           |                                                                |   | Of which Use of Proceeds | Of which enabling |                                                                |     | Of which Use of Proceeds | Of which transitional | Of which enabling |
| 31                                                                              | Collateral obtained by taking possession: residential and commercial immovable properties | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0   | 0                        | 0                     | 0                 |
| 32                                                                              | Assets excluded from the numerator for GAR calculation (covered in the denominator)       |                                                                |   |                          |                   | 0                                                              | 0   | 0                        | 0                     | 0                 |
| 33                                                                              | Financial and Non-financial undertakings                                                  |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 34                                                                              | SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations                |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 35                                                                              | Loans and advances                                                                        |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 36                                                                              | of which loans collateralized by commercial immovable property                            |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 37                                                                              | of which building renovation loans                                                        |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 38                                                                              | Debt securities                                                                           |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 39                                                                              | Equity instruments                                                                        |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 40                                                                              | Non-EU country counterparties not subject to NFRD disclosure obligations                  |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 41                                                                              | Loans and advances                                                                        |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 42                                                                              | Debt securities                                                                           |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 43                                                                              | Equity instruments                                                                        |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 44                                                                              | Derivatives                                                                               |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 45                                                                              | On demand interbank loans                                                                 |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 46                                                                              | Cash and cash-related assets                                                              |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 47                                                                              | Other categories of assets (e.g. goodwill, commodities etc.)                              |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 48                                                                              | Total GAR assets                                                                          | 0                                                              | 0 | 0                        | 0                 | 403                                                            | 108 | 0                        | 2                     | 31                |
| 49                                                                              | Assets not covered for GAR calculation                                                    |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 50                                                                              | Central governments and Supranational issuers                                             |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 51                                                                              | Central banks exposure                                                                    |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 52                                                                              | Trading book                                                                              |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 53                                                                              | Total assets                                                                              | 0                                                              | 0 | 0                        | 0                 | 403                                                            | 108 | 0                        | 2                     | 31                |
| Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations |                                                                                           |                                                                |   |                          |                   |                                                                |     |                          |                       |                   |
| 54                                                                              | Financial guarantees                                                                      | 0                                                              | 0 | 0                        | 0                 | 118                                                            | 53  | 0                        | 1                     | 22                |
| 55                                                                              | Assets under management                                                                   | 0                                                              | 0 | 0                        | 0                 | 159                                                            | 81  | 0                        | 0                     | 61                |
| 56                                                                              | Of which debt securities                                                                  | 0                                                              | 0 | 0                        | 0                 | 0                                                              | 0   | 0                        | 0                     | 0                 |
| 57                                                                              | Of which equity instruments                                                               | 0                                                              | 0 | 0                        | 0                 | 159                                                            | 81  | 0                        | 0                     | 61                |

The tables below show the proportion of environmentally sustainable assets compared to the covered assets recorded in the main EU Taxonomy. The purpose of these tables is to show the proportion of total assets covered by the GAR.

**Table 2 - Turnover**

| 2. GAR sector information based on Turnover                |                                                                                                        | a                                             | b                                             | c                                      | d                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Climate change mitigation (CCM)               |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (CCM) | Million EUR                            | Of which environmentally<br>sustainable (CCM) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 2                                             | 1                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 8                                             | 2                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 16                                            | 4                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 3                                             | 2                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 33                                            | 28                                            |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 25                                            | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 45                                            | 8                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 23                                            | 23                                            |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 5                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 1                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 1                                             | 1                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 1                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 34                                            | 10                                            |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 1                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on Turnover                |                                                                                                        | e                                             | f                                             | g                                      | h                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Climate change adaptation (CCA)               |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (CCA) | Million EUR                            | Of which environmentally<br>sustainable (CCA) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                             |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                             |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on Turnover                |                                                                                                        | i                                             | j                                             | k                                      | l                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Water and marine resources (WTR)              |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (WTR) | Million EUR                            | Of which environmentally<br>sustainable (WTR) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                             |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                             |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on Turnover                |                                                                                                        | m                                             | n                                            | o                                      | p                                            |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|----------------------------------------------|----------------------------------------|----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Circular economy (CE)                         |                                              |                                        |                                              |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                              | SMEs and other NFC not subject to NFRD |                                              |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                              | [Gross] carrying amount                |                                              |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (CE) | Million EUR                            | Of which environmentally<br>sustainable (CE) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                            |                                        |                                              |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                            |                                        |                                              |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                            |                                        |                                              |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                            |                                        |                                              |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                            |                                        |                                              |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                            |                                        |                                              |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                            |                                        |                                              |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                            |                                        |                                              |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                            |                                        |                                              |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                            |                                        |                                              |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                            |                                        |                                              |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                            |                                        |                                              |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                            |                                        |                                              |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                            |                                        |                                              |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                            |                                        |                                              |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                            |                                        |                                              |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                            |                                        |                                              |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                            |                                        |                                              |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                            |                                        |                                              |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                            |                                        |                                              |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                            |                                        |                                              |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                            |                                        |                                              |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                            |                                        |                                              |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                            |                                        |                                              |

| 2. GAR sector information based on Turnover                |                                                                                                        | q                                             | r                                             | s                                      | t                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Pollution prevention and control (PPC)        |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (PPC) | Million EUR                            | Of which environmentally<br>sustainable (PPC) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                             |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                             |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on Turnover                |                                                                                                        | u                                             | v                                             | w                                      | x                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Biodiversity and ecosystems (BIO)             |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (BIO) | Million EUR                            | Of which environmentally<br>sustainable (BIO) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                             |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                             |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |



| 2. GAR sector information based on Turnover                |                                                                                                        | y                                             | z                                                                             | aa                                     | ab                                                                            |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------|----------------------------------------|-------------------------------------------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)      |                                                                               |                                        |                                                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                                                               | SMEs and other NFC not subject to NFRD |                                                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                                                               | [Gross] carrying amount                |                                                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (CCM + CCA + WTR<br>+ CE + PPC + BIO) | Million EUR                            | Of which environmentally<br>sustainable (CCM + CCA + WTR<br>+ CE + PPC + BIO) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                                                             |                                        |                                                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                                                             |                                        |                                                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 2                                             | 1                                                                             |                                        |                                                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 8                                             | 2                                                                             |                                        |                                                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 16                                            | 4                                                                             |                                        |                                                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                                                             |                                        |                                                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 3                                             | 2                                                                             |                                        |                                                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 33                                            | 28                                                                            |                                        |                                                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 25                                            | 0                                                                             |                                        |                                                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 45                                            | 8                                                                             |                                        |                                                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                                                             |                                        |                                                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 23                                            | 23                                                                            |                                        |                                                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                                                             |                                        |                                                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 5                                             | 0                                                                             |                                        |                                                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                                                             |                                        |                                                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 1                                             | 0                                                                             |                                        |                                                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 2                                             | 1                                                                             |                                        |                                                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 1                                             | 0                                                                             |                                        |                                                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                                                             |                                        |                                                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                                                             |                                        |                                                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                                                             |                                        |                                                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 34                                            | 10                                                                            |                                        |                                                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                                                             |                                        |                                                                               |
| 24                                                         | S9999 Other services                                                                                   | 1                                             | 0                                                                             |                                        |                                                                               |

**Table 2 - CapEx**

| 2. GAR sector information based on CapEx                   |                                                                                                        | a                                             | b                                             | c                                      | d                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Climate change mitigation (CCM)               |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (CCM) | Million EUR                            | Of which environmentally<br>sustainable (CCM) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 1                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 2                                             | 2                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 31                                            | 10                                            |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 25                                            | 10                                            |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 3                                             | 3                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 26                                            | 9                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 39                                            | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 67                                            | 30                                            |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 5                                             | 3                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 28                                            | 28                                            |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 3                                             | 2                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 5                                             | 2                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 2                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 1                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 46                                            | 40                                            |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 1                                             | 1                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on CapEx                   |                                                                                                        | e                                             | f                                             | g                                      | h                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Climate change adaptation (CCA)               |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (CCA) | Million EUR                            | Of which environmentally<br>sustainable (CCA) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                             |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                             |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on CapEx                   |                                                                                                        | i                                             | j                                             | k                                      | l                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Water and marine resources (WTR)              |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (WTR) | Million EUR                            | Of which environmentally<br>sustainable (WTR) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                             |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                             |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on CapEx                   |                                                                                                        | m                                             | n                                            | o                                      | p                                            |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|----------------------------------------------|----------------------------------------|----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Circular economy (CE)                         |                                              |                                        |                                              |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                              | SMEs and other NFC not subject to NFRD |                                              |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                              | [Gross] carrying amount                |                                              |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (CE) | Million EUR                            | Of which environmentally<br>sustainable (CE) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                            |                                        |                                              |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                            |                                        |                                              |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                            |                                        |                                              |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                            |                                        |                                              |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                            |                                        |                                              |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                            |                                        |                                              |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                            |                                        |                                              |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                            |                                        |                                              |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                            |                                        |                                              |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                            |                                        |                                              |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                            |                                        |                                              |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                            |                                        |                                              |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                            |                                        |                                              |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                            |                                        |                                              |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                            |                                        |                                              |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                            |                                        |                                              |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                            |                                        |                                              |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                            |                                        |                                              |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                            |                                        |                                              |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                            |                                        |                                              |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                            |                                        |                                              |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                            |                                        |                                              |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                            |                                        |                                              |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                            |                                        |                                              |

| 2. GAR sector information based on CapEx                   |                                                                                                        | q                                             | r                                             | s                                      | t                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Pollution prevention and control (PPC)        |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (PPC) | Million EUR                            | Of which environmentally<br>sustainable (PPC) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                             |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                             |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on CapEx                   |                                                                                                        | u                                             | v                                             | w                                      | x                                             |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|----------------------------------------|-----------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | Biodiversity and ecosystems (BIO)             |                                               |                                        |                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                               | SMEs and other NFC not subject to NFRD |                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                               | [Gross] carrying amount                |                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (BIO) | Million EUR                            | Of which environmentally<br>sustainable (BIO) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 0                                             | 0                                             |                                        |                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                             |                                        |                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 0                                             | 0                                             |                                        |                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 0                                             | 0                                             |                                        |                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 0                                             | 0                                             |                                        |                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                             |                                        |                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 0                                             | 0                                             |                                        |                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 0                                             | 0                                             |                                        |                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 0                                             | 0                                             |                                        |                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 0                                             | 0                                             |                                        |                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 0                                             | 0                                             |                                        |                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 0                                             | 0                                             |                                        |                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 0                                             | 0                                             |                                        |                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 0                                             | 0                                             |                                        |                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                             |                                        |                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 0                                             | 0                                             |                                        |                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 0                                             | 0                                             |                                        |                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                             |                                        |                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                             |                                        |                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                             |                                        |                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                             |                                        |                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 0                                             | 0                                             |                                        |                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 0                                             | 0                                             |                                        |                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                             |                                        |                                               |

| 2. GAR sector information based on CapEx                   |                                                                                                        | y                                             | z                                                                             | aa                                     | ab                                                                            |
|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------|-------------------------------------------------------------------------------|----------------------------------------|-------------------------------------------------------------------------------|
| Breakdown by sector - NACE 4 digits level (code and label) |                                                                                                        | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)      |                                                                               |                                        |                                                                               |
|                                                            |                                                                                                        | Non-Financial corporates<br>(Subject to NFRD) |                                                                               | SMEs and other NFC not subject to NFRD |                                                                               |
|                                                            |                                                                                                        | [Gross] carrying amount                       |                                                                               | [Gross] carrying amount                |                                                                               |
|                                                            |                                                                                                        | Million EUR                                   | Of which environmentally<br>sustainable (CCM + CCA + WTR<br>+ CE + PPC + BIO) | Million EUR                            | Of which environmentally<br>sustainable (CCM + CCA + WTR<br>+ CE + PPC + BIO) |
| 1                                                          | C1393 Manufacture of carpets and rugs                                                                  | 1                                             | 0                                                                             |                                        |                                                                               |
| 2                                                          | C2020 Manufacture of pesticides and other agrochemical products                                        | 0                                             | 0                                                                             |                                        |                                                                               |
| 3                                                          | C2420 Manufacture of tubes, pipes, hollow profiles, and related fittings, of steel                     | 2                                             | 2                                                                             |                                        |                                                                               |
| 4                                                          | C2442 Manufacture of aluminum                                                                          | 31                                            | 10                                                                            |                                        |                                                                               |
| 5                                                          | C2550 Forging, pressing, stamping, and roll-forming of metal; powder metallurgy                        | 25                                            | 10                                                                            |                                        |                                                                               |
| 6                                                          | C2630 Manufacture of communication equipment                                                           | 0                                             | 0                                                                             |                                        |                                                                               |
| 7                                                          | C2732 Manufacture of other electronic and electric wires and cables                                    | 3                                             | 3                                                                             |                                        |                                                                               |
| 8                                                          | D3511 Production of electricity within the electricity, gas, steam, and air conditioning supply sector | 26                                            | 9                                                                             |                                        |                                                                               |
| 9                                                          | F4120 Construction of residential and non-residential buildings                                        | 39                                            | 0                                                                             |                                        |                                                                               |
| 10                                                         | F4211 Construction of roads and motorways                                                              | 67                                            | 30                                                                            |                                        |                                                                               |
| 11                                                         | F4221 Construction of utility projects for fluids                                                      | 5                                             | 3                                                                             |                                        |                                                                               |
| 12                                                         | F4299 Construction of other civil engineering projects                                                 | 28                                            | 28                                                                            |                                        |                                                                               |
| 13                                                         | G4671 Wholesale of solid, liquid, and gaseous fuels and related products                               | 4                                             | 2                                                                             |                                        |                                                                               |
| 14                                                         | H5010 Sea and coastal passenger water transport                                                        | 5                                             | 2                                                                             |                                        |                                                                               |
| 15                                                         | H5221 Service activities incidental to land transportation                                             | 0                                             | 0                                                                             |                                        |                                                                               |
| 16                                                         | I5510 Hotels and similar accommodation                                                                 | 2                                             | 0                                                                             |                                        |                                                                               |
| 17                                                         | J6201 Computer programming activities                                                                  | 1                                             | 0                                                                             |                                        |                                                                               |
| 18                                                         | J6209 Other information technology and computer service activities                                     | 0                                             | 0                                                                             |                                        |                                                                               |
| 19                                                         | K6430 Trusts, funds, and similar financial entities                                                    | 0                                             | 0                                                                             |                                        |                                                                               |
| 20                                                         | L6820 Renting and operating of own or leased real estate                                               | 0                                             | 0                                                                             |                                        |                                                                               |
| 21                                                         | M7112 Engineering activities and related technical consultancy                                         | 0                                             | 0                                                                             |                                        |                                                                               |
| 22                                                         | M7490 Other professional, scientific and technical activities                                          | 46                                            | 40                                                                            |                                        |                                                                               |
| 23                                                         | N8121 General cleaning of buildings                                                                    | 1                                             | 1                                                                             |                                        |                                                                               |
| 24                                                         | S9999 Other services                                                                                   | 0                                             | 0                                                                             |                                        |                                                                               |



**Table 3 - Turnover**

| 3. GAR KPI stock based on Turnover                             |                                                                                               | a                                                                                        | b     | c     | d                                         | e     | f                                                                                        | g     | h                                         | i     | j                                                                                        | k     | l                                         | m     | n                                                                                        | o     | p     | q     |
|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------|-------|-------------------------------------------|-------|------------------------------------------------------------------------------------------|-------|-------------------------------------------|-------|------------------------------------------------------------------------------------------|-------|-------------------------------------------|-------|------------------------------------------------------------------------------------------|-------|-------|-------|
| % (compared to total covered assets in the denominator)        |                                                                                               | 31 December 2024                                                                         |       |       |                                           |       |                                                                                          |       |                                           |       |                                                                                          |       |                                           |       |                                                                                          |       |       |       |
|                                                                |                                                                                               | Climate change mitigation (CCM)                                                          |       |       |                                           |       | Climate change adaptation (CCA)                                                          |       |                                           |       | Water and marine resources (WTR)                                                         |       |                                           |       | Circular economy (CE)                                                                    |       |       |       |
|                                                                |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |       |                                           |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                                           |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                                           |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |       |       |
|                                                                |                                                                                               |                                                                                          |       |       |                                           |       |                                                                                          |       |                                           |       |                                                                                          |       |                                           |       |                                                                                          |       |       |       |
|                                                                |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |       |                                           |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                                           |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                                           |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |       |       |
| Of which Use of ProceedsOf which transitionalOf which enabling |                                                                                               |                                                                                          |       |       | Of which Use of ProceedsOf which enabling |       |                                                                                          |       | Of which Use of ProceedsOf which enabling |       |                                                                                          |       | Of which Use of ProceedsOf which enabling |       |                                                                                          |       |       |       |
|                                                                | GAR - Covered assets in both numerator and denominator                                        |                                                                                          |       |       |                                           |       |                                                                                          |       |                                           |       |                                                                                          |       |                                           |       |                                                                                          |       |       |       |
| 1                                                              | Loans and advances, debt securities and equity instrument no HfT eligible for GAR calculation | 34.82%                                                                                   | 5.64% | 0.00% | 0.01%                                     | 0.95% | 0.12%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |
| 2                                                              | Financial undertakings                                                                        | 28.15%                                                                                   | 1.70% | 0.00% | 0.05%                                     | 0.12% | 0.34%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |
| 3                                                              | Credit institutions                                                                           | 25.27%                                                                                   | 1.77% | 0.00% | 0.06%                                     | 0.12% | 0.36%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |
| 4                                                              | Loans and advances                                                                            | 21.99%                                                                                   | 1.43% | 0.00% | 0.16%                                     | 0.18% | 0.23%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |
| 5                                                              | Debt securities, including UoP                                                                | 25.84%                                                                                   | 1.82% | 0.00% | 0.04%                                     | 0.11% | 0.38%                                                                                    | 0,01% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |
| 6                                                              | Equity instruments                                                                            | 0.00%                                                                                    | 0.00% |       | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% |                                           | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     |       | 0.00%                                                                                    | 0.00% |       | 0.00% |
| 7                                                              | Other financial corporations                                                                  | 100.00%                                                                                  | 0.00% | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |
| 8                                                              | of which investment firms                                                                     | 100.00%                                                                                  | 0.00% | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |
| 9                                                              | Loans and advances                                                                            | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |
| 10                                                             | Debt securities, including UoP                                                                | 100.00%                                                                                  | 0.00% | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                     | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |

| 3. GAR KPI stock based on Turnover                      |                                                                 | a                                                                                        | b      | c                        | d                     | e                 | f                                                                                        | g     | h                        | i                 | j                                                                                        | k     | l                        | m                                                                                        | n     | o     | p                        | q                 |
|---------------------------------------------------------|-----------------------------------------------------------------|------------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|------------------------------------------------------------------------------------------|-------|-------|--------------------------|-------------------|
| % (compared to total covered assets in the denominator) |                                                                 | 31 December 2024                                                                         |        |                          |                       |                   |                                                                                          |       |                          |                   |                                                                                          |       |                          |                                                                                          |       |       |                          |                   |
|                                                         |                                                                 | Climate change mitigation (CCM)                                                          |        |                          |                       |                   | Climate change adaptation (CCA)                                                          |       |                          |                   | Water and marine resources (WTR)                                                         |       |                          | Circular economy (CE)                                                                    |       |       |                          |                   |
|                                                         |                                                                 | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |        |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |       |                          |                   |
|                                                         |                                                                 | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |        |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |       |                          |                   |
|                                                         |                                                                 |                                                                                          |        | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling                                                                        |       |       | Of which Use of Proceeds | Of which enabling |
| 11                                                      | Equity instruments                                              | 0.00%                                                                                    | 0.00%  |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% |                          | 0.00%             | 0.00%                                                                                    | 0.00% |                          | 0.00%                                                                                    | 0.00% | 0.00% |                          | 0.00%             |
| 12                                                      | of which management companies                                   | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 13                                                      | Loans and advances                                              | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 14                                                      | Debt securities, including UoP                                  | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 15                                                      | Equity instruments                                              | 0.00%                                                                                    | 0.00%  |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% |                          | 0.00%             | 0.00%                                                                                    | 0.00% |                          | 0.00%                                                                                    | 0.00% | 0.00% |                          | 0.00%             |
| 16                                                      | of which insurance undertakings                                 | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 17                                                      | Loans and advances                                              | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 18                                                      | Debt securities, including UoP                                  | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 19                                                      | Equity instruments                                              | 0.00%                                                                                    | 0.00%  |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% |                          | 0.00%             | 0.00%                                                                                    | 0.00% |                          | 0.00%                                                                                    | 0.00% | 0.00% |                          | 0.00%             |
| 20                                                      | Non-financial undertakings                                      | 28.94%                                                                                   | 9.41%  | 0.00%                    | 0.01%                 | 1.64%             | 0.10%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 21                                                      | Loans and advances                                              | 27.71%                                                                                   | 10.70% | 0.00%                    | 0.00%                 | 1.91%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 22                                                      | Debt securities, including UoP                                  | 35.60%                                                                                   | 2.45%  | 0.00%                    | 0.06%                 | 0.19%             | 0.62%                                                                                    | 0.01% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 23                                                      | Equity instruments                                              | 0.00%                                                                                    | 0.00%  |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% |                          | 0.00%             | 0.00%                                                                                    | 0.00% |                          | 0.00%                                                                                    | 0.00% | 0.00% |                          | 0.00%             |
| 24                                                      | Households                                                      | 58.83%                                                                                   | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             |                                                                                          |       |                          |                                                                                          | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 25                                                      | of which loans collateralized by residential immovable property | 100.00%                                                                                  | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             |                                                                                          |       |                          |                                                                                          | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 26                                                      | of which building renovation loans                              | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             |                                                                                          |       |                          |                                                                                          | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 27                                                      | of which motor vehicle loans                                    | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             |                                                                                          |       |                          |                   |                                                                                          |       |                          |                                                                                          |       |       |                          |                   |
| 28                                                      | Local governments financing                                     | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |
| 29                                                      | Housing financing                                               | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                    | 0.00%             |

| 3. GAR KPI stock based on Turnover                      |                                                                                           | a                                                                                        | b     | c                        | d                     | e                 | f                                                                                        | g     | h                                                                                       | i                 | j                                                                                        | k     | l                                                                                       | m                                                                                        | n     | o     | p                                                                                       | q                 |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------|-------------------|------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------|-------|-----------------------------------------------------------------------------------------|-------------------|
| % (compared to total covered assets in the denominator) |                                                                                           | 31 December 2024                                                                         |       |                          |                       |                   |                                                                                          |       |                                                                                         |                   |                                                                                          |       |                                                                                         |                                                                                          |       |       |                                                                                         |                   |
|                                                         |                                                                                           | Climate change mitigation (CCM)                                                          |       |                          |                       |                   | Climate change adaptation (CCA)                                                          |       |                                                                                         |                   | Water and marine resources (WTR)                                                         |       |                                                                                         | Circular economy (CE)                                                                    |       |       |                                                                                         |                   |
|                                                         |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                                                                                         |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                                                                                         | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |       |                                                                                         |                   |
|                                                         |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                       |                   |                                                                                          |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                   |                                                                                          |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                                                                                          |       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                   |
|                                                         |                                                                                           |                                                                                          |       | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |       | Of which Use of Proceeds                                                                | Of which enabling |                                                                                          |       | Of which Use of Proceeds                                                                | Of which enabling                                                                        |       |       | Of which Use of Proceeds                                                                | Of which enabling |
| 30                                                      | Other local government financing                                                          | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                                                                                   | 0.00%             |
| 31                                                      | Collateral obtained by taking possession: residential and commercial immovable properties | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                                                                                   | 0.00%             |
| 32                                                      | Total GAR assets                                                                          | 7.80%                                                                                    | 1.26% | 0.00%                    | 0.00%                 | 0.21%             | 0.03%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00% | 0.00% | 0.00%                                                                                   | 0.00%             |

| 3. GAR KPI stock based on Turnover                      |                                                                                               | r                                                                                        | s                        | t                 | u     | v                                                                                        | w                 | x     | z                        | aa                                                                                       | ab                | ac    | ad    | ae                                 | af     |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------------|-------------------|-------|------------------------------------------------------------------------------------------|-------------------|-------|--------------------------|------------------------------------------------------------------------------------------|-------------------|-------|-------|------------------------------------|--------|
| % (compared to total covered assets in the denominator) |                                                                                               | 31 December 2024                                                                         |                          |                   |       |                                                                                          |                   |       |                          |                                                                                          |                   |       |       |                                    |        |
|                                                         |                                                                                               | Pollution prevention and control (PPC)                                                   |                          |                   |       | Biodiversity and ecosystems (BIO)                                                        |                   |       |                          | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |                   |       |       |                                    |        |
|                                                         |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                          |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                   |       |                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                   |       |       | Proportion of total assets covered |        |
|                                                         |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                          |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                   |       |                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                   |       |       |                                    |        |
|                                                         |                                                                                               |                                                                                          | Of which Use of Proceeds | Of which enabling |       | Of which Use of Proceeds                                                                 | Of which enabling |       | Of which Use of Proceeds | Of which transitional                                                                    | Of which enabling |       |       |                                    |        |
|                                                         | GAR - Covered assets in both numerator and denominator                                        |                                                                                          |                          |                   |       |                                                                                          |                   |       |                          |                                                                                          |                   |       |       |                                    |        |
| 1                                                       | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 34.93%                                                                                   | 5,64%             | 0.00% | 0,01% | 0.95%                              | 17.46% |
| 2                                                       | Financial undertakings                                                                        | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 28.50%                                                                                   | 1.70%             | 0.00% | 0.05% | 0.12%                              | 3.09%  |
| 3                                                       | Credit institutions                                                                           | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 25.63%                                                                                   | 1.77%             | 0.00% | 0.06% | 0.12%                              | 2.97%  |
| 4                                                       | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 22.22%                                                                                   | 1.43%             | 0.00% | 0.16% | 0.19%                              | 0.44%  |
| 5                                                       | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 26.22%                                                                                   | 1.83%             | 0.00% | 0.04% | 0.11%                              | 2.53%  |
| 6                                                       | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00%                              | 0.00%  |
| 7                                                       | Other financial corporations                                                                  | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 100.00%                                                                                  | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.12%  |
| 8                                                       | of which investment firms                                                                     | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 100.00%                                                                                  | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0,12%  |
| 9                                                       | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%  |
| 10                                                      | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 100.00%                                                                                  | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.12%  |
| 11                                                      | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00%                              | 0.00%  |
| 12                                                      | of which management companies                                                                 | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%  |
| 13                                                      | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%  |
| 14                                                      | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%  |
| 15                                                      | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00%                              | 0.00%  |
| 16                                                      | of which insurance undertakings                                                               | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%  |
| 17                                                      | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%  |
| 18                                                      | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%  |
| 19                                                      | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00%                              | 0.00%  |
| 20                                                      | Non-financial undertakings                                                                    | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 29.04%                                                                                   | 9.41%             | 0.00% | 0.01% | 1.64%                              | 9.90%  |
| 21                                                      | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 27.71%                                                                                   | 10.70%            | 0.00% | 0.00% | 1.91%                              | 8.36%  |
| 22                                                      | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 36.23%                                                                                   | 2.46%             | 0.00% | 0.06% | 0.19%                              | 1.54%  |
| 23                                                      | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00%                              | 0.00%  |
| 24                                                      | Households                                                                                    |                                                                                          |                          |                   |       |                                                                                          |                   |       |                          | 58.83%                                                                                   | 0.00%             | 0.00% | 0.00% | 0.00%                              | 3.98%  |
| 25                                                      | of which loans collateralized by residential immovable property                               |                                                                                          |                          |                   |       |                                                                                          |                   |       |                          | 100.00%                                                                                  | 0.00%             | 0.00% | 0.00% | 0.00%                              | 2.34%  |

| 3. GAR KPI stock based on Turnover                      |                                                                                           | r                                                                                        | s                        | t     | u     | v                                                                                        | w     | x     | z     | aa                                                                                       | ab                | ac    | ad    | ae                                 | af                       |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------------|-------|-------|------------------------------------------------------------------------------------------|-------|-------|-------|------------------------------------------------------------------------------------------|-------------------|-------|-------|------------------------------------|--------------------------|
| % (compared to total covered assets in the denominator) |                                                                                           | 31 December 2024                                                                         |                          |       |       |                                                                                          |       |       |       |                                                                                          |                   |       |       |                                    |                          |
|                                                         |                                                                                           | Pollution prevention and control (PPC)                                                   |                          |       |       | Biodiversity and ecosystems (BIO)                                                        |       |       |       | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |                   |       |       |                                    |                          |
|                                                         |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                          |       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                   |       |       | Proportion of total assets covered |                          |
|                                                         |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                          |       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                   |       |       |                                    |                          |
|                                                         |                                                                                           |                                                                                          | Of which Use of Proceeds |       |       | Of which enabling                                                                        |       |       |       | Of which Use of Proceeds                                                                 | Of which enabling |       |       |                                    | Of which Use of Proceeds |
| 26                                                      | of which building renovation loans                                                        |                                                                                          |                          |       |       |                                                                                          |       |       |       | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%                    |
| 27                                                      | of which motor vehicle loans                                                              |                                                                                          |                          |       |       |                                                                                          |       |       |       |                                                                                          |                   |       |       |                                    |                          |
| 28                                                      | Local governments financing                                                               | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.48%                    |
| 29                                                      | Housing financing                                                                         | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%                    |
| 30                                                      | Other local government financing                                                          | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.48%                    |
| 31                                                      | Collateral obtained by taking possession: residential and commercial immovable properties | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00%                              | 0.00%                    |
| 32                                                      | Total GAR assets                                                                          | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 7.83%                                                                                    | 1.26%             | 0.00% | 0.00% | 0.21%                              | 77.89%                   |

**Table 3 - CapEx**

| 3. GAR KPI stock based on CapEx                         |                                                                                               | a                                                                                        | b      | c                        | d                     | e                 | f                                                                                        | g     | h                                                                                       | i                 | j                                                                                        | k     | l                                                                                       | m                 | n                                                                                        | o     | p                                                                                       | q                 |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------|-------------------|------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------|-------------------|------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------|-------------------|
| % (compared to total covered assets in the denominator) |                                                                                               | 31 December 2024                                                                         |        |                          |                       |                   |                                                                                          |       |                                                                                         |                   |                                                                                          |       |                                                                                         |                   |                                                                                          |       |                                                                                         |                   |
|                                                         |                                                                                               | Climate change mitigation (CCM)                                                          |        |                          |                       |                   | Climate change adaptation (CCA)                                                          |       |                                                                                         |                   | Water and marine resources (WTR)                                                         |       |                                                                                         |                   | Circular economy (CE)                                                                    |       |                                                                                         |                   |
|                                                         |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |        |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                                                                                         |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                                                                                         |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                                                                                         |                   |
|                                                         |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |        |                          |                       |                   |                                                                                          |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                   |                                                                                          |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                   |                                                                                          |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                   |
|                                                         |                                                                                               |                                                                                          |        | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |       | Of which Use of Proceeds                                                                | Of which enabling |                                                                                          |       | Of which Use of Proceeds                                                                | Of which enabling |                                                                                          |       | Of which Use of Proceeds                                                                | Of which enabling |
|                                                         | GAR - Covered assets in both numerator and denominator                                        |                                                                                          |        |                          |                       |                   |                                                                                          |       |                                                                                         |                   |                                                                                          |       |                                                                                         |                   |                                                                                          |       |                                                                                         |                   |
| 1                                                       | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 41.56%                                                                                   | 11.17% | 0.00%                    | 0.25%                 | 3.22%             | 0.08%                                                                                    | 0.01% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             |
| 2                                                       | Financial undertakings                                                                        | 37.55%                                                                                   | 6.54%  | 0.00%                    | 0.13%                 | 0.24%             | 0.39%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             |
| 3                                                       | Credit institutions                                                                           | 35.05%                                                                                   | 6.80%  | 0.00%                    | 0.14%                 | 0.25%             | 0.40%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             |
| 4                                                       | Loans and advances                                                                            | 34.38%                                                                                   | 8.50%  | 0.00%                    | 0.30%                 | 0.33%             | 0.24%                                                                                    | 0,03% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             |
| 5                                                       | Debt securities, including UoP                                                                | 35.16%                                                                                   | 6.51%  | 0.00%                    | 0.11%                 | 0.23%             | 0.43%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             |
| 6                                                       | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%  |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% |                                                                                         | 0.00%             | 0.00%                                                                                    | 0.00% |                                                                                         | 0.00%             | 0.00%                                                                                    | 0.00% |                                                                                         | 0.00%             |
| 7                                                       | Other financial corporations                                                                  | 100.00%                                                                                  | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             |
| 8                                                       | of which investment firms                                                                     | 100.00%                                                                                  | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             |
| 9                                                       | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00%             |

| 3. GAR KPI stock based on CapEx                         |                                                                 | a                                                                                        | b      | c                        | d     | e                     | f                                                                                        | g                 | h     | i                                                                                       | j                                                                                        | k                        | l     | m                                                                                        | n     | o                                                                                       | p     | q                        |  |
|---------------------------------------------------------|-----------------------------------------------------------------|------------------------------------------------------------------------------------------|--------|--------------------------|-------|-----------------------|------------------------------------------------------------------------------------------|-------------------|-------|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------------|-------|------------------------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------|-------|--------------------------|--|
| % (compared to total covered assets in the denominator) |                                                                 | 31 December 2024                                                                         |        |                          |       |                       |                                                                                          |                   |       |                                                                                         |                                                                                          |                          |       |                                                                                          |       |                                                                                         |       |                          |  |
|                                                         |                                                                 | Climate change mitigation (CCM)                                                          |        |                          |       |                       | Climate change adaptation (CCA)                                                          |                   |       |                                                                                         | Water and marine resources (WTR)                                                         |                          |       | Circular economy (CE)                                                                    |       |                                                                                         |       |                          |  |
|                                                         |                                                                 | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |        |                          |       |                       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                   |       |                                                                                         | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                          |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                                                                                         |       |                          |  |
|                                                         |                                                                 |                                                                                          |        |                          |       |                       |                                                                                          |                   |       |                                                                                         |                                                                                          |                          |       |                                                                                          |       |                                                                                         |       |                          |  |
|                                                         |                                                                 | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |        | Of which Use of Proceeds |       | Of which transitional |                                                                                          | Of which enabling |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                                                                                          | Of which Use of Proceeds |       | Of which enabling                                                                        |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |       | Of which Use of Proceeds |  |
|                                                         |                                                                 |                                                                                          |        |                          |       |                       |                                                                                          |                   |       |                                                                                         |                                                                                          |                          |       |                                                                                          |       |                                                                                         |       |                          |  |
| 10                                                      | Debt securities, including UoP                                  | 100.00%                                                                                  | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 11                                                      | Equity instruments                                              | 0.00%                                                                                    | 0.00%  |                          | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             |       | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    |       | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   |       | 0.00%                    |  |
| 12                                                      | of which management companies                                   | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 13                                                      | Loans and advances                                              | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 14                                                      | Debt securities, including UoP                                  | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 15                                                      | Equity instruments                                              | 0.00%                                                                                    | 0.00%  |                          | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             |       | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    |       | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   |       | 0.00%                    |  |
| 16                                                      | of which insurance undertakings                                 | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 17                                                      | Loans and advances                                              | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 18                                                      | Debt securities, including UoP                                  | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 19                                                      | Equity instruments                                              | 0.00%                                                                                    | 0.00%  |                          | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             |       | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    |       | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   |       | 0.00%                    |  |
| 20                                                      | Non-financial undertakings                                      | 37.86%                                                                                   | 17.66% | 0.00%                    | 0.39% | 5.60%                 | 0.01%                                                                                    | 0.01%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 21                                                      | Loans and advances                                              | 35.70%                                                                                   | 18.65% | 0.00%                    | 0.35% | 6.40%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 22                                                      | Debt securities, including UoP                                  | 49.54%                                                                                   | 12.31% | 0.00%                    | 0.64% | 1.27%                 | 0.09%                                                                                    | 0,09%             | 0.00% | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 23                                                      | Equity instruments                                              | 0.00%                                                                                    | 0.00%  |                          | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             |       | 0.00%                                                                                   | 0.00%                                                                                    | 0.00%                    |       | 0.00%                                                                                    | 0.00% | 0.00%                                                                                   |       | 0.00%                    |  |
| 24                                                      | Households                                                      | 58.91%                                                                                   | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   |                                                                                          |                          |       |                                                                                          | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |
| 25                                                      | of which loans collateralized by residential immovable property | 100.00%                                                                                  | 0.00%  | 0.00%                    | 0.00% | 0.00%                 | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                                                                                   |                                                                                          |                          |       |                                                                                          | 0.00% | 0.00%                                                                                   | 0.00% | 0.00%                    |  |

| 3. GAR KPI stock based on CapEx                         |                                                                                           | a                                                                                        | b     | c     | d     | e                     | f     | g                                                                                        | h     | i     | j     | k                                                                                        | l     | m                 | n     | o                                                                                        | p     | q                        |       |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------|-------|-------|-----------------------|-------|------------------------------------------------------------------------------------------|-------|-------|-------|------------------------------------------------------------------------------------------|-------|-------------------|-------|------------------------------------------------------------------------------------------|-------|--------------------------|-------|
| % (compared to total covered assets in the denominator) |                                                                                           | 31 December 2024                                                                         |       |       |       |                       |       |                                                                                          |       |       |       |                                                                                          |       |                   |       |                                                                                          |       |                          |       |
|                                                         |                                                                                           | Climate change mitigation (CCM)                                                          |       |       |       |                       |       | Climate change adaptation (CCA)                                                          |       |       |       | Water and marine resources (WTR)                                                         |       |                   |       | Circular economy (CE)                                                                    |       |                          |       |
|                                                         |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |       |       |                       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |       |
|                                                         |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |       |       |                       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |       |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |       |
|                                                         |                                                                                           |                                                                                          |       |       |       |                       |       |                                                                                          |       |       |       |                                                                                          |       |                   |       |                                                                                          |       |                          |       |
|                                                         |                                                                                           | Of which Use of Proceeds                                                                 |       |       |       | Of which transitional |       | Of which enabling                                                                        |       |       |       | Of which Use of Proceeds                                                                 |       | Of which enabling |       |                                                                                          |       | Of which Use of Proceeds |       |
| 26                                                      | of which building renovation loans                                                        | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                 | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% |                                                                                          |       |                   |       | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00% |
| 27                                                      | of which motor vehicle loans                                                              | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                 |       |                                                                                          |       |       |       |                                                                                          |       |                   |       |                                                                                          |       |                          |       |
| 28                                                      | Local governments financing                                                               | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                 | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00% |
| 29                                                      | Housing financing                                                                         | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                 | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00% |
| 30                                                      | Other local government financing                                                          | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                 | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00% |
| 31                                                      | Collateral obtained by taking possession: residential and commercial immovable properties | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                 | 0.00% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00% |
| 32                                                      | Total GAR assets                                                                          | 9.31%                                                                                    | 2.50% | 0.00% | 0.06% | 0.72%                 | 0.02% | 0.00%                                                                                    | 0.00% | 0.00% | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00% |



| 3. GAR KPI stock based on CapEx                         |                                                                                               | r                                                                                        | s                        | t                 | u     | v                                                                                        | w                 | x     | z                        | aa                                                                                       | ab                | ac    | ad    | ae    | af                                 |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------------|-------------------|-------|------------------------------------------------------------------------------------------|-------------------|-------|--------------------------|------------------------------------------------------------------------------------------|-------------------|-------|-------|-------|------------------------------------|
| % (compared to total covered assets in the denominator) |                                                                                               | 31 December 2024                                                                         |                          |                   |       |                                                                                          |                   |       |                          |                                                                                          |                   |       |       |       |                                    |
|                                                         |                                                                                               | Pollution prevention and control (PPC)                                                   |                          |                   |       | Biodiversity and ecosystems (BIO)                                                        |                   |       |                          | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |                   |       |       |       |                                    |
|                                                         |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                          |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                   |       |                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                   |       |       |       | Proportion of total assets covered |
|                                                         |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                          |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                   |       |                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                   |       |       |       |                                    |
|                                                         |                                                                                               |                                                                                          | Of which Use of Proceeds | Of which enabling |       | Of which Use of Proceeds                                                                 | Of which enabling |       | Of which Use of Proceeds | Of which transitional                                                                    | Of which enabling |       |       |       |                                    |
|                                                         | GAR - Covered assets in both numerator and denominator                                        |                                                                                          |                          |                   |       |                                                                                          |                   |       |                          |                                                                                          |                   |       |       |       |                                    |
| 1                                                       | Loans and advances, debt securities and equity instrument no HfT eligible for GAR calculation | 0.01%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 41.64%                                                                                   | 11.18%            | 0.00% | 0.25% | 3.22% | 17.46%                             |
| 2                                                       | Financial undertakings                                                                        | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 37.94%                                                                                   | 6.54%             | 0.00% | 0.13% | 0.24% | 3.09%                              |
| 3                                                       | Credit institutions                                                                           | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 35.45%                                                                                   | 6.80%             | 0.00% | 0.14% | 0.25% | 2.97%                              |
| 4                                                       | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 34.63%                                                                                   | 8.53%             | 0.00% | 0.30% | 0.33% | 0.44%                              |
| 5                                                       | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 35.59%                                                                                   | 6.51%             | 0.00% | 0.11% | 0.23% | 2.53%                              |
| 6                                                       | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00% | 0.00%                              |
| 7                                                       | Other financial corporations                                                                  | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 100.00%                                                                                  | 0.00%             | 0.00% | 0.00% | 0.00% | 0.12%                              |
| 8                                                       | of which investment firms                                                                     | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 100.00%                                                                                  | 0.00%             | 0.00% | 0.00% | 0.00% | 0.12%                              |
| 9                                                       | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00% | 0.00%                              |
| 10                                                      | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 100.00%                                                                                  | 0.00%             | 0.00% | 0.00% | 0.00% | 0.12%                              |
| 11                                                      | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00% | 0.00%                              |
| 12                                                      | of which management companies                                                                 | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00% | 0.00%                              |
| 13                                                      | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00% | 0.00%                              |
| 14                                                      | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00% | 0.00%                              |
| 15                                                      | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00% | 0.00%                              |
| 16                                                      | of which insurance undertakings                                                               | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00% | 0.00%                              |
| 17                                                      | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00% | 0.00%                              |
| 18                                                      | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00% | 0.00% | 0.00%                              |
| 19                                                      | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00% | 0.00%                              |
| 20                                                      | Non-financial undertakings                                                                    | 0.02%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 37.89%                                                                                   | 17.68%            | 0.00% | 0.39% | 5.60% | 9.90%                              |
| 21                                                      | Loans and advances                                                                            | 0.03%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 35.73%                                                                                   | 18.65%            | 0.00% | 0.35% | 6.40% | 8.36%                              |
| 22                                                      | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%             | 0.00% | 0.00%                    | 49.63%                                                                                   | 12.40%            | 0.00% | 0.64% | 1.27% | 1.54%                              |
| 23                                                      | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                    |                   | 0.00% | 0.00%                                                                                    | 0.00%             |       | 0.00%                    | 0.00%                                                                                    | 0.00%             |       | 0.00% | 0.00% | 0.00%                              |
| 24                                                      | Households                                                                                    |                                                                                          |                          |                   |       |                                                                                          |                   |       |                          | 58.91%                                                                                   | 0.00%             | 0.00% | 0.00% | 0.00% | 3.98%                              |

| 3. GAR KPI stock based on CapEx                         |                                                                                           | r                                                                                        | s     | t                        | u                 | v                                                                                        | w     | x                        | z                 | aa                                                                                       | ab    | ac                       | ad                    | ae                                 | af     |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-----------------------|------------------------------------|--------|
| % (compared to total covered assets in the denominator) |                                                                                           | 31 December 2024                                                                         |       |                          |                   |                                                                                          |       |                          |                   |                                                                                          |       |                          |                       |                                    |        |
|                                                         |                                                                                           | Pollution prevention and control (PPC)                                                   |       |                          |                   | Biodiversity and ecosystems (BIO)                                                        |       |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |       |                          |                       |                                    |        |
|                                                         |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                       | Proportion of total assets covered |        |
|                                                         |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                       |                                    |        |
|                                                         |                                                                                           |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which transitional | Of which enabling                  |        |
| 25                                                      | of which loans collateralized by residential immovable property                           |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   | 100.00%                                                                                  | 0.00% | 0.00%                    | 0.00%                 | 0.00%                              | 2.34%  |
| 26                                                      | of which building renovation loans                                                        |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                 | 0.00%                              | 0.00%  |
| 27                                                      | of which motor vehicle loans                                                              |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   |                                                                                          |       |                          |                       |                                    |        |
| 28                                                      | Local governments financing                                                               | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                 | 0.00%                              | 0.48%  |
| 29                                                      | Housing financing                                                                         | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                 | 0.00%                              | 0.00%  |
| 30                                                      | Other local government financing                                                          | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                 | 0.00%                              | 0.48%  |
| 31                                                      | Collateral obtained by taking possession: residential and commercial immovable properties | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%                 | 0.00%                              | 0.00%  |
| 32                                                      | Total GAR assets                                                                          | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 9.33%                                                                                    | 2.51% | 0.00%                    | 0.06%                 | 0.72%                              | 77.89% |

**Table 4 - Turnover**

| 4. GAR KPI flow based on Turnover |                                                                                               | a                                                                                        | b            | c                        | d                     | e                 | f                                                                                        | g            | h                        | i                 | j                                                                                        | k            | l                        | m                 | n                                                                                        | o            | p                        | q                 |
|-----------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|
|                                   |                                                                                               | 31 December 2024                                                                         |              |                          |                       |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
|                                   |                                                                                               | Climate change mitigation (CCM)                                                          |              |                          |                       |                   | Climate change adaptation (CCA)                                                          |              |                          |                   | Water and marine resources (WTR)                                                         |              |                          |                   | Circular economy (CE)                                                                    |              |                          |                   |
|                                   |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   |
|                                   |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   |
|                                   |                                                                                               |                                                                                          |              | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |
|                                   |                                                                                               | % (compared to flow of total eligible assets)                                            |              |                          |                       |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
|                                   | GAR - Covered assets in both numerator and denominator                                        |                                                                                          |              |                          |                       |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
| 1                                 | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 26.68%                                                                                   | 4.42%        | 0.00%                    | 0.00%                 | 0.31%             | 0.08%                                                                                    | 0.02%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 2                                 | <b>Financial undertakings</b>                                                                 | <b>21.67%</b>                                                                            | <b>1.28%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.12%</b>      | <b>0.40%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 3                                 | Credit institutions                                                                           | 21.67%                                                                                   | 1.28%        | 0.00%                    | 0.00%                 | 0.12%             | 0.40%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 4                                 | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 5                                 | Debt securities, including UoP                                                                | 21.67%                                                                                   | 1.28%        | 0.00%                    | 0.00%                 | 0.12%             | 0.40%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 6                                 | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 7                                 | <b>Other financial corporations</b>                                                           | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 8                                 | of which investment firms                                                                     | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 9                                 | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 10                                | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 11                                | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 12                                | of which management companies                                                                 | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 13                                | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 14                                | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 15                                | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 16                                | of which insurance undertakings                                                               | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 17                                | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |

| 4. GAR KPI flow based on Turnover             |                                                                                                  | a                                                                                        | b            | c                        | d                     | e                 | f                                                                                        | g            | h                        | i                 | j                                                                                        | k            | l                        | m                 | n                                                                                        | o            | p                        | q                 |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|
|                                               |                                                                                                  | 31 December 2024                                                                         |              |                          |                       |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
|                                               |                                                                                                  | Climate change mitigation (CCM)                                                          |              |                          |                       |                   | Climate change adaptation (CCA)                                                          |              |                          |                   | Water and marine resources (WTR)                                                         |              |                          |                   | Circular economy (CE)                                                                    |              |                          |                   |
|                                               |                                                                                                  | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   |
| % (compared to flow of total eligible assets) |                                                                                                  | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   |
|                                               |                                                                                                  |                                                                                          |              | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |
| 18                                            | Debt securities, including UoP                                                                   | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 19                                            | Equity instruments                                                                               | 0.00%                                                                                    | 0.00%        |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 20                                            | <b>Non-financial undertakings</b>                                                                | <b>20.08%</b>                                                                            | <b>5.87%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.41%</b>      | <b>0.02%</b>                                                                             | <b>0.02%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 21                                            | Loans and advances                                                                               | 16.39%                                                                                   | 5.78%        | 0.00%                    | 0.00%                 | 0,47%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 22                                            | Debt securities, including UoP                                                                   | 33.67%                                                                                   | 6.21%        | 0.00%                    | 0.00%                 | 0,20%             | 0,11%                                                                                    | 0.11%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 23                                            | Equity instruments                                                                               | 0.00%                                                                                    | 0.00%        |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 24                                            | <b>Households</b>                                                                                | <b>69.41%</b>                                                                            | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |                                                                                          |              |                          |                   | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 25                                            | of which loans collateralized by residential immovable property                                  | 100.00%                                                                                  | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |                                                                                          |              |                          |                   | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 26                                            | of which building renovation loans                                                               | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |                                                                                          |              |                          |                   | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 27                                            | of which motor vehicle loans                                                                     | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
| 28                                            | <b>Local governments financing</b>                                                               | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 29                                            | Housing financing                                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 30                                            | Other local government financing                                                                 | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 31                                            | <b>Collateral obtained by taking possession: residential and commercial immovable properties</b> | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 32                                            | <b>Total GAR assets</b>                                                                          | <b>26.68%</b>                                                                            | <b>4.42%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.31%</b>      | <b>0.08%</b>                                                                             | <b>0.02%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |

| 4. GAR KPI flow based on Turnover             |                                                                                               | r                                                                                        | s                                                                                       | t                        | u                 | v                                                                                        | w                                                                                       | x                        | z                 | aa                                                                                       | ab                                                                                      | ac                       | ad                    | ae                                     | af                |
|-----------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------|-----------------------|----------------------------------------|-------------------|
| % (compared to flow of total eligible assets) |                                                                                               | 31 December 2024                                                                         |                                                                                         |                          |                   |                                                                                          |                                                                                         |                          |                   |                                                                                          |                                                                                         |                          |                       |                                        |                   |
|                                               |                                                                                               | Pollution prevention and control (PPC)                                                   |                                                                                         |                          |                   | Biodiversity and ecosystems (BIO)                                                        |                                                                                         |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |                                                                                         |                          |                       |                                        |                   |
|                                               |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                                                                                         |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                                                                                         |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                                                                                         |                          |                       | Proportion of total new assets covered |                   |
|                                               |                                                                                               |                                                                                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                          |                   |                                                                                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                          |                   |                                                                                          | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) |                          |                       |                                        |                   |
|                                               |                                                                                               |                                                                                          |                                                                                         | Of which Use of Proceeds | Of which enabling |                                                                                          |                                                                                         | Of which Use of Proceeds | Of which enabling |                                                                                          |                                                                                         | Of which Use of Proceeds | Of which transitional |                                        | Of which enabling |
|                                               | GAR - Covered assets in both numerator and denominator                                        |                                                                                          |                                                                                         |                          |                   |                                                                                          |                                                                                         |                          |                   |                                                                                          |                                                                                         |                          |                       |                                        |                   |
| 1                                             | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 31.71%                                                                                   | 2.13%                                                                                   | 0.00%                    | 0.00%                 | 0.08%                                  | 100.00%           |
| 2                                             | Financial undertakings                                                                        | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 22.07%                                                                                   | 1.29%                                                                                   | 0.00%                    | 0.00%                 | 0.12%                                  | 14.49%            |
| 3                                             | Credit institutions                                                                           | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 22,07%                                                                                   | 1.29%                                                                                   | 0.00%                    | 0.00%                 | 0,12%                                  | 14.49%            |
| 4                                             | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 5                                             | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 22,07%                                                                                   | 1.29%                                                                                   | 0.00%                    | 0.00%                 | 0.12%                                  | 14.49%            |
| 6                                             | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%                 | 0.00%                                  | 0.00%             |
| 7                                             | Other financial corporations                                                                  | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 8                                             | of which investment firms                                                                     | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 9                                             | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 10                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 11                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%                 | 0.00%                                  | 0.00%             |
| 12                                            | of which management companies                                                                 | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 13                                            | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 14                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 15                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%                 | 0.00%                                  | 0.00%             |
| 16                                            | of which insurance undertakings                                                               | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 17                                            | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 18                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |
| 19                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%                 | 0.00%                                  | 0.00%             |
| 20                                            | Non-financial undertakings                                                                    | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 26.97%                                                                                   | 2.69%                                                                                   | 0.00%                    | 0.00%                 | 0.09%                                  | 72.12%            |
| 21                                            | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 25.12%                                                                                   | 1.71%                                                                                   | 0.00%                    | 0.00%                 | 0,06%                                  | 56.74%            |
| 22                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%             | 33.78%                                                                                   | 6.32%                                                                                   | 0.00%                    | 0.00%                 | 0,20%                                  | 15.38%            |
| 23                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%             | 0.00%                                                                                    | 0.00%                                                                                   |                          | 0.00%                 | 0.00%                                  | 0.00%             |
| 24                                            | Households                                                                                    |                                                                                          |                                                                                         |                          |                   |                                                                                          |                                                                                         |                          |                   | 69,41%                                                                                   | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 13.05%            |
| 25                                            | of which loans collateralized by residential immovable property                               |                                                                                          |                                                                                         |                          |                   |                                                                                          |                                                                                         |                          |                   | 100.00%                                                                                  | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 9.06%             |
| 26                                            | of which building renovation loans                                                            |                                                                                          |                                                                                         |                          |                   |                                                                                          |                                                                                         |                          |                   | 0.00%                                                                                    | 0.00%                                                                                   | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%             |

| 4. GAR KPI flow based on Turnover |                                                                                                  | r                                                                                        | s            | t                        | u                 | v                                                                                        | w            | x                        | z                 | aa                                                                                       | ab           | ac                       | ad                    | ae                                     | af             |
|-----------------------------------|--------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-----------------------|----------------------------------------|----------------|
|                                   |                                                                                                  | 31 December 2024                                                                         |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                       |                                        |                |
|                                   |                                                                                                  | Pollution prevention and control (PPC)                                                   |              |                          |                   | Biodiversity and ecosystems (BIO)                                                        |              |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |              |                          |                       |                                        |                |
|                                   |                                                                                                  | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                       |                                        |                |
|                                   |                                                                                                  | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                       | Proportion of total new assets covered |                |
|                                   |                                                                                                  |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which transitional | Of which enabling                      |                |
| 27                                | of which motor vehicle loans                                                                     |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%          |
| 28                                | <b>Local governments financing</b>                                                               | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>                           | <b>0.34%</b>   |
| 29                                | Housing financing                                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%          |
| 30                                | Other local government financing                                                                 | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%                                  | 0.34%          |
| 31                                | <b>Collateral obtained by taking possession: residential and commercial immovable properties</b> | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>                           | <b>0.00%</b>   |
| 32                                | <b>Total GAR assets</b>                                                                          | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>31.71%</b>                                                                            | <b>2.13%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.08%</b>                           | <b>100.00%</b> |

**Table 4 - CapEx**

| 4. GAR KPI flow based on CapEx                |                                                                                               | a                                                                                        | b            | c                        | d                     | e                 | f                                                                                        | g            | h                        | i                 | j                                                                                        | k            | l                        | m                 | n                                                                                        | o            | p                        | q                 |
|-----------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|
| % (compared to flow of total eligible assets) |                                                                                               | 31 December 2024                                                                         |              |                          |                       |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
|                                               |                                                                                               | Climate change mitigation (CCM)                                                          |              |                          |                       |                   | Climate change adaptation (CCA)                                                          |              |                          |                   | Water and marine resources (WTR)                                                         |              |                          |                   | Circular economy (CE)                                                                    |              |                          |                   |
|                                               |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   |
|                                               |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   |
|                                               |                                                                                               |                                                                                          |              | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |
|                                               | GAR - Covered assets in both numerator and denominator                                        |                                                                                          |              |                          |                       |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
| 1                                             | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 34.96%                                                                                   | 12.25%       | 0.00%                    | 0.03%                 | 2.27%             | 0.08%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 2                                             | <b>Financial undertakings</b>                                                                 | <b>31.68%</b>                                                                            | <b>7.04%</b> | <b>0.00%</b>             | <b>0.10%</b>          | <b>0.26%</b>      | <b>0.47%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 3                                             | Credit institutions                                                                           | 31.68%                                                                                   | 7.04%        | 0.00%                    | 0.10%                 | 0.26%             | 0.47%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 4                                             | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 5                                             | Debt securities, including UoP                                                                | 31.68%                                                                                   | 7.04%        | 0.00%                    | 0.10%                 | 0.26%             | 0.47%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 6                                             | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 7                                             | <b>Other financial corporations</b>                                                           | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 8                                             | of which investment firms                                                                     | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 9                                             | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 10                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 11                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 12                                            | of which management companies                                                                 | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 13                                            | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 14                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 15                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 16                                            | of which insurance undertakings                                                               | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 17                                            | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |

| 4. GAR KPI flow based on CapEx                |                                                                                                  | a                                                                                        | b             | c                        | d                     | e                 | f                                                                                        | g            | h                        | i                 | j                                                                                        | k            | l                        | m                 | n                                                                                        | o            | p                        | q                 |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|---------------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|
|                                               |                                                                                                  | 31 December 2024                                                                         |               |                          |                       |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
|                                               |                                                                                                  | Climate change mitigation (CCM)                                                          |               |                          |                       |                   | Climate change adaptation (CCA)                                                          |              |                          |                   | Water and marine resources (WTR)                                                         |              |                          |                   | Circular economy (CE)                                                                    |              |                          |                   |
|                                               |                                                                                                  | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |               |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   |
| % (compared to flow of total eligible assets) |                                                                                                  | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |               |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   |
|                                               |                                                                                                  |                                                                                          |               | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |
| 18                                            | Debt securities, including UoP                                                                   | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 19                                            | Equity instruments                                                                               | 0.00%                                                                                    | 0.00%         |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    |              | 0.00%                    | 0.00%             |
| 20                                            | <b>Non-financial undertakings</b>                                                                | <b>29.64%</b>                                                                            | <b>15.57%</b> | <b>0.00%</b>             | <b>0.02%</b>          | <b>3.09%</b>      | <b>0.02%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 21                                            | Loans and advances                                                                               | 24.33%                                                                                   | 16.16%        | 0.00%                    | 0.02%                 | 3.64%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 22                                            | Debt securities, including UoP                                                                   | 49.23%                                                                                   | 13.36%        | 0.00%                    | 0.01%                 | 1.05%             | 0.11%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 23                                            | Equity instruments                                                                               | 0.00%                                                                                    | 0.00%         |                          | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    |              | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             |
| 24                                            | <b>Households</b>                                                                                | <b>68.88%</b>                                                                            | <b>0.00%</b>  | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |                                                                                          |              |                          |                   | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 25                                            | of which loans collateralized by residential immovable property                                  | 99.24%                                                                                   | 0.00%         | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |                                                                                          |              |                          |                   | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 26                                            | of which building renovation loans                                                               | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |                                                                                          |              |                          |                   | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 27                                            | of which motor vehicle loans                                                                     | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%             |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |
| 28                                            | <b>Local governments financing</b>                                                               | <b>0.00%</b>                                                                             | <b>0.00%</b>  | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 29                                            | Housing financing                                                                                | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 30                                            | Other local government financing                                                                 | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             |
| 31                                            | <b>Collateral obtained by taking possession: residential and commercial immovable properties</b> | <b>0.00%</b>                                                                             | <b>0.00%</b>  | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |
| 32                                            | <b>Total GAR assets</b>                                                                          | <b>34.96%</b>                                                                            | <b>12.25%</b> | <b>0.00%</b>             | <b>0.03%</b>          | <b>2.27%</b>      | <b>0.08%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      |



| 4. GAR KPI flow based on CapEx                |                                                                                               | r                                                                                        | s            | t                        | u                 | v                                                                                        | w            | x                        | z                 | aa                                                                                       | ab            | ac                       | ad                    | ae                                     | af            |
|-----------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------------|--------------------------|-------------------|------------------------------------------------------------------------------------------|---------------|--------------------------|-----------------------|----------------------------------------|---------------|
|                                               |                                                                                               | 31 December 2024                                                                         |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |               |                          |                       |                                        |               |
|                                               |                                                                                               | Pollution prevention and control (PPC)                                                   |              |                          |                   | Biodiversity and ecosystems (BIO)                                                        |              |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |               |                          |                       |                                        |               |
|                                               |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |               |                          |                       |                                        |               |
|                                               |                                                                                               | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |              |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |               |                          |                       | Proportion of total new assets covered |               |
| % (compared to flow of total eligible assets) |                                                                                               |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |              | Of which Use of Proceeds | Of which enabling |                                                                                          |               | Of which Use of Proceeds | Of which transitional | Of which enabling                      |               |
|                                               | GAR - Covered assets in both numerator and denominator                                        |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   |                                                                                          |               |                          |                       |                                        |               |
| 1                                             | Loans and advances, debt securities and equity instrument no HFT eligible for GAR calculation | 0.03%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 35.07%                                                                                   | 12.25%        | 0.00%                    | 0.03%                 | 2.27%                                  | 100.00%       |
| 2                                             | <b>Financial undertakings</b>                                                                 | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>32.15%</b>                                                                            | <b>7.04%</b>  | <b>0.00%</b>             | <b>0.10%</b>          | <b>0.26%</b>                           | <b>14.49%</b> |
| 3                                             | Credit institutions                                                                           | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 32.15%                                                                                   | 7.04%         | 0.00%                    | 0.10%                 | 0.26%                                  | 14.49%        |
| 4                                             | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 5                                             | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 32.15%                                                                                   | 7.04%         | 0.00%                    | 0.10%                 | 0.26%                                  | 14.49%        |
| 6                                             | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%         |                          | 0.00%                 | 0.00%                                  | 0.00%         |
| 7                                             | <b>Other financial corporations</b>                                                           | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b>  | <b>0.00%</b>             | <b>0.00%</b>          | <b>0.00%</b>                           | <b>0.00%</b>  |
| 8                                             | of which investment firms                                                                     | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 9                                             | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 10                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 11                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%         |                          | 0.00%                 | 0.00%                                  | 0.00%         |
| 12                                            | of which management companies                                                                 | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 13                                            | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 14                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 15                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%         |                          | 0.00%                 | 0.00%                                  | 0.00%         |
| 16                                            | of which insurance undertakings                                                               | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 17                                            | Loans and advances                                                                            | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 18                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |
| 19                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%         |                          | 0.00%                 | 0.00%                                  | 0.00%         |
| 20                                            | <b>Non-financial undertakings</b>                                                             | <b>0.04%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>0.00%</b>                                                                             | <b>0.00%</b> | <b>0.00%</b>             | <b>0.00%</b>      | <b>29.70%</b>                                                                            | <b>15.57%</b> | <b>0.00%</b>             | <b>0.02%</b>          | <b>3.09%</b>                           | <b>72.12%</b> |
| 21                                            | Loans and advances                                                                            | 0.05%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 24.38%                                                                                   | 16.16%        | 0.00%                    | 0.02%                 | 3.64%                                  | 56.74%        |
| 22                                            | Debt securities, including UoP                                                                | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%        | 0.00%                    | 0.00%             | 49.34%                                                                                   | 13.36%        | 0.00%                    | 0.01%                 | 1.05%                                  | 15.38%        |
| 23                                            | Equity instruments                                                                            | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%        |                          | 0.00%             | 0.00%                                                                                    | 0.00%         |                          | 0.00%                 | 0.00%                                  | 0.00%         |
| 24                                            | <b>Households</b>                                                                             |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   | 68.88%                                                                                   | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 13.05%        |
| 25                                            | of which loans collateralized by residential immovable property                               |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   | 99.24%                                                                                   | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 9.06%         |
| 26                                            | of which building renovation loans                                                            |                                                                                          |              |                          |                   |                                                                                          |              |                          |                   | 0.00%                                                                                    | 0.00%         | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%         |

| 4. GAR KPI flow based on CapEx                |                                                                                           | r                                                                                        | s     | t                        | u                 | v                                                                                        | w     | x                        | z                 | aa                                                                                       | ab     | ac                       | ad                    | ae                                     | af      |
|-----------------------------------------------|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|----------------------------------------|---------|
| % (compared to flow of total eligible assets) |                                                                                           | 31 December 2024                                                                         |       |                          |                   |                                                                                          |       |                          |                   |                                                                                          |        |                          |                       |                                        |         |
|                                               |                                                                                           | Pollution prevention and control (PPC)                                                   |       |                          |                   | Biodiversity and ecosystems (BIO)                                                        |       |                          |                   | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |        |                          |                       |                                        |         |
|                                               |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |        |                          |                       |                                        |         |
|                                               |                                                                                           | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |        |                          |                       | Proportion of total new assets covered |         |
|                                               |                                                                                           |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   |                                                                                          |        |                          |                       |                                        |         |
|                                               |                                                                                           |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |        | Of which Use of Proceeds | Of which transitional | Of which enabling                      |         |
| 27                                            | of which motor vehicle loans                                                              |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%   |
| 28                                            | Local governments financing                                                               | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%                                  | 0.34%   |
| 29                                            | Housing financing                                                                         | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%   |
| 30                                            | Other local government financing                                                          | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%                                  | 0.34%   |
| 31                                            | Collateral obtained by taking possession: residential and commercial immovable properties | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00%  | 0.00%                    | 0.00%                 | 0.00%                                  | 0.00%   |
| 32                                            | Total GAR assets                                                                          | 0,03%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 35.07%                                                                                   | 12.25% | 0.00%                    | 0.03%                 | 2.27%                                  | 100.00% |

| 5. KPI off-balance sheet exposures based on Turnover    |                                    | a                                                                                        | b      | c                        | d                     | e                 | f                                                                                        | g     | h                        | i                 | j                                                                                        | k     | l                        | m                 | n                                                                                        | o     | p                        | q                 |
|---------------------------------------------------------|------------------------------------|------------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|
| % (compared to total eligible off-balance sheet assets) |                                    | 31 December 2024                                                                         |        |                          |                       |                   |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   |
|                                                         |                                    | Climate change mitigation (CCM)                                                          |        |                          |                       |                   | Climate change adaptation (CCA)                                                          |       |                          |                   | Water and marine resources (WTR)                                                         |       |                          |                   | Circular economy (CE)                                                                    |       |                          |                   |
|                                                         |                                    | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |        |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   |
|                                                         |                                    | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |        |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   |
|                                                         |                                    |                                                                                          |        | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |
| 1                                                       | Financial guarantees (FinGuar KPI) | 36.00%                                                                                   | 14.79% | 0.00%                    | 0.42%                 | 0.42%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.17%                                                                                    | 0.00% | 0.00%                    | 0.00%             |
| 2                                                       | Assets under management            | 3.56%                                                                                    | 1.49%  | 0.00%                    | 0.00%                 | 0.04%             | 0.96%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.18%                                                                                    | 0.01% | 0.00%                    | 0.00%             |

**Table 5 - Turnover**

| 5. KPI off-balance sheet exposures based on Turnover    |                                    | r                                                                                        | s     | t                        | u                 | v     | w                                                                                        | x                        | z                 | aa     | ab                                                                                       | ac                       | ad                    | ae                |
|---------------------------------------------------------|------------------------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|-------|------------------------------------------------------------------------------------------|--------------------------|-------------------|--------|------------------------------------------------------------------------------------------|--------------------------|-----------------------|-------------------|
| % (compared to total eligible off-balance sheet assets) |                                    | 31 December 2024                                                                         |       |                          |                   |       |                                                                                          |                          |                   |        |                                                                                          |                          |                       |                   |
|                                                         |                                    | Pollution prevention and control (PPC)                                                   |       |                          |                   |       | Biodiversity and ecosystems (BIO)                                                        |                          |                   |        | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |                          |                       |                   |
|                                                         |                                    | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                          |                   |        | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                          |                       |                   |
|                                                         |                                    | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                          |                   |        | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                          |                       |                   |
|                                                         |                                    |                                                                                          |       | Of which Use of Proceeds | Of which enabling |       |                                                                                          | Of which Use of Proceeds | Of which enabling |        |                                                                                          | Of which Use of Proceeds | Of which transitional | Of which enabling |
| 1                                                       | Financial guarantees (FinGuar KPI) | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%                    | 0.00%             | 36.17% | 14.79%                                                                                   | 0.00%                    | 0.42%                 | 0.42%             |
| 2                                                       | Assets under management            | 0.05%                                                                                    | 0.01% | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%                    | 0.00%             | 4.75%  | 1.51%                                                                                    | 0.00%                    | 0.00%                 | 0.04%             |

**Table 5 - CapEx**

| 5. KPI off-balance sheet exposures based on CapEx       |                                    | a                                                                                        | b      | c                        | d                     | e                 | f                                                                                        | g     | h                        | i                 | j                                                                                        | k     | l                        | m                 | n                                                                                        | o     | p                        | q                 |
|---------------------------------------------------------|------------------------------------|------------------------------------------------------------------------------------------|--------|--------------------------|-----------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|
| % (compared to total eligible off-balance sheet assets) |                                    | 31 December 2024                                                                         |        |                          |                       |                   |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   |                                                                                          |       |                          |                   |
|                                                         |                                    | Climate change mitigation (CCM)                                                          |        |                          |                       |                   | Climate change adaptation (CCA)                                                          |       |                          |                   | Water and marine resources (WTR)                                                         |       |                          |                   | Circular economy (CE)                                                                    |       |                          |                   |
|                                                         |                                    | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |        |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   |
|                                                         |                                    | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |        |                          |                       |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   |
|                                                         |                                    |                                                                                          |        | Of which Use of Proceeds | Of which transitional | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |                                                                                          |       | Of which Use of Proceeds | Of which enabling |
| 1                                                       | Financial guarantees (FinGuar KPI) | 60.65%                                                                                   | 27.43% | 0.00%                    | 0.36%                 | 11.35%            | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0,03%                                                                                    | 0.00% | 0.00%                    | 0.00%             |
| 2                                                       | Assets under management            | 37.33%                                                                                   | 20.03% | 0.00%                    | 0.00%                 | 15.25%            | 0.55%                                                                                    | 0.12% | 0.00%                    | 0.00%             | 0.00%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0,03%                                                                                    | 0,02% | 0.00%                    | 0.00%             |

| 5. KPI off-balance sheet exposures based on CapEx       |                                    | r                                                                                        | s     | t                        | u                 | v     | w                                                                                        | x                        | z                 | aa     | ab                                                                                       | ac                       | ad                    | ae                |
|---------------------------------------------------------|------------------------------------|------------------------------------------------------------------------------------------|-------|--------------------------|-------------------|-------|------------------------------------------------------------------------------------------|--------------------------|-------------------|--------|------------------------------------------------------------------------------------------|--------------------------|-----------------------|-------------------|
| % (compared to total eligible off-balance sheet assets) |                                    | 31 December 2024                                                                         |       |                          |                   |       |                                                                                          |                          |                   |        |                                                                                          |                          |                       |                   |
|                                                         |                                    | Pollution prevention and control (PPC)                                                   |       |                          |                   |       | Biodiversity and ecosystems (BIO)                                                        |                          |                   |        | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                                                 |                          |                       |                   |
|                                                         |                                    | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |       |                          |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                          |                   |        | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) |                          |                       |                   |
|                                                         |                                    | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |       |                          |                   |       | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                          |                   |        | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)  |                          |                       |                   |
|                                                         |                                    |                                                                                          |       | Of which Use of Proceeds | Of which enabling |       |                                                                                          | Of which Use of Proceeds | Of which enabling |        |                                                                                          | Of which Use of Proceeds | Of which transitional | Of which enabling |
| 1                                                       | Financial guarantees (FinGuar KPI) | 0.17%                                                                                    | 0.00% | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%                    | 0.00%             | 60.85% | 27.43%                                                                                   | 0.00%                    | 0.36%                 | 11.35%            |
| 2                                                       | Assets under management            | 1.62%                                                                                    | 0.02% | 0.00%                    | 0.00%             | 0.00% | 0.00%                                                                                    | 0.00%                    | 0.00%             | 39.54% | 20.19%                                                                                   | 0.00%                    | 0.00%                 | 15.25%            |

## **ANNEX XII - Complementary Climate Delegated Act**

### **Nuclear and fossil gas related activities**

The tables below present taxonomy reporting on activities related to nuclear energy and fossil gas. Given the ongoing discussion regarding their classification as environmentally sustainable activities, these activities are reported separately from other activities detailed in the preceding tables. The scope of disclosures related to nuclear and fossil gas is limited to non-financial corporations subject to the NFRD and local governments.

The reporting of eligibility and alignment for nuclear and fossil gas-related activities follows a distinct approach compared to other activities. Notably, only six specific activities aimed at accelerating the transition to climate neutrality qualify for alignment under the EU Taxonomy. These activities undergo the same assessment criteria as other activities, with differences primarily in the reporting framework. The tables below outline taxonomy eligibility and alignment for nuclear and fossil gas-related activities. Furthermore, exposures to these activities are compared with the total covered assets reported under the Green Asset Ratio, highlighting the proportion of financing associated with nuclear and fossil gas activities.

### **Template 1: Nuclear and fossil gas-related activities**

| Row | Nuclear energy related activities                                                                                                                                                                                                                                                                                                    |     |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 1.  | The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.                                                                                        | NO  |
| 2.  | The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies. | NO  |
| 3.  | The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.                          | NO  |
|     | Fossil gas related activities                                                                                                                                                                                                                                                                                                        |     |
| 4.  | The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.                                                                                                                                                           | YES |
| 5.  | The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.                                                                                                                                                  | NO  |
| 6.  | The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.                                                                                                                                                    | NO  |

## Template 2: Taxonomy-aligned economic activities (denominator)

*Based on Turnover*

| Row | Economic activities                                                                                                                                                                    | Amount and proportion (the information is to be presented in monetary amounts and as percentages) |       |                                 |       |                                 |       |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|-------|---------------------------------|-------|---------------------------------|-------|
|     |                                                                                                                                                                                        | CCM + CCA                                                                                         |       | Climate change mitigation (CCM) |       | Climate change adaptation (CCA) |       |
|     |                                                                                                                                                                                        | Amount                                                                                            | %     | Amount                          | %     | Amount                          | %     |
| 1.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 2.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 3.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 4.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 26                                                                                                | 0.60% | 26                              | 0,60% | 0                               | 0.00% |

|    |                                                                                                                                                                                        |           |              |           |              |          |              |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|--------------|-----------|--------------|----------|--------------|
| 5. | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0         | 0.00%        | 0         | 0.00%        | 0        | 0.00%        |
| 6. | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0         | 0.00%        | 0         | 0.00%        | 0        | 0.00%        |
| 7. | <b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>                               | <b>34</b> | <b>0.79%</b> | <b>34</b> | <b>0.79%</b> | <b>0</b> | <b>0.00%</b> |
| 8. | <b>Total applicable KPI</b>                                                                                                                                                            | <b>60</b> | <b>1.39%</b> | <b>60</b> | <b>1.39%</b> | <b>0</b> | <b>0.00%</b> |

*Based on CapEx*

| Row | Economic activities                                                                                                                                                                    | Amount and proportion (the information is to be presented in monetary amounts and as percentages) |       |                                 |       |                                 |       |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|-------|---------------------------------|-------|---------------------------------|-------|
|     |                                                                                                                                                                                        | CCM + CCA                                                                                         |       | Climate change mitigation (CCM) |       | Climate change adaptation (CCA) |       |
|     |                                                                                                                                                                                        | Amount                                                                                            | %     | Amount                          | %     | Amount                          | %     |
| 1.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 2.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 3.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 4.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 26                                                                                                | 0.60% | 26                              | 0.60% | 0                               | 0.00% |
| 5.  | Amount and proportion of taxonomy-aligned economic                                                                                                                                     | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |



|    |                                                                                                                                                                                        |            |              |            |              |          |              |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|--------------|------------|--------------|----------|--------------|
|    | activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI                                                    |            |              |            |              |          |              |
| 6. | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%        | 0          | 0.00%        | 0        | 0.00%        |
| 7. | <b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>                               | <b>85</b>  | <b>1.98%</b> | <b>85</b>  | <b>1.98%</b> | <b>0</b> | <b>0.00%</b> |
| 8. | <b>Total applicable KPI</b>                                                                                                                                                            | <b>111</b> | <b>2.57%</b> | <b>111</b> | <b>2.57%</b> | <b>0</b> | <b>0.00%</b> |

### Template 3: Taxonomy-aligned economic activities (numerator)

Based on Turnover

| Row | Economic activities                                                                                                                                                                  | Amount and proportion (the information is to be presented in monetary amounts and as percentages) |        |                                 |        |                                 |       |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|--------|---------------------------------|--------|---------------------------------|-------|
|     |                                                                                                                                                                                      | CCM + CCA                                                                                         |        | Climate change mitigation (CCM) |        | Climate change adaptation (CCA) |       |
|     |                                                                                                                                                                                      | Amount                                                                                            | %      | Amount                          | %      | Amount                          | %     |
| 1.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0                                                                                                 | 0.00%  | 0                               | 0.00%  | 0                               | 0.00% |
| 2.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0                                                                                                 | 0.00%  | 0                               | 0.00%  | 0                               | 0.00% |
| 3.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0                                                                                                 | 0.00%  | 0                               | 0.00%  | 0                               | 0.00% |
| 4.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 26                                                                                                | 43.07% | 26                              | 43.07% | 0                               | 0.00% |
| 5.  | Amount and proportion of                                                                                                                                                             | 0                                                                                                 | 0.00%  | 0                               | 0.00%  | 0                               | 0.00% |

|    |                                                                                                                                                                                      |           |                |           |                |          |              |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------------|-----------|----------------|----------|--------------|
|    | taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI                          |           |                |           |                |          |              |
| 6. | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0         | 0.00%          | 0         | 0.00%          | 0        | 0.00%        |
| 7. | <b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>                               | <b>34</b> | <b>56.93%</b>  | <b>34</b> | <b>56.93%</b>  | <b>0</b> | <b>0.00%</b> |
| 8. | <b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                    | <b>60</b> | <b>100.00%</b> | <b>60</b> | <b>100.00%</b> | <b>0</b> | <b>0.00%</b> |

Based on CapEx

| Row | Economic activities                                                                                                                                                                  | Amount and proportion (the information is to be presented in monetary amounts and as percentages) |        |                                 |        |                                 |       |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|--------|---------------------------------|--------|---------------------------------|-------|
|     |                                                                                                                                                                                      | CCM + CCA                                                                                         |        | Climate change mitigation (CCM) |        | Climate change adaptation (CCA) |       |
|     |                                                                                                                                                                                      | Amount                                                                                            | %      | Amount                          | %      | Amount                          | %     |
| 1.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0                                                                                                 | 0.00%  | 0                               | 0.00%  | 0                               | 0.00% |
| 2.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0                                                                                                 | 0.00%  | 0                               | 0.00%  | 0                               | 0.00% |
| 3.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0                                                                                                 | 0.00%  | 0                               | 0.00%  | 0                               | 0.00% |
| 4.  | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 26                                                                                                | 23.17% | 26                              | 23.17% | 0                               | 0.00% |
| 5.  | Amount and proportion of taxonomy-aligned economic                                                                                                                                   | 0                                                                                                 | 0.00%  | 0                               | 0.00%  | 0                               | 0.00% |

|    |                                                                                                                                                                                      |            |                |            |                |          |              |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|------------|----------------|----------|--------------|
|    | activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI                                                    |            |                |            |                |          |              |
| 6. | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0          | 0.00%          | 0          | 0.00%          | 0        | 0.00%        |
| 7. | <b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>                               | <b>85</b>  | <b>76.83%</b>  | <b>85</b>  | <b>76.83%</b>  | <b>0</b> | <b>0.00%</b> |
| 8. | <b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                    | <b>111</b> | <b>100.00%</b> | <b>111</b> | <b>100.00%</b> | <b>0</b> | <b>0.00%</b> |

#### Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities

Based on Turnover

| Row | Economic activities                                                                                                                                                                                              | Amount and proportion (the information is to be presented in monetary amounts and as percentages) |       |                                 |       |                                 |       |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|-------|---------------------------------|-------|---------------------------------|-------|
|     |                                                                                                                                                                                                                  | CCM + CCA                                                                                         |       | Climate change mitigation (CCM) |       | Climate change adaptation (CCA) |       |
|     |                                                                                                                                                                                                                  | Amount                                                                                            | %     | Amount                          | %     | Amount                          | %     |
| 1.  | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 2.  | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 3.  | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 4.  | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of                                                                                             | 14                                                                                                | 0,33% | 14                              | 0.33% | 0                               | 0.00% |

|    |                                                                                                                                                                                                                  |            |              |            |              |          |              |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|--------------|------------|--------------|----------|--------------|
|    | Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI                                                                                                                      |            |              |            |              |          |              |
| 5. | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%        | 0          | 0.00%        | 0        | 0.00%        |
| 6. | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%        | 0          | 0.00%        | 0        | 0.00%        |
| 7. | <b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>                               | <b>264</b> | <b>6.11%</b> | <b>263</b> | <b>6.09%</b> | <b>1</b> | <b>0.02%</b> |
| 8. | <b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                    | <b>278</b> | <b>6.44%</b> | <b>277</b> | <b>6.42%</b> | <b>1</b> | <b>0.02%</b> |

Based on CapEx

| Row | Economic activities                                                                                                                                                                                              | Amount and proportion (the information is to be presented in monetary amounts and as percentages) |       |                                 |       |                                 |       |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|-------|---------------------------------|-------|---------------------------------|-------|
|     |                                                                                                                                                                                                                  | CCM + CCA                                                                                         |       | Climate change mitigation (CCM) |       | Climate change adaptation (CCA) |       |
|     |                                                                                                                                                                                                                  | Amount                                                                                            | %     | Amount                          | %     | Amount                          | %     |
| 1.  | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 2.  | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 3.  | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0                                                                                                 | 0.00% | 0                               | 0.00% | 0                               | 0.00% |
| 4.  | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of                                                                                             | 4                                                                                                 | 0.10% | 4                               | 0.10% | 0                               | 0.00% |



|    |                                                                                                                                                                                                                  |            |              |            |              |          |              |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|--------------|------------|--------------|----------|--------------|
|    | Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI                                                                                                                      |            |              |            |              |          |              |
| 5. | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%        | 0          | 0.00%        | 0        | 0.00%        |
| 6. | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%        | 0          | 0.00%        | 0        | 0.00%        |
| 7. | <b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>                               | <b>288</b> | <b>6.66%</b> | <b>287</b> | <b>6.64%</b> | <b>1</b> | <b>0.02%</b> |
| 8. | <b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                    | <b>292</b> | <b>6.77%</b> | <b>291</b> | <b>6.74%</b> | <b>1</b> | <b>0.02%</b> |

## Template 5: Taxonomy non-eligible economic activities

*Based on Turnover*

| Row | Economic activities                                                                                                                                                                                                                        | Amount     | Percentage    |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------|
| 1.  | Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 2.  | Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 3.  | Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 4.  | Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 5.  | Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 6.  | Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 7.  | <b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>                                                                              | <b>629</b> | <b>14.57%</b> |
| 8.  | <b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                   | <b>629</b> | <b>14.57%</b> |

*Based on CapEx*

| Row | Economic activities                                                                                                                                                                                                                        | Amount     | Percentage    |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------|
| 1.  | Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 2.  | Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 3.  | Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 4.  | Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 5.  | Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 6.  | Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0          | 0.00%         |
| 7.  | <b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>                                                                              | <b>564</b> | <b>13.07%</b> |
| 8.  | <b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                   | <b>564</b> | <b>13.07%</b> |

**III. Independent Auditor's limited assurance Report on Sustainability Statement**

## TRANSLATION FROM THE ORIGINAL IN THE GREEK LANGUAGE

### Independent Auditor's Limited Assurance Report on Optima bank S.A.'s Sustainability Statement

#### INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT

##### To the Shareholders of Optima bank S.A.

We have conducted a limited assurance engagement on the consolidated Sustainability Statement of **Optima bank S.A.** (henceforth the "Company") and its subsidiaries (collectively the "Group"), included in section "Sustainability Statement 2024" of the consolidated Board of Directors' Annual Report (the "Sustainability Statement"), for the period from 01/01/2024 to 31/12/2024.

##### Limited assurance conclusion

Based on the procedures we have performed, as described below in the "Scope of Work Performed" paragraph, and the evidence we have obtained, nothing has come to our attention that causes us to believe that:

- the Sustainability Statement has not been prepared in all material respects, in accordance with Article 154 of Law 4548/2018, as amended and in force by Law 5164/2024, based on which, Article 29(a) of EU Directive 2013/34 was transposed into Greek legislation,
- the Sustainability Statement does not comply with the European Sustainability Reporting Standards (hereinafter "ESRS"), in accordance with EU Regulation 2023/2772 of the Commission of 31 July 2023, and EU Directive 2022/2464 of the European Parliament and the Council of 14 December 2022,
- the process carried out by the Group to identify and assess material impacts, risks and opportunities (the "Process"), as set out in Note "IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities" of the Sustainability Statement, does not comply with the "Disclosure Requirement IRO-1-Description of the process to identify and assess material impacts, risks and opportunities" of ESRS 2 "General Disclosures",
- the disclosures included in sections "Disclosures pursuant to Article 8 of EU Regulation 2020/852 ("EU Taxonomy Regulation")", "ANNEX VI - Disclosures Delegated Act" and "ANNEX XII - Complementary Climate Delegated Act" of the Sustainability Statement, do not comply with Article 8 of EU Regulation 2020/852.

This assurance report does not extend to information in respect of earlier periods.

##### Basis for conclusion

We conducted a limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised), "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" ("ISAE 3000").

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

Our responsibilities are further described in the "Auditor's Responsibilities" section of our report.

## Professional Ethics and Quality Management

We are independent of the Company, during the whole period of this engagement and we have complied with the requirements of the International Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code), the ethical and independence requirements of Law 4449/2017 and EU Regulation 537/2014.

Our audit firm applies the International Standard on Quality Management 1 (ISQM 1), “Quality Management for firms that perform audits or reviews of financial statements, or other assurance or related services engagements” and accordingly, maintains a comprehensive system of quality management, including documented policies and procedures regarding compliance and ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

## Management’s responsibilities regarding the Sustainability Statement

Management of the Company is responsible for designing and implementing a process to identify the information reported in the Sustainability Statement, in accordance with ESRS, and for disclosing this Process in Note “IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities” of the Sustainability Statement.

This responsibility includes:

- Understanding the context in which the Company’s and the Group’s activities and business relationships take place and developing an understanding of its affected stakeholders.
- The identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Company’s and the Group’s financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium, or long-term.
- The assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds.
- Making assumptions that are reasonable in the circumstances.

Management of the Company is further responsible for the preparation of the Sustainability Statement, in accordance with Article 154 of Law 4548/2018, as amended and in force by Law 5164/2024, based on which, Article 29(a) of EU Directive 2013/34 was transposed into Greek legislation.

In this context, Management’s responsibility includes:

- Compliance of the Sustainability Statement with ESRS.
- Preparing the disclosures in sections “Disclosures pursuant to Article 8 of EU Regulation 2020/852 (“EU Taxonomy Regulation”), “ANNEX VI - Disclosures Delegated Act” and “ANNEX XII - Complementary Climate Delegated Act” of the Sustainability Statement, in compliance with Article 8 of EU Regulation 2020/852.
- Designing, implementing and maintaining such internal controls that management determines are necessary to enable the preparation of the Sustainability Statement is free from material misstatement, whether due to fraud or error.
- The selection and application of appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

The Audit Committee of the Company is responsible for overseeing the sustainability reporting process of the Group.

## **Inherent limitations in preparing the Sustainability Statement**

As discussed in Note “Entity Specific (“ES”)” in the Sustainability Statement, sustainability information for which the applicable criteria are self-defined, the nature of this sustainability information, and absence of consistent external standards, allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact the comparability of sustainability matters reported by different entities and from year to year within an entity as methodologies develop.

In reporting forward-looking information in accordance with ESRS, Management of the Company is required to prepare the forward-looking information based on disclosed assumptions about events that may occur in the future and possible future actions by the Company and the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

As discussed in Note “ESRS E1 Climate Change”, the sustainability information includes, among others, information based on climate-related scenarios, that is subject to inherent uncertainty regarding the likelihood, timing or effect of possible future physical and transitional climate-related impacts.

Our work covered the subject matters listed in the section “Scope of Work Performed” for obtaining limited assurance and is based on the procedures included in the Program, as defined in this section of our report. Our work does not constitute an audit or review of historical financial information in accordance with the applicable International Standards on Auditing or International Standards on Review Engagements, and for this reason, we do not provide any other assurance beyond what is stated in the section “Scope of Work Performed”.

## **Auditor’s responsibilities**

This limited assurance report has been prepared based on the provisions of Article 154C of Law 4548/2018 and Article 32A of Law 4449/2017.

Our responsibility is to plan and perform the limited assurance engagement to obtain limited assurance about whether the Sustainability Statement is free from material misstatement, whether due to fraud or error and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are

considered material when, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000, we exercise professional judgment and maintain our professional skepticism throughout the engagement.

Our responsibilities in respect of the Sustainability Statement, in relation to the Process, include:

- Performing risk assessment procedures, including obtaining an understanding of internal controls relevant to the engagement, to identify risks in the Process applied by the Group to identify the information reported in the Sustainability Statement does not address the applicable requirements of the ESRS, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process and
- Designing and performing procedures to evaluate whether the Process to identify the information reported in the Sustainability Statement is consistent with the Company's description of its Process as disclosed in Note "IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities".

In addition, we are responsible for:

- Performing risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify disclosures where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal controls.
- Designing and performing procedures responsive to disclosures in the consolidated Sustainability Statement, where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls.



## Scope of the Work Performed

Our work involves performing procedures and obtaining audit evidence to form a limited assurance conclusion and are limited to the procedures listed in the limited assurance program issued by the Hellenic Accounting and Auditing Supervisory Oversight Board according to its 262/22.01.2025 decision (hereinafter the “Program”), developed for the purpose of issuing of a limited assurance report on the Group’s Sustainability Statement.

Our procedures were designed for the purpose of obtaining a limited level of assurance to support our conclusion but not for obtaining evidence that would be required to provide a reasonable level of assurance.

Athens, 21 March 2025

The Certified Public Accountant

Konstantinos Kakoliris  
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#### **IV. Independent Auditor's Report**

True Translation of the original in the Greek language

## INDEPENDENT AUDITOR'S REPORT

To the Shareholders of the banking entity "Optima bank S.A."

### Report on the Audit of the Separate and Consolidated Financial Statements

#### Opinion

We have audited the separate and consolidated financial statements of the banking entity "Optima bank S.A." (the Bank), which comprise the separate and consolidated statement of financial position as at 31 December 2024, and the separate and consolidated statements of profit or loss and other comprehensive income, separate and consolidated statements of changes in equity and separate and consolidated statements of cash flows for the year then ended and notes to the financial statements, including material accounting policy information.

In our opinion, the accompanying separate and consolidated financial statements present fairly, in all material respects, the separate and consolidated financial position of Optima bank S.A. and its subsidiaries (the Group) as at 31 December 2024 and its separate and consolidated financial performance and its separate and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs), as endorsed by the European Union.

#### Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs) as they have been incorporated into the Greek legislation. Our responsibilities under those standards are further described in the "Auditor's Responsibilities for the Audit of the Separate and Consolidated Financial Statements" section of our report. We have been independent of the Bank and the Group during the whole period of our appointment, in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code), as incorporated into the Greek legislation and the ethical requirements in Greece, relevant to the audit of the separate and consolidated financial statements. We have fulfilled our ethical requirements in accordance with the applicable legislation and the abovementioned Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### Key Audit Matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the separate and consolidated financial statements of the current year. These matters and the assessed risks of material misstatements were addressed in the context of our audit of the separate and consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

| Key audit matters                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | How our audit addressed the Key audit matters                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           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| <p data-bbox="204 271 1150 297"><b>Allowance for expected credit losses (ECL) for loans and advances to customers at amortised cost</b></p> <p data-bbox="204 304 837 566">Loans and advances to customers at amortised cost of the Bank and the Group amounted to € 3,640,985 thousand and € 3,657,499 thousand respectively as at 31 December 2024 (€ 2,443,532 thousand and € 2,458,509 thousand respectively as at 31 December 2023) and allowance for expected credit losses of the Bank and the Group amounted to € 44,385 thousand and € 44,901 thousand respectively as at 31 December 2024 (€ 27,460 thousand and € 27,595 thousand respectively as at 31 December 2023).</p> <p data-bbox="204 595 837 741">Measurement of expected credit losses on loans and advances to customers at amortised cost is considered a key audit matter as the determination of assumptions used involves critical Management judgments and accounting estimates with inherent risk, high level of subjectivity, and complexity.</p> <p data-bbox="204 770 837 831">The most significant Management judgements and accounting estimates, relate to:</p> <ul data-bbox="204 860 837 1424" style="list-style-type: none"> <li>• The determination of credit risk parameters, such as Loss Given Default (LGD), Probability of Default (PD) and the Exposure at Default (EAD) which were used in the models to estimate the expected credit losses.</li> <li>• The criteria used for the staging allocation of loans and at amortised cost (Significant Increase in Credit Risk – SICR and Unlikeliness to Pay – UTP)</li> <li>• The forecast of each significant forward-looking information used by Management in the models for calculation of expected credit losses and the probability weightings used to estimate the impact of multiple economic scenarios.</li> <li>• The identification and measurement of the adjustments (Management Overlays) made by Management to the estimation of the expected credit losses models. These adjustments include inherent uncertainty and significant degree of Management’s judgment.</li> </ul> <p data-bbox="204 1453 837 1599">Management has provided further information about principles and accounting policies for determining the ECL on loans and advances to customers at amortised cost and management of credit risk in Notes 2.4, 2.4.1, 2.12, 3.A, 4.1 and 20 to the separate and consolidated financial statements.</p> | <p data-bbox="869 304 1422 450">Based on our risk assessment and following a risk-based approach, we have evaluated the impairment methodologies applied and assumptions made by Management in relation to this key audit matter, and we performed, inter alia, the following audit procedures:</p> <ul data-bbox="869 479 1453 1912" style="list-style-type: none"> <li>• With the support of our financial risk modelling specialists where appropriate, we assessed the design and implementation of relevant internal controls over the ECL estimate including the controls around: <ul style="list-style-type: none"> <li>- the significant assumptions used in the ECL models</li> <li>- model monitoring and model validation</li> <li>- governance and review of the adjustments (Management Overlays) made by Management to the results of the ECL models</li> <li>- the staging allocation</li> <li>- the selection of macro-economic scenarios and probability weightings</li> </ul> </li> <li>• With the support of our financial risk modelling specialists we: <ul style="list-style-type: none"> <li>- assessed the appropriateness of the Bank’s and the Group’s IFRS9 impairment methodologies.</li> <li>- assessed the appropriateness of the criteria used to allocate loans to stages in accordance with IFRS9. Our work included the evaluation of the criteria set by Management regarding the identification of significant increase in credit risk or unlikeliness to pay. On a sample basis we tested the timely identification of exposures with significant increase in credit risk, unlikeliness to pay or other criteria use for staging.</li> <li>- we evaluated the appropriateness of the significant parameters (Loss Given Default – LGD, Probability of Default – PD and Exposure at Default – EAD) used in models to estimate the expected credit losses and we verified on a sample basis the accuracy of the model calculations for estimating the expected credit losses. In this context, we examined on a sample basis the accuracy of the data used in the models, including the collaterals used in to determine the Loss Given Default (LGD).</li> <li>- we examined on a sample basis whether the criteria used for the timely identification of exposures with a significant increase in credit risk and the timely identification of credit impaired exposures have been properly applied in accordance with the Bank’s impairment policy of loans and advances to customers.</li> <li>- we assessed the reasonableness and appropriateness of the significant forward-looking information used in the models by comparing them to those included in external sources.</li> </ul> </li> </ul> |

| Key audit matters                                                                                | How our audit addressed the Key audit matters                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Allowance for expected credit losses (ECL) for loans and advances to customers at amortised cost |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                  | <ul style="list-style-type: none"> <li>- we evaluated the appropriateness of the adjustments made by Management (Management Overlays) on the measurement of the expected credit losses, in order to incorporate the effect of factors not captured in the models to estimate the expected credit losses.</li> </ul> <p>Given the complexity and granularity of the related disclosures, we further assessed their completeness and accuracy in accordance with the provisions of the relevant accounting standards.</p> |

| Key audit matters                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | How our audit addressed the Key audit matters                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Information Technology General Controls and controls over financial reporting</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>The Bank's and the Group's financial reporting processes are highly dependent on Information Technology ("IT") systems of the Bank and the Group supporting automated accounting and reconciliation procedures, thus leading to a complex IT environment, pervasive in nature and in which a significant number of transactions are processed daily, across numerous locations.</p> <p>This is a key audit matter since it is important that controls over general information systems related to access security, protection against internal and external cyber security threats, change management to information systems and management of information technology daily operations, are designed and operate effectively to ensure complete and accurate financial records and information.</p> | <p>Based on our risk assessment, we have assessed the design and implementation of General Information Technology Controls (GITCs) relevant for financial reporting. Our assessment included the evaluation of user access over applications, operating systems and databases, the process followed over changes made to information systems, as well as the evaluation of the management of IT daily operations.</p> <p>In summary, our key audit activities included, among others, testing of:</p> <ul style="list-style-type: none"> <li>• User access provisioning and de-provisioning process.</li> <li>• Privileged access to applications, operating systems and databases.</li> <li>• Periodic review of user access rights.</li> <li>• Change management process over applications, operating systems and databases (i.e. user request, user acceptance testing and final approval for promotion to production).</li> <li>• Management of IT daily operations.</li> </ul> |

## **Other Information**

Management is responsible for the other information. The other information, included in the Annual Financial Report prepared in accordance with Law 3556/2007, comprises the Board of Directors' Annual Report, referred to in the section "Report on Other Legal and Regulatory Requirements" and the Statement by the Members of the Board of Directors, but does not include the separate and consolidated financial statements and our auditor's report thereon.

Our opinion on the separate and consolidated financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the separate and consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the separate and consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement in this other information, we are required to report that fact. We have nothing to report in this regard.

## **Responsibilities of Management and Those Charged with Governance for the separate and consolidated financial statements**

Management is responsible for the preparation and fair presentation of the separate and consolidated financial statements in accordance with IFRSs, as endorsed by the European Union, and for such internal control as Management determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate and consolidated financial statements, Management is responsible for assessing the Bank's and the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless Management either intends to liquidate the Bank and the Group or to cease operations, or has no realistic alternative but to do so.

The Audit Committee (article 44 of Law 4449/2017) of the Bank is responsible for overseeing the Bank's and Group's financial reporting process.

## Auditor's Responsibilities for the audit of the separate and consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the separate and consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs, as these have been incorporated into Greek legislation, will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these separate and consolidated financial statements.

As part of an audit in accordance with ISAs, as these have been incorporated into Greek legislation, we exercise professional judgment and maintain professional scepticism throughout the audit.

We also:

- Identify and assess the risks of material misstatement of the separate and consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's and Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by Management.
- Conclude on the appropriateness of Management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's and Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate and consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank and the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the separate and consolidated financial statements, including the disclosures, and whether the separate and consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the separate and consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to impair our independence, and where applicable, related safeguards applied.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the separate and consolidated financial statements of the current year and are therefore the key audit matters.



## Report on Other Legal and Regulatory Requirements

### 1) Board of Directors' Report

Taking into consideration that Management is responsible for the preparation of the Board of Directors' Report which also includes the Corporate Governance Statement, according to the provisions of paragraph 1, sub paragraphs aa), ab) and b) of article 154G of Law 4548/2018, which however do not include the Sustainability Report, for which we have issued a related limited assurance report according to International Standard on Assurance Report 3000 (Revised) dated 21 March 2025, we note the following:

- a) The Board of Directors' report includes the Corporate Governance Statement which provides the information required by article 152 of Law 4548/2018.
- b) In our opinion, the Board of Directors' report has been prepared in accordance with the applicable legal requirements of articles 150 and 153 of Law 4548/2018, except for the provisions relating to the submission of the Sustainability Report of paragraph 5A of article 150 of this Law, and its content is consistent with the accompanying separate and consolidated financial statements for the year ended 31 December 2024.
- c) Based on the knowledge we obtained during our audit of the Bank and the Group and its environment, we have not identified any material inconsistencies in the Board of Directors' Report.

### 2) Additional Report to the Audit Committee

Our audit opinion on the separate and consolidated financial statements is consistent with the additional report to the Audit Committee of the Bank referred to in Article 11 of the European Union (EU) Regulation 537/2014.

### 3) Non-audit Services

We have not provided to the Bank and the Group any prohibited non-audit services referred to in Article 5 of EU Regulation 537/2014.

The allowable non-audit services provided to the Bank and the Group during the year ended 31 December 2024 are disclosed in note 40 to the separate and consolidated financial statements.

### 4) Appointment

We were appointed as statutory auditors for the first time by the Annual General Assembly of shareholders of the Bank on 21 July 2021. The year ended 31 December 2024 is the fourth consecutive year that we serve as statutory auditors, based on the relevant Annual General Assembly.

### 5) Internal Regulation

The Bank retains an Internal Regulation according to the provisions of article 14 of Law 4706/2020.

### 6) Assurance Report on European Single Electronic Format Reporting

#### Subject Matter

We have undertaken the reasonable assurance work to examine the digital archives of the banking entity "Optima bank S.A." (hereinafter the Bank or/and the Group), which has been prepared in accordance with the European Single Electronic Format (ESEF), including the separate and consolidated financial statements of the Bank and the Group for the year ended 31 December 2024, in XHTML format, as well as the envisaged XBRL file (2138008NSD1X1XFUK750-2024-12-31-el.zip) with the appropriate tagging on the above consolidated financial statements, including the notes to the financial statements (the Subject Matter), in order to conclude whether they been prepared in accordance with the requirements set out in the section Applicable Criteria.

#### Applicable Criteria

The Applicable Criteria for the European Single Electronic Format (ESEF) are laid down in European Commission Delegated Regulation (EU) 2019/815, as amended by Regulation (EU) 2020/1989 (the ESEF Regulation) and 2020/C 379/01 European Commission interpretative communication of 10 November 2020, as provide by Law

3556/2007 and the related announcements of the Securities and Exchange Commission and the Athens Stock Exchange. In summary, these criteria provide, inter alia, that:

- Annual financial reports should be prepared in XHTML format.
- With respect to the consolidated financial statements prepared in accordance with International Financial Reporting Standards, financial information included in the consolidated Statement of Financial Position, Income statement, total comprehensive income, statement of changes in equity and statement of cash flows as well as financial information included in the notes to these financial statements shall be tagged with XBRL mark-up (“XBRL tags” and “block tags”) in accordance with ESEF Taxonomy, as currently in force. The technical specifications of ESEF, including the related taxonomy, are included in ESEF Regulatory Technical Standards.

### **Responsibilities of the Administration and Those Responsible for Governance**

Management is responsible for the preparation and submission of these separate and consolidated financial statements of the Bank and the Group for the year ended 31 December 2024, in accordance with the Applicable Criteria, as well as for such internal control as Management determines is necessary to enable the preparation of digital files free from material misstatement, whether due to fraud or error.

### **Auditor’s Responsibilities**

Our responsibility is to issue this report in relation to the assessment of the Subject Matter, based on the work performed, as described below in the section Scope of work performed.

Our work has been conducted in accordance with International Standard on Assurance Engagements 3000 (revised) “Assurance engagements other than audits or review of historical financial information (“ISAE 3000”).

ISAE 3000 requires that we plan and perform our work in order to obtain reasonable assurance to assess the Subject Matter in accordance with the Applicable Criteria. In the course of the assurance engagement, we assess the risk of material misstatement in the information relating to the Subject Matter.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our reasonable assurance opinion, as set out in this report.

### **Professional Ethics and Quality Management**

We have been independent of the Bank and the Group during the whole period of our assignment and have comply with the requirements of of the Code of Conduct for professional Auditors of the Board of International standards of Conduct for Auditors (Code of Ethics), the ethical and independence requirements of Law 4449/2017 and Regulation (EU) 537/2014.

Our auditing firm implements the International Quality Management Standard (ISQM) 1 ‘Quality Management for companies that perform audits or reviews of financial statements or other assurance or related service assignments’ and therefore maintains an integrated quality management system that includes documented policies and procedures related to compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### **Scope of work Performed**

The assurance work performed, is limited to the items included in the ESEF Guidelines and has been performed in accordance with Decision No 214/4/11-02-2022 of the Board of Hellenic Accounting and Auditing Oversight Board (HAASOB) and the “Guidelines in connection with the procedures and the assurance report of the certified auditors on the ESEF reported of Issuers with trading securities on a regulated market in Greece” dated 14/02/2022, as issued by the Institute of Certified Public Accountants, in order to obtain reasonable assurance about whether the separate and consolidated financial statements of the Bank and the Group, prepared by Management in accordance with ESEF, comply in all material respects with the Applicable Criteria.

## Inherent Limitations

Our work covered the items mentioned in the section "Scope of work performed" in order to obtain reasonable assurance based on the procedures described. In this context, the work performed could not provide an absolute assurance that all matters that could be considered as material weaknesses are revealed.

## Conclusion

On the basis of the work performed and the evidence obtained, we conclude that the separate and consolidated financial statements of the Bank and the Group, for the year ended 31 December 2024, in XHTML format as well as the envisaged XBRL file (2138008NSD1X1XFUK750-2024-12-31-el.zip) with the appropriate tagging on these consolidated financial statements, including the notes, are prepared in all material respects in accordance with the Applicable Criteria.

Athens, 21 March 2025

The Certified Public Accountant

**Apostolos Kokkinellis**

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Reg. No. SOEL: E120



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**V. Financial statements for the year ended December 31, 2024**

**Financial Statements**  
**for the year**  
**January 1 - December 31, 2024**

**In accordance with the International Financial Reporting Standards (IFRS)**

## TABLE OF CONTENTS

|                                                                                                         |    |
|---------------------------------------------------------------------------------------------------------|----|
| CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME .....                           | 1  |
| STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME .....                                        | 2  |
| CONSOLIDATED STATEMENT OF FINANCIAL POSITION.....                                                       | 3  |
| STATEMENT OF FINANCIAL POSITION.....                                                                    | 4  |
| CONSOLIDATED STATEMENT OF CHANGES IN EQUITY.....                                                        | 5  |
| STATEMENT OF CHANGES IN EQUITY.....                                                                     | 6  |
| CONSOLIDATED CASH FLOW STATEMENT .....                                                                  | 7  |
| CASH FLOW STATEMENT .....                                                                               | 8  |
| NOTES TO THE FINANCIAL STATEMENTS AS OF 31 DECEMBER 2024.....                                           | 9  |
| 1. General Information .....                                                                            | 9  |
| 2. Material accounting policies .....                                                                   | 11 |
| 2.1. Basis of preparation .....                                                                         | 11 |
| 2.1.1. Going concern .....                                                                              | 11 |
| 2.1.2. Restatement of amounts .....                                                                     | 13 |
| 2.1.3. New standards, amendments to standards and interpretations .....                                 | 13 |
| 2.2. Principles of Consolidation and Equity Method.....                                                 | 14 |
| 2.3. Foreign currency translations .....                                                                | 16 |
| 2.4. Financial assets and liabilities.....                                                              | 17 |
| 2.4.1 Financial assets.....                                                                             | 18 |
| 2.4.2 Financial liabilities .....                                                                       | 22 |
| 2.5. Repurchase agreements and securities lending .....                                                 | 22 |
| 2.6. Own-used property and equipment .....                                                              | 22 |
| 2.7. Intangible assets.....                                                                             | 23 |
| 2.8. Goodwill .....                                                                                     | 23 |
| 2.9. Impairment of non-financial assets.....                                                            | 23 |
| 2.10. Carbon emission rights .....                                                                      | 24 |
| 2.11. Cash and cash equivalents.....                                                                    | 24 |
| 2.12. Impairment of financial assets .....                                                              | 24 |
| 2.13. Financial guarantees .....                                                                        | 33 |
| 2.14. Staff benefits .....                                                                              | 33 |
| 2.15. Provisions .....                                                                                  | 34 |
| 2.16. Offsetting financial instruments.....                                                             | 34 |
| 2.17. Leases.....                                                                                       | 35 |
| 2.18. Interest income and expense .....                                                                 | 36 |
| 2.19. Fee and commission income .....                                                                   | 36 |
| 2.20. Gains/(losses) from financial transactions .....                                                  | 37 |
| 2.21. Dividend income .....                                                                             | 37 |
| 2.22. Income tax and deferred tax.....                                                                  | 37 |
| 2.23. Share capital.....                                                                                | 38 |
| 2.24. Distribution of dividend .....                                                                    | 38 |
| 2.25. Related parties.....                                                                              | 38 |
| 2.26. Earnings per share .....                                                                          | 39 |
| 2.27. Non-current assets held for sale and discontinued operations .....                                | 39 |
| 2.28. Derivative financial instruments .....                                                            | 39 |
| 2.29. Rounding.....                                                                                     | 40 |
| 3. Critical accounting estimates and assumptions for the implementation of the accounting principles... | 40 |
| 4. Financial Risk Management.....                                                                       | 41 |
| 4.1. Credit risk.....                                                                                   | 42 |
| 4.2. Market risk .....                                                                                  | 76 |
| 4.3. Liquidity risk .....                                                                               | 85 |
| 4.4. Capital adequacy.....                                                                              | 87 |
| 5. Fair value of financial assets and liabilities .....                                                 | 89 |
| 5.1. Financial assets and liabilities not carried at fair value .....                                   | 89 |
| 5.2. Fair Value Hierarchy .....                                                                         | 89 |
| 6. Net interest income .....                                                                            | 94 |
| 7. Net fee and commission income.....                                                                   | 95 |

|     |                                                                            |     |
|-----|----------------------------------------------------------------------------|-----|
| 8.  | Gains/ (losses) from financial transactions .....                          | 96  |
| 9.  | Other operating income .....                                               | 97  |
| 10. | Staff costs .....                                                          | 97  |
| 11. | Other operating expenses .....                                             | 98  |
| 12. | Provision for expected credit losses .....                                 | 99  |
| 13. | Other provisions .....                                                     | 99  |
| 14. | Income Tax .....                                                           | 100 |
| 15. | Earnings per share .....                                                   | 101 |
| 16. | Cash and balances with the central bank .....                              | 102 |
| 17. | Due from banks .....                                                       | 103 |
| 18. | Financial assets at fair value through profit and loss .....               | 103 |
| 19. | Derivative financial instruments .....                                     | 104 |
| 20. | Loans and advances to customers .....                                      | 105 |
| 21. | Financial assets at fair value through other comprehensive income .....    | 106 |
| 22. | Debt securities at amortised cost .....                                    | 108 |
| 23. | Investments in subsidiaries and associates .....                           | 110 |
| 24. | Property, plant and equipment .....                                        | 112 |
| 25. | Intangible assets .....                                                    | 113 |
| 26. | Right of use assets and Lease liabilities .....                            | 114 |
| 27. | Deferred tax assets .....                                                  | 117 |
| 28. | Other assets .....                                                         | 119 |
| 29. | Due to banks .....                                                         | 120 |
| 30. | Due to customers .....                                                     | 120 |
| 31. | Retirement benefit obligations .....                                       | 121 |
| 32. | Other liabilities .....                                                    | 122 |
| 33. | Provisions .....                                                           | 123 |
| 34. | Share capital .....                                                        | 124 |
| 35. | Other reserves .....                                                       | 124 |
| 36. | Balance sheet items broken down by expected due date .....                 | 125 |
| 37. | Share based payments .....                                                 | 127 |
| 38. | Commitments, contingent liabilities and assets .....                       | 128 |
| 39. | Related party transactions .....                                           | 130 |
| 40. | Auditor's fees .....                                                       | 133 |
| 41. | Segment Reporting .....                                                    | 133 |
| 42. | Irrevocable payment commitments to the Single Resolution Board (SRB) ..... | 134 |
| 43. | Distribution of dividend .....                                             | 134 |
| 44. | Disclosures of Law 4261/5.5.2014 .....                                     | 135 |
| 45. | Disclosures of Law 4151/2013 .....                                         | 135 |
| 46. | Events after the reporting period date .....                               | 136 |

## GROUP

### CONSOLIDATED STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME

| Amounts in Eur '000                                                                                                             | Note | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|---------------------------------------------------------------------------------------------------------------------------------|------|--------------------------|--------------------------|
| Interest and similar income                                                                                                     | 6    | 253,647                  | 173,097                  |
| Interest expense and similar charges                                                                                            | 6    | (63,790)                 | (30,885)                 |
| <b>Net interest income</b>                                                                                                      |      | <b>189,857</b>           | <b>142,212</b>           |
| Fee and commission income                                                                                                       | 7    | 47,743                   | 38,580                   |
| Fee and commission expense                                                                                                      | 7    | (6,411)                  | (6,461)                  |
| <b>Net fee and commission income</b>                                                                                            |      | <b>41,332</b>            | <b>32,119</b>            |
| Dividend income                                                                                                                 |      | 512                      | 245                      |
| Gains/(losses) from financial transactions                                                                                      | 8    | 19,795                   | 16,557                   |
| Gains from derecognition of financial assets measured at amortised cost                                                         |      | 2,648                    | 812                      |
| Other operating income                                                                                                          | 9    | 579                      | 1,012                    |
|                                                                                                                                 |      | <b>23,534</b>            | <b>18,626</b>            |
| <b>Total operating income</b>                                                                                                   |      | <b>254,723</b>           | <b>192,957</b>           |
| Staff costs                                                                                                                     | 10   | (32,638)                 | (30,383)                 |
| Other operating expenses                                                                                                        | 11   | (16,912)                 | (19,244)                 |
| Depreciation & amortisation                                                                                                     |      | (8,329)                  | (7,312)                  |
| <b>Total operating expenses</b>                                                                                                 |      | <b>(57,879)</b>          | <b>(56,939)</b>          |
| <b>Profit before provisions and taxes</b>                                                                                       |      | <b>196,844</b>           | <b>136,018</b>           |
| Provisions for expected credit losses                                                                                           | 12   | (20,553)                 | (9,913)                  |
| Other provisions                                                                                                                | 13   | 0                        | 29                       |
| <b>Total provisions</b>                                                                                                         |      | <b>(20,553)</b>          | <b>(9,884)</b>           |
| Share of profit/(loss) of associates                                                                                            |      | 349                      | (190)                    |
| <b>Profit before tax</b>                                                                                                        |      | <b>176,640</b>           | <b>125,944</b>           |
| Income tax                                                                                                                      | 14   | (36,414)                 | (22,921)                 |
| <b>Profit after tax (a)</b>                                                                                                     |      | <b>140,226</b>           | <b>103,023</b>           |
| <b>Profits attributable to:</b>                                                                                                 |      |                          |                          |
| Shareholders of the parent company                                                                                              |      | 140,224                  | 103,021                  |
| Non-controlling interests                                                                                                       |      | 2                        | 2                        |
|                                                                                                                                 |      | <b>140,226</b>           | <b>103,023</b>           |
| <b>Other comprehensive income</b>                                                                                               |      |                          |                          |
| <b>Items that may be reclassified subsequently to the income statement</b>                                                      |      |                          |                          |
| Reserve of debt instruments measured at fair value through other comprehensive income ("FVTOCI")                                |      | 1,910                    | 5,025                    |
| Deferred tax on reserve from valuation of debt instruments measured at fair value through other comprehensive income ("FVTOCI") |      | (420)                    | (1,106)                  |
| Provision for expected credit losses for instruments measured at fair value through other comprehensive income ("FVTOCI")       |      | (19)                     | (127)                    |
| <b>Total items that may be reclassified subsequently to the income statement</b>                                                |      | <b>1,471</b>             | <b>3,792</b>             |
| <b>Items that will not be reclassified to the income statement</b>                                                              |      |                          |                          |
| Actuarial losses of defined benefit obligations                                                                                 | 31   | (152)                    | (12)                     |
| Deferred tax on actuarial losses                                                                                                |      | 34                       | 3                        |
| <b>Total items that will not be reclassified to the income statement</b>                                                        |      | <b>(118)</b>             | <b>(9)</b>               |
| <b>Other comprehensive income after tax (b)</b>                                                                                 |      | <b>1,353</b>             | <b>3,783</b>             |
| <b>Total comprehensive income after tax (a)+(b)</b>                                                                             |      | <b>141,579</b>           | <b>106,806</b>           |
| <b>Total comprehensive income attributable to:</b>                                                                              |      |                          |                          |
| Shareholders of the parent company                                                                                              |      | 141,577                  | 106,804                  |
| Non-controlling interests                                                                                                       |      | 2                        | 2                        |
|                                                                                                                                 |      | <b>141,579</b>           | <b>106,806</b>           |
| Earnings after tax per share - basic (in €)                                                                                     | 15   | 1.90                     | 1.93                     |
| Earnings after tax per share - adjusted (in €)                                                                                  | 15   | 1.90                     | 1.93                     |

The notes on pages 9 to 136 form an integral part of these annual financial statements.



## BANK

### STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME

| Amounts in Eur '000                                                                                                             | Note | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|---------------------------------------------------------------------------------------------------------------------------------|------|--------------------------|--------------------------|
| Interest and similar income                                                                                                     | 6    | 250,793                  | 170,814                  |
| Interest expense and similar charges                                                                                            | 6    | (63,783)                 | (30,633)                 |
| <b>Net interest income</b>                                                                                                      |      | <b>187,010</b>           | <b>140,181</b>           |
| Fee and commission income                                                                                                       | 7    | 43,004                   | 34,986                   |
| Fee and commission expense                                                                                                      | 7    | (6,312)                  | (6,455)                  |
| <b>Net fee and commission income</b>                                                                                            |      | <b>36,692</b>            | <b>28,531</b>            |
| Dividend income                                                                                                                 |      | 500                      | 245                      |
| Gains/(losses) from financial transactions                                                                                      | 8    | 19,669                   | 16,735                   |
| Gains from derecognition of financial assets measured at amortised cost                                                         |      | 2,648                    | 863                      |
| Other operating income                                                                                                          | 9    | 695                      | 1,154                    |
|                                                                                                                                 |      | <b>23,512</b>            | <b>18,997</b>            |
| <b>Total operating income</b>                                                                                                   |      | <b>247,214</b>           | <b>187,709</b>           |
| Staff costs                                                                                                                     | 10   | (31,281)                 | (29,361)                 |
| Other operating expenses                                                                                                        | 11   | (15,779)                 | (18,576)                 |
| Depreciation & amortisation                                                                                                     |      | (7,852)                  | (6,907)                  |
| <b>Total operating expenses</b>                                                                                                 |      | <b>(54,912)</b>          | <b>(54,844)</b>          |
| <b>Profit before provisions and taxes</b>                                                                                       |      | <b>192,302</b>           | <b>132,865</b>           |
| Provisions for expected credit losses                                                                                           | 12   | (20,172)                 | (9,711)                  |
| <b>Total provisions</b>                                                                                                         |      | <b>(20,172)</b>          | <b>(9,711)</b>           |
| <b>Profit before tax</b>                                                                                                        |      | <b>172,130</b>           | <b>123,154</b>           |
| Income tax                                                                                                                      | 14   | (35,418)                 | (22,434)                 |
| <b>Profit after tax (a)</b>                                                                                                     |      | <b>136,712</b>           | <b>100,720</b>           |
| <b>Other comprehensive income</b>                                                                                               |      |                          |                          |
| <b>Items that may be reclassified subsequently to the income statement</b>                                                      |      |                          |                          |
| Reserve of debt instruments measured at fair value through other comprehensive income ("FVTOCI")                                |      | 1,910                    | 5,025                    |
| Deferred tax on reserve from valuation of debt instruments measured at fair value through other comprehensive income ("FVTOCI") |      | (420)                    | (1,106)                  |
| Provision for expected credit losses for instruments measured at fair value through other comprehensive income ("FVTOCI")       |      | (19)                     | (127)                    |
| <b>Total items that may be reclassified subsequently to the income statement</b>                                                |      | <b>1,471</b>             | <b>3,792</b>             |
| <b>Items that will not be reclassified to the income statement</b>                                                              |      |                          |                          |
| Actuarial losses of defined benefit obligations                                                                                 | 31   | (141)                    | (12)                     |
| Deferred tax on actuarial losses                                                                                                |      | 31                       | 3                        |
| <b>Total items that will not be reclassified to the income statement</b>                                                        |      | <b>(110)</b>             | <b>(9)</b>               |
| <b>Other comprehensive income after tax (b)</b>                                                                                 |      | <b>1,361</b>             | <b>3,783</b>             |
| <b>Total comprehensive income after tax (a)+(b)</b>                                                                             |      | <b>138,073</b>           | <b>104,503</b>           |
| Earnings after tax per share - basic (in €)                                                                                     | 15   | 1.85                     | 1.89                     |
| Earnings after tax per share - adjusted (in €)                                                                                  | 15   | 1.85                     | 1.89                     |

The notes on pages 9 to 136 form an integral part of these annual financial statements.

**GROUP**

**CONSOLIDATED STATEMENT OF FINANCIAL POSITION**

Amounts in Eur '000

|                                                                            | Note | 31/12/2024       | 31/12/2023       |
|----------------------------------------------------------------------------|------|------------------|------------------|
| <b>ASSETS</b>                                                              |      |                  |                  |
| Cash and balances with central bank                                        | 16   | 797,646          | 479,323          |
| Due from banks                                                             | 17   | 171,309          | 126,090          |
| Financial assets measured at fair value through profit or loss             | 18   | 264,442          | 337,628          |
| Derivative financial instruments                                           | 19   | 2,210            | 1,033            |
| Loans and advances to customers                                            | 20   | 3,612,598        | 2,430,914        |
| Financial assets measured at fair value through other comprehensive income | 21   | 47,390           | 86,488           |
| Debt securities at amortised cost                                          | 22   | 413,844          | 251,388          |
| Investments in associates                                                  | 23   | 609              | 260              |
| Property, plant and equipment                                              | 24   | 10,717           | 10,903           |
| Intangible assets                                                          | 25   | 11,396           | 10,805           |
| Right of use assets                                                        | 26   | 19,595           | 19,508           |
| Deferred tax assets                                                        | 27   | 9,685            | 8,079            |
| Other assets                                                               | 28   | 179,506          | 105,850          |
| <b>Total assets</b>                                                        |      | <b>5,540,947</b> | <b>3,868,269</b> |
| <b>EQUITY AND LIABILITIES</b>                                              |      |                  |                  |
| Due to banks                                                               | 29   | 115,563          | 81,079           |
| Due to customers                                                           | 30   | 4,643,412        | 3,191,804        |
| Derivative financial instruments                                           | 19   | 5,318            | 8,497            |
| Lease liabilities                                                          | 26   | 21,220           | 20,861           |
| Retirement benefit obligations                                             | 31   | 1,027            | 692              |
| Income tax liabilities                                                     |      | 5,573            | 12,226           |
| Other liabilities                                                          | 32   | 124,368          | 40,667           |
| Provisions                                                                 | 33   | 4,167            | 2,366            |
| <b>Total liabilities</b>                                                   |      | <b>4,920,648</b> | <b>3,358,192</b> |
| <b>Shareholders equity</b>                                                 |      |                  |                  |
| Share capital                                                              | 34   | 254,521          | 254,245          |
| Share premium                                                              |      | 84,114           | 84,114           |
| Fair value through other comprehensive income reserve                      |      | (1,464)          | (2,935)          |
| Less: Treasury shares                                                      |      | (112)            | (164)            |
| Other reserves                                                             | 35   | 31,620           | 30,146           |
| Retained earnings                                                          |      | 251,598          | 144,651          |
| <b>Total equity attributable to the Company's shareholders</b>             |      | <b>620,277</b>   | <b>510,057</b>   |
| Non-controlling interests                                                  |      | 22               | 20               |
| <b>Total equity</b>                                                        |      | <b>620,299</b>   | <b>510,077</b>   |
| <b>Total liabilities and equity</b>                                        |      | <b>5,540,947</b> | <b>3,868,269</b> |

The notes on pages 9 to 136 form an integral part of these annual financial statements.

**BANK**

**STATEMENT OF FINANCIAL POSITION**

Amounts in Eur '000

**ASSETS**

|                                                                            | Note | 31/12/2024       | 31/12/2023       |
|----------------------------------------------------------------------------|------|------------------|------------------|
| Cash and balances with central bank                                        | 16   | 797,645          | 479,322          |
| Due from banks                                                             | 17   | 160,157          | 123,625          |
| Financial assets measured at fair value through profit or loss             | 18   | 261,626          | 336,994          |
| Derivative financial instruments                                           | 19   | 2,210            | 1,033            |
| Loans and advances to customers                                            | 20   | 3,596,600        | 2,416,072        |
| Financial assets measured at fair value through other comprehensive income | 21   | 47,390           | 86,488           |
| Debt securities at amortised cost                                          | 22   | 413,844          | 251,388          |
| Investment in subsidiaries and associates                                  | 23   | 23,972           | 9,134            |
| Property, plant and equipment                                              | 24   | 10,588           | 10,738           |
| Intangible assets                                                          | 25   | 8,193            | 7,421            |
| Right of use assets                                                        | 26   | 19,561           | 19,478           |
| Deferred tax assets                                                        | 27   | 10,603           | 8,938            |
| Other assets                                                               | 28   | 179,804          | 104,575          |
| <b>Total assets</b>                                                        |      | <b>5,532,193</b> | <b>3,855,206</b> |

**EQUITY AND LIABILITIES**

|                                  |    |                  |                  |
|----------------------------------|----|------------------|------------------|
| Due to banks                     | 29 | 115,563          | 79,055           |
| Due to customers                 | 30 | 4,654,064        | 3,196,911        |
| Derivative financial instruments | 19 | 5,318            | 8,497            |
| Lease liabilities                | 26 | 21,188           | 20,834           |
| Retirement benefit obligations   | 31 | 964              | 650              |
| Income tax liabilities           |    | 4,961            | 11,491           |
| Other liabilities                | 32 | 122,933          | 39,082           |
| Provisions                       | 33 | 4,157            | 2,356            |
| <b>Total liabilities</b>         |    | <b>4,929,148</b> | <b>3,358,876</b> |

**Shareholders equity**

|                                                       |    |                |                |
|-------------------------------------------------------|----|----------------|----------------|
| Share capital                                         | 34 | 254,521        | 254,245        |
| Share premium                                         |    | 84,114         | 84,114         |
| Fair value through other comprehensive income reserve |    | (1,464)        | (2,935)        |
| Less: Treasury shares                                 |    | (112)          | (164)          |
| Other reserves                                        | 35 | 30,551         | 29,249         |
| Retained earnings                                     |    | 235,435        | 131,821        |
| <b>Total equity</b>                                   |    | <b>603,045</b> | <b>496,330</b> |

**Total liabilities and equity**

|                  |                  |
|------------------|------------------|
| <b>5,532,193</b> | <b>3,855,206</b> |
|------------------|------------------|

The notes on pages 9 to 136 form an integral part of these annual financial statements.

## GROUP

### CONSOLIDATED STATEMENT OF CHANGES IN EQUITY

| Amounts in Eur '000                                                                                                             | Note | Share capital  | Share Premium | Fair value through other comprehensive income reserve | Treasury shares | Other reserves | Retained earnings | Convertible bond loan | Total           | Non-controlling interest | Total           |
|---------------------------------------------------------------------------------------------------------------------------------|------|----------------|---------------|-------------------------------------------------------|-----------------|----------------|-------------------|-----------------------|-----------------|--------------------------|-----------------|
| <b>Balance as at 1 January 2023</b>                                                                                             |      | <b>160,279</b> | <b>0</b>      | <b>(6,727)</b>                                        | <b>0</b>        | <b>19,810</b>  | <b>19,573</b>     | <b>60,000</b>         | <b>252,935</b>  | <b>18</b>                | <b>252,953</b>  |
| Profit for the year, after income tax                                                                                           |      | 0              | 0             | 0                                                     | 0               | 0              | 103,021           | 0                     | 103,021         | 2                        | 103,023         |
| <b>Other comprehensive income</b>                                                                                               |      |                |               |                                                       |                 |                |                   |                       |                 |                          |                 |
| Gain from valuation of financial assets measured at fair value through other comprehensive income recognised directly in equity |      | 0              | 0             | 5,025                                                 | 0               | 0              | 0                 | 0                     | 5,025           | 0                        | 5,025           |
| Loss transferred directly to equity                                                                                             |      | 0              | 0             | (127)                                                 | 0               | 0              | 0                 | 0                     | (127)           | 0                        | (127)           |
| Minus: related income tax                                                                                                       |      | 0              | 0             | (1,106)                                               | 0               | 3              | 0                 | 0                     | (1,103)         | 0                        | (1,103)         |
| Net actuarial loss recognised directly in equity                                                                                | 31   | 0              | 0             | 0                                                     | 0               | (12)           | 0                 | 0                     | (12)            | 0                        | (12)            |
| <b>Total comprehensive income (after taxes)</b>                                                                                 |      | <b>0</b>       | <b>0</b>      | <b>3,792</b>                                          | <b>0</b>        | <b>(9)</b>     | <b>103,021</b>    | <b>0</b>              | <b>106,804</b>  | <b>2</b>                 | <b>106,806</b>  |
| Share capital increase                                                                                                          |      | 72,450         | 78,410        | 0                                                     | 0               | 0              | 0                 | 0                     | 150,861         | 0                        | 150,861         |
| Net off of losses carried forward with share capital                                                                            |      | (30,476)       | 0             | 0                                                     | 0               | 0              | 30,476            | 0                     | 0               | 0                        | 0               |
| Expenses relating to share capital increase                                                                                     |      | 0              | (7,314)       | 0                                                     | 0               | 0              | 0                 | 0                     | (7,314)         | 0                        | (7,314)         |
| Deferred tax on share capital increase expenses                                                                                 |      | 0              | 1,609         | 0                                                     | 0               | 0              | 0                 | 0                     | 1,609           | 0                        | 1,609           |
| Conversion of bond loan into share premium                                                                                      |      | 48,592         | 11,409        | 0                                                     | 0               | 0              | 0                 | (60,000)              | 0               | 0                        | 0               |
| Retained earnings capitalization                                                                                                |      | 3,400          | 0             | 0                                                     | 0               | 0              | (3,400)           | 0                     | 0               | 0                        | 0               |
| Transfer to statutory reserve                                                                                                   |      | 0              | 0             | 0                                                     | 0               | 5,019          | (5,019)           | 0                     | 0               | 0                        | 0               |
| (Purchases)/sales treasury shares                                                                                               |      | 0              | 0             | 0                                                     | (164)           | 0              | 0                 | 0                     | (164)           | 0                        | (164)           |
| Stock awards to personnel                                                                                                       |      | 0              | 0             | 0                                                     | 0               | 5,326          | 0                 | 0                     | 5,326           | 0                        | 5,326           |
| <b>Total transactions with equity shareholders</b>                                                                              |      | <b>93,966</b>  | <b>84,114</b> | <b>0</b>                                              | <b>(164)</b>    | <b>10,345</b>  | <b>22,057</b>     | <b>(60,000)</b>       | <b>150,318</b>  | <b>0</b>                 | <b>150,318</b>  |
| <b>Balance as at 31 December 2023</b>                                                                                           |      | <b>254,245</b> | <b>84,114</b> | <b>(2,935)</b>                                        | <b>(164)</b>    | <b>30,146</b>  | <b>144,651</b>    | <b>0</b>              | <b>510,057</b>  | <b>20</b>                | <b>510,077</b>  |
| <b>Balance as at 1 January 2024</b>                                                                                             |      | <b>254,245</b> | <b>84,114</b> | <b>(2,935)</b>                                        | <b>(164)</b>    | <b>30,146</b>  | <b>144,651</b>    | <b>0</b>              | <b>510,057</b>  | <b>20</b>                | <b>510,077</b>  |
| Profit for the year, after income tax                                                                                           |      | 0              | 0             | 0                                                     | 0               | 0              | 140,224           | 0                     | 140,224         | 2                        | 140,226         |
| <b>Other comprehensive income</b>                                                                                               |      |                |               |                                                       |                 |                |                   |                       |                 |                          |                 |
| Gain from valuation of financial assets measured at fair value through other comprehensive income recognised directly in equity |      | 0              | 0             | 1,910                                                 | 0               | 0              | 0                 | 0                     | 1,910           | 0                        | 1,910           |
| Loss transferred directly to equity                                                                                             |      | 0              | 0             | (19)                                                  | 0               | 0              | 0                 | 0                     | (19)            | 0                        | (19)            |
| Minus: related income tax                                                                                                       |      | 0              | 0             | (420)                                                 | 0               | 34             | 0                 | 0                     | (386)           | 0                        | (386)           |
| Net actuarial loss recognised directly in equity                                                                                | 31   | 0              | 0             | 0                                                     | 0               | (152)          | 0                 | 0                     | (152)           | 0                        | (152)           |
| <b>Total comprehensive income (after taxes)</b>                                                                                 |      | <b>0</b>       | <b>0</b>      | <b>1,471</b>                                          | <b>0</b>        | <b>(118)</b>   | <b>140,224</b>    | <b>0</b>              | <b>141,577</b>  | <b>2</b>                 | <b>141,579</b>  |
| Retained earnings capitalization                                                                                                |      | 276            | 0             | 0                                                     | 0               | 0              | (276)             | 0                     | 0               | 0                        | 0               |
| Transfer to statutory reserve                                                                                                   |      | 0              | 0             | 0                                                     | 0               | 6,918          | (6,918)           | 0                     | 0               | 0                        | 0               |
| Dividend distribution                                                                                                           |      | 0              | 0             | 0                                                     | 0               | 0              | (32,461)          | 0                     | (32,461)        | 0                        | (32,461)        |
| Transfers                                                                                                                       |      | 0              | 0             | 0                                                     | (84)            | (5,827)        | 5,911             | 0                     | 0               | 0                        | 0               |
| (Purchases)/sales treasury shares                                                                                               |      | 0              | 0             | 0                                                     | 136             | 0              | 0                 | 0                     | 136             | 0                        | 136             |
| Stock awards to personnel                                                                                                       |      | 0              | 0             | 0                                                     | 0               | 501            | 467               | 0                     | 968             | 0                        | 968             |
| <b>Total transactions with equity shareholders</b>                                                                              |      | <b>276</b>     | <b>0</b>      | <b>0</b>                                              | <b>52</b>       | <b>1,592</b>   | <b>(33,277)</b>   | <b>0</b>              | <b>(31,357)</b> | <b>0</b>                 | <b>(31,357)</b> |
| <b>Balance as at 31 December 2024</b>                                                                                           |      | <b>254,521</b> | <b>84,114</b> | <b>(1,464)</b>                                        | <b>(112)</b>    | <b>31,620</b>  | <b>251,598</b>    | <b>0</b>              | <b>620,277</b>  | <b>22</b>                | <b>620,299</b>  |

The notes on pages 9 to 136 form an integral part of these annual financial statements.

## BANK

### STATEMENT OF CHANGES IN EQUITY

|                                                                                                                                 |      | Share capital  | Share Premium | Fair value through other comprehensive income reserve | Treasury shares | Other reserves | Retained earnings | Convertible bond loan | Total           |
|---------------------------------------------------------------------------------------------------------------------------------|------|----------------|---------------|-------------------------------------------------------|-----------------|----------------|-------------------|-----------------------|-----------------|
| Amounts in Eur '000                                                                                                             |      |                |               |                                                       |                 |                |                   |                       |                 |
|                                                                                                                                 | Note |                |               |                                                       |                 |                |                   |                       |                 |
| <b>Balance as at 1 January 2023</b>                                                                                             |      | <b>160,279</b> | <b>0</b>      | <b>(6,727)</b>                                        | <b>0</b>        | <b>19,027</b>  | <b>8,930</b>      | <b>60,000</b>         | <b>241,508</b>  |
| Profit for the year, after income tax                                                                                           |      | 0              | 0             | 0                                                     | 0               | 0              | 100,720           | 0                     | 100,720         |
| <b>Other comprehensive income</b>                                                                                               |      |                |               |                                                       |                 |                |                   |                       |                 |
| Gain from valuation of financial assets measured at fair value through other comprehensive income recognised directly in equity |      | 0              | 0             | 5,025                                                 | 0               | 0              | 0                 | 0                     | 5,025           |
| Loss transferred directly to equity                                                                                             |      | 0              | 0             | (127)                                                 | 0               | 0              | 0                 | 0                     | (127)           |
| Minus: related income tax                                                                                                       |      | 0              | 0             | (1,106)                                               | 0               | 3              | 0                 | 0                     | (1,103)         |
| Net actuarial loss recognised directly in equity                                                                                | 31   | 0              | 0             | 0                                                     | 0               | (12)           | 0                 | 0                     | (12)            |
| <b>Total comprehensive income (after taxes)</b>                                                                                 |      | <b>0</b>       | <b>0</b>      | <b>3,792</b>                                          | <b>0</b>        | <b>(9)</b>     | <b>100,720</b>    | <b>0</b>              | <b>104,503</b>  |
| Share capital increase                                                                                                          |      | 72,450         | 78,410        | 0                                                     | 0               | 0              | 0                 | 0                     | 150,860         |
| Net off of losses carried forward with share capital                                                                            |      | (30,476)       | 0             | 0                                                     | 0               | 0              | 30,476            | 0                     | 0               |
| Expenses relating to share capital increase                                                                                     |      | 0              | (7,314)       | 0                                                     | 0               | 0              | 0                 | 0                     | (7,314)         |
| Deferred tax on share capital increase expenses                                                                                 |      | 0              | 1,609         | 0                                                     | 0               | 0              | 0                 | 0                     | 1,609           |
| Conversion of bond loan into share premium                                                                                      |      | 48,592         | 11,409        | 0                                                     | 0               | 0              | 0                 | (60,000)              | 0               |
| Retained earnings capitalization                                                                                                |      | 3,400          | 0             | 0                                                     | 0               | 0              | (3,400)           | 0                     | 0               |
| Stock awards to personnel                                                                                                       |      | 0              | 0             | 0                                                     | 0               | 5,326          | 0                 | 0                     | 5,326           |
| Transfer to statutory reserve                                                                                                   |      | 0              | 0             | 0                                                     | 0               | 4,905          | (4,905)           | 0                     | 0               |
| Purchases)/sales treasury shares                                                                                                |      | 0              | 0             | 0                                                     | (164)           | 0              | 0                 | 0                     | (164)           |
| <b>Total transactions with equity shareholders</b>                                                                              |      | <b>93,966</b>  | <b>84,114</b> | <b>0</b>                                              | <b>(164)</b>    | <b>10,231</b>  | <b>22,171</b>     | <b>(60,000)</b>       | <b>150,318</b>  |
| <b>Balance as at 31 December 2023</b>                                                                                           |      | <b>254,245</b> | <b>84,114</b> | <b>(2,935)</b>                                        | <b>(164)</b>    | <b>29,249</b>  | <b>131,821</b>    | <b>0</b>              | <b>496,330</b>  |
| <b>Balance as at 1 January 2024</b>                                                                                             |      | <b>254,245</b> | <b>84,114</b> | <b>(2,935)</b>                                        | <b>(164)</b>    | <b>29,249</b>  | <b>131,821</b>    | <b>0</b>              | <b>496,330</b>  |
| Profit for the year, after income tax                                                                                           |      | 0              | 0             | 0                                                     | 0               | 0              | 136,712           | 0                     | 136,712         |
| <b>Other comprehensive income</b>                                                                                               |      |                |               |                                                       |                 |                |                   |                       |                 |
| Gain from valuation of financial assets measured at fair value through other comprehensive income recognised directly in equity |      | 0              | 0             | 1,910                                                 | 0               | 0              | 0                 | 0                     | 1,910           |
| Loss transferred directly to equity                                                                                             |      | 0              | 0             | (19)                                                  | 0               | 0              | 0                 | 0                     | (19)            |
| Minus: related income tax                                                                                                       |      | 0              | 0             | (420)                                                 | 0               | 31             | 0                 | 0                     | (389)           |
| Net actuarial loss recognised directly in equity                                                                                | 31   | 0              | 0             | 0                                                     | 0               | (141)          | 0                 | 0                     | (141)           |
| <b>Total comprehensive income (after taxes)</b>                                                                                 |      | <b>0</b>       | <b>0</b>      | <b>1,471</b>                                          | <b>0</b>        | <b>(110)</b>   | <b>136,712</b>    | <b>0</b>              | <b>138,073</b>  |
| Retained earnings capitalization                                                                                                |      | 276            | 0             | 0                                                     | 0               | 0              | (276)             | 0                     | 0               |
| Transfer to statutory reserve                                                                                                   |      | 0              | 0             | 0                                                     | 0               | 6,739          | (6,739)           | 0                     | 0               |
| Dividend distribution                                                                                                           |      | 0              | 0             | 0                                                     | 0               | 0              | (32,461)          | 0                     | (32,461)        |
| Transfers                                                                                                                       |      | 0              | 0             | 0                                                     | (83)            | (5,828)        | 5,911             | 0                     | 0               |
| (Purchases)/sales treasury shares                                                                                               |      | 0              | 0             | 0                                                     | 135             | 0              | 0                 | 0                     | 135             |
| Stock awards to personnel                                                                                                       |      | 0              | 0             | 0                                                     | 0               | 501            | 467               | 0                     | 968             |
| <b>Total transactions with equity shareholders</b>                                                                              |      | <b>276</b>     | <b>0</b>      | <b>0</b>                                              | <b>52</b>       | <b>1,412</b>   | <b>(33,098)</b>   | <b>0</b>              | <b>(31,358)</b> |
| <b>Balance as at 31 December 2024</b>                                                                                           |      | <b>254,521</b> | <b>84,114</b> | <b>(1,464)</b>                                        | <b>(112)</b>    | <b>30,551</b>  | <b>235,435</b>    | <b>0</b>              | <b>603,045</b>  |

The notes on pages 9 to 136 form an integral part of these annual financial statement

## GROUP

### CONSOLIDATED CASH FLOW STATEMENT

Amounts in Eur '000

#### **Cash flows from operating activities**

##### **Profit before tax**

Adjustments for:

Depreciation & amortisation

Fair value losses from financial assets measured at fair value

Interest and non-cash expenses

Dividend income

(Gain)/ loss from derivatives valuation

Share of profit/(loss) of equity method associates

Provision for retirement benefit obligations

Employee benefits & other staff provisions

Provision for expected credit losses

(Gain)/ loss from sale of assets

(Gain)/loss from carbon emission inventory at fair value

Income from provisions

Foreign exchange differences

(Gains)/losses from sale of financial assets at fair value

#### **Changes in operating assets and liabilities**

Financial assets measured at fair value through profit or loss

Loans and advances to customers

Due from banks

Other assets

Due to banks

Due to customers

Other liabilities

Paid staff compensation

Interest paid

#### **Net cash flows from operating activities before income tax**

Income tax paid

#### **Net cash flows from operating activities**

#### **Investing activities**

Acquisition of subsidiaries, associates, joint ventures and other investments

Disposal of participation percentage in subsidiaries and associates

Purchases of investment portfolio securities

Disposal/maturity of investment portfolio securities

Interest received from investment portfolio securities

Dividends received

Proceeds from PPE sales

Purchase of PPE

Purchase of intangible assets

#### **Net cash flow from investing activities**

#### **Financing activities**

Share capital increase

Share capital increase issue costs

Share capital decrease

Purchase of treasury shares

Proceeds from disposal of treasury shares

Dividend distribution

Proceed/(repayments) from loans issued/undertaken

Repayments of lease liabilities (capital and interest)

#### **Net cash flow from financing activities**

Effect of exchange rate changes on cash and cash equivalents

#### **Net increase/(decrease) in cash and cash equivalents**

Cash and cash equivalents at beginning of the year

#### **Cash and cash equivalents at the end of the year**

| Note | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|------|--------------------------|--------------------------|
|      | <b>176,640</b>           | <b>125,944</b>           |
|      | 8,329                    | 7,312                    |
|      | (9,001)                  | (8,548)                  |
|      | 728                      | 751                      |
|      | (512)                    | (245)                    |
|      | (4,424)                  | 8,835                    |
|      | (349)                    | 190                      |
| 31   | 184                      | 225                      |
|      | 968                      | 5,326                    |
| 12   | 20,553                   | 9,913                    |
|      | 184                      | (574)                    |
|      | 1,023                    | (5,290)                  |
| 13   | 0                        | (29)                     |
|      | (61)                     | 3                        |
|      | (33)                     | (35)                     |
|      | <b>194,229</b>           | <b>143,778</b>           |
|      | 84,287                   | (116,793)                |
|      | (1,199,941)              | (766,317)                |
|      | (41)                     | (5,791)                  |
|      | (87,379)                 | (16,740)                 |
|      | 36,508                   | (7,022)                  |
|      | 1,451,608                | 1,014,596                |
|      | 60,176                   | (11,655)                 |
| 31   | 0                        | (96)                     |
|      | (2)                      | (371)                    |
|      | <b>539,445</b>           | <b>233,589</b>           |
|      | (8,918)                  | (8,653)                  |
|      | <b>530,527</b>           | <b>224,936</b>           |
|      | 0                        | (1)                      |
| 23   | 2                        | 0                        |
|      | (392,930)                | (105,411)                |
|      | 252,584                  | 31,300                   |
|      | 16,407                   | 8,001                    |
|      | 512                      | 245                      |
|      | 1                        | 1,000                    |
| 24   | (1,766)                  | (1,486)                  |
| 25   | (3,723)                  | (3,001)                  |
|      | <b>(128,913)</b>         | <b>(69,353)</b>          |
|      | 0                        | 150,861                  |
|      | 0                        | (7,314)                  |
|      | (162)                    | 0                        |
|      | (2,757)                  | (759)                    |
|      | 2,893                    | 595                      |
|      | (32,461)                 | 0                        |
|      | (2,024)                  | (3,013)                  |
|      | (3,703)                  | (3,319)                  |
|      | <b>(38,214)</b>          | <b>137,051</b>           |
|      | 57                       | (67)                     |
|      | <b>363,457</b>           | <b>292,567</b>           |
| 16   | 577,613                  | 285,046                  |
|      | <b>941,070</b>           | <b>577,613</b>           |

The notes on pages 9 to 136 form an integral part of these annual financial statements.

## BANK

### CASH FLOW STATEMENT

Amounts in Eur '000

#### **Cash flows from operating activities**

##### **Profit before tax**

Adjustments for:

Depreciation & amortisation

Fair value losses from financial assets measured at fair value

Interest and non-cash expenses

Dividend income

(Gain)/ loss from derivatives valuation

Provision for retirement benefit obligations

Employee benefits & other staff provisions

Provision for expected credit losses

(Gain)/ loss from sale of assets

(Gain)/loss from carbon emission inventory at fair value

Foreign exchange differences

| Note | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|------|--------------------------|--------------------------|
|      | <b>172,130</b>           | <b>123,154</b>           |
|      | 7,852                    | 6,907                    |
|      | (8,919)                  | (10,087)                 |
|      | 730                      | 749                      |
|      | (500)                    | (245)                    |
|      | (4,424)                  | 8,835                    |
| 31   | 173                      | 207                      |
|      | 968                      | 5,326                    |
| 12   | 20,172                   | 9,711                    |
|      | 184                      | (575)                    |
|      | 1,023                    | (5,290)                  |
|      | (57)                     | 0                        |
|      | <b>189,332</b>           | <b>138,692</b>           |
|      | 84,287                   | (116,793)                |
|      | (1,198,404)              | (768,325)                |
|      | (41)                     | (5,791)                  |
|      | (88,670)                 | (16,754)                 |
|      | 36,508                   | (7,022)                  |
|      | 1,457,152                | 1,017,331                |
|      | 60,273                   | (10,875)                 |
| 31   | 0                        | (84)                     |
|      | 0                        | (366)                    |
|      | <b>540,437</b>           | <b>230,013</b>           |
|      | (8,094)                  | (8,204)                  |
|      | <b>532,343</b>           | <b>221,809</b>           |

#### **Changes in operating assets and liabilities**

Financial assets measured at fair value through profit or loss

Loans and advances to customers

Due from banks

Other assets

Due to banks

Due to customers

Other liabilities

Paid staff compensation

Interest paid

#### **Net cash flows from operating activities before income tax**

Income tax paid

#### **Net cash flows from operating activities**

#### **Investing activities**

Acquisition of subsidiaries, associates, joint ventures and other investments

Disposal of participation percentage in subsidiaries and associates

Purchases of investment portfolio securities

Disposal/maturity of investment portfolio securities

Interest received from investment portfolio securities

Dividends received

Proceeds from PPE sales

Purchase of PPE

Purchase of intangible assets

#### **Net cash flow from investing activities**

|    |                  |                 |
|----|------------------|-----------------|
| 23 | (15,000)         | (1)             |
|    | 2                | 0               |
|    | (389,730)        | (104,761)       |
|    | 251,451          | 31,249          |
|    | 16,407           | 8,001           |
|    | 500              | 245             |
|    | 1                | 1,000           |
| 24 | (1,739)          | (1,478)         |
| 25 | (3,508)          | (2,832)         |
|    | <b>(141,616)</b> | <b>(68,577)</b> |

#### **Financing activities**

Share capital increase

Share capital increase issue costs

Purchase of treasury shares

Proceeds from disposal of treasury shares

Dividend distribution

Repayments of lease liabilities (capital and interest)

#### **Net cash flow from financing activities**

Effect of exchange rate changes on cash and cash equivalents

#### **Net increase/(decrease) in cash and cash equivalents**

Cash and cash equivalents at beginning of the year

#### **Cash and cash equivalents at the end of the year**

|    |                 |                |
|----|-----------------|----------------|
|    | 0               | 150,861        |
|    | 0               | (7,314)        |
|    | (2,757)         | (759)          |
|    | 2,893           | 595            |
|    | (32,461)        | 0              |
|    | (3,689)         | (3,315)        |
|    | <b>(36,014)</b> | <b>140,068</b> |
|    | 57              | (67)           |
|    | <b>354,770</b>  | <b>293,233</b> |
| 16 | 575,147         | 281,914        |
|    | <b>929,917</b>  | <b>575,147</b> |

The notes on pages 9 to 136 form an integral part of these annual financial statements.

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**NOTES TO THE FINANCIAL STATEMENTS AS OF 31 DECEMBER 2024****1. General Information**

**Optima Bank S.A.** arose from the renaming of INVESTMENT BANK OF GREECE S.A.

The Bank provides a wide range of banking and brokerage services as well as investment banking services. It operates in accordance with the provisions of Law 4261/2014 and Law 4548/2014, as in force, under the supervision of the Bank of Greece, while being a member of the Athens Exchange and the Cyprus Stock Exchange. As of 31/12/2024 it employed 550 persons in total, while its registered office is located in the Municipality of Maroussi, Attica (32 Aigialeias St.)

The Investment Bank of Greece was established in 2000 and since 2012 its majority shareholder was Cyprus Popular Bank, the remaining assets of which have been passed to the National Resolution Authority (NRA) of Cyprus and was under special management.

In 2013, within the context of the plan to rescue the banks of Cyprus, all banking operations of Cyprus Popular Bank in Greece were transferred to Piraeus Bank, while the Investment Bank of Greece was excluded and remained an independent banking, investment and financial institution which continued its operation as a Greek financial institution holding a banking license.

In March 2018, Cyprus Popular Bank hired an advisor and started the procedure to sell the Investment Bank of Greece by conducting an international tender, such procedure was completed in October 2018 with the signature of the SPA between the seller (Cyprus Popular Bank) and the buyer (Ireon Investments, a 100% subsidiary of Motor Oil Hellas Group). The transfer procedure was completed in July 2019, following the receipt of the relevant approvals of the regulatory authorities. The participation percentage of Ireon Investments amounted to 97.08%.

Following its acquisition by Ireon Investments, Investment Bank of Greece SA was renamed to Optima Bank S.A., in August 2019.

On March 26, 2020, the Board of Directors of Motor Oil (Hellas) SA granted a special permission to its subsidiary IREON INVESTMENTS LTD so that the latter could proceed with a partial disinvestment by selling shares of "Optima Bank SA". From September to December 2020, IREON INVESTMENTS LTD transferred in total 2,546,006 shares issued by OPTIMA BANK S.A. to parties related to MOTOR OIL (HELLAS) and third parties.

Following the above transactions and combined with the share capital increase conducted by Optima Bank S.A., in accordance with the resolution dated 25.11.2020 of the Extraordinary General Assembly of its Shareholders, the participation percentage of IREON INVESTMENTS LTD in Optima Bank amounted to 15.77% on 31/12/2020.

On 13/1/2021, MOTOR OIL (HELLAS) S.A. announced that its subsidiary IREON INVESTMENTS LTD transferred another 61,500 shares issued by Optima Bank SA to individuals related to the company and 25,000 shares to third parties.

On 15/1/2021, the Bank's Board of Directors certified the share capital increase by cash of E UR 80,139,546, which was decided by the extraordinary meeting of the shareholders on 25.11.2020. IREON INVESTMENTS LTD did not participate in the aforementioned share capital increase.



As a result of the above corporate actions, the participation of IREON INVESTMENTS LTD in Optima Bank was formed to less than 15%.

In October 2022, the issuance of a convertible bond loan of EUR 60,000,000 was successfully completed.

On 22/3/2023, by decision of the Extraordinary General Assembly, it was decided to list all of the Bank's common shares on the Regulated Market (Main Market) of the Athens Stock Exchange, in accordance with the provisions of Law 3371/2005. Furthermore, the decision to list the Bank's shares on the Athens Stock Exchange constituted an activation event for the conversion of the Convertible Bond Loan issued in October 2022, in accordance with its terms.

On 4/10/2023, the listing of all the Bank's shares on the Main Market of the Athens Stock Exchange was completed.

On 11/11/2024, Optima Leasing S.A. was established which is a 100% subsidiary of the Optima Bank Group.

The duration of the Bank is ninety-nine (99) years from its establishment and its purpose, according to its Articles of Association, is the performance of all banking services permitted by Law for its own or third parties' account.

Branches operating in Greece:

| A/A | BRANCH                   | ADDRESS                                        |
|-----|--------------------------|------------------------------------------------|
| 1   | PSYCHIKO                 | Olympionikon & 1 El. Venizelou St. - 15451     |
| 2   | ILIOUPOLI                | A. Papandreou & 1 Gladstonos St. – 163 45      |
| 3   | AGHIA PAARASKEVI         | D. Gounari & 6 Chalandriou St.- 153 43         |
| 4   | MAROUSSI                 | 46 Thisseos & 2 D.Rali St. - 151 24            |
| 5   | AMPELOKIPOI              | 124 Vas. Sofias Ave. - 115 26                  |
| 6   | NEA SMIRNI               | 55 El. Venizelou St. - 171 23                  |
| 7   | PALAIIO FALIRO           | 4 Ag. Alexandrou St. - 175 61                  |
| 8   | KALITHEA                 | 2 Fornezi & El. Venizelou St. - 176 75         |
| 9   | KALAMARIA – THESSALONIKI | 51 Ethnikis Antistasseos St. - 551 34          |
| 10  | PANEPISTIMOU – ATHENS    | 15 El.Venizelou St. - 105 64                   |
| 11  | CHALANDRI                | 1 Kosta Varnali St. - 152 33                   |
| 12  | NIKAIA                   | 232 Petrou Rali St. - 184 53                   |
| 13  | KORINTHOS                | 21 Ethnikis Antistasseos St. - 201 00          |
| 14  | ANO PATISSIA             | 376 Patission St. - 111 41                     |
| 15  | GLYFADA                  | 8-10 Andrea Papandreou - 166 75                |
| 16  | TSIMISKI-THESSALONIKI    | 17 I. Tsimiski St. - 546 24                    |
| 17  | KIFISSIA                 | 242 Kifissias Ave. & 1 Panagitsas St. - 145 62 |
| 18  | PIRAEUS                  | 11 Vas. Georgiou - 185 32                      |
| 19  | MAROUSSI-ANAVRYTA        | 221 Kifissias Ave.- 151 24                     |
| 20  | NEA IONIA                | 346 Irakliou Ave - 142 31                      |
| 21  | EVOSMOS - THESSALONIKI   | 31 28th Oktovriou St. - 562 24                 |
| 22  | PERISTERI                | 16-20 Panagi Tsaldari St. - 121 34             |
| 23  | EGALEO                   | 259 Iera Odos & 25th Martiou St. - 122 44      |

|    |                |                                           |
|----|----------------|-------------------------------------------|
| 24 | PAGRATI        | 34 – 36 Eftichidou - 116 34               |
| 25 | KOLONAKI       | 7 Patriarchou Ioakim & Herodotou - 106 74 |
| 26 | HRAKLION CRETE | 46 25th August - 712 02                   |
| 27 | LARISSA        | 78 Kyprou & Filellinon - 412 22           |
| 28 | PATRA          | 42 Agiou Andreou - 262 21                 |
| 29 | CHANIA         | Kidonias 67 & Zamvrakakidon – 731 35      |

The consolidated and standalone financial statements as of 31/12/2024 were approved by the BoD on 20.03.2025 and are subject to the final approval of the General Assembly of the Shareholders, the annual financial report in accordance with the European Single Electronic Format ("ESEF") is available on the Group's website ([www.optimabank.gr](http://www.optimabank.gr)).

## **2. Material accounting policies**

### **2.1. Basis of preparation**

The consolidated and standalone financial statements are prepared in accordance with the International Financial Reporting Standards (IFRS) and the interpretations of the International Financial Reporting Interpretations Committee (IFRIC), as adopted by the European Union.

The consolidated and standalone financial statements have been prepared on a going concern basis and on a historical cost basis, except for financial assets measured at fair value through profit or loss or measured at fair value through other comprehensive income as presented in the consolidated and standalone statement of financial position and the corresponding disclosures, derivative financial instruments assets and liabilities

The preparation of the financial statements in accordance with the IFRS requires the use of some important accounting estimates and the judgment of the Management for the implementation of the accounting principles. The points that pertain to complex transactions and are highly subjective or the affairs and estimates that are particularly important for the financial statements are presented in note 3.

#### **2.1.1. Going concern**

The financial statements of 31/12/2024 were prepared on a going concern basis.

The Board of Directors evaluated the macroeconomic environment, the Group's strategy, its liquidity and capital position.

Management took into consideration the following:

- The economic growth of the Greek economy during the first 9 months of 2024, the prospects of a positive growth rate of Gross National Product, which is expected to be above the euro area average, the inflow of private investment, the gradual disinflation process and the decreasing rate of unemployment.
- The recovery of the state's credit rating to investment grade status and the restructuring of the banking sector, which are important developments.

- The Group's diligent liquidity management, as reflected in the Group's Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) ratios, which as of 31/12/2024 amounted to 251.4% and 124.8% respectively, significantly higher than the regulatory limits that have been set (100%).
- The Group's capital adequacy, which exceeds the OCR including Pillar 2 Guidance ("P2G").
- Maintaining a high quality Balance Sheet structure, as reflected by the Non-Performing Loans (NPE) ratio which amounts to 0.85%, as well as the increase in after-tax profits by 36%.
- The impact of the ongoing crisis in the Middle East and Ukraine (the Group has no exposure to these countries) and the possible delays in the implementation of the Recovery and Resilience Plan.

Based on the above, the Board of Directors estimates that there are no doubts about the Group's ability to continue its activities for the period of 12 months from the date of approval of the annual financial statements and therefore the conditions for the application of the going concern basis of accounting for the preparation of the financial statements are met.

#### Greek economy

Greek economy continued to grow at a satisfactory pace in 2024, despite international geopolitical turmoil and natural disasters, exceeding the growth rate of the euro area. More specifically, GDP continued to increase in the first nine months of 2024 by 2.3% compared to the corresponding period of 2023. Inflation declined in December 2024 to 2.7% compared to 3.5% in 2023. The labor market has recorded strong growth in recent years, resulting in a reduction in the unemployment rate to 11.1% in 2023, while further de-escalation continued in 2024 with the unemployment rate reaching 10.3% in the first nine months of 2024. According to the Bank of Greece's forecasts, the growth momentum of the Greek economy will continue in the coming years and will reach growth rates approximately double the eurozone average. The growth rate of the Greek economy is expected to reach 2.2% in 2024, accelerate to 2.5% in 2025 and decline slightly to 2.3% in 2026 and 2.0% in 2027. The main driving force of economic activity in the coming years will continue to be consumption, while investments and exports will continue to contribute positively. In 2023, Greece's credit rating regained investment grade and this positive attitude of the rating agencies continued in 2024. The above factors had a positive impact on the prospects of Greek banks and this is reflected in the strengthening of profitability, liquidity and capital adequacy ratios, as well as in the improvement of the quality of their loan portfolio.

#### Liquidity

The Group's deposits on 31/12/2024 amounted to €4.6 billion, showing an increase of 45% from 31/12/2023 and the loan-to-deposit ratio stood at 77.8% from 76.2% on 31/12/2023. At the same time, the Group has zero borrowings from the ECB, while its highly liquid assets amount to €1.1 billion.

#### Capital adequacy

As of 31/12/2024, the Group's Common Equity Tier 1 (CET1) and Total Capital Adequacy Ratio (TCR) under the Basel III framework amounted to 14.40%. At the same time, the Bank's Management is examining the

most appropriate options for strengthening the capital base, so that regulatory capital and regulatory ratios ensure the smooth implementation of the business plan.

### **2.1.2. Restatement of amounts**

Changes in accounting principles and methods (policies) are accounted for by retrospectively restating the financial statements of all periods presented with the current period's financial statements so that the amounts presented to be comparable. In the comparative year ended 2024, no need for reclassification arose.

### **2.1.3. New standards, amendments to standards and interpretations**

The amendments to the applicable standards as of 1/1/2024 are listed below:

► **Amendment to International Financial Reporting Standard 16 "Leases"**: Lease liability in a sale and leaseback.

Effective for annual periods beginning on or after 1/1/2024.

The above amendment had no impact on the financial statements of the Group and the Bank

► **Amendment to International Accounting Standard 7: "Statement of Cash Flows" and International Financial Reporting Standard 7 "Financial Instruments: Disclosures"**: Supplier finance arrangements.

Effective for annual periods beginning on or after 1/1/2024.

The above amendment had no impact on the financial statements of the Group and the Bank.

► **Amendment to International Accounting Standard 1 "Presentation of Financial Statements"**: Classification of liabilities as current and non-current.

Effective for fiscal years beginning on or after 1/1/2024.

The above amendment had no impact on the financial statements of the Group and the Bank.

► **Amendment to International Accounting Standard 1 "Presentation of Financial Statements"**: Long-term contingent liabilities.

Effective for annual periods beginning on or after 1/1/2024.

The above amendment had no impact on the financial statements of the Group and the Bank.

Additionally, the International Accounting Standards Board has issued the following standards and amendments to standards, which have not yet been adopted by the European Union and have not been early applied by the Group and the Bank.

► **Amendment to International Accounting Standard 21 "Lack of Exchangeability"**: The Effects of Changes in Foreign Exchange Rates.

Applicable for annual periods beginning on or after 1/1/2025.

The above amendment is not expected to have an impact on the financial statements of the Group and the Bank.

► **Amendment to International Financial Reporting Standard 9 and International Financial Reporting Standard 7 "Classification and Measurement of Financial Instruments"**: Classification of Financial Assets and Financial Liabilities and Settlement Date.

Effective for annual periods beginning on or after 1/1/2026.

The above amendment is not expected to have an impact on the financial statements of the Group and the Bank.

► **Amendment to International Financial Reporting Standard 9 and International Financial Reporting Standard 7 "Contracts referencing nature-dependent electricity"**: Under which conditions can a contract for renewable electricity dependent on the natural environment be defined as a hedging instrument.

Effective for annual periods beginning on or after 1/1/2026.

The above amendment will be examined to see if it will have an impact on the financial statements of the Group and the Bank.

► **New International Financial Reporting Standard 18 "Presentation and Disclosure in Financial Statements"**: Classification of Income and Expenses in Financial Statements.

Effective for annual periods beginning on or after 1/1/2027.

The above amendment is not expected to have an impact on the financial statements of the Group and the Bank.

► **New International Financial Reporting Standard 19 "Non-Publicly Accountable Subsidiaries"**:

Disclosures of Non-Publicly Accountable Subsidiaries.

Effective for annual periods beginning on or after 1/1/2027.

The above amendment is not expected to have an impact on the financial statements of the Group and the Bank.

## **2.2. Principles of Consolidation and Equity Method**

### **(i) Subsidiaries -Consolidation**

Subsidiaries are all entities controlled by the Bank (the Group's parent). The Bank controls an entity when it has power over it, is exposed to or has rights to variable returns from its involvement with the entity and has the ability to affect those variable returns through its ability to influence the activities of the entity through the use of its power. Subsidiaries are fully consolidated from the date on which the Bank obtains control over them. Consolidation ceases from the date on which control ceases.

Intercompany transactions, balances and unrealized gains from transactions between Group companies are eliminated. Unrealized losses are also eliminated unless the transaction contains indications of impairment of the transferred asset.

### **(ii) Acquisition of a Subsidiary**

The Group uses the acquisition method for accounting for subsidiaries and their acquisition price consists of:

- the fair value of the assets that are transferred
- the liabilities undertaken by the acquirer from the previous owners
- the equity interest issued by the Group
- the fair value of the assets or liabilities that arise from agreements with contingent consideration, and

- the fair value of any interests in the subsidiary that existed before the acquisition.

The acquired identifiable assets and liabilities and any contingent liabilities assumed in a business combination are initially recognised, with a few exceptions, at their fair value on the date of acquisition.

Acquisition-related costs are recognised in profit or loss.

The excess of the sum of

- the acquisition price
- the amount recognised as non-controlling interests a
- the fair value of any interest held by the Group in the subsidiary before the acquisition,

over the fair value of the net assets of the subsidiary acquired is recognised as goodwill. If these amounts are less than the fair value of the net assets of the subsidiary acquired, the difference is recognised directly in profit or loss as a gain on a bargain purchase.

(iii) Non-controlling interests

On an acquisition basis, the Group recognises any non-controlling interest in the subsidiary either at fair value or at the value of the non-controlling interest's share as a percentage of the net assets of the subsidiary acquired. Following the acquisition of control, the measurement of the carrying amount of non-controlling interests is the amount of such interests at initial recognition and their proportion of changes in equity subsequently.

(iv) Associates – Equity method

Associates are entities over which the Group has significant influence but not control, either individually or jointly. This generally applies when the Group holds more than 20% of the voting rights. Investments in associates are accounted for using the equity method and are initially recognised at cost.

Under the equity method, investments in an associate are initially recognised at cost and are subsequently increased or decreased to recognise in the income statement the Group's share of the post-acquisition profits or losses and to recognise in other comprehensive income the Group's share of the changes in the other comprehensive income of the entity. Dividends received or receivable from associates and joint ventures are recognised as a reduction in the carrying amount of the investment.

If the Group's share of losses on an investment accounted for using the equity method equals or exceeds the value of the investment in the business, including any other unsecured long-term receivables, the Group does not recognize additional losses, unless payments have been made or additional obligations have been assumed on behalf of the investment.

Unrealized gains on transactions between the Group and associates are eliminated to the extent of the Group's interest in those entities. Unrealized losses are also eliminated unless the transaction provides evidence of impairment of the transferred asset. The accounting policies governing investments accounted for using the equity method have been amended where necessary to align them with those adopted by the Group.

The carrying amount of investments is reviewed for impairment in accordance with the policy described in note 2.9.

(v) Changes in controlling interests

A change in controlling interests results in an adjustment to the carrying amount of the controlling and non-controlling interests to reflect the relationship of the interests in the subsidiary. Any difference between the amount by which the non-controlling interests are adjusted and any consideration paid or received is recognised in a separate reserve account within equity attributable to the owners of the Group.

(vi) Loss of control

The Group ceases to consolidate a subsidiary when it loses control of it either individually or jointly. In the event of loss of control, the gain or loss on disposal is calculated as the difference between (a) the sum of the fair value of the consideration and the fair value of the interest retained by the Group and (b) the carrying amount, before disposal, of the assets (including goodwill), liabilities and non-controlling interests.

Any remaining interest is remeasured to its fair value, with any resulting differences recognised in profit or loss. The asset is recognised as an associate if the Group has significant influence, a joint venture if there is a joint arrangement whereby the parties that exercise joint control over the arrangement also have rights to the net assets of the arrangement, or a financial asset at fair value. In addition, related amounts previously recognised in other comprehensive income are accounted for in the same way as they would be accounted for if the assets and liabilities in question were sold. This means that amounts previously recognised in other comprehensive income may be reclassified to profit or loss.

### **2.3. Foreign currency translations**

(i) Functional and presentation currency

The Group's items on the financial statements are measured with the currency of the primary economic environment in which the Group operates ("functional currency"). The financial statements are presented in Euro, which is the functional currency.

(ii) Transactions and balances

Transactions in foreign currencies are translated to the functional currency at the exchange rate valid on the dates these transactions were made. Monetary assets and liabilities denominated in foreign currencies are translated to Euro in accordance with the exchange rate valid on the date the financial statements were prepared. The exchange differences arising are recognised in the profit or loss. The profits and losses from exchange differences are recognised on a net basis in the profit or loss, on the line of the gains/(losses) from financial transactions (note 8).

The exchange differences from assets and liabilities measured at fair value are recognised as part of the fair value profit or loss.

## **2.4. Financial assets and liabilities**

### **Methods of measurement**

The financial assets measured at amortised cost are:

- Debt securities at amortised cost
- Cash and balances with central bank
- Due from banks
- Loans and advances to customers
- Other receivables included in "Other assets".

The financial liabilities measured at amortised cost are:

- Due to credit institutions
- Due to central bank
- Due to customers
- Other liabilities included in "Other Liabilities".

#### **Amortised cost and effective interest rate**

The amortised cost is the amount that measures the financial asset or liability at its initial recognition less the repayments of principal, plus or minus the accumulated depreciation using the effective interest rate method for, any differences between the said initial amount and the amount at the end and, in the event of financial assets, readjusted with any provision for impairment losses.

The effective interest rate is the rate that discounts future cash flows through the expected life of the financial asset or financial liability so that the present value of all future cash flows equals the carrying amount of the financial instrument, including any transaction costs. When calculating the effective interest rate, expected credit losses are not taken into account (with the exception of "Purchased or originated as impaired loans and advances to customers") and all fees paid or received between the parties and forming an integral part of the effective interest rate, transaction costs and any increase or decrease in the nominal value of the financial asset are included.

When the Group revises its estimates of future cash flows, the carrying amount of the related financial assets and liabilities is adjusted to reflect the actual and revised estimated future contractual cash flows using the original effective interest rate of the financial instrument as the discount rate. The adjustment is recognized in the income statement as income or expense. In the event of a change in the base interest rate, the effective interest rate is adjusted accordingly without affecting the results.

#### **Initial recognition**



Regular purchases and sales of investments are recognised on the transaction date, which is the date on which the Group commits to purchase or sell the asset. Loans and receivables from customers are recognised at the time of disbursement.

At the initial recognition, the Group recognises a financial asset at fair value plus, in the event of a financial asset not measured at fair value through profit or loss, the cost of the transactions directly attributed to the acquisition of the financial asset. The transaction costs for the financial assets measured at fair value through profit or loss are recognised directly in the profit or loss.

Where the fair value of the financial assets and liabilities is different than the transaction price, the Group recognises the difference as follows:

- a) if the fair value is proven by an official market price in an active market for a similar asset or liability (i.e. a 1st level input) or according to a technical assessment using only data from observable market prices, the difference is recognised as profit or loss in the current year.
- b) in all other cases, the difference is transferred and recognised as profit or loss only to the extent that it arises from the variation of a factor (including time) that the participants in the market would have taken into account to assess the asset or liability.

#### **2.4.1 Financial assets**

##### **(i) Classification and subsequent measurement**

The classification of financial assets and their subsequent measurement depend on:

- (i) The business model of the Group for their management, and
- (ii) The features of their contractual cash flows.

According to the above factors, the Group classifies its financial assets in one of the following three measurement categories:

- Amortised cost: The financial assets are measured at their amortised cost, if they are held as part of a business model aiming at holding the financial assets to collect their contractual cash flows and such contractual cash flows concern solely payments of principal and interest (SPPI). Interest income, realized profits and losses due to the derecognition and the changes in the expected credit losses from assets classified at the amortised cost, are included in the profit or loss statement.
- Fair value through other comprehensive income: The financial assets are measured at fair value through other comprehensive income if they are held as part of a business model aiming at both collecting the contractual cash flows and at selling financial assets and such contractual cash flows concern solely payments of principal and interest. After the initial recognition, they are measured at their fair value through the other comprehensive income, except from their respective interest income, relevant profits or losses from foreign exchange differences and the expected credit losses, which are recognised in the profit or loss statement. The accumulated profits or losses previously recognised in the other

comprehensive income are transferred to the profit or loss statement when the financial instrument is derecognised.

- Fair value through profit or loss: Financial assets that do not meet the criteria for classification as measured at amortised cost or measured at fair value through other comprehensive income are measured at fair value through profit or loss. Financial assets are mandatorily measured at fair value if their contractual terms do not give rise to cash flows on specific dates that are solely payments of principal and interest on the principal outstanding (SPPI Fail). In addition, the Group may designate a financial asset at initial recognition as measured at fair value through profit or loss if this eliminates or significantly reduces an accounting mismatch. After initial recognition, gains or losses arising from changes in fair value are included in the income statement.

#### Investments in equity instruments

Investments in equity securities concern securities that fall within the definition of participation on the part of the issuer, i.e. they do not involve any contractual payment obligation and demonstrate a right to the balance remaining if the issuer's assets are deducted from its liabilities.

The Group measures all equity instruments at fair value upon initial recognition. When the Group irrevocably elects upon initial recognition to recognise changes in the fair value of equity instruments in other comprehensive income, any gains/losses from the measurement at fair value of equity instruments in other comprehensive income are not reclassified to the income statement after the investment is derecognised. Dividends are recognised in the income statement in other income when the Group establishes the right to receive the proceeds.

Changes in the fair value of financial assets measured at fair value through profit or loss are recognised in the income statement under the results of financial transactions.

Note 5 provides information on determining the fair value of financial assets.

Under IFRS 9, separation of an embedded derivative from its host contract is not applicable when the host contract is a financial asset within the scope of the standard. Instead, the assessment of the classification of the hybrid financial instrument is made in its entirety.

The Group reclassifies financial assets when, and only when, it changes the business model it applies to manage those financial assets. The reclassification takes place from the beginning of the first reporting period following the change. Such changes are not expected to be frequent. The above categories include investments in debt securities, such as loans, government and corporate bonds.

#### **(ii) Impairment**

The Group measures the expected credit losses relevant to the financial assets measured at the amortised costs, to the investments in debt instruments measured at fair value through comprehensive income, the financial guarantee contracts and the loan commitments, as well as the irrevocable unutilized credit limits taking

into consideration the forecasts for the future economic conditions. The Group recognises a loss allowance for expected credit losses at each reporting date. The calculation of the expected credit losses reflects:

- an defined and probability-weighted amount determined through the evaluation of a series of possible outcomes;
- the time value of money, and
- reasonable and sound information available on the reporting date at no unreasonable cost or effort, pertaining to past events, current conditions and forecasts for the future economic conditions.

The accounting policy of the Group regarding financial assets impairment is disclosed in detail in note 2.12.

### **(iii) Loan modifications**

The Group and the Bank reviewed and updated in the fiscal year the accounting policy regarding the modification of loan terms with the aim of providing more relevant information on the effects of the specific transactions on the financial position and financial performance of the Bank and the Group in agreement and compliance with the practices followed by the banking industry.

The Group and the Bank may modify the loan agreements and consequently, the contractual loan flows either as a refinancing or loan restructuring of a customer facing or about to face financial difficulties or due to various other factors such as changes in market conditions or commercial negotiation.

In the above cases, the Group and the Bank initially assess whether the new terms are substantially different from the original terms of the contract. The new terms in the contractual flows of loans are considered to be substantially different, in the following cases: change of creditor, change of loan currency, introduction or removal of convertibility rights or profit sharing mechanisms, aggregation of non-similar contracts, the present value of the modified contractual cash flows discounted at the original effective interest rate differs by more than 10% from the carrying amount of the loan before the modification.

The Group and the Bank then consider whether the modification of the contracts is due to changes in market conditions or for commercial reasons and is generally carried out at the request of the borrower in order to apply the current market conditions or new commercial reasons to his loan.

The resulting new contract is considered a new transaction and consequently it is necessary to derecognise the original financial asset (loan) and recognise a new financial asset.

The new financial asset is subject to the classification and measurement requirements specified by IFRS 9 and is recognised at fair value, while the difference between the carrying amount of the old financial asset and the fair value of the new one is recognised at income statement as gains or losses arising from the derecognition of financial assets measured at amortised cost.

In case that the contract is modified due to a refinancing or financing restructuring in which the contractual cash flows are modified to allow a customer experiencing financial difficulties (current or future) to meet its payment obligations, and in case that the modification does not take place it was reasonably certain that the creditor will not be able to meet the payment obligations of the initial contract, then the renegotiation or

modification does not result in derecognition of the aforementioned financial asset. The Group and the Bank consider that the contractual cash flows have not changed materially and recalculate the pre-provisions carrying amount of the financial asset (loan) based on the new cash flows, recognising in the results gains or losses from modification of loans contractual terms, adjusting the pre-provisions carrying amount of the financial asset (loan) after the modification accordingly. The carrying amount before provisions of the financial asset is recalculated as the present value of the renegotiated or modified contractual cash flows discounted at the initial effective interest rate (or the credit-adjusted effective interest rate for purchased or originated credit-impaired financial assets) of the financial asset. Any costs or fees adjust the carrying amount of the modified financial asset and are amortised over the remaining life of the modified financial asset.

The Group and the Bank in accordance with the requirements of the IAS 8 have adopted this decision retrospectively as a change in accounting policy. The retrospective application of this accounting policy does not have a significant effect on the Statement of Financial Position and the Statement of Profit and Loss and Other Comprehensive Income as of December 31, 2023.

**(iv) Derecognition, except the recognition arising from a modification**

Except for the above case of loan modification, the Group shall derecognise a financial asset when, and only when:

- a) the contractual rights to the cash flows from the financial asset expire, or
- b) transfers the financial asset and such transfer qualifies for derecognition.

When the Group retains the contractual rights to receive the cash flows of a financial asset (the "original asset"), but assumes a contractual obligation to pay those cash flows to one or more entities (the "eventual recipients"), the Group handles the transaction as a transfer of a financial asset if, and only if, all of the following three conditions are met:

- a) the Group has no obligation to pay amounts to the eventual recipients unless it collects equivalent amounts from the original asset.
- b) the Group is prohibited by the terms of the transfer contract from selling or pledging the original asset.
- c) the Group has an obligation to remit any cash flows it collects on behalf of the eventual recipients without material delay.

**(v) Write offs**

The Group writes off financial assets, in whole or in part, when it has exhausted all recovery efforts and concluded that there is no reasonable expectation of recovery. Write-offs and partial write-offs represent derecognition or partial derecognition events. The write-off reduces the carrying amount of the claim and the respective allowance losses. Balances that were written off and recovered at a later stage reduce the amount of the impairment loss in the income statement.

## **2.4.2 Financial liabilities**

### **(i) Classification and subsequent measurement**

The financial liabilities of the Group pertain mainly to due to financial institutions and due to customers. The Group classifies all financial liabilities as subsequently measured at amortised cost, apart from:

- Derivatives (note 2.28)
- Financial guarantee contracts (note 2.13).

### **(ii) Derecognition**

A financial liability is derecognised when it is settled, canceled or expires.

## **2.5. Repurchase agreements and securities lending**

The Group enters into agreements to purchase (sell) securities and resell (repurchase) substantially the same securities on a certain date in the future, and at a fixed price. The purchased securities subject to a commitment to resell them in future dates (reverse repos) are not recognised as investments. The amounts paid for such purchases are recognised in receivables. The receivables are presented in the statement of financial position in the line "Due from banks" with the title as collateral. Investments sold under repurchase agreements (repos) continue to be recognised in the statement of financial position, given that the Group essentially continues to undertake all their risks and benefits and are measured depending on their classification. Proceeds from the sale of investments under repurchase agreements (repos) are shown as "Due to banks" or "Due to customers".

The difference between the sale price and the repurchase value is recognized as interest in the line "Interest and similar expenses" or "Interest and similar income" during the period of the repurchase or resale agreement, using the effective interest method.

Securities that the Group lends to third parties continue to remain in financial assets and the income arising from the lending is recognised in the Income Statement.

## **2.6. Own-used property and equipment**

Tangible assets are recognised at acquisition cost less the accumulated amortisation and any impairments. The acquisition cost includes all expenses directly attributable to the acquisition of the assets.

The amortisation of other categories of tangible assets is calculated in accordance with the straight-line method to allocate their cost less their residual values during their useful life. The useful life has been defined as follows:

- Machinery and equipment: 5-10 years
- Vehicles: 9-10 years

Improvements leased fixed assets are depreciated over the shorter of the useful life of the improvement and the lease term of the lease.

The residual value and the useful life of a tangible asset shall be reviewed and adjusted, if necessary, at the end of each reference period.

The book value of an asset is written-down to its recoverable amount when its book value exceeds its estimated recoverable amount (note 2.99).

Profits and losses on disposals are defined by comparing the proceeds with the book value and are presented in the profit or loss.

## **2.7. Intangible assets**

### **Software**

Intangible assets include software and are recognised at acquisition cost less the accumulated amortisations and any impairments. They are amortised using the straight-line method throughout their useful life ranging from 1 to 5 years.

### **Other intangible assets**

Intangible assets arising from the allocation of the purchase price (consideration) on the acquisition of companies or which are individually acquired.

Such intangible assets are amortised over their useful lives when there is a defined useful life (e.g. a customer base), which is set between 10 and 15 years.

When intangible assets do not have a defined useful life (e.g. a trademark), such assets are not subject to amortisation.

All intangible assets are tested for impairment whenever there is an indication of impairment.

The Group does not calculate residual value for intangible assets. If an intangible asset is sold, it is derecognised, while when no economic benefits are expected to flow to the Group, the asset is fully impaired. On disposal of an intangible asset, the difference between the selling price and its carrying amount is recognised in profit or loss.

## **2.8. Goodwill**

Goodwill represents the difference between the total consideration paid plus the value of any non-controlling interest and the fair value of the assets and liabilities of the acquired companies, as at the acquisition date.

Positive goodwill, resulting from acquisitions of companies, is recognised in the Balance Sheet account "Goodwill", when it comes to the acquisition of a company that constitutes a subsidiary, and is examined for any impairment of their value at each reporting date. When it comes to investment in associates or joint ventures, goodwill is recognised in the Balance Sheet account "Investments in associates".

Negative goodwill is recognised as income in the profit or loss.

## **2.9. Impairment of non-financial assets**

Amortised fixed assets are assessed for impairment when events or changes in conditions suggest that their book value may not be recoverable. Where the book value of an asset exceeds its recoverable amount, its relevant impairment loss is recognised on profit or loss. Recoverable amount is the higher of the fair value less the selling expenses and its value in use. To define the impairment, the assets are classified to the lowest level

where the cash flows may be individually defined (cash generating units). Impairments recognised in previous periods as non-financial assets are examined at each reporting date for any reversal.

### **2.10. Carbon emission rights**

The Group acts as a broker – dealer with regards to carbon emission rights and as such these rights are accounted for as inventories under IAS 2.

Carbon emission rights are classified in “Other assets” in the statement of financial position. The Group initially recognises such rights at fair value and subsequently measures them at fair value less cost to sell. Any changes in fair value less cost to sell are charged in the statement of profit or loss during the financial period that the changes occur.

Carbon emission rights are derecognised from the statement of financial position upon disposal.

### **2.11. Cash and cash equivalents**

Cash and cash equivalents include deposits in the central bank and due to bank balances with original maturities of less than three months from the date of acquisition, which are readily convertible to cash and which are subject to an insignificant risk of changes in value. Cash and cash equivalents are stated at amortised cost.

### **2.12. Impairment of financial assets**

Expected credit losses for “Loans and advances to customers” and “Due from banks” are recognized using a three-stage approach based on the increase in the credit risk of the customer and in relation to the initial recognition of the financial asset and are summarized as follows:

- A financial asset that does not show a significant increase in risk and is not impaired was purchased or originated while impaired is classified in “Stage 1”
- A financial asset that was purchased impaired or was already credit-impaired on its initial recognition is classified in the “POCI – purchased or originated credit-impaired stage” and the expected credit losses are measured throughout life the lifetime of the asset.
- If there is a significant increase in credit risk at the reporting date after the initial recognition of the financial asset, it is classified in “Stage 2”.
- If the financial asset is non performing, then it is transferred to “Stage 3”;
- For the “Stage 1” financial assets, the expected credit losses are measured throughout the lifetime of the assets, which losses arise from default events that may occur during the next 12 months after the reporting date.
- For the “Stage 2” financial assets, the expected credit losses are measured throughout the lifetime of the assets, which losses arise from default events that may occur throughout the lifetime of the assets.
- For the “Stage 3” financial assets, the expected credit losses are measured throughout the lifetime of the assets.

- The fundamental principle for calculating the expected credit losses in accordance with IFRS 9 is the measurement taking into consideration information about reasonable and valid forecasts for future events and macroeconomic conditions.

The basic estimates adopted by the Group regarding the implementation of the Standard's requirements are presented below:

## **A) Significant increase in credit risk**

### **Loans and advances to customers**

A key element in the classification of a financial exposure at "Stage 1" is the assessment of whether there has been a significant increase in credit risk (SICR) since its initial recognition under IFRS. 9. In the event of a significant increase in credit risk, the Group classifies the financial exposure in "Stage 2" in order to recognise expected credit losses for its entire lifetime (Lifetime ECL).

Specifically, the objective of impairment requirements is to recognise expected credit losses throughout the life of financial exposures in which there has been a significant increase in credit risk since initial recognition. This is considered regardless of whether the assessment is carried out on an individual or collective basis, always considering all available and supporting information, including information on future economic developments.

The determination of the SICR is based on qualitative and quantitative criteria depending on the availability and quality of information.

In order to classify the financial exposures into stages, the Group assesses the increase in credit risk (SICR) as defined by the change in the probability of default of the financial exposures and the deterioration of their credit rating (rating) on the reporting date compared to the date of initial recognition.

Cases that indicate the existence of SICR for the Group are the following:

- Financial exposures in which amounts are more than 30 days past due.
- Exposures are considered forborne exposures when concessions are granted to a borrower who faces or is about to face financial difficulties in fulfilling his contractual obligations. These concessions are characterized as a significant increase in credit risk, and since the financial exposure is classified as Forborne Performing Exposure (FPE) it is allocated to "Stage 2".
- The significant deterioration of a creditor in the Group's financial exposure assessment model is used as an indication of a significant increase in credit risk. In order to determine whether an exposure presents SICR for corporate loans, the Bank considers whether this assessment implies a real deterioration in the credit quality of the exposure. To perform the assessment, the Group and the Bank compare the default risk at the reporting date with the corresponding risk at the date of initial recognition. The significant increase in the probability of default is determined by moving to the risk zones of the table in section 4.1.
- Special case of assessment in the business portfolio: For customers whose total exposure (on and off balance sheet) exceeds €1 million, the Bank may individually review their transactional behavior and



their latest available financial data for these exposures. If the Bank determines that, according to their latest available financial data, they deviate significantly (positive or negative) from their current credit rating and the customers appear as non-delinquent in the bank's systems (pre-delinquency stage 0-30 days, no indication of adjustment – Forborne), then the Bank may assess the existence or not of SICR without taking into account the risk level of the loan according to the applicable rating scale (ICAP). The decision following the recommendation of the competent business unit is approved by the corresponding credit scale/committee of the Bank.

## Securities

A key element in the classification of a security at a stage is the assessment of whether there has been a Significant Increase in Credit Risk (SICR) compared to its initial recognition. At each reporting date the Group assesses whether there has been a significant increase in credit risk since the initial recognition of a security, taking into account reasonable and reliable information concerning past events, current conditions and forecasts of future economic conditions.

In assessing the credit risk of securities, the Group relies on the credit rating scale of the credit rating agencies/institutions or on the internal credit rating of the issuer/counterparty if the securities are corporate debt securities of companies for which the Group has granted loans. In addition, at each reporting period the Group uses the same external credit rating agencies to ensure that the securities are rated using the same criteria as they were rated at initial recognition.

The credit rating scales of the External Credit Assessment Institutions (hereinafter "ECAI"), namely Fitch, Moody's, S&P and ICAP used are listed in the Table below.

| Moody's           | S&P Global | Fitch      | ICAP      | Investment type        |
|-------------------|------------|------------|-----------|------------------------|
| <b>Aaa – Baa3</b> | AAA – BBB- | AAA – BBB- | AAA – BBB | Investment Grade       |
| <b>Ba1 – Caa3</b> | BB+ – CCC- | BB+ – CCC- | BB - CC   | Non - Investment Grade |
| <b>Ca, C</b>      | CC – D     | CC – D     | C - D     | Default                |

Table: Investment grade rating of the securities according to External Credit Assessment Institutions

There are cases of securities that are unrated instruments by an ECAI. If there is no credit rating for corporate security, the Group assigns to it the credit rating of the issuing company or the industry to which the issuing company belongs or the country where the issuing company is domiciled and operates (if available). In the case

of sovereign debt securities, the country's rating shall also be assigned to security. The Group makes use of these ratings in the following order of priority:

- Credit rating of the security (if available);
- Credit rating of the issuer (if available), and
- Credit rating of the financial sector of activity or the country of origin of the issuer.

If the corporate securities are not rated by an ECAI, but the issuer is a borrower of the Group, then the securities will be classified at the same level as the issuer's loan products.

If none of the above conditions is met, in which case the securities are considered to be unrated, the Group shall based on the internal rating of the securities. In particular, the Group compares the characteristics of the unrated securities (e.g. coupon rate, yield to maturity) with similar rated securities held by the Group to determine its credit quality.

Therefore, the information that the Group assesses to determine whether the credit risk has significantly increased is presented in the following non-exhaustive list:

- The downgrade of the credit rating of the issuer/counterparty or the security at the reporting date compared to the credit rating at the date of initial recognition;
- the increase in the probability of default of the issuer/counterparty at the reporting date compared to the relevant probability of default at the date of initial recognition;
- the change in the credit spread of the security at the reporting date compared to the date of initial recognition.

More specifically, the Group recognises a significant increase in credit risk (SICR), and classifies the security at Stage 2 (Lifetime ECL), in the following circumstances:

- Debt securities for which their assessment on the reporting date has been downgraded by two notches (or more) in relation to their initial assessment according to the ECAI credit rating and do not fall under the following case.

Regarding the securities that maintain a high credit rating (remain in investment grade / Investment Grade in the table above) or their probability of default remains low (less than or equal to 3%), the Group considers that there is no significant increase in credit risk.

- Securities for which the Probability of Default (PD) at the reporting date has a percentage increase of at least 50% in relation to the Probability of Default at initial recognition.
- Securities for which the credit spread has increased by more than 5% in absolute value at the reporting date compared to the date of initial recognition.

## B) Definition of default and perimeter of credit-impaired financial assets

### Loans and advances to customers

According to the Credit Policy, the Bank's Provision Policy and the New Definition of Default Policy of the Loan Portfolio, a loan is considered impaired and classified at "Stage 3", when it is characterized as non-performing – in a state of default (Non-Performing Exposure - NPE).

### Definition of Default

A debtor or a financial exposure is in 'default' if at least one of the following conditions applies:

- The debtor or a financial exposure is more than 90 days in material arrears in the payment of any material obligation to the Group.
- The Group considers that the debtor or a financial exposure meets the Unlikely to Pay (UtP) and that it is unlikely to meet its obligation to the Group in full, without the Group resorting to actions such as the enforcement of collateral.
- The Group has classified the debtor's loan as Forborne Non-Performing Exposure.

The Group's basic principle regarding the application of the definition of default is to apply at the debtor level (one obligor) for Corporate Banking products, while for Retail Banking products the definition of default is applied at loan product level.

### Materiality thresholds

The materiality thresholds determine whether a financial exposure in arrears will be considered to be a default or not. Materiality thresholds apply at the financial exposure level for retail banking customers and at the debtor level for corporate banking customers.

The materiality thresholds for retail portfolio are presented in the table below:

| Absolute criterion                                  | Relative criterion                                                                                                     |
|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| The absolute amount in default must exceed EUR 100. | The total on-balance sheet default balance of the <u>account</u> must exceed 1% of the total on-balance sheet balance. |

The materiality thresholds for the corporate portfolio are presented in the following table:

| Absolute criterion                                  | Relative criterion                                                                                              |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| The absolute amount in default must exceed EUR 500. | The total on-balance default balance of the <u>debtor</u> must exceed 1% of the total on-balance sheet balance. |

In this case, when the above relative and absolute criteria are simultaneously met, all on and off balance sheet financial exposures of the corporate debtor are considered in default.

In addition, where the Group has on balance sheet financial exposures in default to a retail customer whose gross carrying amount represents more than 20% of the gross carrying amount of all on-balance sheet financial exposures to that customer, all on and off balance sheet financial exposures to that customer are considered to be in default. This means that if the above threshold is met, then default status is extended to the debtor level for all financial exposures to the retail debtor.

### Securities

A security is considered to be in 'default' if at least one of the following conditions applies:

- Payments on the security are more than 14 days overdue (relates to Best Practices) against the Group.
- The Group considers that the creditor or the security meets the Unlikely To Pay (UTP) criteria and it is unlikely to fully perform its credit obligation to the Group unless the Group resorts to measures such as liquidation of the collateral.
- The rating of the quality of the security by a certified External Credit Rating Institution, if available, corresponds to a non-investment grade default according to the table below of note 2.12(A). Note that if an external rating is not available, the internal rating is used, based on the Bank's internal data.

### C) Reclassification of stages

#### Loans and advances to customers

The stage reclassification is applied when the criteria of the initial classification of the loan no longer exist, and the relevant probation period has successfully passed. The probation period is defined as the period in which the loan is not overdue for more than 30 days.

In case the credit risk of an exposure improves then it can be moved from "Stage 2" to "Stage 1". Movements from "Stage 3" to "Stage 2" are rare and strong documentation needed, as the (below) expectation of successful completion of the monitoring period is not fully met. Both cases have positive effects on the Group's overall forecasts.

According to the IFRS 9, we have the following criteria for the reclassification of stages:

- For the transition from "Stage 2" to "Stage 1", of credit exposures which are characterized as "Forborne Performing Exposures (FPEs)", the successful completion of a twenty-four (24) month probation period is required.
- For the transition from "Stage 3" to "Stage 2", of credit exposures which are characterized as Non-Performing Exposures (NPEs), the successful completion (with no delinquency) of a three (3) month probation period is required.
- For the transition from "Stage 3" to "Stage 2", of credit exposures which are characterized as Forborne Non-Performing Exposures (FNPEs), the successful completion (with no delinquency) of a twelve (12) month probation period is required.

### **Securities**

The stage reclassification is applied when the criteria of the initial classification of the security no longer exist. Stage reclassification in the case of securities depends on the downgrade or upgrade based on its rating, by the ECAIs.

In cases where the credit quality of a security deteriorates significantly (SICR), the security is reclassified to a lower credit rating stage, negatively affecting the Group's total provisions. Therefore, security can be downgraded from "Stage 1" to "Stage 2" when it is downgraded by two notches or from "Stage 2" to "Stage 3" if it is rated at a level equivalent to default. Both cases have negative implications and increase the Group's total provisions.

In case the credit risk of a security improves then it can move from "Stage 2" to "Stage 1". Movements from "Stage 3" to "Stage 2" or "Stage 1" are rare.

### **D) Measurement of the expected credit losses**

The expected credit losses are measured either based on the likelihood that the default event will occur within the next 12 months, or throughout the lifetime of the financial asset, depending on whether a significant increase of the credit risk has occurred and on whether the items are considered as credit-impaired. The expected credit losses are defined as the discounted product of the probability of default (PD), the exposure at default (EAD) and the loss given default (LGD).

- Probability of Default ("PD") represents the probability of default (as defined above) of the obligor's obligation estimated based on prevailing economic conditions at the reporting date, adjusted to the estimates of future economic conditions that may affect the risk of default, in a given time horizon.
- Exposure at default ("EAD") is an estimate of exposure at a future date of default, taking into account expected changes in the exposure after the reference date, including repayments of principal and interest and expected disbursements of loan commitments. Exposure at default ("EAD") includes both on and off balance sheet exposures. The on balance sheet report corresponds to the total amount committed and payable, which includes the principal owed, accrued interest and past due amounts. Off

balance sheet exposure represents credit available for drawdown in addition to on balance sheet exposure.

- The loss given default ("LGD") expresses the extent of the loss that the Group expects for exposures that are in default and is defined as the difference between the contractual cash flows and those that the Group expects to collect including amounts from the liquidation of collateral. LGD, which is usually expressed as a percentage of Exposure at default ("EAD"), varies according to the type of counterparty, the type and priority of the claim, the existence of collateral and other credit enhancements.

The Bank, in accordance with the Provision Policy and the methodology for calculating the expected loss based on IFRS 9, evaluates and calculates the expected loss individually per credit exposure.

## **E) Determination of macroeconomic variables, scenarios and probability-weights (forward looking information)**

### **Analysis of elements in the expected credit loss model under multiple economic scenarios**

The Bank uses the data provided by Moody's Analytics as a source for the evolution of macroeconomic variables, such as GDP, the main market index of the Athens Stock Exchange (ASE), and unemployment that will affect the amount of expected credit losses (ECL) of the loan portfolios under multiple economic scenarios. The Management, when calculating the expected credit losses (ECL), calculates three (3) different scenarios (Favorable – Base –Unfavorable), each of which is associated with different probabilities of default (PDs) and different losses in case of default (LGDs). Management has assigned the following weightings to each scenario: Base 40%, Favorable 30% and Unfavorable 30%.

The key parameter is the change per quarter of GDP and per annual scenario for the next 3 years presented in the table below.

|      | <b>Base<br/>scenario</b> | <b>Favorable<br/>scenario</b> | <b>Unfavorable<br/>scenario</b> |
|------|--------------------------|-------------------------------|---------------------------------|
|      | <b>% annual change</b>   |                               |                                 |
| 2024 | 2.6%                     | 2.6%                          | 2.6%*                           |
| 2025 | 1.8%                     | 4.2%                          | -4.0%                           |
| 2026 | 1.8%                     | 1.5%                          | 2.4%                            |
| 2027 | 2.2%                     | 2.0%                          | 4.0%                            |

\* The time series are based on historical data of the Greek Economy and the forecast scenarios of Moody's Analytics start from the first quarter of 2025, which is why there is no difference in the calculation basis of the three scenarios.

### **Multiple economic scenarios for calculating expected credit losses**

Management assessed the sensitivity of the Group's impairment forecast for loans and advances to customers at amortised cost to reasonably possible changes in the growth rate of Greece's GDP, compared to the forward-looking scenarios used in the measurement of expected credit losses at 31 December 2024. The sensitivity

analysis was performed using alternative scenarios in the business portfolio which mainly affect the probability of default (PD) parameter.

The following table includes the impact of expected credit losses as of 31 December 2024, for each alternative hypothetical scenario. The impact per scenario is a comparison of the result of the Group's expected credit losses against a calculation by replacing the base scenario with the alternative base in the calculation of the weighted amount used by the Group while maintaining the same factors (40% -alternative base, 30% - favorable / unfavorable to existing calculations).

|                                             | GDP deviation from the base scenario, % | Impact on ECL |         |         |
|---------------------------------------------|-----------------------------------------|---------------|---------|---------|
|                                             |                                         | Stage 1       | Stage 2 | Stage 3 |
| A) Alternative Favorable scenario as base   | +1.1%                                   | -3.16%        | -1.03%  | -0.02%  |
| B) Alternative Unfavorable scenario as base | -2.0%                                   | 6.45%         | 1.35%   | 0.02%   |

The effect of the above scenarios on the expected credit losses by replacing the corresponding scenarios from the alternatives in the basic calculations is for (A) decrease EUR 690 thousand and for (B) increase EUR 1,895 thousand.

#### Effect of LGD on expected credit loss calculation

Scenarios of a change in the LGD parameter by +/- 5% were performed in all the Bank's portfolios. The results are:

|                   | LGD change by +5% | Change in ECL | Total ECL | LGD change by -5% | Change in ECL | Total ECL |
|-------------------|-------------------|---------------|-----------|-------------------|---------------|-----------|
| Retail banking    | +25.75%           | +125          | 610       | -14.61%           | -71           | 414       |
| Corporate banking | +8.86%            | +3,636        | 44,679    | -7.35%            | -3,018        | 38,025    |

#### F) Criteria for grouping exposures based on common credit risk characteristics

For assessing impairment on a collective basis, loans are grouped according to similar credit risk characteristics in sub-portfolios which have the greatest possible homogeneity and uniformity. The main parameters used in the process of segmenting the portfolio and inclusion in the individual sub-portfolios are the following:

- loan product (retail banking)
- service status of the loan and
- loan classification as forborne.

In order to determine the impairment provision of each sub-portfolio, not only its particular elements, but also the effect on their final formation, of the main macroeconomic parameters are quantified. The recognised impairment provision or reversal of provision is recorded in the profit or loss.

### **G) Management overlays**

Adjustment of the results of the credit risk models used by the Group to measure expected credit losses (Post Model Adjustments - PMA).

The Group's approach to estimating the expected credit loss measurement of Loans and advances to customers for 2024 included qualitative and quantitative adjustments to the result produced by the credit risk models. The Group implements an internal governance and framework for early recognition of any required adjustments as well as supporting the implementation of these adjustments and the related calculation. The Group's governance framework requires that such adjustments be adequately documented and approved by the Provisions Committee.

#### **2.13. Financial guarantees**

Financial guarantees are contracts under which the issuer undertakes to compensate the holder of the contract for a loss that he suffers, in the event that a specific debtor fails to fulfill his obligations in accordance with the terms of a debt instrument.

Financial guarantees are recognised as financial liabilities initially at fair value. After the initial recognition, the financial guarantees are measured at the highest value between:

- (i) The amount of the provision for impairment according to the model of the expected credit losses of IFRS 9, and
- (ii) The value initially recognised less the accumulated amount of the commission recognised as income according to IFRS 15, if any.

The liabilities arising from financial guarantee contracts are presented in the item "Other liabilities".

#### **2.14. Staff benefits**

##### **(i) Short-term staff benefits**

Liabilities for wages and salaries that are to be fully settled within 12 months from the end of the period when the employees provide the relevant service are recognised for the services of the employees until the end of the reporting period and are measured at the amounts that are expected to be paid during the settlement of the liabilities. The liabilities are presented in "other liabilities" of the statement of financial position.

##### **(ii) Post-employment liabilities**

The Group's liabilities for post-employment pertain to both defined contribution plans and defined benefit plans.

The liability recognised in the statement of financial position for defined benefit plans is the present value of the liability for the defined benefit at the reporting date. The defined benefit liability is calculated annually by an independent actuary using the projected unit credit method.



The present value of the defined benefit liability is calculated by discounting the estimated future cash outflows using as discount rate interest rates of high ranking corporate bonds in the same currency and with the same term to maturity as those of the liability.

The financial cost is calculated by applying the discount rate on the balance of the defined benefits liability. This cost is included in the employee benefits of the profit and loss statement.

Gains or losses arising from empirical adjustments and changes in actuarial assumptions are recognised over the period in which they arise, directly to the other comprehensive income. Are included in the other reserves of the statement of changes in equity and the statement of financial position.

The changes in the present value of the defined benefit liability that arise from modifications or cuts of the plan are recognised right away in the profit or loss, as past service cost.

Regarding defined contribution plans, the Group pays contributions to public or private pension insurance plans on a mandatory, contractual or optional basis. Apart from the payment of contributions, the Group has no further obligations. Contributions are recognised as staff costs when they become payable. Contributions that are paid in advance are recognised as an asset if there is a possibility of returning the money or offsetting it with future payments.

### **(iii) Employment termination benefits**

The employment termination benefits become payable when the Group terminates employment before the regular retirement date or when the employee accepts the voluntary termination of service against such benefits. The Group recognises these benefits on the earlier of the following dates: a) when the Group cannot recall the offer of the benefits anymore, and b) when the Group recognises a restructuring cost falling within the scope of application of IAS 37 and includes the payment of the employment termination benefits. In the event of an offer made to boost voluntary termination of service, the termination benefits are calculated on the basis of the number of employees who are expected to accept the said offer. Any employment termination benefits that will become payable 12 months after the end of the reporting period are discounted at their present value.

### **(iv) Benefits in equity securities**

Group employees may receive compensation in the form of equity securities through the provision of stock awards or stock options. The total cost of these benefits is recognised as personnel expense in the reporting period from the grant date to the maturity date of the relevant rights with a simultaneous increase in equity and specifically in other reserves.

## **2.15. Provisions**

Provisions are recognised when a present legal or constructive obligation exists as a result of past events, an outflow of resources to settle the obligation is probable and the amount can be reliably estimated.

## **2.16. Offsetting financial instruments**

Financial assets and financial liabilities are set off and the net amount is reported in the statement of financial position only when there is a legal right to set off the recognised amounts and there is an intention to either settle the net amount arising from the offset or to simultaneously settle the total amount of both the financial asset and the liability.

## **2.17. Leases**

### The Group as Lessee

The agreements of the Group pertain to building and offices rentals, as well as to long-term leasing of vehicles and machinery.

The assets and liabilities that arise from the lease are initially recognised at present value. The lease liabilities include the net present value of the following rents:

- fixed rents (including the “essentially” fixed payments);
- variable rents that depend on a ratio or interest rate, which are initially measured using the ratio or the interest rate on the commencement date of the lease term;
- amounts expected to be paid on the basis of guaranteed residual values;
- price at which the right to buy is exercised, if it is rather certain that the Group will exercise such right, and
- payment of a penalty for termination of the lease, if the term of the lease reflects the exercise of the Group’s right to terminate the lease.

The measurement of the lease liability includes also the payment of rents during the lease extension period, if it is rather certain that the Group will exercise the right to extend.

Rent payments are discounted at the deemed interest rate of the rental or in the event that such interest rate cannot be defined in the contract, at the lessee’s incremental borrowing rate, i.e. the rate the lessee would have paid to borrow the necessary funds in order to acquire a asset of similar value with that of the leased asset over a similar period of time, with similar collaterals and in a similar economic environment.

The Group is exposed to possible future increase of the variable rents which depend on a ratio or interest rate, which are only included in the lease liability when accrued. When the above changes occur, the lease liability is redefined and adjusted by relevantly adjusting the right to use the asset.

Any rent payment is allocated between the lease liability and the financial cost. The interests on the liability arising from the lease for each lease period equal the amount that arises from the application of a fixed, periodic interest rate on the outstanding balance of the lease liability.

After their initial measurement, the lease liabilities are increased by the financial cost and decreased by the payment of rents. The lease liability is remeasured to reflect any reassessments or modifications of the lease.

The cost of the asset with right to use consists of:

- The amount of the initial measurement of the lease liability
- Any rents paid on the lease period commencement date or before it, less any lease incentives already collected, and
- Any initial direct costs suffered by the Group as lessee.

The rights to use assets are measured at cost and amortised by the straight-line method during the shorter period of time between the useful lifetime of the asset and the term of the lease.

The Group chose to use the recognition exceptions provided for in the Standard for the short-term leases, i.e. leases with a term shorter than 12 months without any right of redemption, as well as for leases where the subject asset presents a low value. For the above leases, the Group recognises the rents as expenses in the profit or loss statement using the straight-line method throughout the term of the lease.

### **2.18. Interest income and expense**

Interest income and expenses mainly relate to coupons from securities, interest from loans and advances to customers, interest from financial institutions and interest from due to customers.

Interest income and expense are recognised in the profit or loss for all interest bearing instruments on an accruals basis, using effective interest rate method or the relevant floating interest rate. The effective interest method is a method to calculate the amortised cost of a financial asset or liability and to allocate the interest income or expense over the reference period. Effective interest rate is the rate that discounts just the estimated future payments or receipts throughout the expected life of the financial instrument, or during a shorter period, when necessary, so that the discounted value would equal its book value, at the initial recognition including any transaction costs.

In particular, as regards the financial assets, to calculate the effective interest rate, the Group calculates the cash flows taking into consideration all contractual terms for the financial asset, excluding the expected credit risk losses (except the "Purchased or Originated Credit-Impaired loans and advances to customers" where the expected credit losses are taken into consideration).

### **2.19. Fee and commission income**

Fee and commission income mainly include commissions on loans, letters of guarantee and brokerage transactions, as well as commissions on investment banking and other transactions.

The Group applies the following five-step model to all contracts with customers other than leases and financial instruments:

- identification of the contract with the customer;
- identification of the obligations arising from the contracts;
- definition of the transaction price;

- allocation of the transaction price to the obligations arising from the contracts, and
- recognition of income as the entity fulfils its obligations.

Therefore, the Group recognises income when the performance obligation is fulfilled, i.e. when control of the services or goods is transferred to the customer in accordance with the requirements of IFRS 15.

Fee and commission income is recognised in the income statement throughout the period in which the relevant services were provided, unless they influence the effective interest rate.

## **2.20. Gains/(losses) from financial transactions**

Gains/ (losses) on financial transactions include gains and losses arising from sales of financial assets and liabilities measured at fair value through profit or loss and other comprehensive income. In addition, gains/(losses) from and changes in the fair value of financial assets and liabilities measured at fair value through profit or loss are included.

## **2.21. Dividend income**

Dividend income is recognised in the profit & loss statement on the date the right to collect dividends is established.

## **2.22. Income tax and deferred tax**

The income tax of the fiscal period is the tax calculated on the taxable income of the current period based on the tax rate applicable in each country, adjusted to any changes in the deferred tax assets and liabilities due to provisional differences and unutilized tax losses. The fiscal year tax includes any tax audit differences pertaining to additional income taxes and additional charges attributed by the tax authorities due to the redefinition of the Group's taxable income within the framework of an ordinary or extraordinary tax audit.

The liability arising from the current income tax is calculated according to the legislation in force or the legislation that in fact applies at the end of the closing year in the countries where the Bank, and the subsidiaries and associates of the Group have activities and produce taxable income. The Management periodically assesses the positions in the tax returns in the event that the tax legislation is subject to any interpretation. Moreover, it forms provisions, where necessary, for the amounts that are expected to be paid to the tax authorities.

The deferred income tax is defined using the liability method; such liability is defined by the temporary differences between the tax assessment base and the carrying amount of the assets and liabilities presented on the consolidated financial statements. However, the deferred tax liabilities are not recognised if they arise at the initial recognition of goodwill. Moreover, the deferred income tax is not accounted for if it arises from the initial recognition of an asset or liability in a transaction other than a business combination that at the time of the transaction did not affect either the accounting or the taxable profit or loss. Deferred tax is measured at the tax rates expected to apply on the financial year when the liability will be settled, considering the tax rates (and tax laws) that have been enacted or are substantively in force at the end of the closing year.

Deferred income tax assets are recognised to the extent that there will be a future taxable profit in order to utilize the temporary difference generated by the deferred income tax asset.

Deferred tax receivables and liabilities are not recognised for any temporary differences between the carrying amount and the tax base of investments in businesses abroad where the Bank controls the reversal of temporary differences and it is likely that the temporary differences will not be reversed in the foreseeable future.

Deferred tax receivables and liabilities are offset when there is an applicable legal right to offset the current tax receivables and liabilities and when the deferred income taxes involve the same tax authority. The current tax receivables and liabilities are offset when there is an applicable legal right to offset and an intention to settle on a net basis or to acquire the asset and to settle the liabilities at the same time.

The current and deferred taxes are recognised in the profit or loss, unless they pertain to assets that are recognised in the other comprehensive income or directly in equity. In such a case, the tax is also recognised in the other comprehensive income or directly in equity, respectively.

### **2.23. Share capital**

The share capital includes the Bank's ordinary shares. The ordinary shares are presented under equity. Additional expenses required for the issue of shares appear upon deduction of the relevant income tax, to the reduction of the issue proceeds.

The cost of acquisition of treasury shares, including any attributable incremental transaction costs, is presented as a reduction in equity according to the provisions of IAS 32, until the treasury shares are cancelled or disposed of. The gains or losses from the sale of treasury shares (net of expenses) are included directly in the retained earnings (equity).

The number of treasury shares held by the Group does not reduce the number of shares issued. Treasury shares held by the Bank are not eligible to receive cash dividends.

### **2.24. Distribution of dividend**

The distribution of dividend to the Bank's shareholders is recognised as liability in the financial statements of the Group over the period during which the distribution is approved by the General Assembly of the Shareholders.

### **2.25. Related parties**

In accordance with IAS 24, a related party is a person or an entity that is related to the Group.

More specifically for the Group, related parties are the following:

- (a) subsidiaries;
- (b) entities that control the Bank and entities that are controlled, jointly controlled or significantly influenced by those entities, as well as the key management personnel of that entities and their close relatives;
- (c) the key management personnel, their close relatives, and the entities controlled or jointly controlled by them,

(d) the Bank's associates and joint ventures.

## **2.26. Earnings per share**

The Earnings per share ratio (EPS) arises by dividing the profit or loss corresponding to the common shareholders of the Group's parent company by the weighted number of outstanding ordinary shares during the reporting period.

Diluted earnings per share are calculated using the same method as the basic earnings per share ratio, however earnings and number of shares are adjusted accordingly to reflect any potential reduction in earnings per share that could result from the conversion of any convertible bonds or the exercise of stock options or other related contracts into ordinary shares.

## **2.27. Non-current assets held for sale and discontinued operations**

The Group classifies a non-current asset or a group of assets and liabilities as items held for sale if their value is expected to be recovered mainly due to the sale of the said items and not through their use, while their sale is considered very likely. They are measured at the lowest value between their book and fair value decreased by the direct costs of sale, except from assets such as deferred tax liabilities and financial assets that are explicitly excluded from the measurement requirements of the Standard.

The impairment losses arising are recognised in the profit or loss. Any possible increase of the fair value at a subsequent remeasurement is recognised in the profit or loss but not for an amount higher than the initially recognised impairment loss. Any profits or losses not recognised on the date of sale of the non-current asset (or the group of assets) are recognised on the date of the derecognition.

As of the date when a non-current (amortised) asset (or the non-current assets that are included in a group of assets and liabilities) is classified as held for sale, no amortisations are calculated on the said non-current assets.

The non-current assets and groups of assets classified as held for sale are presented separately in the statement of financial position. The liabilities relevant to the groups of assets classified as held for sale are presented separately from the other liabilities in the statement of financial position.

## **2.28. Derivative financial instruments**

The derivative financial instruments mainly include futures, options, FX Swaps and Interest Rate Swaps (IRS-IRCAP).

The derivatives are initially recognised in the statement of financial position at fair value on the date of entering the contract and then are measured at their fair value. When the fair value is positive, the derivatives are included in the assets, while when the fair value is negative they are included in the liabilities.

The fair value of the derivative financial instruments is defined on the basis of the market price, taking into consideration recent transactions on the market or using other appropriate measurement techniques (see Note 5).

The Group does not apply any hedge accounting. Consequently, all derivatives held are recognised and measured at their fair value through profit or loss.

## **2.29. Rounding**

The amounts are presented in thousands of euros, rounded to the nearest thousand, unless otherwise stated. Any differences between the amounts in the financial statements and the corresponding amounts in the notes are due to rounding.

## **3. Critical accounting estimates and assumptions for the implementation of the accounting principles**

In applying the Group's and the Bank's accounting policies, Management makes estimates and assumptions that may significantly affect the amounts of assets and liabilities presented in the consolidated and stand alone financial statements in the next reporting year. The estimates and assumptions are reviewed at each reporting date and are based on historical data and other factors, including estimates of future events, which, based on current circumstances, are considered reasonable. The estimates and assumptions in applying the accounting policies mainly concern the following areas:

### **A. Impairment provisions for credit risks from loans and advances to customers**

At each reporting date the Group and the Bank recognises an allowance for the expected credit risk losses from loans and advances to customers.

The Group, when testing for impairment of loans and advances to customers, makes estimates regarding the amount and timing of collection of future cash flows. Considering that these estimates are influenced by a number of factors such as the financial condition of the borrower, the net realizable value of any collateral, historical loss ratios per portfolio, actual results may differ from the estimates. Similar estimates are also included in the assessment of the existence of impairment losses on securities classified as financial assets measured at fair value through other comprehensive income or financial assets measured at amortised cost.

The measuring of the expected credit losses is based on the assumptions of the Management regarding the recoverability of the exposure and the guarantees received. The Management makes assumptions on the financial position of the counterparty, its credit risk, the recoverability of any collaterals and guarantees.

In the context of evaluating the credit risk increase, the Group also rates its borrowers based on the evidence of financial difficulties and the possibility of a default, in accordance with its policy in force.

Additional information on the impairment provisions for credit risks from loans and advances to customers is included in notes 2.4, 2.12, 4.1 and 20.

### **B. Recoverability of deferred tax assets**

The Group recognises deferred tax assets to the extent that it assumes that it will have sufficient future taxable profits available.

The recognition of the above deferred tax assets requires estimates regarding the future financial performance of the Group's companies to which the deferred tax assets have been recognised. In particular, the definition of the deferred tax assets that may be recognised requires making significant estimates about the timing and the amount of the future taxable profits.

Further information about the deferred tax assets of the Group can be found in note 27.

### **C. Fair Value of financial assets**

The fair value of financial assets for which there are no observable prices in an active market is determined using valuation models. The valuation methodology used includes discounted cash flow methods that are based primarily on observable data, where available. The fair value of the securitized loan bond depends on key assumptions that include future income and cash flows, operating expenses and discount rates. The securitized loan bond is classified as level 3.

Further information about the fair value of financial assets can be found in notes 5, 18, 19 and 21.

### **D. Subsidiaries impairment**

The Bank reviews the value of its investments in subsidiaries for impairment by comparing the recoverable amount of each investment (the higher of value in use and fair value less costs to sell) with its carrying amount.

## **4. Financial Risk Management**

The Group, as any credit institution, is exposed to risks. Such risks are constantly monitored in different ways to avoid the excessive accumulation of risks. The nature of these risks as well as their management are explained below. Moreover, further financial information is given to describe the extent and the nature of the financial risks faced by the Group, with relevant comparative information on the previous reporting year.

The strategy for undertaking and managing all types of risks is aligned with best international practices, applicable legislation and the supervisory framework, while it is constantly evolving through the development of a single risk management concept for the entire Group.

The Risk Management Framework is reviewed annually and on an ad hoc basis whenever special circumstances require it in relation to internal events, the broader economic environment or the supervisory framework in accordance with best practices and in any case within the applicable legal and regulatory framework. This review is carried out in collaboration with the Risk Management Department and the Units that undertake the various risks, the Risk Management Committee, the Executive Committee, as well as the Board of Directors.

The Risk Management Committee (RMC) and the Board of Directors (BoD) are responsible for approving and periodically reviewing the risk profile undertaken by the Group.

The Risk Management Division operates in accordance with the provisions of BoG Governor's Act 2577/06 and its amendments. The Division in terms of organization, is accountable to the Risk Management Committee. The Risk Management Division Manager is appointed by the Board of Directors, on the recommendation of the Risk Management Committee, and his/her appointment, as well as any replacement, is notified to the Bank of Greece.

The objective of the Unit and consequently of the Risk Management Division is to identify, analyze and develop effective systems for measuring, managing and controlling all forms of risk inherent in every task undertaken by the Bank and, on a consolidated basis, by the Group.

The Unit consists of six (6) departments:



- (i) Credit Risk: its main responsibility is to propose, implement and ensure compliance to the framework of policies and procedures for the management of the Bank's credit risk arising from the application of the credit process and the measurement and monitoring of tolerance limits.
- (ii) Market Risks & Liquidity Department: is responsible for the formation of the uniform framework of Policy and Procedures for the management of market, interest rate and liquidity risks at Group level, for ensuring its compliance, as well as for monitoring and controlling the limits subject to its responsibility.
- (iii) Operational Risk Department: its main responsibility is to recommend, implement and ensure compliance to the framework of policies and procedures for the management of operational risks the Bank and the Group and to monitor compliance with the risk tolerance limits that have been set.
- (iv) The Capital Adequacy Management Department has as its main responsibility the recommendation, implementation and compliance of the framework of policies and procedures for the calculation and effective management of the Bank's capital adequacy.
- (v) Supervisory Relations Department: Its objectives are the coordination, execution and monitoring of the tasks: a) of the supervisory obligations regarding the Group's Risk Management (supervisory reports, Pillars I / II and III of the framework, etc.), b) the collection, analysis and processing of the necessary data for the execution of the tasks of the departments of the Risk Management Division.
- (vi) Modelling Department: Its purpose is to coordinate and monitor the work of external partners regarding the certification of existing models, the flow of procedures and the correct execution, today, of the ECL methodology, as well as the other systems that will be implemented in the future in the area of Risk Management. Validation Reports, including findings and recommendations, are submitted to the Risk Management Committee.

#### **4.1. Credit risk**

Credit risk is the risk of financial loss due to the potential inability or unwillingness of a counterparty to fulfill its contractual obligations, resulting in the loss of capital and profit. Credit risk management focuses on ensuring a disciplined culture, transparency and rational risk-taking, based on recognised international practices.

The credit risk management methodologies are adjusted to reflect the economic environment at any given time. The various methods used are reviewed annually or whenever deemed necessary and are adjusted according to the Group's strategy and the Group's short-term and long-term objectives.

The various analyses of sectors and sub-sectors of the economy, combined with economic forecasts, provide the guidelines for determining credit policy. With the aim of minimizing credit risk, and taking into account the creditworthiness of the borrower, the collateral and guarantees offered that reduce the Group's exposure to credit risk, the type and duration of the credit facility, financial limits are set per borrower. As regards the

analysis of the creditworthiness of each borrower, this is carried out taking into account the risk of the country and the sector of the economy in which it operates, as well as its qualitative and quantitative characteristics.

In addition, credit facility approval limits have been established and tasks have been defined during the lending process to ensure objectivity, independence and control of new and existing loans.

During the approval process, the overall credit risk for each counterparty or group of counterparties that are related to each other is examined and the credit limits approved by different companies of the Group are aggregated.

The monitoring of the creditworthiness of counterparties and credit exposures, in combination with the respective approved limits, is carried out on a systematic basis. In addition, any concentration is analyzed and monitored on an ongoing basis, with the aim of limiting potential large exposures and dangerous concentrations. A concentration of credit risk can be created at the level of an economic sector, counterparty or group of counterparties, country, currency and type of collateral.

Balancing the risk-reward relationship is crucial to the Group's continued profitability. This relationship is analyzed at the customer and product level through profitability measurement and pricing analysis, with the aim of combining the risk taken with the expected profitability.

In addition, the Bank uses various techniques to limit its exposure to credit risk, such as taking collateral and guarantees. Tangible collaterals provide the Bank with a right over the assets (movable or immovable assets) owned by the debtor in order to obtain priority in the satisfaction from the liquidation proceeds of the property. Tangible collaterals are divided into mortgages and mortgages prenotations on immovable property, as well as pledges registered on movable property (e.g. merchandise, checks) or on receivables. Similarly, guarantees refer to contractual agreements whereby a person or an entity undertakes the responsibility for the repayment of debt of another person or entity.

The main types of collateral accepted by the Group in accordance with the Credit Policy Manual are broken down into the following categories:

- mortgages on urban/non-urban real estate property, both in and outside the town plan, at a rate proportionate to the security margin set by the Bank;
- pledging of cash, checks, bills of landing, receivables, goods with securities, etc.;
- guarantees provided by the Greek State, banks, the Hellenic Development Bank and by companies with high credit-rating.

In addition, within the framework of the credit risk management policy, the effect of extreme but feasible scenarios on the quality of the loan portfolio and on the available funds is evaluated by conducting stress tests.

### **Internal rating systems**

The methods to evaluate the creditworthiness are classified in the following categories, depending on the type of the counterparty: central governments (for purchase and holding of bonds), financial institutions, large and small & medium-sized entities (SMEs) and individuals.

As regards the rating of governments and financial institutions, there is detailed analysis in the sections "Counterparty bank risk" and "Country risk".

Individuals are rated following research conducted in the TIRESSIAS bank information system presenting the background of the transaction activity of the customer and income criteria. Especially for the issuance of credit card or the grant of mortgage loans, customers' creditworthiness is evaluated using the scoring/rating system based both on demographic factors and objective financial information (e.g. income, assets).

For the rating of large and SME businesses, a risk classification system is used. The system has been developed by ICAP-CRIF SA and the internal rating ranges from 1 (low credit risk) to 10 (high credit risk).

The first dimension concerns the classification of the borrower's creditworthiness into ten levels based on qualitative and quantitative criteria, determining the probability of default on its obligations. The weight of the individual criteria varies depending on the nature and size of the borrower's activities.

| <b>IRP<br/>Debtor<br/>Score</b> | <b>Mapping to Moody's<br/>Impairment Studio©</b> | <b>Risk Classification</b> |
|---------------------------------|--------------------------------------------------|----------------------------|
| 1                               | Aa2                                              | Low credit risk            |
| 2                               | A2                                               | Low credit risk            |
| 3                               | Baa2                                             | Low credit risk            |
| 4                               | Ba1                                              | Low credit risk            |
| 5                               | Ba3                                              | Average credit risk        |
| 6                               | B2                                               | Average credit risk        |
| 7                               | B3                                               | Average credit risk        |
| 8                               | Caa2                                             | High credit risk           |
| 9                               | Caa3                                             | High credit risk           |
| 10                              | Ca                                               | High credit risk           |

The second dimension of transaction risk assessment is the assessment of the quality and adequacy of collateral, determining the expected loss in the event of default.

The creditworthiness of the customer is used in conjunction with the degree of collateral adequacy (i.e. unsecured risk) in the credit approval process and the setting of the corresponding limits. In particular, the creditworthiness rating at the corporate portfolio level is systematically monitored for the internal calculation of default probabilities and for the early diagnosis of adverse shifts in the various quality/risk levels of the portfolio, with a view to developing appropriate strategies to offset the risks undertaken.

### **Macroeconomic models**

To calculate the forward-looking lifetime probability of default (PD) on the corporate portfolio, an appropriate macroeconomic model from Moody's Analytics™ is used. The model combines idiosyncratic exposure

characteristics with forecasts of specific macroeconomic variables, appropriately adjusting the probability of default (PD) of the debtor/exposure taking into account future conditions. The model also incorporates industry sensitivity in order to generate complementary information. For the final selection of scenarios, the company's scenario estimates are checked against those published by the European Central Bank (ECB), the European Commission (EC) and the Greek Government for their relevance. The Risk Management Committee, following the relevant approval by the Executive Committee, validates the scenarios and their severity on a quarterly basis.

### **Collateral Valuation**

The type of collateral and the percentage of coverage required depends on the financial situation, dynamics and prospects of the borrower, the form and amount of the credit facility and the credit risk of each counterparty.

The valuation of collateral is carried out by the Bank and the Group, systematically and with frequency depending on the type of collateral, as defined in the Credit Policy Manual and special experts are used, where required, such as real estate. For the valuation of the collateral, parameters related to the time and cost of liquidation are taken into account.

#### Real estate

- Prenotated property values – property appraisals and revaluations

The value of the prenotated properties is estimated by the Bank's engineering appraisers in accordance with international appraisal standards. With regard to the assessment and reassessment of the value of the properties that are listed, the following apply:

- New Financing:

When a request for new financing secured by a property prenotation is being considered, the assessment is carried out with a physical inspection/on-site visit by an independent authorized appraiser.

- Existing Financing:

For existing financing that has as collateral a real estate prenotation and if it relates to a residential house and other residential properties (e.g. plots of land, parcels of land), the value of the property is monitored regularly, at least every 3 years, with a desktop assessment (without a visit or physical inspection) or the statistical adjustment if market conditions have not changed significantly.

For commercial property, the value of the property is monitored at least once a year with a desktop valuation (without an on-site visit) and every 3 years with a physical inspection.

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Negotiable securities where there is a valuation in the market

Their value is adjusted daily within the Bank's systems and are taken into account in the ECL calculations.

Other Collateral

To calculate their value, appropriate impairment factors (haircuts) are applied in accordance with best practices.

## Maximum exposure to credit risk before collateral held and other credit enhancements

The following table presents the maximum exposure to credit risk arising from financial instruments presented in the statement of financial position of the Group and the Bank, without taking into consideration any collaterals held or other credit enhancements. For the financial instruments presented in the statement of financial position, the exposure to credit risk equals to their carrying amount.

### Group

| Amounts in Eur '000                                                        | Maximum exposure |                  |
|----------------------------------------------------------------------------|------------------|------------------|
|                                                                            | 31/12/2024       | 31/12/2023       |
| <b>Exposure to credit risk from items on the SOFP:</b>                     |                  |                  |
| Deposits with central bank                                                 | 797,646          | 467,679          |
| Due from banks                                                             | 171,309          | 126,090          |
| Financial assets measured at fair value through profit or loss             | 264,442          | 337,628          |
| Derivative financial instruments                                           | 2,210            | 1,033            |
| Loans and advances to customers                                            | 3,612,598        | 2,430,914        |
| Financial assets measured at fair value through other comprehensive income | 47,390           | 86,488           |
| Debt securities at amortised cost                                          | 413,844          | 251,388          |
| Other financial assets                                                     | 33,665           | 39,878           |
| <b>Total on balance sheet credit exposures</b>                             | <b>5,343,104</b> | <b>3,741,098</b> |
| <b>Total off balance sheet credit exposures:</b>                           |                  |                  |
| Letter of guarantee and unutilised credit limits                           | 862,056          | 625,311          |
| <b>Total</b>                                                               | <b>6,205,160</b> | <b>4,366,409</b> |

**Bank**

| Amounts in Eur '000                                                        | Maximum exposure |                  |
|----------------------------------------------------------------------------|------------------|------------------|
|                                                                            | 31/12/2024       | 31/12/2023       |
| <b>Exposure to credit risk from items on the SOFP:</b>                     |                  |                  |
| Deposits with central bank                                                 | 797,645          | 467,679          |
| Due from banks                                                             | 160,157          | 123,625          |
| Financial assets measured at fair value through profit or loss             | 261,626          | 336,994          |
| Derivative financial instruments                                           | 2,210            | 1,033            |
| Loans and advances to customers                                            | 3,596,600        | 2,416,072        |
| Financial assets measured at fair value through other comprehensive income | 47,390           | 86,488           |
| Debt securities at amortised cost                                          | 413,844          | 251,388          |
| Other financial assets                                                     | 34,236           | 32,396           |
| <b>Total on balance sheet credit exposures</b>                             | <b>5,313,708</b> | <b>3,715,675</b> |
| <b>Total off balance sheet credit exposures:</b>                           |                  |                  |
| Letter of guarantee and unutilised credit limits                           | 862,056          | 623,532          |
| <b>Total</b>                                                               | <b>6,175,764</b> | <b>4,339,207</b> |

## Loans and advances to customers

The following table presents the quality of the loans and advances to customers of the Group and the Bank.

### Group

| Loans and advances to customers and impairment provisions per IFRS 9 Stage |                                       |               |                                       |              |                                       |               |                                       |             |                                       |               |                                           |
|----------------------------------------------------------------------------|---------------------------------------|---------------|---------------------------------------|--------------|---------------------------------------|---------------|---------------------------------------|-------------|---------------------------------------|---------------|-------------------------------------------|
| Amounts in Eur '000                                                        | Stage 1                               |               | Stage 2                               |              | Stage 3                               |               | POCI                                  |             | Total                                 |               | Loans and advances to customers net value |
| 31/12/2024                                                                 | Gross loans and advances to customers | Impairments   | Gross loans and advances to customers | Impairments  | Gross loans and advances to customers | Impairments   | Gross loans and advances to customers | Impairments | Gross loans and advances to customers | Impairments   |                                           |
| <b>Individuals</b>                                                         |                                       |               |                                       |              |                                       |               |                                       |             |                                       |               |                                           |
| Consumer, personal & other                                                 | 34,965                                | 127           | 29                                    | 3            | 19                                    | 19            | 0                                     | 0           | 35,013                                | 149           | 34,864                                    |
| Mortgages                                                                  | 132,641                               | 371           | 0                                     | 0            | 0                                     | 0             | 0                                     | 0           | 132,641                               | 371           | 132,270                                   |
| <b>Corporate</b>                                                           |                                       |               |                                       |              |                                       |               |                                       |             |                                       |               |                                           |
| Large Corporate                                                            | 1,606,696                             | 10,559        | 99,297                                | 4,072        | 11,720                                | 4,096         | 0                                     | 0           | 1,717,713                             | 18,727        | 1,698,986                                 |
| SMEs                                                                       | 1,613,336                             | 10,854        | 132,238                               | 3,589        | 19,426                                | 10,834        | 7,132                                 | 377         | 1,772,132                             | 25,654        | 1,746,478                                 |
| <b>Total</b>                                                               | <b>3,387,638</b>                      | <b>21,911</b> | <b>231,564</b>                        | <b>7,664</b> | <b>31,165</b>                         | <b>14,949</b> | <b>7,132</b>                          | <b>377</b>  | <b>3,657,499</b>                      | <b>44,901</b> | <b>3,612,598</b>                          |
| <b>Commitments relevant to credit risk</b>                                 |                                       |               |                                       |              |                                       |               |                                       |             |                                       |               |                                           |
| Letters of guarantee                                                       | 765,362                               | 2,952         | 89,770                                | 696          | 0                                     | 0             | 0                                     | 0           | 855,132                               | 3,648         | 851,484                                   |
| Loan commitments                                                           | 10,525                                | 0             | 47                                    | 0            | 0                                     | 0             | 0                                     | 0           | 10,572                                | 0             | 10,572                                    |
| <b>Total</b>                                                               | <b>775,887</b>                        | <b>2,952</b>  | <b>89,817</b>                         | <b>696</b>   | <b>0</b>                              | <b>0</b>      | <b>0</b>                              | <b>0</b>    | <b>865,704</b>                        | <b>3,648</b>  | <b>862,056</b>                            |



| Loans and advances to customers and impairment provisions per IFRS 9 Stage |                                       |               |                                       |              |                                       |              |                                       |             |                                       |               |                                           |
|----------------------------------------------------------------------------|---------------------------------------|---------------|---------------------------------------|--------------|---------------------------------------|--------------|---------------------------------------|-------------|---------------------------------------|---------------|-------------------------------------------|
| Amounts in Eur '000                                                        | Stage 1                               |               | Stage 2                               |              | Stage 3                               |              | POCI                                  |             | Total                                 |               | Loans and advances to customers net value |
| 31/12/2023                                                                 | Gross loans and advances to customers | Impairments   | Gross loans and advances to customers | Impairments  | Gross loans and advances to customers | Impairments  | Gross loans and advances to customers | Impairments | Gross loans and advances to customers | Impairments   |                                           |
| <b>Individuals</b>                                                         |                                       |               |                                       |              |                                       |              |                                       |             |                                       |               |                                           |
| Consumer, personal & other                                                 | 30,933                                | 244           | 19                                    | 9            | 1,801                                 | 1,801        | 0                                     | 0           | 32,753                                | 2,054         | 30,699                                    |
| Mortgages                                                                  | 98,190                                | 358           | 0                                     | 0            | 9                                     | 8            | 0                                     | 0           | 98,199                                | 366           | 97,833                                    |
| <b>Corporate</b>                                                           |                                       |               |                                       |              |                                       |              |                                       |             |                                       |               |                                           |
| Large Corporate                                                            | 1,012,694                             | 6,866         | 40,182                                | 506          | 1,980                                 | 1,980        | 0                                     | 0           | 1,054,856                             | 9,352         | 1,045,504                                 |
| SMEs                                                                       | 1,175,013                             | 6,248         | 84,412                                | 3,988        | 7,338                                 | 5,565        | 5,938                                 | 22          | 1,272,701                             | 15,823        | 1,256,878                                 |
| <b>Total</b>                                                               | <b>2,316,830</b>                      | <b>13,716</b> | <b>124,613</b>                        | <b>4,503</b> | <b>11,128</b>                         | <b>9,354</b> | <b>5,938</b>                          | <b>22</b>   | <b>2,458,509</b>                      | <b>27,595</b> | <b>2,430,914</b>                          |
| <b>Commitments relevant to credit risk</b>                                 |                                       |               |                                       |              |                                       |              |                                       |             |                                       |               |                                           |
| Letters of guarantee                                                       | 598,202                               | 1,753         | 18,257                                | 26           | 0                                     | 0            | 0                                     | 0           | 616,459                               | 1,779         | 614,680                                   |
| Loan commitments                                                           | 8,790                                 | 0             | 62                                    | 0            | 0                                     | 0            | 0                                     | 0           | 8,852                                 | 0             | 8,852                                     |
| <b>Total</b>                                                               | <b>606,992</b>                        | <b>1,753</b>  | <b>18,319</b>                         | <b>26</b>    | <b>0</b>                              | <b>0</b>     | <b>0</b>                              | <b>0</b>    | <b>625,311</b>                        | <b>1,779</b>  | <b>623,532</b>                            |

**Bank**

| Loans and advances to customers and impairment provisions per IFRS 9 Stage |                                       |               |                                       |              |                                       |               |                                       |             |                                       |               |                                           |
|----------------------------------------------------------------------------|---------------------------------------|---------------|---------------------------------------|--------------|---------------------------------------|---------------|---------------------------------------|-------------|---------------------------------------|---------------|-------------------------------------------|
| Amounts in Eur '000                                                        | Stage 1                               |               | Stage 2                               |              | Stage 3                               |               | POCI                                  |             | Total                                 |               | Loans and advances to customers net value |
| 31/12/2024                                                                 | Gross loans and advances to customers | Impairments   | Gross loans and advances to customers | Impairments  | Gross loans and advances to customers | Impairments   | Gross loans and advances to customers | Impairments | Gross loans and advances to customers | Impairments   |                                           |
| <b>Individuals</b>                                                         |                                       |               |                                       |              |                                       |               |                                       |             |                                       |               |                                           |
| Consumer, personal & other                                                 | 34,965                                | 127           | 29                                    | 3            | 19                                    | 19            | 0                                     | 0           | 35,013                                | 149           | 34,864                                    |
| Mortgages                                                                  | 132,641                               | 371           | 0                                     | 0            | 0                                     | 0             | 0                                     | 0           | 132,641                               | 371           | 132,270                                   |
| <b>Corporate</b>                                                           |                                       |               |                                       |              |                                       |               |                                       |             |                                       |               |                                           |
| Large Corporate                                                            | 1,685,176                             | 10,492        | 92,428                                | 4,064        | 11,720                                | 4,096         | 0                                     | 0           | 1,789,324                             | 18,652        | 1,770,672                                 |
| SMEs                                                                       | 1,531,273                             | 10,616        | 126,352                               | 3,562        | 19,250                                | 10,658        | 7,132                                 | 377         | 1,684,007                             | 25,213        | 1,658,794                                 |
| <b>Total</b>                                                               | <b>3,384,055</b>                      | <b>21,606</b> | <b>218,809</b>                        | <b>7,629</b> | <b>30,989</b>                         | <b>14,773</b> | <b>7,132</b>                          | <b>377</b>  | <b>3,640,985</b>                      | <b>44,385</b> | <b>3,596,600</b>                          |
| <b>Commitments relevant to credit risk</b>                                 |                                       |               |                                       |              |                                       |               |                                       |             |                                       |               |                                           |
| Letters of guarantee                                                       | 765,362                               | 2,952         | 89,770                                | 696          | 0                                     | 0             | 0                                     | 0           | 855,132                               | 3,648         | 851,484                                   |
| Loan commitments                                                           | 10,525                                | 0             | 47                                    | 0            | 0                                     | 0             | 0                                     | 0           | 10,572                                | 0             | 10,572                                    |
| <b>Total</b>                                                               | <b>775,887</b>                        | <b>2,952</b>  | <b>89,817</b>                         | <b>696</b>   | <b>0</b>                              | <b>0</b>      | <b>0</b>                              | <b>0</b>    | <b>865,704</b>                        | <b>3,648</b>  | <b>862,056</b>                            |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage |                                       |               |                                       |              |                                       |              |                                       |             |                                       |               |                                           |
|----------------------------------------------------------------------------|---------------------------------------|---------------|---------------------------------------|--------------|---------------------------------------|--------------|---------------------------------------|-------------|---------------------------------------|---------------|-------------------------------------------|
| Amounts in Eur '000                                                        | Stage 1                               |               | Stage 2                               |              | Stage 3                               |              | POCI                                  |             | Total                                 |               | Loans and advances to customers net value |
| 31/12/2023                                                                 | Gross loans and advances to customers | Impairments   | Gross loans and advances to customers | Impairments  | Gross loans and advances to customers | Impairments  | Gross loans and advances to customers | Impairments | Gross loans and advances to customers | Impairments   |                                           |
| <b>Individuals</b>                                                         |                                       |               |                                       |              |                                       |              |                                       |             |                                       |               |                                           |
| Consumer, personal & other                                                 | 30,933                                | 244           | 19                                    | 9            | 1,801                                 | 1,801        | 0                                     | 0           | 32,753                                | 2,054         | 30,699                                    |
| Mortgages                                                                  | 98,190                                | 358           | 0                                     | 0            | 9                                     | 8            | 0                                     | 0           | 98,199                                | 366           | 97,833                                    |
| <b>Corporate</b>                                                           |                                       |               |                                       |              |                                       |              |                                       |             |                                       |               |                                           |
| Large Corporate                                                            | 1,074,318                             | 6,856         | 40,182                                | 506          | 1,980                                 | 1,980        | 0                                     | 0           | 1,116,480                             | 9,342         | 1,107,138                                 |
| SMEs                                                                       | 1,098,412                             | 6,123         | 84,412                                | 3,988        | 7,338                                 | 5,565        | 5,938                                 | 22          | 1,196,100                             | 15,698        | 1,180,402                                 |
| <b>Total</b>                                                               | <b>2,301,853</b>                      | <b>13,581</b> | <b>124,613</b>                        | <b>4,503</b> | <b>11,128</b>                         | <b>9,354</b> | <b>5,938</b>                          | <b>22</b>   | <b>2,443,532</b>                      | <b>27,460</b> | <b>2,416,072</b>                          |
| <b>Commitments relevant to credit risk</b>                                 |                                       |               |                                       |              |                                       |              |                                       |             |                                       |               |                                           |
| Letters of guarantee                                                       | 598,202                               | 1,753         | 18,257                                | 26           | 0                                     | 0            | 0                                     | 0           | 616,459                               | 1,779         | 614,680                                   |
| Loan commitments                                                           | 8,790                                 | 0             | 62                                    | 0            | 0                                     | 0            | 0                                     | 0           | 8,852                                 | 0             | 8,852                                     |
| <b>Total</b>                                                               | <b>606,992</b>                        | <b>1,753</b>  | <b>18,319</b>                         | <b>26</b>    | <b>0</b>                              | <b>0</b>     | <b>0</b>                              | <b>0</b>    | <b>625,311</b>                        | <b>1,779</b>  | <b>623,532</b>                            |

**Group**

| Loans and advances to customers based on their quality (impairments under IFRS 9) |                                       |                      |                               |                                   |                      |                                  |                      |
|-----------------------------------------------------------------------------------|---------------------------------------|----------------------|-------------------------------|-----------------------------------|----------------------|----------------------------------|----------------------|
| Amounts in Eur '000<br><br>31/12/2024                                             | Gross loans and advances to customers |                      | Total value before impairment | Accumulated impairment provisions |                      | Total net value after impairment | Value of collaterals |
|                                                                                   | Individual assesment                  | Collective assesment |                               | Individual assesment              | Collective assesment |                                  |                      |
| <b><u>Individuals</u></b>                                                         |                                       |                      |                               |                                   |                      |                                  |                      |
| Consumer, personal & other                                                        | 0                                     | 35,013               | 35,013                        | 0                                 | 149                  | 34,864                           | 98,783               |
| Mortgages                                                                         | 0                                     | 132,641              | 132,641                       | 0                                 | 371                  | 132,270                          | 172,918              |
| <b><u>Corporate</u></b>                                                           |                                       |                      |                               |                                   |                      |                                  |                      |
| Large Corporate                                                                   | 0                                     | 1,717,713            | 1,717,713                     | 0                                 | 18,727               | 1,698,986                        | 1,173,174            |
| SMEs                                                                              | 0                                     | 1,772,132            | 1,772,132                     | 0                                 | 25,654               | 1,746,478                        | 1,659,310            |
| <b>Total</b>                                                                      | <b>0</b>                              | <b>3,657,499</b>     | <b>3,657,499</b>              | <b>0</b>                          | <b>44,901</b>        | <b>3,612,598</b>                 | <b>3,104,185</b>     |
| <b><u>Commitments relevant to credit risk</u></b>                                 |                                       |                      |                               |                                   |                      |                                  |                      |
| Letters of guarantee                                                              | 0                                     | 855,132              | 855,132                       | 0                                 | 3,648                | 851,484                          | 85,576               |
| Loan commitments                                                                  | 0                                     | 10,572               | 10,572                        | 0                                 | 0                    | 10,572                           | 0                    |
| <b>Total</b>                                                                      | <b>0</b>                              | <b>865,704</b>       | <b>865,704</b>                | <b>0</b>                          | <b>3,648</b>         | <b>862,056</b>                   | <b>85,576</b>        |

| Loans and advances to customers based on their quality (impairments under IFRS 9) |                                       |                      |                               |                                   |                      |                                  |                      |
|-----------------------------------------------------------------------------------|---------------------------------------|----------------------|-------------------------------|-----------------------------------|----------------------|----------------------------------|----------------------|
| Amounts in Eur ' 000<br><br>31/12/2023                                            | Gross loans and advances to customers |                      | Total value before impairment | Accumulated impairment provisions |                      | Total net value after impairment | Value of collaterals |
|                                                                                   | Individual assesment                  | Collective assesment |                               | Individual assesment              | Collective assesment |                                  |                      |
| <b><u>Individuals</u></b>                                                         |                                       |                      |                               |                                   |                      |                                  |                      |
| Consumer, personal & other                                                        | 0                                     | 32,753               | 32,753                        | 0                                 | 2,054                | 30,699                           | 105,750              |
| Mortgages                                                                         | 0                                     | 98,199               | 98,199                        | 0                                 | 366                  | 97,833                           | 122,231              |
| <b><u>Corporate</u></b>                                                           |                                       |                      |                               |                                   |                      |                                  |                      |
| Large Corporate                                                                   | 0                                     | 1,054,856            | 1,054,856                     | 0                                 | 9,352                | 1,045,504                        | 871,094              |
| SMEs                                                                              | 0                                     | 1,272,701            | 1,272,701                     | 0                                 | 15,823               | 1,256,878                        | 1,143,736            |
| <b>Total</b>                                                                      | <b>0</b>                              | <b>2,458,509</b>     | <b>2,458,509</b>              | <b>0</b>                          | <b>27,595</b>        | <b>2,430,914</b>                 | <b>2,242,811</b>     |
| <b><u>Commitments relevant to credit risk</u></b>                                 |                                       |                      |                               |                                   |                      |                                  |                      |
| Letters of guarantee                                                              | 0                                     | 616,459              | 616,459                       | 0                                 | 1,779                | 614,680                          | 81,331               |
| Loan commitments                                                                  | 0                                     | 8,852                | 8,852                         | 0                                 | 0                    | 8,852                            | 0                    |
| <b>Total</b>                                                                      | <b>0</b>                              | <b>625,311</b>       | <b>625,311</b>                | <b>0</b>                          | <b>1,779</b>         | <b>623,532</b>                   | <b>81,331</b>        |

**Bank**

| Loans and advances to customers based on their quality (impairments under IFRS 9) |                                       |                      |                               |                                   |                      |                                  |                      |
|-----------------------------------------------------------------------------------|---------------------------------------|----------------------|-------------------------------|-----------------------------------|----------------------|----------------------------------|----------------------|
| Amounts in Eur '000<br><br>31/12/2024                                             | Gross loans and advances to customers |                      | Total value before impairment | Accumulated impairment provisions |                      | Total net value after impairment | Value of collaterals |
|                                                                                   | Individual assesment                  | Collective assesment |                               | Individual assesment              | Collective assesment |                                  |                      |
| <b><u>Individuals</u></b>                                                         |                                       |                      |                               |                                   |                      |                                  |                      |
| Consumer, personal & other                                                        | 0                                     | 35,013               | 35,013                        | 0                                 | 149                  | 34,864                           | 98,783               |
| Mortgages                                                                         | 0                                     | 132,641              | 132,641                       | 0                                 | 371                  | 132,270                          | 172,918              |
| <b><u>Corporate</u></b>                                                           |                                       |                      |                               |                                   |                      |                                  |                      |
| Large Corporate                                                                   | 0                                     | 1,789,324            | 1,789,324                     | 0                                 | 18,652               | 1,770,672                        | 1,073,554            |
| SMEs                                                                              | 0                                     | 1,684,007            | 1,684,007                     | 0                                 | 25,213               | 1,658,794                        | 1,532,019            |
| <b>Total</b>                                                                      | <b>0</b>                              | <b>3,640,985</b>     | <b>3,640,985</b>              | <b>0</b>                          | <b>44,385</b>        | <b>3,596,600</b>                 | <b>2,877,274</b>     |
| <b><u>Commitments relevant to credit risk</u></b>                                 |                                       |                      |                               |                                   |                      |                                  |                      |
| Letters of guarantee                                                              | 0                                     | 855,132              | 855,132                       | 0                                 | 3,648                | 851,484                          | 85,576               |
| Loan commitments                                                                  | 0                                     | 10,572               | 10,572                        | 0                                 | 0                    | 10,572                           | 0                    |
| <b>Total</b>                                                                      | <b>0</b>                              | <b>865,704</b>       | <b>865,704</b>                | <b>0</b>                          | <b>3,648</b>         | <b>862,056</b>                   | <b>85,576</b>        |

| Loans and advances to customers based on their quality (impairments under IFRS 9) |                                       |                      |                               |                                   |                      |                                  |                      |
|-----------------------------------------------------------------------------------|---------------------------------------|----------------------|-------------------------------|-----------------------------------|----------------------|----------------------------------|----------------------|
| Amounts in Eur '000<br><br>31/12/2023                                             | Gross loans and advances to customers |                      | Total value before impairment | Accumulated impairment provisions |                      | Total net value after impairment | Value of collaterals |
|                                                                                   | Individual assesment                  | Collective assesment |                               | Individual assesment              | Collective assesment |                                  |                      |
| <b><u>Individuals</u></b>                                                         |                                       |                      |                               |                                   |                      |                                  |                      |
| Consumer, personal & other                                                        | 0                                     | 32,753               | 32,753                        | 0                                 | 2,054                | 30,699                           | 105,750              |
| Mortgages                                                                         | 0                                     | 98,199               | 98,199                        | 0                                 | 366                  | 97,833                           | 122,231              |
| <b><u>Corporate</u></b>                                                           |                                       |                      |                               |                                   |                      |                                  |                      |
| Large Corporate                                                                   | 0                                     | 1,116,480            | 1,116,480                     | 0                                 | 9,342                | 1,107,138                        | 786,563              |
| SMEs                                                                              | 0                                     | 1,196,100            | 1,196,100                     | 0                                 | 15,698               | 1,180,402                        | 1,041,769            |
| <b>Total</b>                                                                      | <b>0</b>                              | <b>2,443,532</b>     | <b>2,443,532</b>              | <b>0</b>                          | <b>27,460</b>        | <b>2,416,072</b>                 | <b>2,056,313</b>     |
| <b><u>Commitments relevant to credit risk</u></b>                                 |                                       |                      |                               |                                   |                      |                                  |                      |
| Letters of guarantee                                                              | 0                                     | 616,459              | 616,459                       | 0                                 | 1,779                | 614,680                          | 81,331               |
| Loan commitments                                                                  | 0                                     | 8,852                | 8,852                         | 0                                 | 0                    | 8,852                            | 0                    |
| <b>Total</b>                                                                      | <b>0</b>                              | <b>625,311</b>       | <b>625,311</b>                | <b>0</b>                          | <b>1,779</b>         | <b>623,532</b>                   | <b>81,331</b>        |

**Group**

| Loans and advances to customers and impairment provisions per IFRS 9 Stage (per industry and geographical region) |                  |                |               |              |                                       |               |                                           |                 |              |              |          |                                       |                                           |
|-------------------------------------------------------------------------------------------------------------------|------------------|----------------|---------------|--------------|---------------------------------------|---------------|-------------------------------------------|-----------------|--------------|--------------|----------|---------------------------------------|-------------------------------------------|
| Amounts in Eur '000<br><br>31/12/2024                                                                             | Greece           |                |               |              |                                       |               |                                           | Other countries |              |              |          |                                       |                                           |
|                                                                                                                   | Stage 1          | Stage 2        | Stage 3       | POCI         | Gross loans and advances to customers | Impairments   | Loans and advances to customers net value | Stage 1         | Stage 2      | Stage 3      | POCI     | Gross loans and advances to customers | Loans and advances to customers net value |
| <b>Individuals</b>                                                                                                | <b>156,045</b>   | <b>28</b>      | <b>19</b>     | <b>0</b>     | <b>156,092</b>                        | <b>499</b>    | <b>155,593</b>                            | <b>11,561</b>   | <b>1</b>     | <b>0</b>     | <b>0</b> | <b>11,562</b>                         | <b>21</b><br><b>11,541</b>                |
| Consumer, personal & other                                                                                        | 34,550           | 28             | 19            | 0            | 34,597                                | 148           | 34,449                                    | 415             | 1            | 0            | 0        | 416                                   | 1<br>415                                  |
| Mortgages                                                                                                         | 121,495          | 0              | 0             | 0            | 121,495                               | 351           | 121,144                                   | 11,146          | 0            | 0            | 0        | 11,146                                | 20<br>11,126                              |
| <b>Corporate</b>                                                                                                  | <b>2,829,451</b> | <b>229,171</b> | <b>29,430</b> | <b>7,132</b> | <b>3,095,184</b>                      | <b>41,586</b> | <b>3,053,598</b>                          | <b>363,230</b>  | <b>2,364</b> | <b>1,716</b> | <b>0</b> | <b>367,310</b>                        | <b>2,686</b><br><b>364,624</b>            |
| Financial institutions and other financial services                                                               | 141,702          | 0              | 0             | 0            | 141,702                               | 491           | 141,211                                   | 36,956          | 0            | 0            | 0        | 36,956                                | 69<br>36,887                              |
| Manufacturing                                                                                                     | 320,478          | 33,986         | 3,054         | 0            | 357,518                               | 6,517         | 351,001                                   | 0               | 0            | 0            | 0        | 0                                     | 0<br>0                                    |
| Construction                                                                                                      | 249,219          | 26,516         | 4,529         | 0            | 280,264                               | 5,290         | 274,974                                   | 1,340           | 0            | 0            | 0        | 1,340                                 | 5<br>1,335                                |
| Wholesale and retail trade                                                                                        | 392,947          | 45,626         | 1,921         | 3,646        | 444,140                               | 6,192         | 437,948                                   | 9,699           | 0            | 0            | 0        | 9,699                                 | 46<br>9,653                               |
| Accommodation and food service activities                                                                         | 295,565          | 27,730         | 2,451         | 2,600        | 328,346                               | 3,306         | 325,040                                   | 0               | 0            | 0            | 0        | 0                                     | 0<br>0                                    |
| Information and communication                                                                                     | 142,064          | 41,037         | 81            | 0            | 183,182                               | 4,197         | 178,985                                   | 3,993           | 0            | 0            | 0        | 3,993                                 | 1<br>3,992                                |
| Energy                                                                                                            | 500,862          | 6,246          | 7,148         | 0            | 514,256                               | 3,347         | 510,909                                   | 248             | 0            | 0            | 0        | 248                                   | 0<br>248                                  |
| Real estate activities                                                                                            | 339,875          | 22,193         | 1,477         | 0            | 363,545                               | 3,672         | 359,873                                   | 22,303          | 0            | 0            | 0        | 22,303                                | 25<br>22,278                              |
| Services and other industries                                                                                     | 446,739          | 25,837         | 8,769         | 886          | 482,231                               | 8,574         | 473,657                                   | 288,691         | 2,364        | 1,716        | 0        | 292,771                               | 2,540<br>290,231                          |
| <b>Public sector</b>                                                                                              | <b>27,351</b>    | <b>0</b>       | <b>0</b>      | <b>0</b>     | <b>27,351</b>                         | <b>109</b>    | <b>27,242</b>                             | <b>0</b>        | <b>0</b>     | <b>0</b>     | <b>0</b> | <b>0</b>                              | <b>0</b><br><b>0</b>                      |
| <b>Total</b>                                                                                                      | <b>3,012,847</b> | <b>229,199</b> | <b>29,449</b> | <b>7,132</b> | <b>3,278,627</b>                      | <b>42,194</b> | <b>3,236,433</b>                          | <b>374,791</b>  | <b>2,365</b> | <b>1,716</b> | <b>0</b> | <b>378,872</b>                        | <b>2,707</b><br><b>376,165</b>            |



| Loans and advances to customers and impairment provisions per IFRS 9 Stage (per industry and geographical region) |                  |                |              |              |                                       |               |                                           |                 |              |              |          |                                       |              |                                           |
|-------------------------------------------------------------------------------------------------------------------|------------------|----------------|--------------|--------------|---------------------------------------|---------------|-------------------------------------------|-----------------|--------------|--------------|----------|---------------------------------------|--------------|-------------------------------------------|
| Amounts in Eur '000<br><br>31/12/2023                                                                             | Greece           |                |              |              |                                       |               |                                           | Other countries |              |              |          |                                       |              |                                           |
|                                                                                                                   | Stage 1          | Stage 2        | Stage 3      | POCI         | Gross loans and advances to customers | Impairments   | Loans and advances to customers net value | Stage 1         | Stage 2      | Stage 3      | POCI     | Gross loans and advances to customers | Impairments  | Loans and advances to customers net value |
| <b><u>Individuals</u></b>                                                                                         | <b>117,988</b>   | <b>19</b>      | <b>1,810</b> | <b>0</b>     | <b>119,817</b>                        | <b>2,395</b>  | <b>117,422</b>                            | <b>11,135</b>   | <b>0</b>     | <b>0</b>     | <b>0</b> | <b>11,135</b>                         | <b>25</b>    | <b>11,110</b>                             |
| Consumer, personal & other                                                                                        | 27,649           | 19             | 1,801        | 0            | 29,469                                | 2,048         | 27,421                                    | 3,284           | 0            | 0            | 0        | 3,284                                 | 6            | 3,278                                     |
| Mortgages                                                                                                         | 90,339           | 0              | 9            | 0            | 90,348                                | 347           | 90,001                                    | 7,851           | 0            | 0            | 0        | 7,851                                 | 19           | 7,832                                     |
| <b><u>Corporate</u></b>                                                                                           | <b>1,922,320</b> | <b>118,504</b> | <b>7,690</b> | <b>5,938</b> | <b>2,054,452</b>                      | <b>22,770</b> | <b>2,031,682</b>                          | <b>237,771</b>  | <b>6,090</b> | <b>1,628</b> | <b>0</b> | <b>245,489</b>                        | <b>2,321</b> | <b>243,168</b>                            |
| Financial institutions and other financial services                                                               | 31,031           | 0              | 0            | 0            | 31,031                                | 95            | 30,936                                    | 66,978          | 0            | 0            | 0        | 66,978                                | 129          | 66,849                                    |
| Manufacturing                                                                                                     | 263,952          | 22,542         | 2,975        | 0            | 289,469                               | 4,482         | 284,987                                   | 2,372           | 0            | 0            | 0        | 2,372                                 | 11           | 2,361                                     |
| Construction                                                                                                      | 249,073          | 9,365          | 0            | 0            | 258,438                               | 2,587         | 255,851                                   | 0               | 0            | 0            | 0        | 0                                     | 0            | 0                                         |
| Wholesale and retail trade                                                                                        | 319,136          | 32,990         | 2,529        | 3,224        | 357,879                               | 5,355         | 352,524                                   | 4,458           | 0            | 0            | 0        | 4,458                                 | 9            | 4,449                                     |
| Accommodation and food service activities                                                                         | 174,290          | 18,762         | 592          | 2,714        | 196,358                               | 2,628         | 193,730                                   | 0               | 0            | 0            | 0        | 0                                     | 0            | 0                                         |
| Information and communication                                                                                     | 95,302           | 4,697          | 79           | 0            | 100,078                               | 1,544         | 98,534                                    | 3,893           | 0            | 0            | 0        | 3,893                                 | 1            | 3,892                                     |
| Energy                                                                                                            | 312,345          | 10,473         | 269          | 0            | 323,087                               | 2,557         | 320,530                                   | 277             | 0            | 0            | 0        | 277                                   | 1            | 276                                       |
| Real estate activities                                                                                            | 285,791          | 5,453          | 0            | 0            | 291,244                               | 1,322         | 289,922                                   | 17,497          | 0            | 0            | 0        | 17,497                                | 52           | 17,445                                    |
| Services and other industries                                                                                     | 191,400          | 14,222         | 1,246        | 0            | 206,868                               | 2,200         | 204,668                                   | 142,296         | 6,090        | 1,628        | 0        | 150,014                               | 2,118        | 147,896                                   |
| <b><u>Public sector</u></b>                                                                                       | <b>27,616</b>    | <b>0</b>       | <b>0</b>     | <b>0</b>     | <b>27,616</b>                         | <b>84</b>     | <b>27,532</b>                             | <b>0</b>        | <b>0</b>     | <b>0</b>     | <b>0</b> | <b>0</b>                              | <b>0</b>     | <b>0</b>                                  |
| <b>Total</b>                                                                                                      | <b>2,067,924</b> | <b>118,523</b> | <b>9,500</b> | <b>5,938</b> | <b>2,201,885</b>                      | <b>25,249</b> | <b>2,176,636</b>                          | <b>248,906</b>  | <b>6,090</b> | <b>1,628</b> | <b>0</b> | <b>256,624</b>                        | <b>2,346</b> | <b>254,278</b>                            |

**Bank**

| Loans and advances to customers and impairment provisions per IFRS 9 Stage (per industry and geographical region) |                  |                |               |              |                                       |               |                                           |                 |              |              |          |                                       |              |                                           |
|-------------------------------------------------------------------------------------------------------------------|------------------|----------------|---------------|--------------|---------------------------------------|---------------|-------------------------------------------|-----------------|--------------|--------------|----------|---------------------------------------|--------------|-------------------------------------------|
| Amounts in Eur ' 000<br><br>31/12/2024                                                                            | Greece           |                |               |              |                                       |               |                                           | Other countries |              |              |          |                                       |              |                                           |
|                                                                                                                   | Stage 1          | Stage 2        | Stage 3       | POCI         | Gross loans and advances to customers | Impairments   | Loans and advances to customers net value | Stage 1         | Stage 2      | Stage 3      | POCI     | Gross loans and advances to customers | Impairments  | Loans and advances to customers net value |
| <b><u>Individuals</u></b>                                                                                         | <b>156,045</b>   | <b>28</b>      | <b>19</b>     | <b>0</b>     | <b>156,092</b>                        | <b>498</b>    | <b>155,594</b>                            | <b>11,561</b>   | <b>1</b>     | <b>0</b>     | <b>0</b> | <b>11,562</b>                         | <b>22</b>    | <b>11,540</b>                             |
| Consumer, personal & other                                                                                        | 34,550           | 28             | 19            | 0            | 34,597                                | 147           | 34,450                                    | 415             | 1            | 0            | 0        | 416                                   | 2            | 414                                       |
| Mortgages                                                                                                         | 121,495          | 0              | 0             | 0            | 121,495                               | 351           | 121,144                                   | 11,146          | 0            | 0            | 0        | 11,146                                | 20           | 11,126                                    |
| <b><u>Corporate</u></b>                                                                                           | <b>2,832,337</b> | <b>216,416</b> | <b>29,254</b> | <b>7,132</b> | <b>3,085,139</b>                      | <b>41,080</b> | <b>3,044,059</b>                          | <b>356,761</b>  | <b>2,364</b> | <b>1,716</b> | <b>0</b> | <b>360,841</b>                        | <b>2,676</b> | <b>358,165</b>                            |
| Financial institutions and other financial services                                                               | 278,618          | 0              | 0             | 0            | 278,618                               | 529           | 278,089                                   | 36,956          | 0            | 0            | 0        | 36,956                                | 69           | 36,887                                    |
| Manufacturing                                                                                                     | 302,557          | 32,436         | 3,054         | 0            | 338,047                               | 6,487         | 331,560                                   | 0               | 0            | 0            | 0        | 0                                     | 0            | 0                                         |
| Construction                                                                                                      | 246,691          | 21,974         | 4,529         | 0            | 273,194                               | 5,277         | 267,917                                   | 1,340           | 0            | 0            | 0        | 1,340                                 | 5            | 1,335                                     |
| Wholesale and retail trade                                                                                        | 352,640          | 44,635         | 1,745         | 3,646        | 402,666                               | 5,993         | 396,673                                   | 7,223           | 0            | 0            | 0        | 7,223                                 | 37           | 7,186                                     |
| Accommodation and food service activities                                                                         | 295,565          | 27,730         | 2,451         | 2,600        | 328,346                               | 3,306         | 325,040                                   | 0               | 0            | 0            | 0        | 0                                     | 0            | 0                                         |
| Information and communication                                                                                     | 98,244           | 35,442         | 81            | 0            | 133,767                               | 4,006         | 129,761                                   | 0               | 0            | 0            | 0        | 0                                     | 0            | 0                                         |
| Energy                                                                                                            | 500,862          | 6,246          | 7,148         | 0            | 514,256                               | 3,347         | 510,909                                   | 248             | 0            | 0            | 0        | 248                                   | 0            | 248                                       |
| Real estate activities                                                                                            | 339,875          | 22,193         | 1,477         | 0            | 363,545                               | 3,672         | 359,873                                   | 22,303          | 0            | 0            | 0        | 22,303                                | 25           | 22,278                                    |
| Services and other industries                                                                                     | 417,285          | 25,760         | 8,769         | 886          | 452,700                               | 8,463         | 444,237                                   | 288,691         | 2,364        | 1,716        | 0        | 292,771                               | 2,540        | 290,231                                   |
| <b><u>Public sector</u></b>                                                                                       | <b>27,351</b>    | <b>0</b>       | <b>0</b>      | <b>0</b>     | <b>27,351</b>                         | <b>109</b>    | <b>27,242</b>                             | <b>0</b>        | <b>0</b>     | <b>0</b>     | <b>0</b> | <b>0</b>                              | <b>0</b>     | <b>0</b>                                  |
| <b>Total</b>                                                                                                      | <b>3,015,733</b> | <b>216,444</b> | <b>29,273</b> | <b>7,132</b> | <b>3,268,582</b>                      | <b>41,687</b> | <b>3,226,895</b>                          | <b>368,322</b>  | <b>2,365</b> | <b>1,716</b> | <b>0</b> | <b>372,403</b>                        | <b>2,698</b> | <b>369,705</b>                            |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage (per industry and geographical region) |                  |                |              |              |                                       |               |                                           |                 |              |              |          |                                       |              |                                           |
|-------------------------------------------------------------------------------------------------------------------|------------------|----------------|--------------|--------------|---------------------------------------|---------------|-------------------------------------------|-----------------|--------------|--------------|----------|---------------------------------------|--------------|-------------------------------------------|
| Amounts in Eur '000                                                                                               | Greece           |                |              |              |                                       |               |                                           | Other countries |              |              |          |                                       |              |                                           |
|                                                                                                                   | Stage 1          | Stage 2        | Stage 3      | POCI         | Gross loans and advances to customers | Impairments   | Loans and advances to customers net value | Stage 1         | Stage 2      | Stage 3      | POCI     | Gross loans and advances to customers | Impairments  | Loans and advances to customers net value |
| <b>31/12/2023</b>                                                                                                 |                  |                |              |              |                                       |               |                                           |                 |              |              |          |                                       |              |                                           |
| <b>Individuals</b>                                                                                                | <b>117,988</b>   | <b>19</b>      | <b>1,810</b> | <b>0</b>     | <b>119,817</b>                        | <b>2,395</b>  | <b>117,422</b>                            | <b>11,135</b>   | <b>0</b>     | <b>0</b>     | <b>0</b> | <b>11,135</b>                         | <b>25</b>    | <b>11,110</b>                             |
| Consumer, personal & other                                                                                        | 27,649           | 19             | 1,801        | 0            | 29,469                                | 2,048         | 27,421                                    | 3,284           | 0            | 0            | 0        | 3,284                                 | 6            | 3,278                                     |
| Mortgages                                                                                                         | 90,339           | 0              | 9            | 0            | 90,348                                | 347           | 90,001                                    | 7,851           | 0            | 0            | 0        | 7,851                                 | 19           | 7,832                                     |
| <b>Corporate</b>                                                                                                  | <b>1,913,954</b> | <b>118,504</b> | <b>7,690</b> | <b>5,938</b> | <b>2,046,086</b>                      | <b>22,636</b> | <b>2,023,450</b>                          | <b>231,162</b>  | <b>6,090</b> | <b>1,628</b> | <b>0</b> | <b>238,880</b>                        | <b>2,320</b> | <b>236,560</b>                            |
| Financial institutions and other financial services                                                               | 134,890          | 0              | 0            | 0            | 134,890                               | 548           | 134,342                                   | 66,979          | 0            | 0            | 0        | 66,979                                | 129          | 66,850                                    |
| Manufacturing                                                                                                     | 244,272          | 22,542         | 2,973        | 0            | 269,787                               | 4,475         | 265,312                                   | 2,372           | 0            | 0            | 0        | 2,372                                 | 11           | 2,361                                     |
| Construction                                                                                                      | 229,598          | 9,365          | 0            | 0            | 238,963                               | 2,272         | 236,691                                   | 0               | 0            | 0            | 0        | 0                                     | 0            | 0                                         |
| Wholesale and retail trade                                                                                        | 297,336          | 32,990         | 2,529        | 3,225        | 336,080                               | 5,346         | 330,734                                   | 2,032           | 0            | 0            | 0        | 2,032                                 | 8            | 2,024                                     |
| Accommodation and food service activities                                                                         | 174,290          | 18,762         | 592          | 2,713        | 196,357                               | 2,628         | 193,729                                   | 0               | 0            | 0            | 0        | 0                                     | 0            | 0                                         |
| Information and communication                                                                                     | 69,067           | 4,697          | 79           | 0            | 73,843                                | 1,444         | 72,399                                    | 0               | 0            | 0            | 0        | 0                                     | 0            | 0                                         |
| Energy                                                                                                            | 312,345          | 10,473         | 269          | 0            | 323,087                               | 2,557         | 320,530                                   | 277             | 0            | 0            | 0        | 277                                   | 1            | 276                                       |
| Real estate activities                                                                                            | 285,791          | 5,453          | 0            | 0            | 291,244                               | 1,322         | 289,922                                   | 17,497          | 0            | 0            | 0        | 17,497                                | 52           | 17,445                                    |
| Services and other industries                                                                                     | 166,365          | 14,222         | 1,248        | 0            | 181,835                               | 2,044         | 179,791                                   | 142,005         | 6,090        | 1,628        | 0        | 149,723                               | 2,119        | 147,604                                   |
| <b>Public sector</b>                                                                                              | <b>27,614</b>    | <b>0</b>       | <b>0</b>     | <b>0</b>     | <b>27,614</b>                         | <b>84</b>     | <b>27,530</b>                             | <b>0</b>        | <b>0</b>     | <b>0</b>     | <b>0</b> | <b>0</b>                              | <b>0</b>     | <b>0</b>                                  |
| <b>Total</b>                                                                                                      | <b>2,059,556</b> | <b>118,523</b> | <b>9,500</b> | <b>5,938</b> | <b>2,193,517</b>                      | <b>25,115</b> | <b>2,168,402</b>                          | <b>242,297</b>  | <b>6,090</b> | <b>1,628</b> | <b>0</b> | <b>250,015</b>                        | <b>2,345</b> | <b>247,670</b>                            |

**Group**

| Movement in ECL allowance of loans and advances to customers measured at amortised cost |              |          |                |          |                |               |              |               |            |               |               |              |               |            |               |
|-----------------------------------------------------------------------------------------|--------------|----------|----------------|----------|----------------|---------------|--------------|---------------|------------|---------------|---------------|--------------|---------------|------------|---------------|
| 31/12/2024                                                                              |              |          |                |          |                |               |              |               |            |               |               |              |               |            |               |
| Amounts in Eur ' 000                                                                    | Individuals  |          |                |          |                | Corporate     |              |               |            |               | Total         |              |               |            |               |
|                                                                                         | Stage 1      | Stage 2  | Stage 3        | POCI     | Total          | Stage 1       | Stage 2      | Stage 3       | POCI       | Total         | Stage 1       | Stage 2      | Stage 3       | POCI       | Total         |
| <b>ECL allowance as at 1/1/2024</b>                                                     | <b>602</b>   | <b>9</b> | <b>1,809</b>   | <b>0</b> | <b>2,420</b>   | <b>13,114</b> | <b>4,494</b> | <b>7,545</b>  | <b>22</b>  | <b>25,175</b> | <b>13,716</b> | <b>4,503</b> | <b>9,354</b>  | <b>22</b>  | <b>27,595</b> |
| Transferred from Stage 1 to Stage 2 or Stage 3                                          | 0            | 0        | 0              | 0        | 0              | (1,621)       | 1,495        | 126           | 0          | 0             | (1,621)       | 1,495        | 126           | 0          | 0             |
| Transferred from Stage 2 to Stage 1 or Stage 3                                          | 5            | (11)     | 6              | 0        | 0              | 1,481         | (1,673)      | 192           | 0          | 0             | 1,486         | (1,684)      | 198           | 0          | 0             |
| Transferred from Stage 3 & POCI to Stage 1 or Stage 2                                   | 8            | 2        | (10)           | 0        | 0              | 1,824         | 2,390        | (4,214)       | 0          | 0             | 1,832         | 2,392        | (4,224)       | 0          | 0             |
| <b>Allowances:</b>                                                                      | <b>(117)</b> | <b>3</b> | <b>(1,739)</b> | <b>0</b> | <b>(1,853)</b> | <b>6,615</b>  | <b>955</b>   | <b>11,281</b> | <b>355</b> | <b>19,206</b> | <b>6,498</b>  | <b>958</b>   | <b>9,542</b>  | <b>355</b> | <b>17,353</b> |
| ECL impairment charge/(release) for the year (P&L)                                      | (717)        | 3        | (1,739)        | 0        | (2,453)        | (12,458)      | 886          | 11,281        | 51         | (240)         | (13,175)      | 889          | 9,542         | 51         | (2,693)       |
| ECL impairment charge for new financial assets originated or purchased (P&L)            | 600          | 0        | 0              | 0        | 600            | 19,073        | 69           | 0             | 304        | 19,446        | 19,673        | 69           | 0             | 304        | 20,046        |
| Write-offs                                                                              | 0            | 0        | (47)           | 0        | (47)           | 0             | 0            | 0             | 0          | 0             | 0             | 0            | (47)          | 0          | (47)          |
| <b>ECL allowance as at 31/12/24</b>                                                     | <b>498</b>   | <b>3</b> | <b>19</b>      | <b>0</b> | <b>520</b>     | <b>21,413</b> | <b>7,661</b> | <b>14,930</b> | <b>377</b> | <b>44,381</b> | <b>21,911</b> | <b>7,664</b> | <b>14,949</b> | <b>377</b> | <b>44,901</b> |

| Movement in ECL allowance of loans and advances to customers measured at amortised cost |              |             |              |          |              |               |              |              |             |               |               |              |              |             |               |
|-----------------------------------------------------------------------------------------|--------------|-------------|--------------|----------|--------------|---------------|--------------|--------------|-------------|---------------|---------------|--------------|--------------|-------------|---------------|
| 31/12/2023                                                                              |              |             |              |          |              |               |              |              |             |               |               |              |              |             |               |
| Amounts in Eur ' 000                                                                    | Individuals  |             |              |          |              | Corporate     |              |              |             |               | Total         |              |              |             |               |
|                                                                                         | Stage 1      | Stage 2     | Stage 3      | POCI     | Total        | Stage 1       | Stage 2      | Stage 3      | POCI        | Total         | Stage 1       | Stage 2      | Stage 3      | POCI        | Total         |
| <b>ECL allowance as at 1/1/2023</b>                                                     | <b>750</b>   | <b>3</b>    | <b>305</b>   | <b>0</b> | <b>1,058</b> | <b>11,924</b> | <b>2,719</b> | <b>3,205</b> | <b>0</b>    | <b>17,848</b> | <b>12,674</b> | <b>2,722</b> | <b>3,510</b> | <b>0</b>    | <b>18,907</b> |
| Transferred from Stage 1 to Stage 2 or Stage 3                                          | (2)          | 2           | 0            | 0        | 0            | (1,185)       | 1,107        | 7            | 71          | 0             | (1,187)       | 1,109        | 7            | 71          | 0             |
| Transferred from Stage 2 to Stage 1 or Stage 3                                          | 3            | (4)         | 1            | 0        | 0            | 1,204         | (1,460)      | 256          | 0           | 0             | 1,207         | (1,464)      | 257          | 0           | 0             |
| Transferred from Stage 3 & POCI to Stage 1 or Stage 2                                   | 0            | 36          | (36)         | 0        | 0            | 2             | 131          | (133)        | 0           | 0             | 2             | 167          | (169)        | 0           | 0             |
| <b>Allowances:</b>                                                                      | <b>(149)</b> | <b>(28)</b> | <b>1,725</b> | <b>0</b> | <b>1,548</b> | <b>1,169</b>  | <b>1,997</b> | <b>4,780</b> | <b>(49)</b> | <b>7,897</b>  | <b>1,020</b>  | <b>1,969</b> | <b>6,505</b> | <b>(49)</b> | <b>9,444</b>  |
| ECL impairment charge/(release) for the year (P&L)                                      | (656)        | (28)        | 1,725        | 0        | 1,041        | (11,685)      | 765          | 4,780        | (49)        | (6,189)       | (12,341)      | 737          | 6,505        | (49)        | (5,148)       |
| ECL impairment charge for new financial assets originated or purchased (P&L)            | 507          | 0           | 0            | 0        | 507          | 12,854        | 1,232        | 0            | 0           | 14,086        | 13,361        | 1,232        | 0            | 0           | 14,593        |
| Write-offs                                                                              | 0            | 0           | (186)        | 0        | (186)        | 0             | 0            | (570)        | 0           | (570)         | 0             | 0            | (756)        | 0           | (756)         |
| <b>ECL allowance as at 31/12/23</b>                                                     | <b>602</b>   | <b>9</b>    | <b>1,809</b> | <b>0</b> | <b>2,420</b> | <b>13,114</b> | <b>4,494</b> | <b>7,545</b> | <b>22</b>   | <b>25,175</b> | <b>13,716</b> | <b>4,503</b> | <b>9,354</b> | <b>22</b>   | <b>27,595</b> |

**Bank**

| Movement in ECL allowance of loans and advances to customers measured at amortised cost |              |          |                |          |                |               |              |               |            |               |               |              |               |            |               |
|-----------------------------------------------------------------------------------------|--------------|----------|----------------|----------|----------------|---------------|--------------|---------------|------------|---------------|---------------|--------------|---------------|------------|---------------|
| 31/12/2024                                                                              |              |          |                |          |                |               |              |               |            |               |               |              |               |            |               |
| Amounts in Eur '000                                                                     | Individuals  |          |                |          |                | Corporate     |              |               |            |               | Total         |              |               |            |               |
|                                                                                         | Stage 1      | Stage 2  | Stage 3        | POCI     | Total          | Stage 1       | Stage 2      | Stage 3       | POCI       | Total         | Stage 1       | Stage 2      | Stage 3       | POCI       | Total         |
| <b>ECL allowance as at 1/1/2024</b>                                                     | <b>602</b>   | <b>9</b> | <b>1,809</b>   | <b>0</b> | <b>2,420</b>   | <b>12,979</b> | <b>4,494</b> | <b>7,545</b>  | <b>22</b>  | <b>25,040</b> | <b>13,581</b> | <b>4,503</b> | <b>9,354</b>  | <b>22</b>  | <b>27,460</b> |
| Transferred from Stage 1 to Stage 2 or Stage 3                                          | 0            | 0        | 0              | 0        | 0              | (1,598)       | 1,472        | 126           | 0          | 0             | (1,598)       | 1,472        | 126           | 0          | 0             |
| Transferred from Stage 2 to Stage 1 or Stage 3                                          | 5            | (11)     | 6              | 0        | 0              | 1,481         | (1,674)      | 193           | 0          | 0             | 1,486         | (1,685)      | 199           | 0          | 0             |
| Transferred from Stage 3 & POCI to Stage 1 or Stage 2                                   | 8            | 2        | (10)           | 0        | 0              | 1,824         | 2,390        | (4,214)       | 0          | 0             | 1,832         | 2,392        | (4,224)       | 0          | 0             |
| <b>Allowances:</b>                                                                      | <b>(117)</b> | <b>3</b> | <b>(1,739)</b> | <b>0</b> | <b>(1,853)</b> | <b>6,422</b>  | <b>944</b>   | <b>11,104</b> | <b>355</b> | <b>18,825</b> | <b>6,305</b>  | <b>947</b>   | <b>9,365</b>  | <b>355</b> | <b>16,972</b> |
| ECL impairment charge/(release) for the year (P&L)                                      | (717)        | 3        | (1,739)        | 0        | (2,453)        | (12,606)      | 878          | 11,104        | 51         | (573)         | (13,323)      | 881          | 9,365         | 51         | (3,026)       |
| ECL impairment charge for new financial assets originated or purchased (P&L)            | 600          | 0        | 0              | 0        | 600            | 19,028        | 66           | 0             | 304        | 19,398        | 19,628        | 66           | 0             | 304        | 19,998        |
| Write-offs                                                                              | 0            | 0        | (47)           | 0        | (47)           | 0             | 0            | 0             | 0          | 0             | 0             | 0            | (47)          | 0          | (47)          |
| <b>ECL allowance as at 31/12/24</b>                                                     | <b>498</b>   | <b>3</b> | <b>19</b>      | <b>0</b> | <b>520</b>     | <b>21,108</b> | <b>7,626</b> | <b>14,754</b> | <b>377</b> | <b>43,865</b> | <b>21,606</b> | <b>7,629</b> | <b>14,773</b> | <b>377</b> | <b>44,385</b> |

| Movement in ECL allowance of loans and advances to customers measured at amortised cost |              |             |              |          |              |               |              |              |             |               |               |              |              |             |               |
|-----------------------------------------------------------------------------------------|--------------|-------------|--------------|----------|--------------|---------------|--------------|--------------|-------------|---------------|---------------|--------------|--------------|-------------|---------------|
| 31/12/2023                                                                              |              |             |              |          |              |               |              |              |             |               |               |              |              |             |               |
| Amounts in Eur '000                                                                     | Individuals  |             |              |          |              | Corporate     |              |              |             |               | Total         |              |              |             |               |
|                                                                                         | Stage 1      | Stage 2     | Stage 3      | POCI     | Total        | Stage 1       | Stage 2      | Stage 3      | POCI        | Total         | Stage 1       | Stage 2      | Stage 3      | POCI        | Total         |
| <b>ECL allowance as at 1/1/2023</b>                                                     | <b>750</b>   | <b>3</b>    | <b>305</b>   | <b>0</b> | <b>1,058</b> | <b>11,992</b> | <b>2,719</b> | <b>3,205</b> | <b>0</b>    | <b>17,916</b> | <b>12,742</b> | <b>2,722</b> | <b>3,510</b> | <b>0</b>    | <b>18,974</b> |
| Transferred from Stage 1 to Stage 2 or Stage 3                                          | (2)          | 2           | 0            | 0        | 0            | (1,186)       | 1,108        | 7            | 71          | 0             | (1,188)       | 1,110        | 7            | 71          | 0             |
| Transferred from Stage 2 to Stage 1 or Stage 3                                          | 3            | (4)         | 1            | 0        | 0            | 1,204         | (1,460)      | 256          | 0           | 0             | 1,207         | (1,464)      | 257          | 0           | 0             |
| Transferred from Stage 3 & POCI to Stage 1 or Stage 2                                   | 0            | 36          | (36)         | 0        | 0            | 2             | 131          | (133)        | 0           | 0             | 2             | 167          | (169)        | 0           | 0             |
| <b>Allowances:</b>                                                                      | <b>(149)</b> | <b>(28)</b> | <b>1,725</b> | <b>0</b> | <b>1,548</b> | <b>967</b>    | <b>1,996</b> | <b>4,780</b> | <b>(49)</b> | <b>7,694</b>  | <b>818</b>    | <b>1,968</b> | <b>6,505</b> | <b>(49)</b> | <b>9,242</b>  |
| ECL impairment charge/(release) for the year (P&L)                                      | (656)        | (28)        | 1,725        | 0        | 1,041        | (11,380)      | 765          | 4,780        | (49)        | (5,884)       | (12,036)      | 737          | 6,505        | (49)        | (4,843)       |
| ECL impairment charge for new financial assets originated or purchased (P&L)            | 507          | 0           | 0            | 0        | 507          | 12,347        | 1,231        | 0            | 0           | 13,578        | 12,854        | 1,231        | 0            | 0           | 14,085        |
| Write-offs                                                                              | 0            | 0           | (186)        | 0        | (186)        | 0             | 0            | (570)        | 0           | (570)         | 0             | 0            | (756)        | 0           | (756)         |
| <b>ECL allowance as at 31/12/23</b>                                                     | <b>602</b>   | <b>9</b>    | <b>1,809</b> | <b>0</b> | <b>2,420</b> | <b>12,979</b> | <b>4,494</b> | <b>7,545</b> | <b>22</b>   | <b>25,040</b> | <b>13,581</b> | <b>4,503</b> | <b>9,354</b> | <b>22</b>   | <b>27,460</b> |

**Group**

| Movement in ECL allowance of commitments relevant to credit risk             |              |            |          |          |              |
|------------------------------------------------------------------------------|--------------|------------|----------|----------|--------------|
| 31/12/2024                                                                   |              |            |          |          |              |
| Amounts in Eur '000                                                          | Stage 1      | Stage 2    | Stage 3  | POCI     | Total        |
| <b>ECL allowance as at 1/1/2024</b>                                          | <b>1,753</b> | <b>25</b>  | <b>0</b> | <b>0</b> | <b>1,779</b> |
| Transferred from Stage 1 to Stage 2 or Stage 3                               | (192)        | 192        | 0        | 0        | 0            |
| Transferred from Stage 2 to Stage 1 or Stage 3                               | 15           | (15)       | 0        | 0        | 0            |
| Transferred from Stage 3 & POCI to Stage 1 or Stage 2                        | 0            | 0          | 0        | 0        | 0            |
| <b>Allowances</b>                                                            | <b>1,375</b> | <b>494</b> | <b>0</b> | <b>0</b> | <b>1,869</b> |
| ECL impairment charge/(release) for the year (P&L)                           | 643          | 494        | 0        | 0        | 1,137        |
| ECL impairment charge for new financial assets originated or purchased (P&L) | 732          | 0          | 0        | 0        | 732          |
| <b>ECL allowance as at 31/12/24</b>                                          | <b>2,951</b> | <b>696</b> | <b>0</b> | <b>0</b> | <b>3,648</b> |

| Movement in ECL allowance of commitments relevant to credit risk             |              |             |          |          |              |
|------------------------------------------------------------------------------|--------------|-------------|----------|----------|--------------|
| 31/12/2023                                                                   |              |             |          |          |              |
| Amounts in Eur '000                                                          | Stage 1      | Stage 2     | Stage 3  | POCI     | Total        |
| <b>ECL allowance as at 1/1/2023</b>                                          | <b>1,631</b> | <b>338</b>  | <b>0</b> | <b>0</b> | <b>1,969</b> |
| Transferred from Stage 1 to Stage 2 or Stage 3                               | (6)          | 6           | 0        | 0        | 0            |
| Transferred from Stage 2 to Stage 1 or Stage 3                               | 229          | (229)       | 0        | 0        | 0            |
| Transferred from Stage 3 & POCI to Stage 1 or Stage 2                        | 0            | 0           | 0        | 0        | 0            |
| <b>Allowances</b>                                                            | <b>(100)</b> | <b>(90)</b> | <b>0</b> | <b>0</b> | <b>(191)</b> |
| ECL impairment charge/(release) for the year (P&L)                           | (988)        | (89)        | 0        | 0        | (1,077)      |
| ECL impairment charge for new financial assets originated or purchased (P&L) | 887          | 0           | 0        | 0        | 887          |
| <b>ECL allowance as at 31/12/23</b>                                          | <b>1,753</b> | <b>25</b>   | <b>0</b> | <b>0</b> | <b>1,779</b> |

**Bank**

| Movement in ECL allowance of commitments relevant to credit risk             |              |            |          |          |              |
|------------------------------------------------------------------------------|--------------|------------|----------|----------|--------------|
| 31/12/2024                                                                   |              |            |          |          |              |
| Amounts in Eur '000                                                          | Stage 1      | Stage 2    | Stage 3  | POCI     | Total        |
| <b>ECL allowance as at 1/1/2024</b>                                          | <b>1,753</b> | <b>26</b>  | <b>0</b> | <b>0</b> | <b>1,779</b> |
| Transferred from Stage 1 to Stage 2 or Stage 3                               | (192)        | 192        | 0        | 0        | 0            |
| Transferred from Stage 2 to Stage 1 or Stage 3                               | 15           | (15)       | 0        | 0        | 0            |
| Transferred from Stage 3 & POCI to Stage 1 or Stage 2                        | 0            | 0          | 0        | 0        | 0            |
| <b>Allowances</b>                                                            | <b>1,375</b> | <b>494</b> | <b>0</b> | <b>0</b> | <b>1,869</b> |
| ECL impairment charge/(release) for the year (P&L)                           | 643          | 494        | 0        | 0        | 1,137        |
| ECL impairment charge for new financial assets originated or purchased (P&L) | 732          | 0          | 0        | 0        | 732          |
| <b>ECL allowance as at 31/12/24</b>                                          | <b>2,951</b> | <b>697</b> | <b>0</b> | <b>0</b> | <b>3,648</b> |

| Movement in ECL allowance of commitments relevant to credit risk             |              |             |          |          |              |
|------------------------------------------------------------------------------|--------------|-------------|----------|----------|--------------|
| 31/12/2023                                                                   |              |             |          |          |              |
| Amounts in Eur '000                                                          | Stage 1      | Stage 2     | Stage 3  | POCI     | Total        |
| <b>ECL allowance as at 1/1/2023</b>                                          | <b>1,631</b> | <b>338</b>  | <b>0</b> | <b>0</b> | <b>1,969</b> |
| Transferred from Stage 1 to Stage 2 or Stage 3                               | (6)          | 6           | 0        | 0        | 0            |
| Transferred from Stage 2 to Stage 1 or Stage 3                               | 229          | (229)       | 0        | 0        | 0            |
| Transferred from Stage 3 & POCI to Stage 1 or Stage 2                        | 0            | 0           | 0        | 0        | 0            |
| <b>Allowances</b>                                                            | <b>(101)</b> | <b>(89)</b> | <b>0</b> | <b>0</b> | <b>(191)</b> |
| ECL impairment charge/(release) for the year (P&L)                           | (988)        | (89)        | 0        | 0        | (1,077)      |
| ECL impairment charge for new financial assets originated or purchased (P&L) | 887          | 0           | 0        | 0        | 887          |
| <b>ECL allowance as at 31/12/23</b>                                          | <b>1,753</b> | <b>26</b>   | <b>0</b> | <b>0</b> | <b>1,779</b> |

**Group**

| Credit quality of Loans and advances to customers and value of collaterals |                       |          |          |                             |          |          |                |                |          |          |          |               |               |          |          |              |                      |
|----------------------------------------------------------------------------|-----------------------|----------|----------|-----------------------------|----------|----------|----------------|----------------|----------|----------|----------|---------------|---------------|----------|----------|--------------|----------------------|
| Amounts in Eur '000<br><br>31/12/2024                                      | Strong credit quality |          |          | Satisfactory credit quality |          |          | Watch list     |                |          | Default  |          |               | Not rated     |          |          |              | Value of collaterals |
|                                                                            | Stage 1               | Stage 2  | Stage 3  | Stage 1                     | Stage 2  | Stage 3  | Stage 1        | Stage 2        | Stage 3  | Stage 1  | Stage 2  | Stage 3       | Stage 1       | Stage 2  | Stage 3  | POCI         |                      |
| <b><u>Individuals</u></b>                                                  |                       |          |          |                             |          |          |                |                |          |          |          |               |               |          |          |              |                      |
| Consumer, personal & other                                                 | 8,344                 | 0        | 0        | 27                          | 0        | 0        | 134            | 29             | 0        | 0        | 0        | 19            | 26,460        | 0        | 0        | 0            | 98,783               |
| Mortgages                                                                  | 0                     | 0        | 0        | 132,641                     | 0        | 0        | 0              | 0              | 0        | 0        | 0        | 0             | 0             | 0        | 0        | 0            | 172,918              |
| <b><u>Corporate</u></b>                                                    |                       |          |          |                             |          |          |                |                |          |          |          |               |               |          |          |              |                      |
| Large Corporate                                                            | 1,054,455             | 0        | 0        | 515,020                     | 0        | 0        | 37,221         | 99,297         | 0        | 0        | 0        | 11,720        | 0             | 0        | 0        | 0            | 1,173,174            |
| SMEs                                                                       | 670,629               | 0        | 0        | 868,677                     | 0        | 0        | 63,069         | 132,238        | 0        | 0        | 0        | 19,426        | 10,961        | 0        | 0        | 7,132        | 1,659,310            |
| <b>Total</b>                                                               | <b>1,733,428</b>      | <b>0</b> | <b>0</b> | <b>1,516,365</b>            | <b>0</b> | <b>0</b> | <b>100,424</b> | <b>231,564</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>31,165</b> | <b>37,421</b> | <b>0</b> | <b>0</b> | <b>7,132</b> | <b>3,104,185</b>     |

| Credit quality of Loans and advances to customers and value of collaterals |                       |            |            |                             |            |            |                |                |            |            |            |               |               |            |            |              |                         |
|----------------------------------------------------------------------------|-----------------------|------------|------------|-----------------------------|------------|------------|----------------|----------------|------------|------------|------------|---------------|---------------|------------|------------|--------------|-------------------------|
| Amounts in Eur '000<br><br>31/12/2023                                      | Strong credit quality |            |            | Satisfactory credit quality |            |            | Watch list     |                |            | Default    |            |               | Not rated     |            |            |              | Value of<br>collaterals |
|                                                                            | Stage<br>1            | Stage<br>2 | Stage<br>3 | Stage<br>1                  | Stage<br>2 | Stage<br>3 | Stage<br>1     | Stage<br>2     | Stage<br>3 | Stage<br>1 | Stage<br>2 | Stage<br>3    | Stage<br>1    | Stage<br>2 | Stage<br>3 | POCI         |                         |
| <b>Individuals</b>                                                         |                       |            |            |                             |            |            |                |                |            |            |            |               |               |            |            |              |                         |
| Consumer, personal<br>& other                                              | 5,231                 | 0          | 0          | 981                         | 0          | 0          | 480            | 19             | 0          | 0          | 0          | 1,801         | 24,241        | 0          | 0          | 0            | 105,750                 |
| Mortgages                                                                  | 27,352                | 0          | 0          | 70,838                      | 0          | 0          | 0              | 0              | 0          | 0          | 0          | 9             | 0             | 0          | 0          | 0            | 122,231                 |
| <b>Corporate</b>                                                           |                       |            |            |                             |            |            |                |                |            |            |            |               |               |            |            |              |                         |
| Large Corporate                                                            | 578,286               | 0          | 0          | 362,745                     | 0          | 0          | 71,663         | 40,182         | 0          | 0          | 0          | 1,980         | 0             | 0          | 0          | 0            | 871,094                 |
| SMEs                                                                       | 445,349               | 0          | 0          | 694,237                     | 0          | 0          | 29,777         | 84,412         | 0          | 0          | 0          | 7,338         | 5,650         | 0          | 0          | 5,938        | 1,143,736               |
| <b>Total</b>                                                               | <b>1,056,218</b>      | <b>0</b>   | <b>0</b>   | <b>1,128,801</b>            | <b>0</b>   | <b>0</b>   | <b>101,920</b> | <b>124,613</b> | <b>0</b>   | <b>0</b>   | <b>0</b>   | <b>11,128</b> | <b>29,891</b> | <b>0</b>   | <b>0</b>   | <b>5,938</b> | <b>2,242,811</b>        |



**Bank**

| Credit quality of Loans and advances to customers and value of collaterals |                       |          |          |                             |          |          |               |                |          |          |          |               |               |          |          |              |                      |
|----------------------------------------------------------------------------|-----------------------|----------|----------|-----------------------------|----------|----------|---------------|----------------|----------|----------|----------|---------------|---------------|----------|----------|--------------|----------------------|
| Amounts in Eur '000<br>31/12/2024                                          | Strong credit quality |          |          | Satisfactory credit quality |          |          | Watch list    |                |          | Default  |          |               | Not rated     |          |          |              | Value of collaterals |
|                                                                            | Stage 1               | Stage 2  | Stage 3  | Stage 1                     | Stage 2  | Stage 3  | Stage 1       | Stage 2        | Stage 3  | Stage 1  | Stage 2  | Stage 3       | Stage 1       | Stage 2  | Stage 3  | POCI         |                      |
| <b>Individuals</b>                                                         |                       |          |          |                             |          |          |               |                |          |          |          |               |               |          |          |              |                      |
| Consumer, personal & other                                                 | 8,344                 | 0        | 0        | 27                          | 0        | 0        | 134           | 29             | 0        | 0        | 0        | 19            | 26,460        | 0        | 0        | 0            | 98,783               |
| Mortgages                                                                  | 0                     | 0        | 0        | 132,641                     | 0        | 0        | 0             | 0              | 0        | 0        | 0        | 0             | 0             | 0        | 0        | 0            | 172,918              |
| <b>Corporate</b>                                                           |                       |          |          |                             |          |          |               |                |          |          |          |               |               |          |          |              |                      |
| Large Corporate                                                            | 1,170,292             | 0        | 0        | 482,778                     | 0        | 0        | 32,106        | 92,428         | 0        | 0        | 0        | 11,720        | 0             | 0        | 0        | 0            | 1,073,554            |
| SMEs                                                                       | 642,996               | 0        | 0        | 827,337                     | 0        | 0        | 49,979        | 126,352        | 0        | 0        | 0        | 19,250        | 10,961        | 0        | 0        | 7,132        | 1,532,019            |
| <b>Total</b>                                                               | <b>1,821,632</b>      | <b>0</b> | <b>0</b> | <b>1,442,783</b>            | <b>0</b> | <b>0</b> | <b>82,219</b> | <b>218,809</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>30,989</b> | <b>37,421</b> | <b>0</b> | <b>0</b> | <b>7,132</b> | <b>2,877,274</b>     |

| Credit quality of Loans and advances to customers and value of collaterals |                       |          |          |                             |          |          |               |                |          |          |          |               |               |          |          |              |                      |
|----------------------------------------------------------------------------|-----------------------|----------|----------|-----------------------------|----------|----------|---------------|----------------|----------|----------|----------|---------------|---------------|----------|----------|--------------|----------------------|
| Amounts in Eur '000<br>31/12/2023                                          | Strong credit quality |          |          | Satisfactory credit quality |          |          | Watch list    |                |          | Default  |          |               | Not rated     |          |          |              | Value of collaterals |
|                                                                            | Stage 1               | Stage 2  | Stage 3  | Stage 1                     | Stage 2  | Stage 3  | Stage 1       | Stage 2        | Stage 3  | Stage 1  | Stage 2  | Stage 3       | Stage 1       | Stage 2  | Stage 3  | POCI         |                      |
| <b>Individuals</b>                                                         |                       |          |          |                             |          |          |               |                |          |          |          |               |               |          |          |              |                      |
| Consumer, personal & other                                                 | 5,231                 | 0        | 0        | 981                         | 0        | 0        | 480           | 19             | 0        | 0        | 0        | 1,801         | 24,241        | 0        | 0        | 0            | 105,750              |
| Mortgages                                                                  | 27,353                | 0        | 0        | 70,837                      | 0        | 0        | 0             | 0              | 0        | 0        | 0        | 9             | 0             | 0        | 0        | 0            | 122,231              |
| <b>Corporate</b>                                                           |                       |          |          |                             |          |          |               |                |          |          |          |               |               |          |          |              |                      |
| Large Corporate                                                            | 665,714               | 0        | 0        | 336,942                     | 0        | 0        | 71,662        | 40,182         | 0        | 0        | 0        | 1,980         | 0             | 0        | 0        | 0            | 786,563              |
| SMEs                                                                       | 423,903               | 0        | 0        | 648,248                     | 0        | 0        | 20,611        | 84,412         | 0        | 0        | 0        | 7,338         | 5,650         | 0        | 0        | 5,938        | 1,041,769            |
| <b>Total</b>                                                               | <b>1,122,201</b>      | <b>0</b> | <b>0</b> | <b>1,057,008</b>            | <b>0</b> | <b>0</b> | <b>92,753</b> | <b>124,613</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>11,128</b> | <b>29,891</b> | <b>0</b> | <b>0</b> | <b>5,938</b> | <b>2,056,313</b>     |

**Group**

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Individuals |                  |           |           |          |                |          |          |          |
|------------------------------------------------------------------------------------------|------------------|-----------|-----------|----------|----------------|----------|----------|----------|
| Amounts in Eur ' 000                                                                     | Large corporates |           |           |          | SMEs           |          |          |          |
| 31/12/2024                                                                               | Stage 1          | Stage 2   | Stage 3   | POCI     | Stage 1        | Stage 2  | Stage 3  | POCI     |
| Performing                                                                               | 34,599           | 7         | 0         | 0        | 117,662        | 0        | 0        | 0        |
| From 1 to 30 days                                                                        | 366              | 10        | 1         | 0        | 14,979         | 0        | 0        | 0        |
| From 31 to 60 days                                                                       | 0                | 11        | 0         | 0        | 0              | 0        | 0        | 0        |
| From 61 to 90 days                                                                       | 0                | 1         | 0         | 0        | 0              | 0        | 0        | 0        |
| From 91 to 180 days                                                                      | 0                | 0         | 2         | 0        | 0              | 0        | 0        | 0        |
| From 181 to 365 days                                                                     | 0                | 0         | 8         | 0        | 0              | 0        | 0        | 0        |
| More than 365 days                                                                       | 0                | 0         | 0         | 0        | 0              | 0        | 0        | 0        |
| Denounced                                                                                | 0                | 0         | 8         | 0        | 0              | 0        | 0        | 0        |
| <b>Total</b>                                                                             | <b>34,965</b>    | <b>29</b> | <b>19</b> | <b>0</b> | <b>132,641</b> | <b>0</b> | <b>0</b> | <b>0</b> |
| Impairments                                                                              | 127              | 3         | 19        | 0        | 371            | 0        | 0        | 0        |
| <b>Net value</b>                                                                         | <b>34,838</b>    | <b>26</b> | <b>0</b>  | <b>0</b> | <b>132,270</b> | <b>0</b> | <b>0</b> | <b>0</b> |
| Collaterals                                                                              | 98,783           | 0         | 0         | 0        | 172,918        | 0        | 0        | 0        |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Corporate |                  |               |               |          |                  |                |               |              |
|----------------------------------------------------------------------------------------|------------------|---------------|---------------|----------|------------------|----------------|---------------|--------------|
| Amounts in Eur ' 000                                                                   | Large corporates |               |               |          | SMEs             |                |               |              |
| 31/12/2024                                                                             | Stage 1          | Stage 2       | Stage 3       | POCI     | Stage 1          | Stage 2        | Stage 3       | POCI         |
| Performing                                                                             | 1,466,481        | 88,026        | 1,469         | 0        | 1,518,348        | 116,945        | 2,289         | 7,030        |
| From 1 to 30 days                                                                      | 140,215          | 6,709         | 4,991         | 0        | 94,988           | 3,261          | 3,578         | 0            |
| From 31 to 60 days                                                                     | 0                | 4,562         | 0             | 0        | 0                | 11,961         | 1,547         | 102          |
| From 61 to 90 days                                                                     | 0                | 0             | 134           | 0        | 0                | 71             | 1,593         | 0            |
| From 91 to 180 days                                                                    | 0                | 0             | 1,414         | 0        | 0                | 0              | 6,570         | 0            |
| From 181 to 365 days                                                                   | 0                | 0             | 3,712         | 0        | 0                | 0              | 176           | 0            |
| More than 365 days                                                                     | 0                | 0             | 0             | 0        | 0                | 0              | 0             | 0            |
| Denounced                                                                              | 0                | 0             | 0             | 0        | 0                | 0              | 3,673         | 0            |
| <b>Total</b>                                                                           | <b>1,606,696</b> | <b>99,297</b> | <b>11,720</b> | <b>0</b> | <b>1,613,336</b> | <b>132,238</b> | <b>19,426</b> | <b>7,132</b> |
| Impairments                                                                            | 10,559           | 4,072         | 4,096         | 0        | 10,854           | 3,589          | 10,834        | 377          |
| <b>Net value</b>                                                                       | <b>1,596,137</b> | <b>95,225</b> | <b>7,624</b>  | <b>0</b> | <b>1,602,482</b> | <b>128,649</b> | <b>8,592</b>  | <b>6,755</b> |
| Collaterals                                                                            | 1,087,832        | 68,682        | 16,660        | 0        | 1,521,063        | 98,923         | 29,658        | 9,666        |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Individuals |                  |           |              |          |               |          |          |          |
|------------------------------------------------------------------------------------------|------------------|-----------|--------------|----------|---------------|----------|----------|----------|
| Amounts in Eur '000<br>31/12/2023                                                        | Large corporates |           |              |          | SMEs          |          |          |          |
|                                                                                          | Stage 1          | Stage 2   | Stage 3      | POCI     | Stage 1       | Stage 2  | Stage 3  | POCI     |
| Performing                                                                               | 30,745           | 9         | 0            | 0        | 89,104        | 0        | 9        | 0        |
| From 1 to 30 days                                                                        | 180              | 3         | 2            | 0        | 9,086         | 0        | 0        | 0        |
| From 31 to 60 days                                                                       | 0                | 6         | 0            | 0        | 0             | 0        | 0        | 0        |
| From 61 to 90 days                                                                       | 0                | 1         | 1            | 0        | 0             | 0        | 0        | 0        |
| From 91 to 180 days                                                                      | 0                | 0         | 1            | 0        | 0             | 0        | 0        | 0        |
| From 181 to 365 days                                                                     | 0                | 0         | 1,745        | 0        | 0             | 0        | 0        | 0        |
| More than 365 days                                                                       | 0                | 0         | 13           | 0        | 0             | 0        | 0        | 0        |
| Denounced                                                                                | 0                | 0         | 39           | 0        | 0             | 0        | 0        | 0        |
| <b>Total</b>                                                                             | <b>30,925</b>    | <b>19</b> | <b>1,801</b> | <b>0</b> | <b>98,190</b> | <b>0</b> | <b>9</b> | <b>0</b> |
| Impairments                                                                              | 244              | 9         | 1,801        | 0        | 358           | 0        | 8        | 0        |
| <b>Net value</b>                                                                         | <b>30,681</b>    | <b>10</b> | <b>0</b>     | <b>0</b> | <b>97,832</b> | <b>0</b> | <b>1</b> | <b>0</b> |
| Collaterals                                                                              | 105,750          | 0         | 0            | 0        | 122,231       | 0        | 0        | 0        |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Corporate |                  |               |              |          |                  |               |              |              |
|----------------------------------------------------------------------------------------|------------------|---------------|--------------|----------|------------------|---------------|--------------|--------------|
| Amounts in Eur '000<br>31/12/2023                                                      | Large corporates |               |              |          | SMEs             |               |              |              |
|                                                                                        | Stage 1          | Stage 2       | Stage 3      | POCI     | Stage 1          | Stage 2       | Stage 3      | POCI         |
| Performing                                                                             | 791,849          | 30,512        | 0            | 0        | 999,431          | 68,298        | 845          | 5,938        |
| From 1 to 30 days                                                                      | 220,845          | 9,670         | 1,980        | 0        | 175,582          | 15,057        | 140          | 0            |
| From 31 to 60 days                                                                     | 0                | 0             | 0            | 0        | 0                | 839           | 881          | 0            |
| From 61 to 90 days                                                                     | 0                | 0             | 0            | 0        | 0                | 218           | 155          | 0            |
| From 91 to 180 days                                                                    | 0                | 0             | 0            | 0        | 0                | 0             | 317          | 0            |
| From 181 to 365 days                                                                   | 0                | 0             | 0            | 0        | 0                | 0             | 1,628        | 0            |
| More than 365 days                                                                     | 0                | 0             | 0            | 0        | 0                | 0             | 0            | 0            |
| Denounced                                                                              | 0                | 0             | 0            | 0        | 0                | 0             | 3,372        | 0            |
| <b>Total</b>                                                                           | <b>1,012,694</b> | <b>40,182</b> | <b>1,980</b> | <b>0</b> | <b>1,175,013</b> | <b>84,412</b> | <b>7,338</b> | <b>5,938</b> |
| Impairments                                                                            | 6,866            | 506           | 1,980        | 0        | 6,248            | 3,988         | 5,565        | 22           |
| <b>Net value</b>                                                                       | <b>1,005,828</b> | <b>39,676</b> | <b>0</b>     | <b>0</b> | <b>1,168,765</b> | <b>80,424</b> | <b>1,773</b> | <b>5,916</b> |
| Collaterals                                                                            | 831,832          | 37,816        | 1,446        | 0        | 1,067,957        | 63,659        | 2,806        | 9,314        |

**Bank**

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Individuals |                  |           |           |          |                |          |          |          |
|------------------------------------------------------------------------------------------|------------------|-----------|-----------|----------|----------------|----------|----------|----------|
| Amounts in Eur '000<br>31/12/2024                                                        | Large corporates |           |           |          | SMEs           |          |          |          |
|                                                                                          | Stage 1          | Stage 2   | Stage 3   | POCI     | Stage 1        | Stage 2  | Stage 3  | POCI     |
| Performing                                                                               | 34,599           | 7         | 0         | 0        | 117,662        | 0        | 0        | 0        |
| From 1 to 30 days                                                                        | 366              | 10        | 1         | 0        | 14,979         | 0        | 0        | 0        |
| From 31 to 60 days                                                                       | 0                | 11        | 0         | 0        | 0              | 0        | 0        | 0        |
| From 61 to 90 days                                                                       | 0                | 1         | 0         | 0        | 0              | 0        | 0        | 0        |
| From 91 to 180 days                                                                      | 0                | 0         | 2         | 0        | 0              | 0        | 0        | 0        |
| From 181 to 365 days                                                                     | 0                | 0         | 8         | 0        | 0              | 0        | 0        | 0        |
| More than 365 days                                                                       | 0                | 0         | 0         | 0        | 0              | 0        | 0        | 0        |
| Denounced                                                                                | 0                | 0         | 8         | 0        | 0              | 0        | 0        | 0        |
| <b>Total</b>                                                                             | <b>34,965</b>    | <b>29</b> | <b>19</b> | <b>0</b> | <b>132,641</b> | <b>0</b> | <b>0</b> | <b>0</b> |
| Impairments                                                                              | 127              | 3         | 19        | 0        | 371            | 0        | 0        | 0        |
| <b>Net value</b>                                                                         | <b>34,838</b>    | <b>26</b> | <b>0</b>  | <b>0</b> | <b>132,270</b> | <b>0</b> | <b>0</b> | <b>0</b> |
| Collaterals                                                                              | 98,783           | 0         | 0         | 0        | 172,918        | 0        | 0        | 0        |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Corporate |                  |               |               |          |                  |                |               |              |
|----------------------------------------------------------------------------------------|------------------|---------------|---------------|----------|------------------|----------------|---------------|--------------|
| Amounts in Eur '000<br>31/12/2024                                                      | Large corporates |               |               |          | SMEs             |                |               |              |
|                                                                                        | Stage 1          | Stage 2       | Stage 3       | POCI     | Stage 1          | Stage 2        | Stage 3       | POCI         |
| Performing                                                                             | 1,544,961        | 81,157        | 1,469         | 0        | 1,436,285        | 111,059        | 2,289         | 7,030        |
| From 1 to 30 days                                                                      | 140,215          | 6,709         | 4,991         | 0        | 94,988           | 3,261          | 3,578         | 0            |
| From 31 to 60 days                                                                     | 0                | 4,562         | 0             | 0        | 0                | 11,961         | 1,547         | 102          |
| From 61 to 90 days                                                                     | 0                | 0             | 134           | 0        | 0                | 71             | 1,593         | 0            |
| From 91 to 180 days                                                                    | 0                | 0             | 1,414         | 0        | 0                | 0              | 6,570         | 0            |
| From 181 to 365 days                                                                   | 0                | 0             | 3,712         | 0        | 0                | 0              | 0             | 0            |
| More than 365 days                                                                     | 0                | 0             | 0             | 0        | 0                | 0              | 0             | 0            |
| Denounced                                                                              | 0                | 0             | 0             | 0        | 0                | 0              | 3,673         | 0            |
| <b>Total</b>                                                                           | <b>1,685,176</b> | <b>92,428</b> | <b>11,720</b> | <b>0</b> | <b>1,531,273</b> | <b>126,352</b> | <b>19,250</b> | <b>7,132</b> |
| Impairments                                                                            | 10,492           | 4,064         | 4,096         | 0        | 10,616           | 3,562          | 10,658        | 377          |
| <b>Net value</b>                                                                       | <b>1,674,684</b> | <b>88,364</b> | <b>7,624</b>  | <b>0</b> | <b>1,520,657</b> | <b>122,790</b> | <b>8,592</b>  | <b>6,755</b> |
| Collaterals                                                                            | 998,304          | 58,590        | 16,660        | 0        | 1,401,726        | 90,969         | 29,658        | 9,666        |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Individuals |                  |           |              |          |               |          |          |          |
|------------------------------------------------------------------------------------------|------------------|-----------|--------------|----------|---------------|----------|----------|----------|
| Amounts in Eur ' 000<br>31/12/2023                                                       | Large corporates |           |              |          | SMEs          |          |          |          |
|                                                                                          | Stage 1          | Stage 2   | Stage 3      | POCI     | Stage 1       | Stage 2  | Stage 3  | POCI     |
| Performing                                                                               | 30,753           | 8         | 0            | 0        | 89,103        | 0        | 9        | 0        |
| From 1 to 30 days                                                                        | 180              | 3         | 2            | 0        | 9,087         | 0        | 0        | 0        |
| From 31 to 60 days                                                                       | 0                | 7         | 0            | 0        | 0             | 0        | 0        | 0        |
| From 61 to 90 days                                                                       | 0                | 1         | 1            | 0        | 0             | 0        | 0        | 0        |
| From 91 to 180 days                                                                      | 0                | 0         | 1            | 0        | 0             | 0        | 0        | 0        |
| From 181 to 365 days                                                                     | 0                | 0         | 1,745        | 0        | 0             | 0        | 0        | 0        |
| More than 365 days                                                                       | 0                | 0         | 13           | 0        | 0             | 0        | 0        | 0        |
| Denounced                                                                                | 0                | 0         | 39           | 0        | 0             | 0        | 0        | 0        |
| <b>Total</b>                                                                             | <b>30,933</b>    | <b>19</b> | <b>1,801</b> | <b>0</b> | <b>98,190</b> | <b>0</b> | <b>9</b> | <b>0</b> |
| Impairments                                                                              | 244              | 9         | 1,801        | 0        | 358           | 0        | 8        | 0        |
| <b>Net value</b>                                                                         | <b>30,689</b>    | <b>10</b> | <b>0</b>     | <b>0</b> | <b>97,832</b> | <b>0</b> | <b>1</b> | <b>0</b> |
| Collaterals                                                                              | 105,750          | 0         | 0            | 0        | 122,231       | 0        | 0        | 0        |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Corporate |                  |               |              |          |                  |               |              |              |
|----------------------------------------------------------------------------------------|------------------|---------------|--------------|----------|------------------|---------------|--------------|--------------|
| Amounts in Eur ' 000<br>31/12/2023                                                     | Large corporates |               |              |          | SMEs             |               |              |              |
|                                                                                        | Stage 1          | Stage 2       | Stage 3      | POCI     | Stage 1          | Stage 2       | Stage 3      | POCI         |
| Performing                                                                             | 853,474          | 30,512        | 0            | 0        | 922,830          | 68,298        | 845          | 5,938        |
| From 1 to 30 days                                                                      | 220,844          | 9,670         | 1,980        | 0        | 175,582          | 15,057        | 140          | 0            |
| From 31 to 60 days                                                                     | 0                | 0             | 0            | 0        | 0                | 839           | 881          | 0            |
| From 61 to 90 days                                                                     | 0                | 0             | 0            | 0        | 0                | 218           | 155          | 0            |
| From 91 to 180 days                                                                    | 0                | 0             | 0            | 0        | 0                | 0             | 317          | 0            |
| From 181 to 365 days                                                                   | 0                | 0             | 0            | 0        | 0                | 0             | 1,628        | 0            |
| More than 365 days                                                                     | 0                | 0             | 0            | 0        | 0                | 0             | 0            | 0            |
| Denounced                                                                              | 0                | 0             | 0            | 0        | 0                | 0             | 3,372        | 0            |
| <b>Total</b>                                                                           | <b>1,074,318</b> | <b>40,182</b> | <b>1,980</b> | <b>0</b> | <b>1,098,412</b> | <b>84,412</b> | <b>7,338</b> | <b>5,938</b> |
| Impairments                                                                            | 6,856            | 506           | 1,980        | 0        | 6,123            | 3,988         | 5,565        | 22           |
| <b>Net value</b>                                                                       | <b>1,067,462</b> | <b>39,676</b> | <b>0</b>     | <b>0</b> | <b>1,092,289</b> | <b>80,424</b> | <b>1,773</b> | <b>5,916</b> |
| Collaterals                                                                            | 747,301          | 37,816        | 1,446        | 0        | 965,990          | 63,659        | 2,806        | 9,314        |

**Group**

| Loan-to-value ratio (LTV)        |                |             |
|----------------------------------|----------------|-------------|
| Amounts in Eur ' 000             |                | 31/12/2024  |
| Mortgages                        | Total loans    | Impairments |
| < 50%                            | 6,074          | 2           |
| 51% - 70%                        | 17,217         | 8           |
| 71% -90%                         | 98,312         | 322         |
| 91% - 100%                       | 7,512          | 11          |
| > 100%                           | 3,526          | 28          |
| <b>Total</b>                     | <b>132,641</b> | <b>371</b>  |
| <b>Simple average of LTV (%)</b> | <b>77%</b>     |             |

| Loan-to-value ratio (LTV)        |               |             |
|----------------------------------|---------------|-------------|
| Amounts in Eur ' 000             |               | 31/12/2023  |
| Mortgages                        | Total loans   | Impairments |
| < 50%                            | 3,519         | 1           |
| 51% - 70%                        | 8,950         | 4           |
| 71% -90%                         | 79,529        | 334         |
| 91% - 100%                       | 2,894         | 8           |
| > 100%                           | 3,307         | 19          |
| <b>Total</b>                     | <b>98,199</b> | <b>366</b>  |
| <b>Simple average of LTV (%)</b> | <b>79%</b>    |             |

**Bank**

| Loan-to-value ratio (LTV)        |                |             |
|----------------------------------|----------------|-------------|
| Amounts in Eur '000              |                | 31/12/2024  |
| Mortgages                        | Total loans    | Impairments |
| < 50%                            | 6,074          | 2           |
| 51% - 70%                        | 17,217         | 8           |
| 71% -90%                         | 98,312         | 323         |
| 91% - 100%                       | 7,512          | 11          |
| > 100%                           | 3,526          | 28          |
| <b>Total</b>                     | <b>132,641</b> | <b>372</b>  |
| <b>Simple average of LTV (%)</b> | <b>77%</b>     |             |

| Loan-to-value ratio (LTV)        |               |             |
|----------------------------------|---------------|-------------|
| Amounts in Eur '000              |               | 31/12/2023  |
| Mortgages                        | Total loans   | Impairments |
| < 50%                            | 3,519         | 1           |
| 51% - 70%                        | 8,950         | 4           |
| 71% -90%                         | 79,529        | 334         |
| 91% - 100%                       | 2,894         | 8           |
| > 100%                           | 3,307         | 19          |
| <b>Total</b>                     | <b>98,199</b> | <b>366</b>  |
| <b>Simple average of LTV (%)</b> | <b>79%</b>    |             |

**Group**

| Amounts in Eur '000<br>31/12/2024 | Real estate collaterals | Financial collaterals | Government guarantees | Other collaterals | Total collaterals |
|-----------------------------------|-------------------------|-----------------------|-----------------------|-------------------|-------------------|
| Individuals                       | 162,202                 | 100,610               | 0                     | 10,266            | <b>273,078</b>    |
| Corporate                         | 1,239,830               | 226,543               | 42,443                | 1,407,867         | <b>2,916,683</b>  |
| <b>Total</b>                      | <b>1,402,032</b>        | <b>327,153</b>        | <b>42,443</b>         | <b>1,418,133</b>  | <b>3,189,761</b>  |

| Amounts in Eur '000<br>31/12/2023 | Real estate collaterals | Financial collaterals | Government guarantees | Other collaterals | Total collaterals |
|-----------------------------------|-------------------------|-----------------------|-----------------------|-------------------|-------------------|
| Individuals                       | 113,432                 | 107,762               | 0                     | 8,862             | <b>230,056</b>    |
| Corporate                         | 836,794                 | 236,933               | 41,628                | 978,731           | <b>2,094,086</b>  |
| <b>Total</b>                      | <b>950,226</b>          | <b>344,695</b>        | <b>41,628</b>         | <b>987,593</b>    | <b>2,324,142</b>  |

Collaterals received include letters of guarantee of EUR 85,576 thousand. (31/12/23 EUR 81,331 thousand).

**Bank**

| Amounts in Eur '000<br>31/12/2024 | Real estate collaterals | Financial collaterals | Government guarantees | Other collaterals | Total collaterals |
|-----------------------------------|-------------------------|-----------------------|-----------------------|-------------------|-------------------|
| Individuals                       | 162,202                 | 100,610               | 0                     | 10,266            | <b>273,078</b>    |
| Corporate                         | 1,239,830               | 226,543               | 42,443                | 1,180,956         | <b>2,689,772</b>  |
| <b>Total</b>                      | <b>1,402,032</b>        | <b>327,153</b>        | <b>42,443</b>         | <b>1,191,222</b>  | <b>2,962,850</b>  |

| Amounts in Eur '000<br>31/12/2023 | Real estate collaterals | Financial collaterals | Government guarantees | Other collaterals | Total collaterals |
|-----------------------------------|-------------------------|-----------------------|-----------------------|-------------------|-------------------|
| Individuals                       | 113,432                 | 107,762               | 0                     | 8,862             | <b>230,056</b>    |
| Corporate                         | 836,794                 | 236,933               | 41,628                | 792,233           | <b>1,907,588</b>  |
| <b>Total</b>                      | <b>950,226</b>          | <b>344,695</b>        | <b>41,628</b>         | <b>801,095</b>    | <b>2,137,644</b>  |

Collaterals received include letters of guarantee of EUR 85,576 thousand. (31/12/23 EUR 81,331 thousand).

Write-offs for the Bank and the Group for 2024 amounted to EUR 47 thousand (EUR 756 thousand 2023).



## Bonds

### Group

| 31/12/2024      |                                                                      |                                   |                                       |                |                                                                       |                                        |            |
|-----------------|----------------------------------------------------------------------|-----------------------------------|---------------------------------------|----------------|-----------------------------------------------------------------------|----------------------------------------|------------|
| Debt Securities | Securities measured at fair value through other comprehensive income | Securities measured at fair value | Securities measured at amortised cost | Total          | Expected credit loss at fair value through other comprehensive income | Expected credit loss at amortised cost | Total ECL  |
| A- to AAA       | 2,286                                                                | 19,153                            | 50,354                                | <b>71,793</b>  | 0                                                                     | 28                                     | <b>28</b>  |
| B- to BBB+      | 44,839                                                               | 191,199                           | 333,685                               | <b>569,723</b> | 62                                                                    | 485                                    | <b>547</b> |
| C- to CCC+      | 0                                                                    | 3,900                             | 15,346                                | <b>19,246</b>  | 0                                                                     | 178                                    | <b>178</b> |
| Not rated       | 0                                                                    | 38,066                            | 15,263                                | <b>53,329</b>  | 0                                                                     | 112                                    | <b>112</b> |
| <b>Total</b>    | <b>47,125</b>                                                        | <b>252,318</b>                    | <b>414,648</b>                        | <b>714,091</b> | <b>62</b>                                                             | <b>803</b>                             | <b>865</b> |

| 31/12/2023      |                                                                      |                                   |                                       |                |                                                                       |                                        |            |
|-----------------|----------------------------------------------------------------------|-----------------------------------|---------------------------------------|----------------|-----------------------------------------------------------------------|----------------------------------------|------------|
| Debt Securities | Securities measured at fair value through other comprehensive income | Securities measured at fair value | Securities measured at amortised cost | Total          | Expected credit loss at fair value through other comprehensive income | Expected credit loss at amortised cost | Total ECL  |
| A- to AAA       | 4,246                                                                | 28,143                            | 31,703                                | <b>64,092</b>  | 0                                                                     | 6                                      | <b>6</b>   |
| B- to BBB+      | 81,972                                                               | 250,999                           | 215,085                               | <b>548,056</b> | 81                                                                    | 306                                    | <b>387</b> |
| C- to CCC+      | 0                                                                    | 1,646                             | 4,979                                 | <b>6,625</b>   | 0                                                                     | 68                                     | <b>68</b>  |
| Not rated       | 0                                                                    | 46,503                            | 0                                     | <b>46,503</b>  | 0                                                                     | 0                                      | <b>0</b>   |
| <b>Total</b>    | <b>86,218</b>                                                        | <b>327,291</b>                    | <b>251,767</b>                        | <b>665,276</b> | <b>81</b>                                                             | <b>380</b>                             | <b>461</b> |

All securities in the portfolio measured through other comprehensive income and of the amortised cost portfolio are classified at "Stage 1".

**Bank**

| 31/12/2024      |                                                                      |                                   |                                       |                |                                                                       |                                        |            |
|-----------------|----------------------------------------------------------------------|-----------------------------------|---------------------------------------|----------------|-----------------------------------------------------------------------|----------------------------------------|------------|
| Debt Securities | Securities measured at fair value through other comprehensive income | Securities measured at fair value | Securities measured at amortised cost | Total          | Expected credit loss at fair value through other comprehensive income | Expected credit loss at amortised cost | Total ECL  |
| A- to AAA       | 2,286                                                                | 19,153                            | 50,354                                | <b>71,793</b>  | 0                                                                     | 28                                     | <b>28</b>  |
| B- to BBB+      | 44,839                                                               | 191,199                           | 333,685                               | <b>569,723</b> | 62                                                                    | 485                                    | <b>547</b> |
| C- to CCC+      | 0                                                                    | 3,900                             | 15,346                                | <b>19,246</b>  | 0                                                                     | 178                                    | <b>178</b> |
| Not rated       | 0                                                                    | 38,066                            | 15,263                                | <b>53,329</b>  | 0                                                                     | 112                                    | <b>112</b> |
| <b>Total</b>    | <b>47,125</b>                                                        | <b>252,318</b>                    | <b>414,648</b>                        | <b>714,091</b> | <b>62</b>                                                             | <b>803</b>                             | <b>865</b> |

| 31/12/2023      |                                                                      |                                   |                                       |                |                                                                       |                                        |            |
|-----------------|----------------------------------------------------------------------|-----------------------------------|---------------------------------------|----------------|-----------------------------------------------------------------------|----------------------------------------|------------|
| Debt Securities | Securities measured at fair value through other comprehensive income | Securities measured at fair value | Securities measured at amortised cost | Total          | Expected credit loss at fair value through other comprehensive income | Expected credit loss at amortised cost | Total ECL  |
| A- to AAA       | 4,246                                                                | 28,143                            | 31,703                                | <b>64,092</b>  | 0                                                                     | 6                                      | <b>6</b>   |
| B- to BBB+      | 81,972                                                               | 250,999                           | 215,085                               | <b>548,056</b> | 81                                                                    | 306                                    | <b>387</b> |
| C- to CCC+      | 0                                                                    | 1,646                             | 4,979                                 | <b>6,625</b>   | 0                                                                     | 68                                     | <b>68</b>  |
| Not rated       | 0                                                                    | 46,503                            | 0                                     | <b>46,503</b>  | 0                                                                     | 0                                      | <b>0</b>   |
| <b>Total</b>    | <b>86,218</b>                                                        | <b>327,291</b>                    | <b>251,767</b>                        | <b>665,276</b> | <b>81</b>                                                             | <b>380</b>                             | <b>461</b> |

All securities of the total income portfolio and the amortised cost portfolio are classified at "Stage 1".

**Counterparty banks risk**

The Group is exposed to the risk of capital losses due to contingent delayed payments of outstanding and contingent liabilities of counterparty banks. Through its daily operations, the Group deals with other banks and financial institutions. By conducting such activities, the Group is exposed to the risk of capital losses due to contingent delayed repayments to the Group of outstanding and contingent liabilities of counterparty banks.

According to the Policy and Procedure for Credit Risk Assessment of Institutional Counterparties the responsibility of approving the relevant limits for counterparty risk and their classification per type of exposure rests with the Bank's Credit Committee, following a recommendation from the unit which is competent for the relationship, based on internal and/or external financial analyses.

The credit limit granted to each counterparty is divided into sub limits covering placements, bonds and shares market, foreign exchange market and derivatives market. The open positions are compared to the limits on a daily basis.

## Country risk

The Group is exposed to the risk of capital loss due to possible political, economic and other events that occur in a specific country where the capital or cash of the Group have been placed or invested through various local banks and financial institutions.

All countries are assessed according to size, economic data and perspectives of the country, as well as its credit rating by international credit rating institutions (Moody's). The actual positions per country are compared to their limits on a daily basis. The limits are reviewed at the discretion of the Group, while countries with the smaller size and lower solvency ratio are subject to a more thorough and frequent analysis and evaluation, where considered necessary.

## 4.2. Market risk

Market risk is defined as the potential loss that can be caused to the Bank's portfolio by unexpected fluctuations in the market value in individual areas of this portfolio. Portfolios facing this possibility are those exposed to interest rate risk and/or currency risk and/or price risk. In many cases, the market risk may not be separated from other types of risk or arise from them and the correlation between them.

The Group's Asset Management Liability Committee (ALCO) approves the market risk management procedures and has set the relevant limits for undertaking such a risk per product and portfolio. These limits are systematically monitored and checked, while they are reviewed at least once a year; they are modified, if necessary, depending on the Group's strategy and prevailing market conditions.

The Risk Management Division proceeds with the measurement, control and monitoring of the Market Risk daily and conducts measurements to estimate such risks for all individual portfolios.

*(i) Market risk of commercial and available-for-sale portfolios (portfolio measured at fair value through profit and loss)*

Measurements are made using various methodologies and measurement techniques such as Value At Risk – VAR. The Value At Risk measurement determines the maximum potential loss of a portfolio the maximum potential loss of a portfolio for a one-day time horizon with a 99% confidence level using the variance-covariance method. The measurements cover all measured at fair value through profit and loss of the Group's companies.

The market risk of the Group and the Bank, in terms of VaR, for the aforementioned positions on December 31, 2024, amounted to EUR 293 thousand and EUR 254 thousand respectively as analysed in the following table

**Group**

| Amounts in Eur '000                               | 31/12/2024 | 31/12/2023 |
|---------------------------------------------------|------------|------------|
| Foreign exchange risk                             | 6          | 42         |
| Bond portfolio interest rate risk                 | 200        | 536        |
| Stock market portfolio market risk                | 7          | 12         |
| Commodities                                       | 91         | 27         |
| Decrease due to correlation                       | (50)       | (61)       |
| Subsidiaries price risk (Optima asset Management) | 39         | 2          |
| <b>Total (Net Market Risk)</b>                    | <b>293</b> | <b>558</b> |

**Bank**

| Amounts in Eur '000                | 31/12/2024 | 31/12/2023 |
|------------------------------------|------------|------------|
| Foreign exchange risk              | 6          | 42         |
| Bond portfolio interest rate risk  | 200        | 536        |
| Stock market portfolio market risk | 7          | 12         |
| Commodities                        | 91         | 27         |
| Decrease due to correlation        | (50)       | (61)       |
| <b>Total (Net Market Risk)</b>     | <b>254</b> | <b>556</b> |

In addition to the above measurements, the market risk of the portfolios is monitored by a series of additional limits, such as the maximum open position limit for each product and stop-loss limits for each portfolio.

Finally, at regular periods, and certainly at the end of each semester, measurements of various stress test scenarios are carried out for the purpose of, on the one hand, the more effective management of such risk and, on the other hand, the information of the Management and the supervisory authorities.

*(ii) Interest Rate Risk*

The interest rate risk is the risk due to the fluctuations in interest rates which affect the exposure of the banking portfolio and impacts both the capital and the profits of the Bank. The fluctuations in interest rates result in changes in the Present Value (PV) and the future cash flows of the assets, the liabilities and the off-balance sheet exposures of the Bank and consequently in the economic value of its equity (EVE). The fluctuations in interest rates also affect the profit of the Bank, thus changing the income and expenses which are sensitive to said fluctuations. Consequently, the net interest income (NII) is affected.

The following tables present the Group's and the Bank's exposure to interest rate risk. The tables present the assets and liabilities of the Group and the Bank at their carrying amounts, classified according to the interest rate repricing date, for floating interest rates or maturity date, for fixed interest rates.

**Group**

| Amounts in Eur '000                                               | Up to<br>1 month   | 1-3<br>months    | 3-12<br>months  | 1-2<br>years  | 2-5<br>years   | Over 5<br>years | Non-<br>interest<br>bearing | Total            |
|-------------------------------------------------------------------|--------------------|------------------|-----------------|---------------|----------------|-----------------|-----------------------------|------------------|
| <b>As at 31st December 2024</b>                                   |                    |                  |                 |               |                |                 |                             |                  |
| <b>Assets</b>                                                     |                    |                  |                 |               |                |                 |                             |                  |
| Cash and balances with central bank                               | 781,378            | 0                | 0               | 0             | 0              | 0               | 16,268                      | <b>797,646</b>   |
| Due from banks                                                    | 162,286            | 9,023            | 0               | 0             | 0              | 0               | 0                           | <b>171,309</b>   |
| Financial assets at fair value through profit and loss            | 229,055            | 0                | 0               | 0             | 0              | 0               | 35,387                      | <b>264,442</b>   |
| Loans and advances to customers                                   | 49,072             | 2,612,312        | 610,539         | 28,319        | 23,393         | 205,641         | 83,322                      | <b>3,612,598</b> |
| Financial assets at fair value through other comprehensive income | 0                  | 3,703            | 0               | 3,729         | 22,210         | 17,482          | 266                         | <b>47,390</b>    |
| Debt instruments at amortised cost                                | 0                  | 39,845           | 30              | 16,754        | 207,211        | 150,004         | 0                           | <b>413,844</b>   |
| Derivative financial instruments                                  | 0                  | 0                | 0               | 0             | 0              | 0               | 2,210                       | <b>2,210</b>     |
| Other assets                                                      | 0                  | 31,279           | 0               | 0             | 0              | 0               | 0                           | <b>31,279</b>    |
| <b>Total assets</b>                                               | <b>1,221,791</b>   | <b>2,696,162</b> | <b>610,569</b>  | <b>48,802</b> | <b>252,814</b> | <b>373,127</b>  | <b>137,453</b>              | <b>5,340,718</b> |
| <b>Liabilities</b>                                                |                    |                  |                 |               |                |                 |                             |                  |
| Due to banks                                                      | 115,563            | 0                | 0               | 0             | 0              | 0               | 0                           | <b>115,563</b>   |
| Due to customers                                                  | 2,811,903          | 1,184,856        | 642,847         | 3,806         | 0              | 0               | 0                           | <b>4,643,412</b> |
| Derivative financial instruments                                  | 5,318              | 0                | 0               | 0             | 0              | 0               | 0                           | <b>5,318</b>     |
| Other liabilities                                                 | 0                  | 0                | 0               | 0             | 0              | 0               | 717                         | <b>717</b>       |
| <b>Total liabilities</b>                                          | <b>2,932,784</b>   | <b>1,184,856</b> | <b>642,847</b>  | <b>3,806</b>  | <b>0</b>       | <b>0</b>        | <b>717</b>                  | <b>4,765,010</b> |
| <b>Total interest rate gap</b>                                    | <b>(1,710,993)</b> | <b>1,511,306</b> | <b>(32,278)</b> | <b>44,996</b> | <b>252,814</b> | <b>373,127</b>  | <b>136,736</b>              | <b>575,708</b>   |

| Amounts in Eur '000                                               | Up to<br>1 month   | 1-3<br>months    | 3-12<br>months | 1-2<br>years  | 2-5<br>years   | Over 5<br>years | Non-<br>interest<br>bearing | Total            |
|-------------------------------------------------------------------|--------------------|------------------|----------------|---------------|----------------|-----------------|-----------------------------|------------------|
| <b>As at 31st December 2023</b>                                   |                    |                  |                |               |                |                 |                             |                  |
| <b>Assets</b>                                                     |                    |                  |                |               |                |                 |                             |                  |
| Cash and balances with central bank                               | 467,679            | 0                | 0              | 0             | 0              | 0               | 11,644                      | <b>479,323</b>   |
| Due from banks                                                    | 117,171            | 8,919            | 0              | 0             | 0              | 0               | 0                           | <b>126,090</b>   |
| Financial assets at fair value through profit and loss            | 297,229            | 0                | 0              | 0             | 0              | 0               | 40,399                      | <b>337,628</b>   |
| Loans and advances to customers                                   | 30,558             | 1,790,989        | 436,960        | 11,867        | 8,075          | 120,135         | 32,330                      | <b>2,430,914</b> |
| Financial assets at fair value through other comprehensive income | 0                  | 0                | 38,319         | 3,723         | 22,482         | 21,694          | 270                         | <b>86,488</b>    |
| Debt instruments at amortised cost                                | 0                  | 0                | 22,701         | 12,141        | 133,122        | 83,424          | 0                           | <b>251,388</b>   |
| Derivative financial instruments                                  | 0                  | 0                | 0              | 0             | 0              | 0               | 1,033                       | <b>1,033</b>     |
| Other assets                                                      | 0                  | 23,719           | 0              | 0             | 0              | 0               | 0                           | <b>23,719</b>    |
| <b>Total assets</b>                                               | <b>912,637</b>     | <b>1,823,627</b> | <b>497,980</b> | <b>27,731</b> | <b>163,679</b> | <b>225,253</b>  | <b>85,676</b>               | <b>3,736,583</b> |
| <b>Liabilities</b>                                                |                    |                  |                |               |                |                 |                             |                  |
| Due to banks                                                      | 0                  | 78,287           | 0              | 0             | 0              | 0               | 2,792                       | <b>81,079</b>    |
| Due to customers                                                  | 2,095,316          | 678,834          | 303,833        | 14,224        | 0              | 0               | 99,597                      | <b>3,191,804</b> |
| Derivative financial instruments                                  | 0                  | 0                | 0              | 0             | 0              | 0               | 8,497                       | <b>8,497</b>     |
| Other liabilities                                                 | 0                  | 0                | 0              | 0             | 0              | 0               | 181                         | <b>181</b>       |
| <b>Total liabilities</b>                                          | <b>2,095,316</b>   | <b>757,121</b>   | <b>303,833</b> | <b>14,224</b> | <b>0</b>       | <b>0</b>        | <b>111,067</b>              | <b>3,281,561</b> |
| <b>Total interest rate gap</b>                                    | <b>(1,182,679)</b> | <b>1,066,506</b> | <b>194,147</b> | <b>13,507</b> | <b>163,679</b> | <b>225,253</b>  | <b>(25,391)</b>             | <b>455,022</b>   |

**Bank**

| Amounts in Eur '000                                               | Up to<br>1 month   | 1-3<br>months    | 3-12<br>months  | 1-2<br>years  | 2-5<br>years   | Over 5<br>years | Non-<br>interest<br>bearing | Total            |
|-------------------------------------------------------------------|--------------------|------------------|-----------------|---------------|----------------|-----------------|-----------------------------|------------------|
| <b>As at 31st December 2024</b>                                   |                    |                  |                 |               |                |                 |                             |                  |
| <b>Assets</b>                                                     |                    |                  |                 |               |                |                 |                             |                  |
| Cash and balances with central bank                               | 781,378            | 0                | 0               | 0             | 0              | 0               | 16,267                      | <b>797,645</b>   |
| Due from banks                                                    | 151,204            | 8,953            | 0               | 0             | 0              | 0               | 0                           | <b>160,157</b>   |
| Financial assets at fair value through profit and loss            | 226,239            | 0                | 0               | 0             | 0              | 0               | 35,387                      | <b>261,626</b>   |
| Loans and advances to customers                                   | 70,027             | 2,633,687        | 610,539         | 23,393        | 28,319         | 205,641         | 24,994                      | <b>3,596,600</b> |
| Financial assets at fair value through other comprehensive income | 0                  | 3,703            | 0               | 3,729         | 22,210         | 17,482          | 266                         | <b>47,390</b>    |
| Debt instruments at amortised cost                                | 0                  | 39,845           | 30              | 16,754        | 207,211        | 150,004         | 0                           | <b>413,844</b>   |
| Derivative financial instruments                                  | 0                  | 0                | 0               | 0             | 0              | 0               | 2,210                       | <b>2,210</b>     |
| Other assets                                                      | 0                  | 30,430           | 0               | 0             | 0              | 0               | 0                           | <b>30,430</b>    |
| <b>Total assets</b>                                               | <b>1,228,848</b>   | <b>2,716,618</b> | <b>610,569</b>  | <b>43,876</b> | <b>257,740</b> | <b>373,127</b>  | <b>79,124</b>               | <b>5,309,902</b> |
| <b>Liabilities</b>                                                |                    |                  |                 |               |                |                 |                             |                  |
| Due to banks                                                      | 115,563            | 0                | 0               | 0             | 0              | 0               | 0                           | <b>115,563</b>   |
| Due to customers                                                  | 2,822,555          | 1,184,856        | 642,847         | 3,806         | 0              | 0               | 0                           | <b>4,654,064</b> |
| Derivative financial instruments                                  | 5,318              | 0                | 0               | 0             | 0              | 0               | 0                           | <b>5,318</b>     |
| Other liabilities                                                 | 0                  | 0                | 0               | 0             | 0              | 0               | 221                         | <b>221</b>       |
| <b>Total liabilities</b>                                          | <b>2,943,436</b>   | <b>1,184,856</b> | <b>642,847</b>  | <b>3,806</b>  | <b>0</b>       | <b>0</b>        | <b>221</b>                  | <b>4,775,166</b> |
| <b>Total interest rate gap</b>                                    | <b>(1,714,588)</b> | <b>1,531,762</b> | <b>(32,278)</b> | <b>40,070</b> | <b>257,740</b> | <b>373,127</b>  | <b>78,903</b>               | <b>534,736</b>   |

| Amounts in Eur '000                                               | Up to<br>1 month   | 1-3<br>months    | 3-12<br>months | 1-2<br>years  | 2-5<br>years   | Over 5<br>years | Non-<br>interest<br>bearing | Total            |
|-------------------------------------------------------------------|--------------------|------------------|----------------|---------------|----------------|-----------------|-----------------------------|------------------|
| <b>As at 31st December 2023</b>                                   |                    |                  |                |               |                |                 |                             |                  |
| <b>Assets</b>                                                     |                    |                  |                |               |                |                 |                             |                  |
| Cash and balances with central bank                               | 467,679            | 0                | 0              | 0             | 0              | 0               | 11,643                      | <b>479,322</b>   |
| Due from banks                                                    | 114,705            | 8,920            | 0              | 0             | 0              | 0               | 0                           | <b>123,625</b>   |
| Financial assets at fair value through profit and loss            | 296,595            | 0                | 0              | 0             | 0              | 0               | 40,399                      | <b>336,994</b>   |
| Loans and advances to customers                                   | 30,558             | 1,775,609        | 436,960        | 11,867        | 8,075          | 120,135         | 32,868                      | <b>2,416,072</b> |
| Financial assets at fair value through other comprehensive income | 0                  | 0                | 38,319         | 3,723         | 22,482         | 21,694          | 270                         | <b>86,488</b>    |
| Debt instruments at amortised cost                                | 0                  | 0                | 22,701         | 12,141        | 133,122        | 83,424          | 0                           | <b>251,388</b>   |
| Derivative financial instruments                                  | 0                  | 0                | 0              | 0             | 0              | 0               | 1,033                       | <b>1,033</b>     |
| Other assets                                                      | 0                  | 23,719           | 0              | 0             | 0              | 0               | 0                           | <b>23,719</b>    |
| <b>Total assets</b>                                               | <b>909,537</b>     | <b>1,808,248</b> | <b>497,980</b> | <b>27,731</b> | <b>163,679</b> | <b>225,253</b>  | <b>86,213</b>               | <b>3,718,641</b> |
| <b>Liabilities</b>                                                |                    |                  |                |               |                |                 |                             |                  |
| Due to banks                                                      | 0                  | 78,287           | 0              | 0             | 0              | 0               | 768                         | <b>79,055</b>    |
| Due to customers                                                  | 2,095,316          | 678,834          | 303,833        | 14,224        | 0              | 0               | 104,704                     | <b>3,196,911</b> |
| Derivative financial instruments                                  | 0                  | 0                | 0              | 0             | 0              | 0               | 8,497                       | <b>8,497</b>     |
| Other liabilities                                                 | 0                  | 0                | 0              | 0             | 0              | 0               | 181                         | <b>181</b>       |
| <b>Total liabilities</b>                                          | <b>2,095,316</b>   | <b>757,121</b>   | <b>303,833</b> | <b>14,224</b> | <b>0</b>       | <b>0</b>        | <b>114,150</b>              | <b>3,284,644</b> |
| <b>Total interest rate gap</b>                                    | <b>(1,185,779)</b> | <b>1,051,127</b> | <b>194,147</b> | <b>13,507</b> | <b>163,679</b> | <b>225,253</b>  | <b>(27,937)</b>             | <b>433,997</b>   |

*(iii) Foreign exchange risk*

Foreign exchange risk is the risk of fluctuation of the value of financial instruments and assets and liabilities due to changes in exchange rates. Foreign exchange transaction risk arises from an open position, positive or negative, which exposes the Group to exchange rate changes. Such a risk could arise in the event of assets being carried in one currency while financed by liabilities in another, or from forwards and swaps, as well as derivatives, including options.

The following tables present the Group's and the Bank's exposure to foreign exchange risk. The following tables present the carrying amount of the assets and liabilities of the Group and the Bank, classified per currency.

**Group**

| Amounts to Eur '000                                                        | EUR              | USD              | GBP           | CHF          | JPY        | Other Currencies | Total            |
|----------------------------------------------------------------------------|------------------|------------------|---------------|--------------|------------|------------------|------------------|
| <b>As at 31st December 2024</b>                                            |                  |                  |               |              |            |                  |                  |
| <b>Foreign exchange risk - Assets</b>                                      |                  |                  |               |              |            |                  |                  |
| Cash and balances with central bank                                        | 795,752          | 1,127            | 163           | 515          | 44         | 45               | <b>797,646</b>   |
| Due from banks                                                             | 50,716           | 96,276           | 9,821         | 189          | 1          | 14,306           | <b>171,309</b>   |
| Financial assets measured at fair value through profit or loss             | 264,442          | 0                | 0             | 0            | 0          | 0                | <b>264,442</b>   |
| Derivative financial instruments                                           | 2,085            | 125              | 0             | 0            | 0          | 0                | <b>2,210</b>     |
| Loans and advances to customers                                            | 3,510,921        | 96,665           | 5,012         | 0            | 0          | 0                | <b>3,612,598</b> |
| Financial assets measured at fair value through other comprehensive income | 47,390           | 0                | 0             | 0            | 0          | 0                | <b>47,390</b>    |
| Debt securities at amortised cost                                          | 403,831          | 10,013           | 0             | 0            | 0          | 0                | <b>413,844</b>   |
| Investment in subsidiaries and associates                                  | 609              | 0                | 0             | 0            | 0          | 0                | <b>609</b>       |
| Property, plant and equipment                                              | 10,717           | 0                | 0             | 0            | 0          | 0                | <b>10,717</b>    |
| Intangible assets                                                          | 11,396           | 0                | 0             | 0            | 0          | 0                | <b>11,396</b>    |
| Right of use assets                                                        | 19,595           | 0                | 0             | 0            | 0          | 0                | <b>19,595</b>    |
| Deferred tax assets                                                        | 9,685            | 0                | 0             | 0            | 0          | 0                | <b>9,685</b>     |
| Other assets                                                               | 172,776          | 5,160            | 734           | 339          | 170        | 327              | <b>179,506</b>   |
| <b>Total assets</b>                                                        | <b>5,299,915</b> | <b>209,366</b>   | <b>15,730</b> | <b>1,043</b> | <b>215</b> | <b>14,678</b>    | <b>5,540,947</b> |
| <b>Foreign exchange risk - Liabilities</b>                                 |                  |                  |               |              |            |                  |                  |
| Due to banks                                                               | 109,263          | 174              | 6,120         | 6            | 0          | 0                | <b>115,563</b>   |
| Due to customers                                                           | 4,149,662        | 469,650          | 9,612         | 950          | 215        | 13,323           | <b>4,643,412</b> |
| Derivative financial instruments                                           | 5,315            | 3                | 0             | 0            | 0          | 0                | <b>5,318</b>     |
| Lease liability                                                            | 21,220           | 0                | 0             | 0            | 0          | 0                | <b>21,220</b>    |
| Retirement benefit obligations                                             | 1,027            | 0                | 0             | 0            | 0          | 0                | <b>1,027</b>     |
| Income tax liability                                                       | 5,637            | (64)             | 0             | 0            | 0          | 0                | <b>5,573</b>     |
| Other liabilities                                                          | 124,180          | 178              | 10            | 0            | 0          | 0                | <b>124,368</b>   |
| Provisions                                                                 | 4,167            | 0                | 0             | 0            | 0          | 0                | <b>4,167</b>     |
| <b>Total liabilities</b>                                                   | <b>4,420,471</b> | <b>469,941</b>   | <b>15,742</b> | <b>956</b>   | <b>215</b> | <b>13,323</b>    | <b>4,920,648</b> |
| <b>Net on balance sheet position</b>                                       | <b>879,444</b>   | <b>(260,575)</b> | <b>(12)</b>   | <b>87</b>    | <b>0</b>   | <b>1,355</b>     | <b>620,299</b>   |

| Amounts to Eur '000                                                        | EUR              | USD              | GBP           | CHF        | JPY         | Other Currencies | Total            |
|----------------------------------------------------------------------------|------------------|------------------|---------------|------------|-------------|------------------|------------------|
| <b>As at 31st December 2023</b>                                            |                  |                  |               |            |             |                  |                  |
| <b>Foreign exchange risk - Assets</b>                                      |                  |                  |               |            |             |                  |                  |
| Cash and balances with central bank                                        | 477,887          | 1,025            | 158           | 172        | 0           | 81               | <b>479,323</b>   |
| Due from banks                                                             | 45,080           | 45,932           | 10,389        | 24         | 86          | 24,579           | <b>126,090</b>   |
| Financial assets measured at fair value through profit or loss             | 337,628          | 0                | 0             | 0          | 0           | 0                | <b>337,628</b>   |
| Derivative financial instruments                                           | 1,029            | 4                | 0             | 0          | 0           | 0                | <b>1,033</b>     |
| Loans and advances to customers                                            | 2,401,649        | 21,250           | 8,015         | 0          | 0           | 0                | <b>2,430,914</b> |
| Financial assets measured at fair value through other comprehensive income | 86,488           | 0                | 0             | 0          | 0           | 0                | <b>86,488</b>    |
| Debt securities at amortised cost                                          | 251,388          | 0                | 0             | 0          | 0           | 0                | <b>251,388</b>   |
| Investment in subsidiaries and associates                                  | 260              | 0                | 0             | 0          | 0           | 0                | <b>260</b>       |
| Property, plant and equipment                                              | 10,903           | 0                | 0             | 0          | 0           | 0                | <b>10,903</b>    |
| Intangible assets                                                          | 10,805           | 0                | 0             | 0          | 0           | 0                | <b>10,805</b>    |
| Right of use assets                                                        | 19,508           | 0                | 0             | 0          | 0           | 0                | <b>19,508</b>    |
| Deferred tax assets                                                        | 8,079            | 0                | 0             | 0          | 0           | 0                | <b>8,079</b>     |
| Other assets                                                               | 99,648           | 5,283            | 225           | 296        | 57          | 341              | <b>105,850</b>   |
| <b>Total assets</b>                                                        | <b>3,750,352</b> | <b>73,494</b>    | <b>18,787</b> | <b>492</b> | <b>143</b>  | <b>25,001</b>    | <b>3,868,269</b> |
| <b>Foreign exchange risk - Liabilities</b>                                 |                  |                  |               |            |             |                  |                  |
| Due to banks                                                               | 33,138           | 42,136           | 5,799         | 6          | 0           | 0                | <b>81,079</b>    |
| Due to customers                                                           | 2,797,276        | 355,926          | 13,164        | 441        | 223         | 24,774           | <b>3,191,804</b> |
| Derivative financial instruments                                           | 8,482            | 15               | 0             | 0          | 0           | 0                | <b>8,497</b>     |
| Lease liability                                                            | 20,861           | 0                | 0             | 0          | 0           | 0                | <b>20,861</b>    |
| Retirement benefit obligations                                             | 692              | 0                | 0             | 0          | 0           | 0                | <b>692</b>       |
| Income tax liability                                                       | 12,316           | (90)             | 0             | 0          | 0           | 0                | <b>12,226</b>    |
| Other liabilities                                                          | 40,057           | 601              | 4             | 0          | 0           | 5                | <b>40,667</b>    |
| Provisions                                                                 | 2,366            | 0                | 0             | 0          | 0           | 0                | <b>2,366</b>     |
| <b>Total liabilities</b>                                                   | <b>2,915,188</b> | <b>398,588</b>   | <b>18,967</b> | <b>447</b> | <b>223</b>  | <b>24,779</b>    | <b>3,358,192</b> |
| <b>Net on balance sheet position</b>                                       | <b>835,164</b>   | <b>(325,094)</b> | <b>(180)</b>  | <b>45</b>  | <b>(80)</b> | <b>222</b>       | <b>510,077</b>   |



**Bank**

| Amounts to Eur '000                                                        | EUR              | USD              | GBP           | CHF          | JPY        | Other Currencies | Total            |
|----------------------------------------------------------------------------|------------------|------------------|---------------|--------------|------------|------------------|------------------|
| <b>As at 31st December 2024</b>                                            |                  |                  |               |              |            |                  |                  |
| <b>Foreign exchange risk - Assets</b>                                      |                  |                  |               |              |            |                  |                  |
| Cash and balances with central bank                                        | 795,751          | 1,127            | 163           | 515          | 44         | 45               | <b>797,645</b>   |
| Due from banks                                                             | 39,572           | 96,268           | 9,821         | 189          | 1          | 14,306           | <b>160,157</b>   |
| Financial assets measured at fair value through profit or loss             | 261,626          | 0                | 0             | 0            | 0          | 0                | <b>261,626</b>   |
| Derivative financial instruments                                           | 2,085            | 125              | 0             | 0            | 0          | 0                | <b>2,210</b>     |
| Loans and advances to customers                                            | 3,493,440        | 98,147           | 5,012         | 0            | 0          | 0                | <b>3,596,599</b> |
| Financial assets measured at fair value through other comprehensive income | 47,390           | 0                | 0             | 0            | 0          | 0                | <b>47,390</b>    |
| Debt securities at amortised cost                                          | 403,832          | 10,013           | 0             | 0            | 0          | 0                | <b>413,845</b>   |
| Investment in subsidiaries and associates                                  | 23,972           | 0                | 0             | 0            | 0          | 0                | <b>23,972</b>    |
| Property, plant and equipment                                              | 10,588           | 0                | 0             | 0            | 0          | 0                | <b>10,588</b>    |
| Intangible assets                                                          | 8,193            | 0                | 0             | 0            | 0          | 0                | <b>8,193</b>     |
| Right of use assets                                                        | 19,561           | 0                | 0             | 0            | 0          | 0                | <b>19,561</b>    |
| Deferred tax assets                                                        | 10,603           | 0                | 0             | 0            | 0          | 0                | <b>10,603</b>    |
| Other assets                                                               | 173,074          | 5,160            | 734           | 339          | 170        | 327              | <b>179,804</b>   |
| <b>Total assets</b>                                                        | <b>5,289,687</b> | <b>210,840</b>   | <b>15,730</b> | <b>1,043</b> | <b>215</b> | <b>14,678</b>    | <b>5,532,193</b> |
| <b>Foreign exchange risk - Liabilities</b>                                 |                  |                  |               |              |            |                  |                  |
| Due to central bank                                                        | 0                | 0                | 0             | 0            | 0          | 0                | <b>0</b>         |
| Due to banks                                                               | 109,263          | 174              | 6,120         | 6            | 0          | 0                | <b>115,563</b>   |
| Due to customers                                                           | 4,158,797        | 471,167          | 9,612         | 950          | 215        | 13,323           | <b>4,654,064</b> |
| Derivative financial instruments                                           | 5,315            | 3                | 0             | 0            | 0          | 0                | <b>5,318</b>     |
| Lease liability                                                            | 21,188           | 0                | 0             | 0            | 0          | 0                | <b>21,188</b>    |
| Retirement benefit obligations                                             | 964              | 0                | 0             | 0            | 0          | 0                | <b>964</b>       |
| Income tax liability                                                       | 5,025            | (64)             | 0             | 0            | 0          | 0                | <b>4,961</b>     |
| Other liabilities                                                          | 122,745          | 178              | 10            | 0            | 0          | 0                | <b>122,933</b>   |
| Provisions                                                                 | 4,157            | 0                | 0             | 0            | 0          | 0                | <b>4,157</b>     |
| <b>Total liabilities</b>                                                   | <b>4,427,454</b> | <b>471,458</b>   | <b>15,742</b> | <b>956</b>   | <b>215</b> | <b>13,323</b>    | <b>4,929,148</b> |
| <b>Net on balance sheet position</b>                                       | <b>862,233</b>   | <b>(260,618)</b> | <b>(12)</b>   | <b>87</b>    | <b>0</b>   | <b>1,355</b>     | <b>603,045</b>   |

| Amounts to Eur '000                                                        | EUR              | USD              | GBP           | CHF        | JPY         | Other Currencies | Total            |
|----------------------------------------------------------------------------|------------------|------------------|---------------|------------|-------------|------------------|------------------|
| <b>As at 31st December 2023</b>                                            |                  |                  |               |            |             |                  |                  |
| <b>Foreign exchange risk - Assets</b>                                      |                  |                  |               |            |             |                  |                  |
| Cash and balances with central bank                                        | 477,886          | 1,025            | 158           | 172        | 0           | 81               | <b>479,322</b>   |
| Due from banks                                                             | 42,615           | 45,932           | 10,389        | 24         | 86          | 24,579           | <b>123,625</b>   |
| Financial assets measured at fair value through profit or loss             | 336,994          | 0                | 0             | 0          | 0           | 0                | <b>336,994</b>   |
| Derivative financial instruments                                           | 1,029            | 4                | 0             | 0          | 0           | 0                | <b>1,033</b>     |
| Loans and advances to customers                                            | 2,386,266        | 21,791           | 8,015         | 0          | 0           | 0                | <b>2,416,072</b> |
| Financial assets measured at fair value through other comprehensive income | 86,488           | 0                | 0             | 0          | 0           | 0                | <b>86,488</b>    |
| Debt securities at amortised cost                                          | 251,388          | 0                | 0             | 0          | 0           | 0                | <b>251,388</b>   |
| Investment in subsidiaries and associates                                  | 9,134            | 0                | 0             | 0          | 0           | 0                | <b>9,134</b>     |
| Property, plant and equipment                                              | 10,738           | 0                | 0             | 0          | 0           | 0                | <b>10,738</b>    |
| Intangible assets                                                          | 7,421            | 0                | 0             | 0          | 0           | 0                | <b>7,421</b>     |
| Right of use assets                                                        | 19,478           | 0                | 0             | 0          | 0           | 0                | <b>19,478</b>    |
| Deferred tax assets                                                        | 8,938            | 0                | 0             | 0          | 0           | 0                | <b>8,938</b>     |
| Other assets                                                               | 98,373           | 5,283            | 225           | 296        | 57          | 341              | <b>104,575</b>   |
| <b>Total assets</b>                                                        | <b>3,736,748</b> | <b>74,035</b>    | <b>18,787</b> | <b>492</b> | <b>143</b>  | <b>25,001</b>    | <b>3,855,206</b> |
| <b>Foreign exchange risk - Liabilities</b>                                 |                  |                  |               |            |             |                  |                  |
| Due to central bank                                                        | 0                | 0                | 0             | 0          | 0           | 0                | <b>0</b>         |
| Due to banks                                                               | 30,574           | 42,676           | 5,799         | 6          | 0           | 0                | <b>79,055</b>    |
| Due to customers                                                           | 2,802,369        | 355,940          | 13,164        | 441        | 223         | 24,774           | <b>3,196,911</b> |
| Derivative financial instruments                                           | 8,482            | 15               | 0             | 0          | 0           | 0                | <b>8,497</b>     |
| Lease liability                                                            | 20,834           | 0                | 0             | 0          | 0           | 0                | <b>20,834</b>    |
| Retirement benefit obligations                                             | 650              | 0                | 0             | 0          | 0           | 0                | <b>650</b>       |
| Income tax liability                                                       | 11,581           | (90)             | 0             | 0          | 0           | 0                | <b>11,491</b>    |
| Other liabilities                                                          | 38,472           | 601              | 4             | 0          | 0           | 5                | <b>39,082</b>    |
| Provisions                                                                 | 2,356            | 0                | 0             | 0          | 0           | 0                | <b>2,356</b>     |
| <b>Total liabilities</b>                                                   | <b>2,915,318</b> | <b>399,142</b>   | <b>18,967</b> | <b>447</b> | <b>223</b>  | <b>24,779</b>    | <b>3,358,876</b> |
| <b>Net on balance sheet position</b>                                       | <b>821,430</b>   | <b>(325,107)</b> | <b>(180)</b>  | <b>45</b>  | <b>(80)</b> | <b>222</b>       | <b>496,330</b>   |

The crisis simulation examines the negative effect on the Bank's annual profit or loss using possible scenarios of the fluctuation of the international exchange rates. The examined scenarios include the following fluctuations in the key currencies: Eur/Usd +15.6%, Eur/Gbp +25.7%, Eur/Chf -12%, Eur/Jpy +16.10%, Eur/Aud +20.8%, Eur/Nok +14.2%, Eur/Cad +16.4%, Eur/Sek +14.5%, Eur/Try +48.7%, Eur/Rub +34.3%, Eur/Dkk +20.8%, Eur/Ron +19.5%, Eur/Hkd +17%, Eur/Czk +15.4%, Eur/Pln +17.5%, Eur/Aed +20.8%. With closing balances as of 31/12/2024, the simulation results in losses of EUR 95.80 thousand.

### **Risk arising from share and other securities price changes**

#### **Group**

The risk regarding the shares and other securities held by the Group arises from possible negative fluctuations of the current prices of shares and other securities. The Group invests mainly in government bonds, corporate bonds traded both on international markets and on the Athens Stock Exchange, as well as in equity securities of the Athens Stock Exchange. Depending on the business purpose of the investment, they are allocated to the appropriate portfolio (assessment at fair value through profit or loss or the other comprehensive income).

The Group, as a measure of price risk assessment, calculates the negative impact on its annual results after taxes from a change in share prices.

## **Bank**

The risk of share prices relates to adverse fluctuations of shares' prices and derivatives on shares and stock exchange ratios held by the Bank in the portfolio measured at fair value through profit or loss.

This risk is monitored through limits set for each share and/or group of shares and furthermore techniques are applied to reduce it through derivatives on the respective shares and indices. Consequently, no significant exposure to this risk has been observed in 2024 beyond the risk undertaking levels set by the net of levels dully approved on the basis of the Bank's strategy.

The following table presents the results of the stress test regarding share price risks conducted on the portfolio held for trading and on the portfolio available for sale using balances as of 31/12/2024.

The scenarios examined are the following:

Regarding shares price risk (since the exposure of the portfolios focuses on the Greek market), the FTSE/ASE Large Cap. +/-56% fluctuation scenario was examined, as well as the S&P +/-55% fluctuation scenario.

| <b>Risk factors</b>        | <b>Markets</b>                                 | <b>Unfavorable scenario</b> | <b>Favorable scenario</b> |
|----------------------------|------------------------------------------------|-----------------------------|---------------------------|
| <b>Amounts in Eur '000</b> |                                                |                             |                           |
| <b>Shares prices</b>       | ASE movement of FTSE/Stock Exchange Large Cap. | 377                         | (220)                     |
|                            | Change in S&P                                  | 655                         | (424)                     |
|                            | <b>Total</b>                                   | <b>1,032</b>                | <b>(644)</b>              |

The total bond portfolio held by the Bank on 31/12/2024 amounts to EUR 687,207 thousand and is analysed as follows:

|                                                                       |         |
|-----------------------------------------------------------------------|---------|
| - Portfolio measured at fair value through profit or loss             | 226,238 |
| - Portfolio measured at fair value through other comprehensive income | 47,125  |
| - Portfolio measured at amortised cost                                | 413,844 |

The above amount does not include the "Bond from loan securitisation" of EUR 26.080 thousand.

In accordance with the business model followed by the Bank for the management of its securities, these are held in separate portfolios with the aim of

- exclusive collection of contractual cash flows
- both the collection of contractual cash flows and their sale
- mainly the sale of securities

The positions in the above portfolios consist mainly of Greek and Italian government bonds, interest-bearing Greek government bills as well as Greek corporate and bank bonds.

The Management of the Bank is informed on a daily basis about the bond transactions, the position and the valuation of the bonds.

The following table presents the losses and gains that would arise on the bond portfolio measured at fair value through profit or loss excluding the Bond from loan securitization and on the bond portfolio measured at fair value through other income, in case of a parallel shift in the bond yield curve by +/- 200 basis points:

| Risk factors<br>Amounts in Eur '000 | Scenario                              | Portfolio                                                           | +200 Bps | -200 Bps |
|-------------------------------------|---------------------------------------|---------------------------------------------------------------------|----------|----------|
| Bond yield curves                   | Movement of<br>bonds' yield<br>curves | Fair Value through P&L Portfolio (FVTPL)                            | (3,380)  | 3,679    |
|                                     |                                       | Interest rate swaps                                                 | 4,339    | (5,393)  |
|                                     |                                       | Fair Value through other comprehensive<br>income Portfolio (FVTOCI) | (3,466)  | 3,499    |
| Totals                              |                                       |                                                                     | (2,507)  | 1,786    |

In 2024 the Bank was also involved in the trading of carbon emission rights.

As part of the simulation exercise for its positions, the Bank examined the scenario of the decrease in the ICEDEU3 Index at a rate of -41%, with a time horizon of one day. The test resulted in gains of EUR 14.97 thousand.

### 4.3. Liquidity risk

Liquidity risk is the risk of not being able to find sufficient liquid assets to cover the Group's immediate obligations, or of finding them at a high financial cost to the Group.

The above risk is controlled through a developed liquidity management structure, consisting of various types of controls, procedures and limits. In this way, compliance with the regulations on liquidity ratios of the competent supervisory authorities, as well as with internal limits, is ensured.

The control and management of liquidity risk is achieved through the use and control of the following ratios:

(a) Liquidity Coverage Ratio (LCR): It is defined as the ratio of the high-quality liquid assets reserve to the net cash outflows of 30 days, as specified in Regulation (EU) 575/2013.

(b) Net Stable Funding Ratio (NSFR): It is defined as the ratio of the available amount of stable funding to the required amount of stable funding, as specified in Regulation (EU) No. 575/2013. A significant part of the assets is financed by customer deposits. Immediate cash needs are financed mainly by demand and savings deposits. The financing of long-term investments is mainly covered by long-term liabilities and by Equity.

Although these deposits can be withdrawn without notice if requested, the dispersion in number and type of deposits ensures the absence of significant fluctuations and therefore they constitute a stable deposit base for the most part. The Group carries out crisis simulations in the area of liquidity.

The following liquidity risk tables analyze the Group's and the Bank's liabilities to other banks, customer deposits and other liabilities to customers in the relevant periods, depending on the remaining period from the reporting date to their maturity. The amounts reported are the contractual undiscounted cash flows.

**Group**

| Amounts in Eur '000              | Up to<br>1 month | 1-3<br>months    | 3-12<br>months | 1-2<br>years | 2-5<br>years | Over 5<br>years | Total            |
|----------------------------------|------------------|------------------|----------------|--------------|--------------|-----------------|------------------|
| <b>As at 31st December 2024</b>  |                  |                  |                |              |              |                 |                  |
| <b>LIABILITIES</b>               |                  |                  |                |              |              |                 |                  |
| Due to banks                     | 115,563          | 0                | 0              | 0            | 0            | 0               | 115,563          |
| Due to customers                 | 2,811,903        | 1,184,856        | 642,847        | 3,806        | 0            | 0               | 4,643,412        |
| Derivative financial instruments | 5,318            | 0                | 0              | 0            | 0            | 0               | 5,318            |
| Lease Liability                  | 329              | 661              | 3,005          | 4,045        | 9,917        | 6,135           | 24,092           |
| Retirement benefit obligations   | 0                | 0                | 0              | 0            | 0            | 1,027           | 1,027            |
| Income tax liability             | 0                | 0                | 5,573          | 0            | 0            | 0               | 5,573            |
| Other liabilities                | 0                | 96,144           | 28,224         | 0            | 0            | 0               | 124,368          |
| Provisions                       | 0                | 0                | 0              | 0            | 0            | 4,167           | 4,167            |
| <b>Total liabilities</b>         | <b>2,933,113</b> | <b>1,281,661</b> | <b>679,649</b> | <b>7,851</b> | <b>9,917</b> | <b>11,329</b>   | <b>4,923,520</b> |

| Amounts in Eur '000              | Up to<br>1 month | 1-3<br>months  | 3-12<br>months | 1-2<br>years  | 2-5<br>years | Over 5<br>years | Total            |
|----------------------------------|------------------|----------------|----------------|---------------|--------------|-----------------|------------------|
| <b>As at 31st December 2023</b>  |                  |                |                |               |              |                 |                  |
| <b>LIABILITIES</b>               |                  |                |                |               |              |                 |                  |
| Due to banks                     | 81,079           | 0              | 0              | 0             | 0            | 0               | 81,079           |
| Due to customers                 | 2,194,913        | 678,834        | 303,833        | 14,224        | 0            | 0               | 3,191,804        |
| Derivative financial instruments | 8,497            | 0              | 0              | 0             | 0            | 0               | 8,497            |
| Lease Liability                  | 282              | 565            | 2,548          | 3,425         | 9,724        | 7,301           | 23,845           |
| Retirement benefit obligations   | 0                | 0              | 0              | 0             | 0            | 692             | 692              |
| Income tax liability             | 0                | 0              | 12,226         | 0             | 0            | 0               | 12,226           |
| Other liabilities                | 0                | 10,480         | 30,187         | 0             | 0            | 0               | 40,667           |
| Provisions                       | 0                | 0              | 0              | 0             | 0            | 2,366           | 2,366            |
| <b>Total liabilities</b>         | <b>2,284,771</b> | <b>689,879</b> | <b>348,794</b> | <b>17,649</b> | <b>9,724</b> | <b>10,359</b>   | <b>3,361,176</b> |

**Bank**

| Amounts in Eur '000              | Up to<br>1 month | 1-3<br>months    | 3-12<br>months | 1-2<br>years | 2-5<br>years | Over 5<br>years | Total            |
|----------------------------------|------------------|------------------|----------------|--------------|--------------|-----------------|------------------|
| <b>As at 31st December 2024</b>  |                  |                  |                |              |              |                 |                  |
| <b>LIABILITIES</b>               |                  |                  |                |              |              |                 |                  |
| Due to banks                     | 115,563          | 0                | 0              | 0            | 0            | 0               | 115,563          |
| Due to customers                 | 2,822,555        | 1,184,856        | 642,847        | 3,806        | 0            | 0               | 4,654,064        |
| Derivative financial instruments | 5,318            | 0                | 0              | 0            | 0            | 0               | 5,318            |
| Lease Liability                  | 327              | 656              | 2,992          | 4,033        | 9,911        | 6,136           | 24,055           |
| Retirement benefit obligations   | 0                | 0                | 0              | 0            | 0            | 964             | 964              |
| Income tax liability             | 0                | 0                | 4,961          | 0            | 0            | 0               | 4,961            |
| Other liabilities                | 0                | 95,570           | 27,363         | 0            | 0            | 0               | 122,933          |
| Provisions                       | 0                | 0                | 0              | 0            | 0            | 4,157           | 4,157            |
| <b>Total liabilities</b>         | <b>2,943,763</b> | <b>1,281,082</b> | <b>678,163</b> | <b>7,839</b> | <b>9,911</b> | <b>11,257</b>   | <b>4,932,015</b> |

| Amounts in Eur '000              | Up to<br>1 month | 1-3<br>months  | 3-12<br>months | 1-2<br>years  | 2-5<br>years | Over 5<br>years | Total            |
|----------------------------------|------------------|----------------|----------------|---------------|--------------|-----------------|------------------|
| <b>As at 31st December 2023</b>  |                  |                |                |               |              |                 |                  |
| <b>LIABILITIES</b>               |                  |                |                |               |              |                 |                  |
| Due to banks                     | 79,055           | 0              | 0              | 0             | 0            | 0               | 79,055           |
| Due to customers                 | 2,200,020        | 678,834        | 303,833        | 14,224        | 0            | 0               | 3,196,911        |
| Derivative financial instruments | 8,497            | 0              | 0              | 0             | 0            | 0               | 8,497            |
| Lease Liability                  | 281              | 562            | 2,540          | 3,410         | 9,722        | 7,301           | 23,816           |
| Retirement benefit obligations   | 0                | 0              | 0              | 0             | 0            | 650             | 650              |
| Income tax liability             | 0                | 0              | 11,491         | 0             | 0            | 0               | 11,491           |
| Other liabilities                | 0                | 9,816          | 29,266         | 0             | 0            | 0               | 39,082           |
| Provisions                       | 0                | 0              | 0              | 0             | 0            | 2,356           | 2,356            |
| <b>Total liabilities</b>         | <b>2,287,853</b> | <b>689,212</b> | <b>347,130</b> | <b>17,634</b> | <b>9,722</b> | <b>10,307</b>   | <b>3,361,858</b> |

#### 4.4. Capital adequacy

The Group is subject to the supervision of Bank of Greece which sets and monitors the Group's capital adequacy requirements.

For the calculation of the capital adequacy the Basel III regulatory framework is applied, which was incorporated into the legislation of the European Union (EU) with the adoption of Regulation (EU) 575/2013 of the European Parliament and of the Council ("CRR") regarding the requirements of prudential supervision for credit institutions and investment companies, as amended and in force, as well as Directive 2013/36 (Capital Requirements Directive-CRD IV) and in Greek legislation by Law 4261/2014, as amended and in force.

According to this (Article 92 paragraph 1 of Regulation (EU) No 575/2013), the minimum capital adequacy ratios that each credit institution shall satisfy are the following:

- Minimum Common Equity Tier 1-CET1 capital ratio of 4.5%,
- minimum Tier 1 capital ratio of 6%,
- and minimum total capital ratio (TCR) of 8%.

Under Pillar I, the Capital Adequacy Ratio is calculated as the ratio of regulatory capital to total weighted assets related to credit, operational and market risk and related to on- and off- balance sheet items at an individual and consolidated level.

By force of the July 5,2024 decision of the Credit and Insurance Committee of the Bank of Greece ("Determination of supervisory requirements for the credit institution "Optima bank A.E." based on the Supervisory Examination and Evaluation Procedure (EDEA)" the Bank is obliged to maintain individually and consolidated basis total capital requirement EDEA (Total SREP Capital Ratio - TSCR) 10.10% and overall capital requirement (Overall Capital Ratio - OCR) 12.60%.

The same decision provides direction to the Group to maintain additional capital of 0.5%, in addition to the total capital requirements of EDEA and the capital safety reserves, as Pillar 2 Capital Guidance which will be covered by capital of common shares of the Tier 1 (CET1). The total capital requirements on an individual and consolidated basis are detailed in the table below:

| <b>Total Capital Requirements</b>                                                | <b>Total Capital (%)</b> |
|----------------------------------------------------------------------------------|--------------------------|
| Minimum Total Capital Ratio                                                      | 8.00%                    |
| Additional Pillar II Own Funds Requirements (P2R)                                | 2.10%                    |
| <b>Total Capital Requirements EDEA (TSCR)</b>                                    | <b>10.10%</b>            |
| (Capital Conservation Buffer - CCB)                                              | 2.50%                    |
| <b>Overall Capital Requirements (OCR)</b>                                        | <b>12.60%</b>            |
| Pillar 2 Guidance – P2G                                                          | 0.50%                    |
| <b>Overall Capital Requirements (OCR) &amp; Pillar 2 Guidance (P2G) – (TRCR)</b> | <b>13.10%</b>            |

More specifically, compliance with EDEA's overall capital requirements includes:

- The total capital requirements of Pillar I amounting to 8% which should be satisfied at all times in accordance with article 92 paragraph 1 of Regulation (EU) no. 575/2013
- The additional capital requirements of Pillar II (P2R) amounting to 2.10% in the context of the implementation of the provisions of article 96A paragraph 1 (a) of Law 4261/2014
- The capital requirement to maintain a capital conservation buffer (CCB) of 2.5% in accordance with article 122 of Law 4261/2014.
- the direction in terms of additional Equity (Pillar 2 Capital Guidance) of maintaining an amount of 0.5% plus EDEA's total capital requirements and safety reserves.

The Capital Adequacy ratio of the Group and the Bank on 31/12/2024 and 31/12/2023 was structured as follows:

### **Group**

| Amounts in Eur '000                          | 31/12/2024 <sup>(1)</sup> | 31/12/2024       | 31/12/2023       |
|----------------------------------------------|---------------------------|------------------|------------------|
| Share Capital                                | 254,521                   | 254,521          | 254,245          |
| Share premium                                | 84,114                    | 84,114           | 84,114           |
| Less: Treasury Shares                        | (112)                     | (112)            | (164)            |
| Other Reserves                               | 30,155                    | 30,152           | 27,211           |
| Retained Earnings                            | 210,582                   | 160,282          | 112,961          |
| Less: Intangible assets                      | (10,775)                  | (10,775)         | (10,116)         |
| Other regulatory adjustments                 | 5,720                     | 4,378            | 6,222            |
| <b>Common Equity Tier 1 Capital ( CET1)</b>  | <b>574,205</b>            | <b>522,560</b>   | <b>474,473</b>   |
| Additional Tier 1 instruments (AT1)          | 0                         | 0                | 0                |
| <b>Additional Tier 1 Capital (AT1)</b>       | <b>0</b>                  | <b>0</b>         | <b>0</b>         |
| <b>Tier 1 Capital (TIER1)</b>                | <b>574,205</b>            | <b>522,560</b>   | <b>474,473</b>   |
| <b>Total regulatory capital</b>              | <b>574,205</b>            | <b>522,560</b>   | <b>474,473</b>   |
| <b>Total risk weighted assets</b>            | <b>3,988,249</b>          | <b>3,859,858</b> | <b>2,685,788</b> |
| <b>CET1 Capital Ratio</b>                    | <b>14.40%</b>             | <b>13.54%</b>    | <b>17.67%</b>    |
| <b>T1 Capital Ratio</b>                      | <b>14.40%</b>             | <b>13.54%</b>    | <b>17.67%</b>    |
| <b>Total Regulatory Capital Ratio (TRCR)</b> | <b>14.40%</b>             | <b>13.54%</b>    | <b>17.67%</b>    |

### **Bank**

| Amounts in Eur '000                          | 31/12/2024 <sup>(2)</sup> | 31/12/2024       | 31/12/2023       |
|----------------------------------------------|---------------------------|------------------|------------------|
| Share Capital                                | 254,521                   | 254,521          | 254,245          |
| Share premium                                | 84,114                    | 84,114           | 84,114           |
| Less: Treasury Shares                        | (112)                     | (112)            | (164)            |
| Other Reserves                               | 29,087                    | 29,084           | 26,314           |
| Retained Earnings                            | 194,422                   | 145,676          | 100,133          |
| Less: Intangible assets                      | (8,193)                   | (8,193)          | (7,421)          |
| Other regulatory adjustments                 | 5,641                     | 4,295            | 6,138            |
| <b>Common Equity Tier 1 Capital ( CET1)</b>  | <b>559,480</b>            | <b>509,385</b>   | <b>463,358</b>   |
| Additional Tier 1 instruments (AT1)          | 0                         | 0                | 0                |
| <b>Additional Tier 1 Capital (AT1)</b>       | <b>0</b>                  | <b>0</b>         | <b>0</b>         |
| <b>Tier 1 Capital (TIER1)</b>                | <b>559,480</b>            | <b>509,385</b>   | <b>463,358</b>   |
| <b>Total regulatory capital</b>              | <b>559,480</b>            | <b>509,385</b>   | <b>463,358</b>   |
| <b>Total risk weighted assets</b>            | <b>3,880,675</b>          | <b>3,759,787</b> | <b>2,599,548</b> |
| <b>CET1 Capital Ratio</b>                    | <b>14.42%</b>             | <b>13.55%</b>    | <b>17.82%</b>    |
| <b>T1 Capital Ratio</b>                      | <b>14.42%</b>             | <b>13.55%</b>    | <b>17.82%</b>    |
| <b>Total Regulatory Capital Ratio (TRCR)</b> | <b>14.42%</b>             | <b>13.55%</b>    | <b>17.82%</b>    |

(1) Items have been calculated including profits of the year (EUR 140,224 thousand) and incorporating a provision for dividend distribution (EUR 41,014 thousand), which is subject to the approval of the Ordinary General Assembly.

(2) Items have been calculated including profits of the year (EUR 136,712 thousand) and incorporating a provision for dividend distribution (EUR 41,014 thousand), which is subject to the approval of the Ordinary General Assembly.

## **5. Fair value of financial assets and liabilities**

### **5.1. Financial assets and liabilities not carried at fair value**

The fair value represents the amount for which an asset could be replaced, or a liability settled, through an orderly transaction on the main or most advantageous market on the date of the measurement and under current market conditions (exit price). Differences may arise between the carrying amount and the fair value of financial assets of the statement of financial position and liabilities. Loans and other advances, securities and financial liabilities measured at amortised cost are not measured at fair value. The carrying amount of these items, as presented in the financial statements, does not significantly differ from their fair value. In particular:

#### **(a) Due from banks**

Due from other banks mainly include short-term interbank placements as well as other receivables, such as loans to credit institutions.

The vast majority of the placements have one-month maturity and therefore their fair value closely approximates their carrying amount.

#### **(b) Loans and advances to customers**

Loans to customers are presented after deducting the provision for impairment. Most of the above are charged at a floating rate and therefore their fair value closely approximates their carrying amount.

#### **(c) Due to customers**

The fair value of deposits without fixed maturity (savings and sight) is the amount that the Group should repay upon whenever requested by the customer. Their fair value is equal to their carrying amount.

### **5.2. Fair Value Hierarchy**

IFRS 13 defines the valuation and control procedures regarding the objectivity of the data used by these models. The observable data are based on active markets and derived from independent sources, while non-observable data refers to the Management assumptions and valuation models. These two methods for retrieving information generate the following hierarchy:

**Level 1** - Quoted prices in active markets for identical financial assets or financial liabilities. This level includes listed shares, debt securities and listed derivatives.

**Level 2** - Includes inputs other than the quoted prices included in Level 1. For similar financial asset or financial liability, for prices from inactive markets and data which are available in the market and can be used in calculating the value of the financial asset or financial liability. This level includes the majority of over-the-counter (OTC) derivative contracts and various debt securities, the value of which is determined by valuation models, discounted cash flows and similar techniques using data related to the prices of the underlying securities, their volatility as well as interest rate curves such as ESTR and SOFR.



**Level 3** – Includes inputs that are not based on observable market data (unobservable inputs). The Group adjusts the unobservable inputs according to the best possible information at its disposal and using in its assessment assumptions that would be used by market participants for the valuation of the financial asset or financial liability. This level includes capital investment and loan funds that are not traded in an active market, and there are no similar products that are traded. The valuation is based on data, observations and assumptions that require significant judgment from the Management.

### **Group**

#### **Fair value hierarchy as of December 31, 2024:**

##### **Financial assets measured at fair value**

| Amounts in Eur '000                                                        |                | 31/12/2024   |               |                  |                        |
|----------------------------------------------------------------------------|----------------|--------------|---------------|------------------|------------------------|
| Financial assets measured at fair value                                    | Level 1        | Level 2      | Level 3       | Total fair value | Total accounting value |
| Financial assets measured at fair value through profit and loss            | 238,362        | 0            | 26,080        | <b>264,442</b>   | <b>264,442</b>         |
| Derivative financial instruments                                           | 56             | 2,154        | 0             | <b>2,210</b>     | <b>2,210</b>           |
| Financial assets measured at fair value through other comprehensive income | 47,390         | 0            | 0             | <b>47,390</b>    | <b>47,390</b>          |
| <b>Total</b>                                                               | <b>285,808</b> | <b>2,154</b> | <b>26,080</b> | <b>314,042</b>   | <b>314,042</b>         |

Level 3 includes a bond from loan securitisation which is calculated at fair value using the income approach method through the application of the discounted cash flow method. Its valuation depends on unobservable values which include future revenues, operating expenses and discount rates. The fair value of the bond from loan securitisation held by the Group on 31/12/2024 was EUR 26,080 thousand and on 31/12/2023 EUR 30,696 thousand. For the valuation of the bond, 3 scenarios and the discount rate have been used rate") ranges from 3% to 15% in the base scenario depending on the characteristics and quality of the loan portfolio.

If the discount rate increases by 2% in the categories where the discount rate used in the valuation is 15% and increases by 1% in all other loan categories relative to the discount rate used in the valuation then the bond price will be higher by EUR 600 thousand.

If the discount rate is reduced by 2% in the categories where the discount rate used in the valuation is 15% and is reduced by 1% in all other loan categories relative to the discount rate used in the valuation then the price of the bond will be smaller by EUR 600 thousand.

| Amounts in Eur '000                          |           | 31/12/2024   |          |                  |                        |
|----------------------------------------------|-----------|--------------|----------|------------------|------------------------|
| Financial liabilities measured at fair value | Level 1   | Level 2      | Level 3  | Total fair value | Total accounting value |
| Derivative financial instruments             | 37        | 5,281        | 0        | <b>5,318</b>     | <b>5,318</b>           |
| <b>Total</b>                                 | <b>37</b> | <b>5,281</b> | <b>0</b> | <b>5,318</b>     | <b>5,318</b>           |

There was no transfer of financial assets and financial liabilities between Levels 1 and 2 during the periods ended 31 December 2024 and 31 December 2023. During the periods ended December 31, 2024 and December 31, 2023, there was no transfer to and from Level 3.

Transfers between levels are considered to have occurred at the end of the reporting periods in which the financial instruments were transferred.

### Financial items not measured at fair value

| Amounts in Eur '000               |                | 31/12/2024 |                  |                  |                        |
|-----------------------------------|----------------|------------|------------------|------------------|------------------------|
| Financial assets                  | Level 1        | Level 2    | Level 3          | Total fair value | Total accounting value |
| Due from banks                    | 162,356        | 0          | 9,332            | 171,688          | 171,309                |
| Loans and advances to customers   | 0              | 0          | 3,830,727        | 3,830,727        | 3,612,598              |
| Debt securities at amortised cost | 406,829        | 0          | 0                | 406,829          | 413,844                |
| <b>Total</b>                      | <b>569,185</b> | <b>0</b>   | <b>3,840,059</b> | <b>4,409,244</b> | <b>4,197,751</b>       |

The following methods and assumptions were used to estimate the fair value of the above financial instruments on December 31, 2024 and 2023.

**Due from banks:** The vast majority of the interbank placements have one-month maturity and therefore their fair value closely approximates their carrying amount. Fair value is calculated using discounted cash flow models. Discount rates incorporate interest rate curves taking into account market data, expected credit risk and specific Bank/customer parameters.

**Loans and advances to customers at amortised cost:** Fair value is calculated using discounted cash flow models. Discount rates incorporate interest rate curves taking into account market data, expected credit risk and specific Bank/customer parameters.

**Debt securities at amortised cost:** Fair value is calculated with prices traded in the market.

It is noted that at Group level there were no movements between levels.

### Fair value hierarchy as of December 31, 2023:

#### Financial assets measured at fair value

| Amounts in Eur '000                                                        |                | 31/12/2023 |               |                  |                        |
|----------------------------------------------------------------------------|----------------|------------|---------------|------------------|------------------------|
| Financial assets measured at fair value                                    | Level 1        | Level 2    | Level 3       | Total fair value | Total accounting value |
| Financial assets measured at fair value through profit and loss            | 306,932        | 0          | 30,696        | 337,628          | 337,628                |
| Derivative financial instruments                                           | 131            | 902        | 0             | 1,033            | 1,033                  |
| Financial assets measured at fair value through other comprehensive income | 86,488         | 0          | 0             | 86,488           | 86,488                 |
| <b>Total</b>                                                               | <b>393,551</b> | <b>902</b> | <b>30,696</b> | <b>425,149</b>   | <b>425,149</b>         |

| Amounts in Eur '000                                                  |            | 31/12/2023   |          |                  |                        |
|----------------------------------------------------------------------|------------|--------------|----------|------------------|------------------------|
| Financial liabilities measured at fair value                         | Level 1    | Level 2      | Level 3  | Total fair value | Total accounting value |
| Derivative financial instruments                                     | 97         | 8,400        | 0        | 8,497            | 8,497                  |
| Financial liabilities measured at fair value through profit and loss | 39         | 0            | 0        | 39               | 39                     |
| <b>Total</b>                                                         | <b>136</b> | <b>8,400</b> | <b>0</b> | <b>8,536</b>     | <b>8,536</b>           |

### Financial items not measured at fair value

| Amounts in Eur '000               |                | 31/12/2023 |                  |                  |                        |
|-----------------------------------|----------------|------------|------------------|------------------|------------------------|
| Financial assets                  | Level 1        | Level 2    | Level 3          | Total fair value | Total accounting value |
| Loans and advances to customers   | 0              | 0          | 2,621,878        | 2,621,878        | 2,430,914              |
| Debt securities at amortised cost | 246,881        | 0          | 0                | 246,881          | 251,388                |
| <b>Total</b>                      | <b>246,881</b> | <b>0</b>   | <b>2,621,878</b> | <b>2,868,759</b> | <b>2,682,302</b>       |

### Movement of financial instruments at Level 3

| Financial instruments measured at fair value through profit or loss |               |
|---------------------------------------------------------------------|---------------|
| <b>Balance as at 1/1/2023</b>                                       | <b>37,781</b> |
| Gain/ (loss) recognised at profit or loss                           | (135)         |
| Repayments                                                          | (6,950)       |
| <b>Balance as at 31/12/2023</b>                                     | <b>30,696</b> |
| Gain/ (loss) recognised at profit or loss                           | 2,043         |
| Repayments                                                          | (6,659)       |
| <b>Balance as at 31/12/2024</b>                                     | <b>26,080</b> |

### Bank

### Fair value hierarchy as of December 31, 2024:

### Financial assets measured at fair value

| Amounts in Eur '000                                                        |                | 31/12/2024   |               |                  |                        |
|----------------------------------------------------------------------------|----------------|--------------|---------------|------------------|------------------------|
| Financial assets measured at fair value                                    | Level 1        | Level 2      | Level 3       | Total fair value | Total accounting value |
| Financial assets measured at fair value through profit and loss            | 235,546        | 0            | 26,080        | 261,626          | 261,626                |
| Derivative financial instruments                                           | 56             | 2,154        | 0             | 2,210            | 2,210                  |
| Financial assets measured at fair value through other comprehensive income | 47,390         | 0            | 0             | 47,390           | 47,390                 |
| <b>Total</b>                                                               | <b>282,992</b> | <b>2,154</b> | <b>26,080</b> | <b>311,226</b>   | <b>311,226</b>         |

Level 3 includes a bond from loan securitisation which is calculated at fair value using the income approach method through the application of the discounted cash flow method. Its valuation depends on unobservable values which include future revenues, operating expenses and discount rates. The fair value of the bond from loan securitisation held by the Group on 31/12/2024 was EUR 26,080 thousand and on 31/12/2023 EUR 30,696 thousand. For the valuation of the bond, 3 scenarios and the discount rate have been used rate") ranges from 3% to 15% in the base scenario depending on the characteristics and quality of the loan portfolio.

If the discount rate increases by 2% in the categories where the discount rate used in the valuation is 15% and increases by 1% in all other loan categories relative to the discount rate used in the valuation then the bond price will be higher by EUR 600 thousand.

If the discount rate is reduced by 2% in the categories where the discount rate used in the valuation is 15% and is reduced by 1% in all other loan categories relative to the discount rate used in the valuation then the price of the bond will be smaller by EUR 600 thousand.

| Amounts in Eur '000                          |           | 31/12/2024   |          |                  |                        |
|----------------------------------------------|-----------|--------------|----------|------------------|------------------------|
| Financial liabilities measured at fair value | Level 1   | Level 2      | Level 3  | Total fair value | Total accounting value |
| Derivative financial instruments             | 37        | 5,281        | 0        | 5,318            | 5,318                  |
| <b>Total</b>                                 | <b>37</b> | <b>5,281</b> | <b>0</b> | <b>5,318</b>     | <b>5,318</b>           |

There was no transfer of financial assets and financial liabilities between Levels 1 and 2 during the periods ended 31 December 2024 and 31 December 2023. During the periods ended December 31, 2024 and December 31, 2023, there was no transfer to and from Level 3.

Transfers between levels are considered to have occurred at the end of the reporting periods in which the financial instruments were transferred.

#### Financial items not measured at fair value

| Amounts in Eur '000               |                | 31/12/2024 |                  |                  |                        |
|-----------------------------------|----------------|------------|------------------|------------------|------------------------|
| Financial assets                  | Level 1        | Level 2    | Level 3          | Total fair value | Total accounting value |
| Due from banks                    | 151,204        | 0          | 9,332            | 160,536          | 160,157                |
| Loans and advances to customers   | 0              | 0          | 3,814,213        | 3,814,213        | 3,596,600              |
| Debt securities at amortised cost | 406,829        | 0          | 0                | 406,829          | 413,844                |
| <b>Total</b>                      | <b>558,033</b> | <b>0</b>   | <b>3,823,545</b> | <b>4,381,578</b> | <b>4,170,601</b>       |

#### Fair value hierarchy as of December 31, 2023:

##### Financial assets measured at fair value

| Amounts in Eur '000                                                        |                | 31/12/2023 |               |                  |                        |
|----------------------------------------------------------------------------|----------------|------------|---------------|------------------|------------------------|
| Financial assets measured at fair value                                    | Level 1        | Level 2    | Level 3       | Total fair value | Total accounting value |
| Financial assets measured at fair value through profit and loss            | 306,298        | 0          | 30,696        | 336,994          | 336,994                |
| Derivative financial instruments                                           | 131            | 902        | 0             | 1,033            | 1,033                  |
| Financial assets measured at fair value through other comprehensive income | 86,488         | 0          | 0             | 86,488           | 86,488                 |
| <b>Total</b>                                                               | <b>392,917</b> | <b>902</b> | <b>30,696</b> | <b>424,515</b>   | <b>424,515</b>         |

| Amounts in Eur '000                                                  |            | 31/12/2023   |          |                  |                        |
|----------------------------------------------------------------------|------------|--------------|----------|------------------|------------------------|
| Financial liabilities measured at fair value                         | Level 1    | Level 2      | Level 3  | Total fair value | Total accounting value |
| Derivative financial instruments                                     | 97         | 8,400        | 0        | 8,497            | 8,497                  |
| Financial liabilities measured at fair value through profit and loss | 39         | 0            | 0        | 39               | 39                     |
| <b>Total</b>                                                         | <b>136</b> | <b>8,400</b> | <b>0</b> | <b>8,536</b>     | <b>8,536</b>           |

## Financial items not measured at fair value

| Amounts in Eur '000               |                | 31/12/2023 |                  |                  |                        |
|-----------------------------------|----------------|------------|------------------|------------------|------------------------|
| Financial assets                  | Level 1        | Level 2    | Level 3          | Total fair value | Total accounting value |
| Loans and advances to customers   | 0              | 0          | 2,606,901        | <b>2,606,901</b> | <b>2,416,072</b>       |
| Debt securities at amortised cost | 246,881        | 0          | 0                | <b>246,881</b>   | <b>251,388</b>         |
| <b>Total</b>                      | <b>246,881</b> | <b>0</b>   | <b>2,606,901</b> | <b>2,853,782</b> | <b>2,667,460</b>       |

### Movement of financial instruments at Level 3

| Financial instruments measured at fair value through profit or loss |               |
|---------------------------------------------------------------------|---------------|
| <b>Balance as at 1/1/2023</b>                                       | <b>36,242</b> |
| Gain/ (loss) recognised at profit or loss                           | 1,404         |
| Repayments                                                          | (6,950)       |
| <b>Balance as at 31/12/2023</b>                                     | <b>30,696</b> |
| Gain/ (loss) recognised at profit or loss                           | 2,043         |
| Repayments                                                          | (6,659)       |
| <b>Balance as at 31/12/2024</b>                                     | <b>26,080</b> |

## 6. Net interest income

The breakdown of net interest income is as follows:

### Group

| Amounts in Eur '000                                                                              | 1/1/2024 –<br>31/12/2024 | 1/1/2023 –<br>31/12/2023 |
|--------------------------------------------------------------------------------------------------|--------------------------|--------------------------|
| <b>Interest and similar income</b>                                                               |                          |                          |
| Interest on debt securities at amortised cost                                                    | 16,614                   | 8,476                    |
| Interest on loans at amortised cost                                                              | 207,230                  | 141,533                  |
| Interest on interbank transactions                                                               | 18,618                   | 12,427                   |
| Other interest income                                                                            | 785                      | 734                      |
| Interest on debt securities measured at fair value through other comprehensive income            | 1,221                    | 1,330                    |
| <b>Total interest and similar income for financial instrument not measured at FVTPL</b>          | <b>244,468</b>           | <b>164,500</b>           |
| Debt securities at fair value through profit and loss                                            | 6,994                    | 8,485                    |
| Interest derivatives                                                                             | 2,185                    | 112                      |
| <b>Total interest and similar income from financial instruments</b>                              | <b>253,647</b>           | <b>173,097</b>           |
| <b>Interest expense and similar charges</b>                                                      |                          |                          |
| Interest on deposits                                                                             | (56,577)                 | (25,756)                 |
| Interbank transactions                                                                           | (3,477)                  | (3,596)                  |
| Interest on convertible bond loan                                                                | 0                        | (366)                    |
| Interest on rights of use assets                                                                 | (732)                    | (762)                    |
| Other interest expenses                                                                          | (649)                    | (301)                    |
| <b>Total interest expense and similar charges on financial instruments not measured at FVTPL</b> | <b>(61,435)</b>          | <b>(30,781)</b>          |
| Interest on derivatives                                                                          | (2,355)                  | (104)                    |
| <b>Total interest expense and similar charges</b>                                                | <b>(63,790)</b>          | <b>(30,885)</b>          |
| <b>Net interest income</b>                                                                       | <b>189,857</b>           | <b>142,212</b>           |

## **Bank**

Amounts in Eur '000

|                                                                                                  | <b>1/1/2024 –<br/>31/12/2024</b> | <b>1/1/2023 –<br/>31/12/2023</b> |
|--------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------|
| <b>Interest and similar income</b>                                                               |                                  |                                  |
| Interest on debt securities at amortised cost                                                    | 16,614                           | 8,476                            |
| Interest on loans at amortised cost                                                              | 204,400                          | 139,233                          |
| Interest on due from banks                                                                       | 18,591                           | 12,427                           |
| Other interest income                                                                            | 788                              | 751                              |
| Interest on debt securities measured at fair value through other comprehensive income            | 1,221                            | 1,330                            |
| <b>Total interest and similar income for financial instrument not measured at FVTPL</b>          | <b>241,614</b>                   | <b>162,217</b>                   |
| Debt securities at fair value through profit and loss                                            | 6,994                            | 8,485                            |
| Interest on derivatives                                                                          | 2,185                            | 112                              |
| <b>Total interest and similar income from financial instruments</b>                              | <b>250,793</b>                   | <b>170,814</b>                   |
| <b>Interest expense and similar charges</b>                                                      |                                  |                                  |
| Interest on deposits                                                                             | (56,602)                         | (25,760)                         |
| Interest on due to banks                                                                         | (3,477)                          | (3,596)                          |
| Interest on convertible bond loan                                                                | 0                                | (366)                            |
| Interest on rights of use assets                                                                 | (730)                            | (762)                            |
| Other interest expenses                                                                          | (619)                            | (44)                             |
| <b>Total interest expense and similar charges on financial instruments not measured at FVTPL</b> | <b>(61,428)</b>                  | <b>(30,528)</b>                  |
| Interest on derivatives                                                                          | (2,355)                          | (105)                            |
| <b>Total interest expense and similar charges</b>                                                | <b>(63,783)</b>                  | <b>(30,633)</b>                  |
| <b>Net interest income</b>                                                                       | <b>187,010</b>                   | <b>140,181</b>                   |

The increase in interest from bonds, loans and deposits is due to the evolution of the balances of the respective portfolios.

## **7. Net fee and commission income**

The breakdown of net fee and commission income is as follows:

### **Group**

Amounts in Eur '000

|                                                       | <b>1/1/2024 –<br/>31/12/2024</b> | <b>1/1/2023 –<br/>31/12/2023</b> |
|-------------------------------------------------------|----------------------------------|----------------------------------|
| <b>Fee and commission income</b>                      |                                  |                                  |
| Commission income from commercial transactions        | 4,478                            | 3,443                            |
| Commission income from loans and letters of guarantee | 20,660                           | 16,187                           |
| Commission income from investment banking             | 6,590                            | 5,336                            |
| Commission income from brokerage services             | 16,015                           | 13,614                           |
| <b>Total fee and commission income</b>                | <b>47,743</b>                    | <b>38,580</b>                    |
| <b>Fee and commission expense</b>                     |                                  |                                  |
| Commission expense from commercial transactions       | (908)                            | (665)                            |
| Commission expense from brokerage services            | (5,503)                          | (5,796)                          |
| <b>Total fee and commission expense</b>               | <b>(6,411)</b>                   | <b>(6,461)</b>                   |
| <b>Net fee and commission income</b>                  | <b>41,332</b>                    | <b>32,119</b>                    |

## **Bank**

Amounts in Eur '000

### **Fee and commission income**

|                                                       | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|-------------------------------------------------------|----------------------------------|----------------------------------|
| Commission income from commercial transactions        | 4,494                            | 3,444                            |
| Commission income from loans and letters of guarantee | 20,697                           | 16,262                           |
| Commission income from investment banking             | 490                              | 924                              |
| Commission income from brokerage services             | 17,323                           | 14,356                           |
| <b>Total fee and commission income</b>                | <b>43,004</b>                    | <b>34,986</b>                    |

### **Fee and commission expense**

|                                                 |                |                |
|-------------------------------------------------|----------------|----------------|
| Commission expense from commercial transactions | (809)          | (659)          |
| Commission expense from brokerage services      | (5,503)        | (5,796)        |
| <b>Total fee and commission expense</b>         | <b>(6,312)</b> | <b>(6,455)</b> |

### **Net fee and commission income**

|               |               |
|---------------|---------------|
| <b>36,692</b> | <b>28,531</b> |
|---------------|---------------|

The increase in loans, as well as the general development of banking and stock exchange transactions resulted in the growth of the corresponding commissions.

## **8. Gains/ (losses) from financial transactions**

The gains/(losses) from financial transactions are analysed as follows:

### **Group**

Amounts in Eur '000

|                                                            | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|------------------------------------------------------------|----------------------------------|----------------------------------|
| Gains/(losses) from foreign exchange differences           | 5,861                            | 8,572                            |
| Gains/(losses) from derivatives held for trading           | 3,538                            | (3,187)                          |
| Gains/(losses) from carbon emission rights                 | 1,050                            | 913                              |
| Gains/(losses) from investments in shares and mutual funds | 1,858                            | 4,426                            |
| Gains/(losses) from bonds                                  | 7,488                            | 5,833                            |
| <b>Total</b>                                               | <b>19,795</b>                    | <b>16,557</b>                    |

### **Bank**

Amounts in Eur '000

|                                                            | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|------------------------------------------------------------|----------------------------------|----------------------------------|
| Gains/(losses) from foreign exchange differences           | 5,857                            | 8,575                            |
| Gains/(losses) from derivatives held for trading           | 3,539                            | (3,187)                          |
| Gains/(losses) from carbon emission rights                 | 1,050                            | 913                              |
| Gains/(losses) from investments in shares and mutual funds | 1,726                            | 4,601                            |
| Gains/(losses) from bonds                                  | 7,497                            | 5,833                            |
| <b>Total</b>                                               | <b>19,669</b>                    | <b>16,735</b>                    |

The gains/(losses) from financial transactions of the Bank have been mainly affected by the following:

- Gain of EUR 5,857 thousand included in line "Gains/(losses) from foreign exchange differences" concerns management of foreign exchange position and client transactions on commodities and foreign exchange derivatives.

- Gain of EUR 3,539 thousand in line "Gains/(losses) of financial transactions from derivatives held for trading" mainly concerns gain of EUR 1,999 thousand from foreign exchange derivatives, gain of EUR 1,889 from settlement and valuation of interest rate derivatives (Interest Rate Swaps & Options) and loss of EUR 335 thousand from derivatives on shares and indices of the Athens Stock Exchange which are offset by profits from investments in shares and mutual funds.
- Gain of EUR 1,050 thousand included in line "Gains/(losses) from carbon emission rights" includes the result from purchase and sale of carbon emission rights, in the context of the promotion of the product to the Bank's customers, valuation of carbon emission inventory and carbon emission derivatives for hedging purposes.
- Gain of EUR 1,726 thousand included in line "Gains/(losses) from investments in shares and mutual funds" relates to management and revaluation of shares position.
- Gain of EUR 7,497 thousand included in line "Gains/(losses) from bonds" arises from gain of EUR 5,454 thousand from liquidations and valuation of bonds measured at fair value through profit and loss, as well as gain of EUR 2,043 thousand relating to the valuation of a bond of securitised loans.

## 9. Other operating income

The other operating income is analysed as follows:

### Group

|                     | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|---------------------|----------------------------------|----------------------------------|
| Amounts in Eur '000 |                                  |                                  |
| Rental income       | 5                                | 6                                |
| Other income        | 574                              | 1,006                            |
| <b>Total</b>        | <b>579</b>                       | <b>1,012</b>                     |

### Bank

|                     | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|---------------------|----------------------------------|----------------------------------|
| Amounts in Eur '000 |                                  |                                  |
| Rental income       | 38                               | 38                               |
| Other income        | 657                              | 1,116                            |
| <b>Total</b>        | <b>695</b>                       | <b>1,154</b>                     |

The variance of other income in Bank is due to the profit from the sale of property (EUR 0.5 million) on 31/12/2023.

## 10. Staff costs

The total charge on the results of the year for staff benefits is broken down as follows:

### Group

|                                               | <b>Note</b> | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|-----------------------------------------------|-------------|----------------------------------|----------------------------------|
| Amounts in Eur '000                           |             |                                  |                                  |
| Salaries and wages                            |             | (26,164)                         | (24,494)                         |
| Social security contributions                 |             | (4,693)                          | (4,337)                          |
| Pension costs - employee defined benefit plan | 31          | (184)                            | (225)                            |
| Other staff costs                             |             | (1,597)                          | (1,327)                          |
| <b>Total</b>                                  |             | <b>(32,638)</b>                  | <b>(30,383)</b>                  |



## **Bank**

|                                               |             | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|-----------------------------------------------|-------------|----------------------------------|----------------------------------|
| Amounts in Eur '000                           | <b>Note</b> |                                  |                                  |
| Salaries and wages                            |             | (25,053)                         | (23,714)                         |
| Social security contributions                 |             | (4,502)                          | (4,150)                          |
| Pension costs - employee defined benefit plan | 31          | (173)                            | (207)                            |
| Other staff costs                             |             | (1,553)                          | (1,290)                          |
| <b>Total</b>                                  |             | <b>(31,281)</b>                  | <b>(29,361)</b>                  |

The increase in staff costs mainly results from the increase in the Bank's staff. The total number of Group's staff on 31/12/2024 amounted to 575 people and of Bank's staff to 550 people (31/12/2023: Group 500 people and Bank 478 people).

## **11. Other operating expenses**

The breakdown of the "Other operating expenses" is as follows:

### **Group**

|                                                  | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|--------------------------------------------------|----------------------------------|----------------------------------|
| Amounts in Eur '000                              |                                  |                                  |
| BoD, legal, consulting, audit fees etc.          | (2,964)                          | (4,363)                          |
| Computerization cost                             | (4,459)                          | (3,822)                          |
| Subscription fees                                | (734)                            | (557)                            |
| Building expenses                                | (1,446)                          | (1,270)                          |
| Promotion, advertising expenses ana sponsorships | (955)                            | (859)                            |
| Taxes and duties                                 | (2,810)                          | (2,490)                          |
| Office supplies                                  | (114)                            | (108)                            |
| Other expenses                                   | (3,430)                          | (5,775)                          |
| <b>Total</b>                                     | <b>(16,912)</b>                  | <b>(19,244)</b>                  |

### **Bank**

|                                                  | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|--------------------------------------------------|----------------------------------|----------------------------------|
| Amounts in Eur '000                              |                                  |                                  |
| BoD, legal, consulting, audit fees etc.          | (2,778)                          | (4,216)                          |
| Computerization cost                             | (4,370)                          | (3,767)                          |
| Subscription fees                                | (571)                            | (410)                            |
| Building expenses                                | (1,416)                          | (1,246)                          |
| Promotion, advertising expenses ana sponsorships | (924)                            | (833)                            |
| Taxes and duties                                 | (2,727)                          | (2,426)                          |
| Office supplies                                  | (110)                            | (103)                            |
| Other expenses                                   | (2,883)                          | (5,575)                          |
| <b>Total</b>                                     | <b>(15,779)</b>                  | <b>(18,576)</b>                  |

## 12. Provision for expected credit losses

The impairment provisions are broken down as follows:

### Group

|                                                                                                   | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|---------------------------------------------------------------------------------------------------|--------------------------|--------------------------|
| Amounts in Eur '000                                                                               |                          |                          |
| Provisions for loan impairment                                                                    | (17,353)                 | (9,444)                  |
| Provision for letters of guarantee                                                                | (1,869)                  | 191                      |
| Provisions for impairment of debt securities at amortised cost                                    | (423)                    | 137                      |
| Provisions for impairment of other receivables                                                    | 45                       | (141)                    |
| Provisions for impairment of financial assets at fair value through the statement of other income | 19                       | 127                      |
| Gain/(loss) from modification of loans contractual terms                                          | (972)                    | (783)                    |
| <b>Total</b>                                                                                      | <b>(20,553)</b>          | <b>(9,913)</b>           |

### Bank

|                                                                                                   | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|---------------------------------------------------------------------------------------------------|--------------------------|--------------------------|
| Amounts in Eur '000                                                                               |                          |                          |
| Provisions for loan impairment                                                                    | (16,972)                 | (9,242)                  |
| Provision for letters of guarantee                                                                | (1,869)                  | 191                      |
| Provisions for impairment of debt securities at amortised cost                                    | (423)                    | 137                      |
| Provisions for impairment of other receivables                                                    | 45                       | (141)                    |
| Provisions for impairment of financial assets at fair value through the statement of other income | 19                       | 127                      |
| Gain/(loss) from modification of loans contractual terms                                          | (972)                    | (783)                    |
| <b>Total</b>                                                                                      | <b>(20,172)</b>          | <b>(9,711)</b>           |

The increase results mainly from the corresponding increase in the loan portfolio and the change in macroeconomic parameters.

The Group on 31 December 2024, taking into account the internal risk tolerance limits as well as the supervisory requirements (EDEA, CRR framework supervisory provisions) recognise an additional ECL amounted to EUR 6,412 thousand to form a minimum coverage ratio of Non-Performing Exposures at a rate of 33%. For the year 2023, the Group recognised additional impairment provisions of EUR 1,070 thousand for customers whose businesses were affected by the natural disasters in the Thessaly region in September 2023.

The following table presents the net carrying amount of the loans of the Group and the Bank, before the modification of contractual terms.

|                                             | 31/12/2024     | 31/12/2023     |
|---------------------------------------------|----------------|----------------|
| Amounts in Eur '000                         |                |                |
| Net carrying amount before the modification | 235,671        | 112,640        |
| Net gain/(loss) due to the modification     | (972)          | (783)          |
| <b>Total</b>                                | <b>234,699</b> | <b>111,857</b> |

## 13. Other provisions

The analysis of "Other provisions" is as follows:

### Group

|                           | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|---------------------------|--------------------------|--------------------------|
| Amounts in Eur '000       |                          |                          |
| Provision for legal cases | 0                        | 29                       |
| <b>Total</b>              | <b>0</b>                 | <b>29</b>                |

For the Bank the balance of other provisions is zero for the years ended 31/12/2024 and 31/12/2023.

#### 14. Income Tax

The charge for income tax for the year is broken down as follows:

##### Group

|                     | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|---------------------|--------------------------|--------------------------|
| Amounts in Eur '000 |                          |                          |
| Deferred tax        | 1,992                    | 2,829                    |
| Current tax         | (38,406)                 | (25,750)                 |
| <b>Total</b>        | <b>(36,414)</b>          | <b>(22,921)</b>          |

|                                                                                         | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|-----------------------------------------------------------------------------------------|--------------------------|--------------------------|
| Amounts in Eur '000                                                                     |                          |                          |
| <b>Profit before tax</b>                                                                | <b>176,640</b>           | <b>125,944</b>           |
| Tax calculated based on the current tax rate of 22% (2023: 22%)                         | (38,861)                 | (27,708)                 |
| <b>Adjustments to income tax for:</b>                                                   |                          |                          |
| Income not subject to taxation                                                          | 10                       | 206                      |
| Previous year tax                                                                       | (1,677)                  | (8)                      |
| Expenses not deductible for tax purposes                                                | (1,446)                  | (462)                    |
| Temporary differences income tax                                                        | 0                        | 10                       |
| Previous year deferred tax recognition                                                  | (921)                    | 594                      |
| Tax effect of utilization of deductible temporary differences not previously recognised | 6,412                    | 4,323                    |
| Other tax adjustments                                                                   | 69                       | 124                      |
| <b>Income tax expense</b>                                                               | <b>(36,414)</b>          | <b>(22,921)</b>          |
| <b>Effective tax rate</b>                                                               | <b>20.61%</b>            | <b>18.20%</b>            |

##### Bank

|                     | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|---------------------|--------------------------|--------------------------|
| Amounts in Eur '000 |                          |                          |
| Deferred tax        | 2,053                    | 2,632                    |
| Current tax         | (37,471)                 | (25,066)                 |
| <b>Total</b>        | <b>(35,418)</b>          | <b>(22,434)</b>          |

|                                                                                         | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|-----------------------------------------------------------------------------------------|--------------------------|--------------------------|
| Amounts in Eur '000                                                                     |                          |                          |
| <b>Profit before tax</b>                                                                | <b>172,130</b>           | <b>123,154</b>           |
| Tax calculated based on the current tax rate of 22% (2023: 22%)                         | (37,869)                 | (27,094)                 |
| <b>Adjustments to income tax for:</b>                                                   |                          |                          |
| Income not subject to taxation                                                          | 0                        | 203                      |
| Previous year tax                                                                       | (1,677)                  | (8)                      |
| Expenses not deductible for tax purposes                                                | (1,373)                  | (452)                    |
| Previous year deferred tax recognition                                                  | (911)                    | 594                      |
| Tax effect of utilization of deductible temporary differences not previously recognised | 6,412                    | 4,323                    |
| <b>Income tax expense</b>                                                               | <b>(35,418)</b>          | <b>(22,434)</b>          |
| <b>Effective tax rate</b>                                                               | <b>20.58%</b>            | <b>18.22%</b>            |

According to Law 4172/2013, the tax rate applicable in Greece for the reporting periods from 2021 onwards is 22%. Unaudited fiscal years for the Group's companies, are presented in note 38(b).

For the financial year 2024, the audit is in progress and the relevant tax certificate is expected to be issued after the publication of the financial statements for the year 2024. Upon completion of the tax audit the Group's Management does not expect any significant tax liabilities beyond those already reported and presented in the financial statements.

## 15. Earnings per share

The earnings per share are analysed as follows:

### Basic and adjusted earnings per share

#### Group

|                                                                | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|----------------------------------------------------------------|----------------------------------|----------------------------------|
| Amounts in Eur '000                                            |                                  |                                  |
| Profits attributable to the shareholders of the parent company | 140,224                          | 103,021                          |
| Weighted average number of common shares (in thousands)        | 73,765                           | 53,327                           |
| <b>Earnings after tax per share - basic (in Eur)</b>           | <b>1.90</b>                      | <b>1.93</b>                      |

#### Bank

|                                                                | <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|----------------------------------------------------------------|----------------------------------|----------------------------------|
| Amounts in Eur '000                                            |                                  |                                  |
| Profits attributable to the shareholders of the parent company | 136,712                          | 100,720                          |
| Weighted average number of common shares (in thousands)        | 73,765                           | 53,327                           |
| <b>Earnings after tax per share - basic (in Eur)</b>           | <b>1.85</b>                      | <b>1.89</b>                      |

With the decision of the Extraordinary General Assembly dated 22/3/2023, a share-split took place in the nominal value of each common share of the Bank with a simultaneous increase in the total number of common registered shares from 7,524,840 common registered shares to 37,624,200 common registered shares. According to par. 64 of the IAS 33, the weighted average number of common shares has been adjusted for the comparative period with the number of shares after the above decision of the Extraordinary General Assembly.

With the decision of the Board of Directors dated 21/4/2023 following the decision of the Extraordinary General Assembly dated 22/3/2023, an increase of the Bank's share capital was carried out due to the conversion of the bond loan and 14,084,435 new common nominal shares with voting right were issued.

With the decision of the Ordinary General Assembly dated 7/6/2023, an increase of the Bank's share capital was carried out on 26/7/2023, through capitalization of part of the profits of the fiscal year 2022, amounting to EUR 3,399,999.15 with the issuance of 985,507 new registered, ordinary, with voting rights, shares. According to par. 64 of the IAS 33, the weighted average number of common shares has been retrospectively adjusted for the comparative period after the above increase in the Bank's share capital.

On 4/10/2023, the increase of the share capital was completed with the issuance of 21,000,000 new registered, common with voting rights shares.

With the decision of the Ordinary General Meeting of Shareholders dated 23/5/2024, an increase of the Bank's share capital was carried out by capitalizing part of undistributed profits of the financial year 2023 in the amount of EUR 276,000, with the issuance of 80,000 new common, registered shares. According to par. 64 of the IAS 33, the weighted average number of common shares has been retrospectively adjusted for the comparative period after the above Bank's share capital increase.

## 16. Cash and balances with the central bank

The balance of cash and cash equivalents available for use, as well as central bank balances is broken down as follows:

### Group

| Amounts in Eur '000        | 31/12/2024     | 31/12/2023     |
|----------------------------|----------------|----------------|
| Cash                       | 16,268         | 11,644         |
| Deposits with central bank | 781,378        | 467,679        |
| <b>Total</b>               | <b>797,646</b> | <b>479,323</b> |

### Bank

| Amounts in Eur '000        | 31/12/2024     | 31/12/2023     |
|----------------------------|----------------|----------------|
| Cash                       | 16,267         | 11,643         |
| Deposits with central bank | 781,378        | 467,679        |
| <b>Total</b>               | <b>797,645</b> | <b>479,322</b> |

The fair value of cash and balances with the central bank closely approximates their carrying amount.

### Cash and cash equivalents (as reported in the Cash Flow Statement)

### Group

| Amounts in Eur '000                 | Note | 31/12/2024     | 31/12/2023     |
|-------------------------------------|------|----------------|----------------|
| Cash and deposits with central bank |      | 797,646        | 479,323        |
| Due from banks                      | 17   | 143,424        | 98,290         |
| <b>Total</b>                        |      | <b>941,070</b> | <b>577,613</b> |

### Bank

| Amounts in Eur '000                 | Note | 31/12/2024     | 31/12/2023     |
|-------------------------------------|------|----------------|----------------|
| Cash and deposits with central bank |      | 797,645        | 479,322        |
| Due from banks                      | 17   | 132,272        | 95,825         |
| <b>Total</b>                        |      | <b>929,917</b> | <b>575,147</b> |

According to requirements from the Bank of Greece and the, the Group and the Bank should maintain deposits with the Bank of Greece with an average balance of 1.00% of total customers deposits, as defined by the European Central Bank.

Mandatory deposits at the Central Bank amount to EUR 39,718 thousand (EUR 29,955 thousand in 2023).

## 17. Due from banks

The claims from deposits and transactions with other financial institutions are analysed as follows:

### Group

| Amounts in Eur '000             | 31/12/2024     | 31/12/2023     |
|---------------------------------|----------------|----------------|
| Due from banks - time deposits  | 10,016         | 0              |
| Due from banks - sight deposits | 133,408        | 98,290         |
| Loans to financial institutions | 8,953          | 8,919          |
| Blocked deposits                | 3,485          | 10,248         |
| Derivatives margin account      | 15,447         | 8,633          |
| <b>Total</b>                    | <b>171,309</b> | <b>126,090</b> |

### Bank

| Amounts in Eur '000             | 31/12/2024     | 31/12/2023     |
|---------------------------------|----------------|----------------|
| Due from banks - sight deposits | 132,272        | 95,825         |
| Loans to financial institutions | 8,953          | 8,919          |
| Blocked deposits                | 3,485          | 10,248         |
| Derivatives margin account      | 15,447         | 8,633          |
| <b>Total</b>                    | <b>160,157</b> | <b>123,625</b> |

## 18. Financial assets at fair value through profit and loss

### Group

| Amounts in Eur '000                                          | 31/12/2024     | 31/12/2023     |
|--------------------------------------------------------------|----------------|----------------|
| <b>Shares and variable securities measured at fair value</b> |                |                |
| Equity securities listed in Athens Stock Exchange            | 9,308          | 9,703          |
| Mutual funds                                                 | 2,816          | 634            |
| Treasury bills                                               | 186,918        | 228,849        |
| Government bonds                                             | 0              | 768            |
| Corporate bonds                                              | 39,320         | 50,335         |
| Bank bonds                                                   | 0              | 16,643         |
| Bond from loan securitisation                                | 26,080         | 30,696         |
| <b>Total</b>                                                 | <b>264,442</b> | <b>337,628</b> |

The "loan securitisation bond" refers to the Bank's purchase of a bond (whose income comes from a securitised mortgage portfolio) with terms of participation in its profits ("Profit Participating Security"), in May 2022

and is mandatorily measured at fair value.

The basic valuation assumptions of the financial assets are presented in note 2.4.

## **Bank**

Amounts in Eur '000

### **Shares and other variable income securities**

Equity securities listed in Athens Stock Exchange

Treasury bills

Government bonds

Corporate bonds

Bank bonds

Bond from loan securitisation

**Total**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
|                   |                   |
| 9,308             | 9,703             |
| 186,918           | 228,849           |
| 0                 | 768               |
| 39,320            | 50,335            |
| 0                 | 16,643            |
| 26,080            | 30,696            |
| <b>261,626</b>    | <b>336,994</b>    |

The movement of financial assets measured at fair value through profit and loss is analysed as follows:

## **Group**

Amounts in Eur '000

### **Balance at the beginning of the year**

Purchases

Sales / maturities / other movements

Fair value adjustments

**Balance at the end of year**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
| <b>337,628</b>    | <b>211,653</b>    |
| 3,428,027         | 3,306,682         |
| (3,503,724)       | (3,184,214)       |
| 2,511             | 3,507             |
| <b>264,442</b>    | <b>337,628</b>    |

## **Bank**

Amounts in Eur '000

### **Balance at the beginning of the year**

Purchases

Sales / maturities / other movements

Fair value adjustments

**Balance at the end of year**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
| <b>336,994</b>    | <b>210,114</b>    |
| 3,424,827         | 3,306,048         |
| (3,502,624)       | (3,184,214)       |
| 2,429             | 5,046             |
| <b>261,626</b>    | <b>336,994</b>    |

## **19. Derivative financial instruments**

### **Group**

Amounts in Eur '000

Bond / Stock /Index futures

Stock /Index options

Foreign exchange derivatives

Commodity derivatives

Interest rate derivatives (IRS- IRCAP)

**Total derivative financial instruments**

|  | <b>31/12/2024</b>      |                                |
|--|------------------------|--------------------------------|
|  | <b>Notional amount</b> | <b>Estimated fair value</b>    |
|  |                        | <b>Assets      Liabilities</b> |
|  |                        |                                |
|  | 9,311                  | 0      0                       |
|  | 53                     | 23      29                     |
|  | 294,548                | 1,571      766                 |
|  | 39,302                 | 33      4,400                  |
|  | 80,360                 | 583      123                   |
|  |                        | <b>2,210      5,318</b>        |

Amounts in Eur '000

|                                               | Nominal<br>value | 31/12/2023           |              |
|-----------------------------------------------|------------------|----------------------|--------------|
|                                               |                  | Estimated fair value |              |
|                                               |                  | Assets               | Liabilities  |
| Bond / Stock / Index futures                  | 13,332           | 0                    | 0            |
| Stock /Index options                          | 138              | 41                   | 97           |
| Foreign exchange derivatives                  | 363,989          | 598                  | 2,913        |
| Commodity derivatives                         | 53,148           | 340                  | 5,442        |
| Interest rate derivatives (IRS- IRCAP)        | 37,174           | 54                   | 45           |
| <b>Total derivative financial instruments</b> |                  | <b>1,033</b>         | <b>8,497</b> |

## Bank

Amounts in Eur '000

|                                               | Notional<br>amount | 31st December 2024   |              |
|-----------------------------------------------|--------------------|----------------------|--------------|
|                                               |                    | Estimated fair value |              |
|                                               |                    | Assets               | Liabilities  |
| Bond / Stock /Index futures                   | 9,311              | 0                    | 0            |
| Stock /Index options                          | 53                 | 23                   | 29           |
| Foreign exchange derivatives                  | 294,548            | 1,571                | 766          |
| Commodity derivatives                         | 39,302             | 33                   | 4,400        |
| Interest rate derivatives (IRS- IRCAP)        | 80,360             | 583                  | 123          |
| <b>Total derivative financial instruments</b> |                    | <b>2,210</b>         | <b>5,318</b> |

Amounts in Eur '000

|                                               | Nominal<br>value | 31st December 2023   |              |
|-----------------------------------------------|------------------|----------------------|--------------|
|                                               |                  | Estimated fair value |              |
|                                               |                  | Assets               | Liabilities  |
| Bond / Stock / Index futures                  | 13,332           | 0                    | 0            |
| Stock /Index options                          | 138              | 41                   | 97           |
| Foreign exchange derivatives                  | 363,989          | 598                  | 2,913        |
| Commodity derivatives                         | 53,148           | 340                  | 5,442        |
| Interest rate derivatives (IRS- IRCAP)        | 37,174           | 54                   | 45           |
| <b>Total derivative financial instruments</b> |                  | <b>1,033</b>         | <b>8,497</b> |

The valuation of the futures contracts up to December 31, 2023 amounted to EUR 34.7 thousand. was included in the margin and clearing accounts.

## 20. Loans and advances to customers

Loans portfolio is broken down as follows:

### Group

Amounts in Eur '000

|                                                                                                  | 31/12/2024       | 31/12/2023       |
|--------------------------------------------------------------------------------------------------|------------------|------------------|
| <b>Loans and advances to customers measured at amortised cost</b>                                |                  |                  |
| Consumer, personal & other                                                                       | 35,013           | 32,753           |
| Mortgages                                                                                        | 132,641          | 98,199           |
| Large Corporate                                                                                  | 1,717,713        | 1,054,855        |
| SMEs                                                                                             | 1,772,132        | 1,272,702        |
|                                                                                                  | <b>3,657,499</b> | <b>2,458,509</b> |
| Less: Provisions for impairment of loans and advances to customers                               | (44,901)         | (27,595)         |
| <b>Book value of loans and advances to customers measured at amortised cost after provisions</b> | <b>3,612,598</b> | <b>2,430,914</b> |



## **Bank**

Amounts in Eur '000

### **Loans and advances to customers measured at amortised cost**

|                                                                                                  | <b>31/12/2024</b> | <b>31/12/2023</b> |
|--------------------------------------------------------------------------------------------------|-------------------|-------------------|
| Consumer, personal & other                                                                       | 35,013            | 32,753            |
| Mortgages                                                                                        | 132,641           | 98,199            |
| Large Corporate                                                                                  | 1,789,324         | 1,116,479         |
| SMEs                                                                                             | 1,684,007         | 1,196,101         |
|                                                                                                  | <b>3,640,985</b>  | <b>2,443,532</b>  |
| Less: Provisions for impairment of loans and advances to customers                               | (44,385)          | (27,460)          |
| <b>Book value of loans and advances to customers measured at amortised cost after provisions</b> | <b>3,596,600</b>  | <b>2,416,072</b>  |

The movement on expected credit losses are broken down as follows:

## **Group**

Amounts in Eur '000

### **Balance at the beginning of the year**

|                                      | <b>Note</b> | <b>31/12/2024</b> | <b>31/12/2023</b> |
|--------------------------------------|-------------|-------------------|-------------------|
| Balance at the beginning of the year |             | <b>(27,595)</b>   | <b>(18,907)</b>   |
| Provisions for the year              | 12          | (17,353)          | (9,444)           |
| Loans written-off                    |             | 47                | 756               |
| <b>Balance at the end of year</b>    |             | <b>(44,901)</b>   | <b>(27,595)</b>   |

## **Bank**

Amounts in Eur '000

### **Balance at the beginning of the year**

|                                      | <b>Note</b> | <b>31/12/2024</b> | <b>31/12/2023</b> |
|--------------------------------------|-------------|-------------------|-------------------|
| Balance at the beginning of the year |             | <b>(27,460)</b>   | <b>(18,974)</b>   |
| Provisions for the year              | 12          | (16,972)          | (9,242)           |
| Loans written-off                    |             | 47                | 756               |
| <b>Balance at the end of year</b>    |             | <b>(44,385)</b>   | <b>(27,460)</b>   |

## **21. Financial assets at fair value through other comprehensive income**

The investment portfolio includes shares and bonds.

## **Group**

Amounts in Eur '000

### **Fixed income securities**

|                                      | <b>31/12/2024</b> | <b>31/12/2023</b> |
|--------------------------------------|-------------------|-------------------|
| Government bonds                     | 17,432            | 52,996            |
| Corporate bonds                      | 10,877            | 6,050             |
| Bank bonds                           | 18,815            | 27,172            |
| <b>Total fixed income securities</b> | <b>47,124</b>     | <b>86,218</b>     |

### **Variable yield securities**

|                                                   |            |            |
|---------------------------------------------------|------------|------------|
| Equity securities listed in Athens Stock Exchange | 260        | 264        |
| Non-listed securities                             | 6          | 6          |
| <b>Total equity variable yield securities</b>     | <b>266</b> | <b>270</b> |

### **Total**

|               |               |
|---------------|---------------|
| <b>47,390</b> | <b>86,488</b> |
|---------------|---------------|

## **Bank**

Amounts in Eur '000

### **Fixed income securities**

Government bonds

Corporate bonds

Bank bonds

### **Total fixed income securities**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
| 17,432            | 52,996            |
| 10,877            | 6,050             |
| 18,815            | 27,172            |
| <b>47,124</b>     | <b>86,218</b>     |

### **Variable yield securities**

Equity securities listed in Athens Stock Exchange

Non-listed securities

### **Total equity variable yield securities**

|            |            |
|------------|------------|
| 260        | 264        |
| 6          | 6          |
| <b>266</b> | <b>270</b> |

### **Total**

|               |               |
|---------------|---------------|
| <b>47,390</b> | <b>86,488</b> |
|---------------|---------------|

The Bank has classified to financial assets at fair value through other comprehensive income shares which are strategic and operational investments with a long-term horizon.

The movement in the portfolio of securities measured at fair value through other comprehensive income is as follows:

## **Group**

Amounts in Eur '000

### **Balance at the beginning of the year**

Purchases

Sales / maturities / other movements

Fair value adjustments

### **Balance at the end of year**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
| <b>86,488</b>     | <b>93,256</b>     |
| 189,178           | 28,318            |
| (230,186)         | (40,111)          |
| 1,910             | 5,025             |
| <b>47,390</b>     | <b>86,488</b>     |

## **Bank**

Amounts in Eur '000

### **Balance at the beginning of the year**

Purchases

Sales / maturities / other movements

Fair value adjustments

### **Balance at the end of year**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
| <b>86,488</b>     | <b>93,256</b>     |
| 189,178           | 28,318            |
| (230,186)         | (40,111)          |
| 1,910             | 5,025             |
| <b>47,390</b>     | <b>86,488</b>     |

The movement in the impairment provision of the securities portfolio measured at fair value through other comprehensive income for the period 1/1/2023 – 31/12/2024 is as follows:

### **Group**

Amounts in Eur '000

|                                                    |              |
|----------------------------------------------------|--------------|
| <b>Balance as at 1st January 2023</b>              | <b>(208)</b> |
| Government bonds                                   | 106          |
| Corporate bonds                                    | 53           |
| Bank bonds                                         | (32)         |
| <b>Impairment provisions 1/1/2023 - 31/12/2023</b> | <b>127</b>   |
| <b>Balance as at 1st January 2024</b>              | <b>(81)</b>  |
| Government Bonds                                   | 13           |
| Corporate bonds                                    | (15)         |
| Bank bonds                                         | 21           |
| <b>Impairment provisions 1/1/2024 - 31/12/2024</b> | <b>19</b>    |
| <b>Balance as at 31st December 2024</b>            | <b>(62)</b>  |

### **Bank**

Amounts in Eur '000

|                                                    |              |
|----------------------------------------------------|--------------|
| <b>Balance as at 1st January 2023</b>              | <b>(208)</b> |
| Government bonds                                   | 106          |
| Corporate bonds                                    | 53           |
| Bank bonds                                         | (32)         |
| <b>Impairment provisions 1/1/2023 - 31/12/2023</b> | <b>127</b>   |
| <b>Balance as at 1st January 2024</b>              | <b>(81)</b>  |
| Government bonds                                   | 13           |
| Corporate bonds                                    | (15)         |
| Bank bonds                                         | 21           |
| <b>Impairment provisions 1/1/2024 - 31/12/2024</b> | <b>19</b>    |
| <b>Balance as at 31st December 2024</b>            | <b>(62)</b>  |

## **22. Debt securities at amortised cost**

The debt securities at amortised cost are analysed as follows:

### **Group**

Amounts in Eur '000

|                                          | <b>31/12/2024</b> | <b>31/12/2023</b> |
|------------------------------------------|-------------------|-------------------|
| <b>Debt securities at amortised cost</b> |                   |                   |
| Government Bonds                         | 161,834           | 93,792            |
| Corporate bonds                          | 102,371           | 63,252            |
| Bank bonds                               | 150,442           | 94,724            |
| Expected credit losses                   | (803)             | (380)             |
| <b>Total</b>                             | <b>413,844</b>    | <b>251,388</b>    |

**Bank**

Amounts in Eur '000

**Debt securities at amortised cost**

|                        | <b>31/12/2024</b> | <b>31/12/2023</b> |
|------------------------|-------------------|-------------------|
| Greek Government Bonds | 161,834           | 93,792            |
| Corporate bonds        | 102,371           | 63,252            |
| Bank bonds             | 150,442           | 94,724            |
| Expected credit losses | (803)             | (380)             |
| <b>Total</b>           | <b>413,844</b>    | <b>251,388</b>    |

The increase in the portfolio is due to the Bank's further investment in fixed interest rate bonds, as hedging, with the aim of reducing the sensitivity of net interest income to changes in interest rates.

The movement in the portfolio of debt securities at amortised cost for the Group and the Bank is as follows:

**Group**

Amounts in Eur '000

**Balance at the beginning of the year**

|                                             | <b>31/12/2024</b> | <b>31/12/2023</b> |
|---------------------------------------------|-------------------|-------------------|
| <b>Balance at the beginning of the year</b> | <b>251,388</b>    | <b>174,464</b>    |
| Purchases                                   | 200,552           | 76,443            |
| Sales / maturities / other movements        | (37,673)          | 861               |
| Expected credit losses                      | (423)             | (380)             |
| <b>Balance at the end of year</b>           | <b>413,844</b>    | <b>251,388</b>    |

**Bank**

Amounts in Eur '000

**Balance at the beginning of the year**

|                                             | <b>31/12/2024</b> | <b>31/12/2023</b> |
|---------------------------------------------|-------------------|-------------------|
| <b>Balance at the beginning of the year</b> | <b>251,388</b>    | <b>174,464</b>    |
| Purchases                                   | 200,552           | 76,443            |
| Sales / maturities / other movements        | (37,673)          | 861               |
| Expected credit losses                      | (423)             | (380)             |
| <b>Balance at the end of year</b>           | <b>413,844</b>    | <b>251,388</b>    |

The movement of portfolio impairment provisions at amortised cost, for the years 1/1/2023-31/12/2024 is as follows:

**Group**

Amounts in Eur '000

**Balance 1st January 2023**

|                                                     |              |
|-----------------------------------------------------|--------------|
|                                                     | <b>(517)</b> |
| Government Bonds                                    | 8            |
| Corporate bonds                                     | 223          |
| Bank bonds                                          | (94)         |
| <b>Expected credit losses 1/1/2023 - 31/12/2023</b> | <b>137</b>   |

**Balance 1st January 2024**

|                                                     |              |
|-----------------------------------------------------|--------------|
|                                                     | <b>(380)</b> |
| Government Bonds                                    | (113)        |
| Corporate bonds                                     | (280)        |
| Bank bonds                                          | (30)         |
| <b>Expected credit losses 1/1/2024 - 31/12/2024</b> | <b>(423)</b> |

**Balance 31st December 2024**

|  |              |
|--|--------------|
|  | <b>(803)</b> |
|--|--------------|

## Bank

Amounts in Eur '000

|                                                     |              |
|-----------------------------------------------------|--------------|
| <b>Balance 1st January 2023</b>                     | <b>(517)</b> |
| Government Bonds                                    | 8            |
| Corporate bonds                                     | 223          |
| Bank bonds                                          | (94)         |
| <b>Expected credit losses 1/1/2023 - 31/12/2023</b> | <b>137</b>   |
| <b>Balance 1st January 2024</b>                     | <b>(380)</b> |
| Government Bonds                                    | (113)        |
| Corporate bonds                                     | (280)        |
| Bank bonds                                          | (30)         |
| <b>Expected credit losses 1/1/2024 - 31/12/2024</b> | <b>(423)</b> |
| <b>Balance 31st December 2024</b>                   | <b>(803)</b> |

## 23. Investments in subsidiaries and associates

### Subsidiaries

| Corporate Name                     | Country                | Business activity          | % Direct investment<br>31/12/2024 | % Indirect investment<br>31/12/2024 |
|------------------------------------|------------------------|----------------------------|-----------------------------------|-------------------------------------|
| IBG CAPITAL S.A.                   | Greece                 | Capital & Holdings Company | 100.00%                           | 0.00%                               |
| IBG INVESTMENTS S.A.               | British Virgin Islands | Investment Company         | 79.04%                            | 20.96%                              |
| OPTIMA FACTORS S.A.                | Greece                 | Factoring Company          | 100.00%                           | 0.00%                               |
| OPTIMA ASSET MANAGEMENT A.E.D.A.K. | Greece                 | Asset Management Company   | 99.44%                            | 0.00%                               |
| OPTIMA LEASING S.A.                | Greece                 | Leasing Company            | 100.00%                           | 0.00%                               |

| Corporate Name                     | Country                | Business activity          | % Direct investment<br>31/12/2023 | % Indirect investment<br>31/12/2023 |
|------------------------------------|------------------------|----------------------------|-----------------------------------|-------------------------------------|
| IBG CAPITAL S.A.                   | Greece                 | Capital & Holdings Company | 100.00%                           | 0.00%                               |
| IBG INVESTMENTS S.A.               | British Virgin Islands | Investment Company         | 81.45%                            | 18.55%                              |
| OPTIMA FACTORS S.A.                | Greece                 | Factoring Company          | 100.00%                           | 0.00%                               |
| OPTIMA ASSET MANAGEMENT A.E.D.A.K. | Greece                 | Asset Management Company   | 99.44%                            | 0.00%                               |

In November 2024, Optima Leasing S.A. was incorporated, which is a 100% subsidiary Company of the Optima Bank Group.

The Group holds a total participation of 100% in IBG INVESTMENTS S.A. during both financial years.

### Associates

| Corporate Name          | Country | Business activity                                                                                                                            | % investment<br>31/12/2024 | % investment<br>31/12/2023 |
|-------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------|
| NOTOS COM HOLDINGS S.A. | Greece  | Commercial representative,<br>exclusive import and trading of<br>cosmetics, personal care<br>products, clothing, footwear<br>and stationery. | 25.00%                     | 25.00%                     |

In October 2022, the Bank acquired 25% of NOTOS COM HOLDINGS S.A. as part of its restructuring.

### Bank

| Financial data 31/12/2024          |                |                |               |                               |
|------------------------------------|----------------|----------------|---------------|-------------------------------|
| Amounts in Eur '000                | Assets         | Liabilities    | Revenues      | Profit / (loss)<br>before tax |
| IBG CAPITAL S.A.                   | 1,171          | 13             | 0             | (13)                          |
| IBG INVESTMENTS S.A.               | 2,228          | 2              | 7             | 0                             |
| OPTIMA FACTORS S.A.                | 164,592        | 145,873        | 13,266        | 4,195                         |
| OPTIMA ASSET MANAGEMENT A.E.D.A.K. | 5,696          | 1,740          | 3,137         | 588                           |
| OPTIMA LEASING S.A.                | 15,189         | 493            | 28            | (304)                         |
|                                    | <b>188,876</b> | <b>148,121</b> | <b>16,438</b> | <b>4,466</b>                  |

| Financial data 31/12/2023          |                |                |               |                               |
|------------------------------------|----------------|----------------|---------------|-------------------------------|
| Amounts in Eur '000                | Assets         | Liabilities    | Revenues      | Profit / (loss)<br>before tax |
| IBG CAPITAL S.A.                   | 1,182          | 11             | 0             | (6)                           |
| IBG INVESTMENTS S.A.               | 2,390          | 2              | (210)         | (217)                         |
| OPTIMA FACTORS S.A.                | 124,618        | 109,114        | 8,792         | 2,757                         |
| OPTIMA ASSET MANAGEMENT A.E.D.A.K. | 5,206          | 1,685          | 2,155         | 387                           |
|                                    | <b>133,395</b> | <b>110,813</b> | <b>10,737</b> | <b>2,920</b>                  |

The above tables present the shareholding percentages held by the Bank.

The "Investments in subsidiaries and associates" is broken down as follows:

### Group - Investments in associates

| Amounts in Eur '000                         | 31/12/2024 | 31/12/2023 |
|---------------------------------------------|------------|------------|
| <b>Balance at the beginning of the year</b> | <b>260</b> | <b>448</b> |
| - New investments                           | 0          | 1          |
| - Share of profit/(loss) of associates      | 349        | (189)      |
| <b>Balance at the end of year</b>           | <b>609</b> | <b>260</b> |

### Bank- Investments in subsidiaries and associates

| Amounts in Eur '000                                                | 31/12/2024    | 31/12/2023   |
|--------------------------------------------------------------------|---------------|--------------|
| <b>Balance at the beginning of the year</b>                        | <b>9,134</b>  | <b>9,133</b> |
| - New investments                                                  | 15,000        | 1            |
| - Disposal of shares in investments in subsidiaries and associates | (162)         | 0            |
| <b>Balance at the end of year</b>                                  | <b>23,972</b> | <b>9,134</b> |

The cost of investment in the Bank's subsidiaries is broken down as follows:

Amounts in Eur '000

**Subsidiaries**

IBG CAPITAL S.A.

IBG INVESTMENTS S.A.

OPTIMA FACTORS

OPTIMA ASSET MANAGEMENT AEDAK

OPTIMA LEASING S.A.

**Total investments in subsidiaries**

| Investment<br>amount<br>31/12/2024 | Investment<br>amount<br>31/12/2023 |
|------------------------------------|------------------------------------|
| 778                                | 778                                |
| 984                                | 1,146                              |
| 6,307                              | 6,307                              |
| 892                                | 892                                |
| 15,000                             | 0                                  |
| <b>23,961</b>                      | <b>9,123</b>                       |

Amounts in Eur '000

**Associated Companies**

NOTOS COM HOLDINGS S.A.

**Total investments in associates**

| Investment<br>amount<br>31/12/2024 | Investment<br>amount<br>31/12/2023 |
|------------------------------------|------------------------------------|
| 11                                 | 11                                 |
| <b>11</b>                          | <b>11</b>                          |

## 24. Property, plant and equipment

The changes in tangible fixed assets during the years 2024 and 2023 are as follows:

### Group

Amounts in Eur '000

|                                              | Land and<br>buildings | Vehicles &<br>machinery | Furniture<br>and other<br>equipment | Total         |
|----------------------------------------------|-----------------------|-------------------------|-------------------------------------|---------------|
| Acquisition cost on 1 January 2024           | 12,787                | 3,277                   | 4,073                               | 20,137        |
| Accumulated depreciation on 1 January 2024   | (4,787)               | (2,374)                 | (2,073)                             | (9,234)       |
| <b>Carrying amount at 1 January 2024</b>     | <b>8,000</b>          | <b>903</b>              | <b>2,000</b>                        | <b>10,903</b> |
| Additions                                    | 987                   | 477                     | 302                                 | 1,766         |
| Disposals/write-offs                         | 0                     | (43)                    | 0                                   | (43)          |
| Depreciation for the year                    | (1,251)               | (388)                   | (309)                               | (1,948)       |
| Depreciation of disposals/write offs         | 0                     | 39                      | 0                                   | 39            |
| Acquisition cost at 31 December 2024         | 13,774                | 3,711                   | 4,375                               | 21,860        |
| Accumulated depreciation at 31 December 2024 | (6,038)               | (2,723)                 | (2,382)                             | (11,143)      |
| <b>Carrying amount at 31 December 2024</b>   | <b>7,736</b>          | <b>988</b>              | <b>1,993</b>                        | <b>10,717</b> |

Amounts in Eur '000

|                                              | Land and<br>buildings | Vehicles &<br>machinery | Furniture<br>and other<br>equipment | Total         |
|----------------------------------------------|-----------------------|-------------------------|-------------------------------------|---------------|
| Acquisition cost on 1 January 2023           | 12,664                | 2,751                   | 3,916                               | 19,331        |
| Accumulated depreciation on 1 January 2023   | (3,686)               | (2,020)                 | (1,786)                             | (7,492)       |
| <b>Carrying amount at 1 January 2023</b>     | <b>8,979</b>          | <b>732</b>              | <b>2,131</b>                        | <b>11,841</b> |
| Additions                                    | 798                   | 528                     | 160                                 | 1,486         |
| Disposals/write-offs                         | (675)                 | (2)                     | (3)                                 | (680)         |
| Depreciation for the year                    | (1,120)               | (356)                   | (290)                               | (1,766)       |
| Depreciation of disposals/write offs         | 19                    | 2                       | 3                                   | 24            |
| Acquisition cost at 31 December 2023         | 12,787                | 3,277                   | 4,073                               | 20,137        |
| Accumulated depreciation at 31 December 2023 | (4,787)               | (2,374)                 | (2,073)                             | (9,234)       |
| <b>Carrying amount at 31 December 2023</b>   | <b>8,000</b>          | <b>903</b>              | <b>2,000</b>                        | <b>10,903</b> |

## Bank

| Amounts in Eur '000                          | Land and buildings | Vehicles & machinery | Furniture and other equipment | Total         |
|----------------------------------------------|--------------------|----------------------|-------------------------------|---------------|
| Acquisition cost on 1 January 2024           | 12,652             | 3,277                | 3,952                         | 19,881        |
| Accumulated depreciation on 1 January 2024   | (4,773)            | (2,374)              | (1,996)                       | (9,143)       |
| <b>Carrying amount at 1 January 2024</b>     | <b>7,879</b>       | <b>903</b>           | <b>1,956</b>                  | <b>10,738</b> |
| Additions                                    | 969                | 476                  | 294                           | 1,739         |
| Disposals/write-offs                         | 0                  | (43)                 | 0                             | (43)          |
| Depreciation for the year                    | (1,203)            | (388)                | (294)                         | (1,885)       |
| Depreciation of disposals/write offs         | 0                  | 39                   | 0                             | 39            |
| Acquisition cost at 31 December 2024         | 13,621             | 3,710                | 4,246                         | 21,577        |
| Accumulated depreciation at 31 December 2024 | (5,976)            | (2,723)              | (2,290)                       | (10,989)      |
| <b>Carrying amount at 31 December 2024</b>   | <b>7,645</b>       | <b>987</b>           | <b>1,956</b>                  | <b>10,588</b> |

| Amounts in Eur '000                          | Land and buildings | Vehicles & machinery | Furniture and other equipment | Total         |
|----------------------------------------------|--------------------|----------------------|-------------------------------|---------------|
| Acquisition cost on 1 January 2023           | 12,533             | 2,751                | 3,800                         | 19,084        |
| Accumulated depreciation on 1 January 2023   | (3,678)            | (2,020)              | (1,722)                       | (7,420)       |
| <b>Carrying amount at 1 January 2023</b>     | <b>8,855</b>       | <b>731</b>           | <b>2,078</b>                  | <b>11,664</b> |
| Additions                                    | 797                | 528                  | 153                           | 1,478         |
| Disposals/write-offs                         | (678)              | (2)                  | (1)                           | (681)         |
| Depreciation for the year                    | (1,114)            | (356)                | (276)                         | (1,746)       |
| Depreciation of disposals/write offs         | 19                 | 2                    | 2                             | 23            |
| Acquisition cost at 31 December 2023         | 12,652             | 3,277                | 3,952                         | 19,881        |
| Accumulated depreciation at 31 December 2023 | (4,773)            | (2,374)              | (1,996)                       | (9,143)       |
| <b>Carrying amount at 31 December 2023</b>   | <b>7,879</b>       | <b>903</b>           | <b>1,956</b>                  | <b>10,738</b> |

## 25. Intangible assets

The movement of the intangible assets the years 2024 and 2023 are as follows:

### Group

| Amounts in Eur '000                          | Software     | Other Intangible | Total         |
|----------------------------------------------|--------------|------------------|---------------|
| Acquisition cost on 1 January 2024           | 14,849       | 4,055            | 18,904        |
| Accumulated depreciation on 1 January 2024   | (7,174)      | (925)            | (8,099)       |
| <b>Carrying amount at 1 January 2024</b>     | <b>7,675</b> | <b>3,130</b>     | <b>10,805</b> |
| Additions                                    | 3,723        | 0                | 3,723         |
| Depreciation for the year                    | (2,824)      | (308)            | (3,132)       |
| Acquisition cost at 31 December 2024         | 18,572       | 4,055            | 22,627        |
| Accumulated depreciation at 31 December 2024 | (9,998)      | (1,233)          | (11,231)      |
| <b>Carrying amount at 31 December 2024</b>   | <b>8,574</b> | <b>2,822</b>     | <b>11,396</b> |



| Amounts in Eur '000                          | Software     | Other Intangible | Total         |
|----------------------------------------------|--------------|------------------|---------------|
| Acquisition cost on 1 January 2023           | 11,848       | 4,055            | 15,903        |
| Accumulated depreciation on 1 January 2023   | (4,962)      | (617)            | (5,579)       |
| <b>Carrying amount at 1 January 2023</b>     | <b>6,886</b> | <b>3,438</b>     | <b>10,324</b> |
| Additions                                    | 3,001        | 0                | 3,001         |
| Depreciation for the year                    | (2,212)      | (308)            | (2,520)       |
| Acquisition cost at 31 December 2023         | 14,849       | 4,055            | 18,904        |
| Accumulated depreciation at 31 December 2023 | (7,174)      | (925)            | (8,099)       |
| <b>Carrying amount at 31 December 2023</b>   | <b>7,675</b> | <b>3,130</b>     | <b>10,805</b> |

The line "Other Intangible" includes intangible assets attributable to customer relationships and trademarks recognised at the time of acquisition of the Bank's subsidiaries Optima Factors and Optima Asset Management AEDAK.

### **Bank**

| Amounts in Eur '000                          | Software     | Total        |
|----------------------------------------------|--------------|--------------|
| Acquisition cost on 1 January 2024           | 13,872       | 13,872       |
| Accumulated depreciation on 1 January 2024   | (6,451)      | (6,451)      |
| <b>Carrying amount at 1 January 2024</b>     | <b>7,421</b> | <b>7,421</b> |
| Additions                                    | 3,508        | 3,508        |
| Depreciation for the year                    | (2,736)      | (2,736)      |
| Acquisition cost at 31 December 2024         | 17,380       | 17,380       |
| Accumulated depreciation at 31 December 2024 | (9,187)      | (9,187)      |
| <b>Carrying amount at 31 December 2024</b>   | <b>8,193</b> | <b>8,193</b> |

| Amounts in Eur '000                          | Software     | Total        |
|----------------------------------------------|--------------|--------------|
| Acquisition cost on 1 January 2023           | 11,040       | 11,040       |
| Accumulated depreciation on 1 January 2023   | (4,307)      | (4,307)      |
| <b>Carrying amount at 1 January 2023</b>     | <b>6,733</b> | <b>6,733</b> |
| Additions                                    | 2,832        | 2,832        |
| Depreciation for the year                    | (2,144)      | (2,144)      |
| Acquisition cost at 31 December 2023         | 13,872       | 13,872       |
| Accumulated depreciation at 31 December 2023 | (6,451)      | (6,451)      |
| <b>Carrying amount at 31 December 2023</b>   | <b>7,421</b> | <b>7,421</b> |

## **26. Right of use assets and Lease liabilities**

### **Group**

(i) Amounts recognised in statement of financial position

| Amounts in Eur '000               | 31/12/2024    | 31/12/2023    |
|-----------------------------------|---------------|---------------|
| <b>Rights of use assets</b>       |               |               |
| Buildings                         | 18,288        | 18,546        |
| Vehicles                          | 1,307         | 962           |
| <b>Balance at the end of year</b> | <b>19,595</b> | <b>19,508</b> |
| <b>Lease liabilities</b>          |               |               |
| Short-term liabilities            | 3,265         | 2,696         |
| Long-term liabilities             | 17,955        | 18,165        |
| <b>Balance at the end of year</b> | <b>21,220</b> | <b>20,861</b> |

(ii) Amounts recognised in statement of profit or loss

| Amounts in Eur '000                            | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|------------------------------------------------|--------------------------|--------------------------|
| <b>Depreciation of rights-of-use on assets</b> |                          |                          |
| Buildings                                      | 2,817                    | 2,693                    |
| Vehicles                                       | 431                      | 331                      |
| <b>Total</b>                                   | <b>3,248</b>             | <b>3,024</b>             |
| Interest expense                               | 739                      | 769                      |

| Amounts in Eur '000                          | Buildings     | Vehicles     | Total         |
|----------------------------------------------|---------------|--------------|---------------|
| Acquisition cost on 1 January 2024           | 27,200        | 1,512        | 28,712        |
| Accumulated depreciation on 1 January 2024   | (8,654)       | (550)        | (9,204)       |
| <b>Carrying amount at 1 January 2024</b>     | <b>18,546</b> | <b>962</b>   | <b>19,508</b> |
| Additions                                    | 2,559         | 775          | 3,334         |
| Disposals/write-offs                         | 0             | (300)        | (300)         |
| Depreciation for the year                    | (2,817)       | (431)        | (3,248)       |
| Depreciation of disposals/write offs         | 1             | 300          | 301           |
| Acquisition cost at 31 December 2024         | 29,759        | 1,987        | 31,746        |
| Accumulated depreciation at 31 December 2024 | (11,470)      | (681)        | (12,151)      |
| <b>Carrying amount at 31 December 2024</b>   | <b>18,289</b> | <b>1,306</b> | <b>19,595</b> |

| Amounts in Eur '000                          | Buildings     | Vehicles   | Total         |
|----------------------------------------------|---------------|------------|---------------|
| Acquisition cost on 1 January 2023           | 25,028        | 1,244      | 26,272        |
| Accumulated depreciation on 1 January 2023   | (6,136)       | (700)      | (6,836)       |
| <b>Carrying amount at 1 January 2023</b>     | <b>18,892</b> | <b>544</b> | <b>19,436</b> |
| Additions                                    | 2,347         | 822        | 3,169         |
| Disposals/write-offs                         | (175)         | (554)      | (729)         |
| Depreciation for the year                    | (2,693)       | (333)      | (3,026)       |
| Depreciation of disposals/write offs         | 175           | 483        | 658           |
| Acquisition cost at 31 December 2023         | 27,200        | 1,512      | 28,712        |
| Accumulated depreciation at 31 December 2023 | (8,654)       | (550)      | (9,204)       |
| <b>Carrying amount at 31 December 2023</b>   | <b>18,546</b> | <b>962</b> | <b>19,508</b> |

**Bank**

(i) Amounts recognised in statement of financial position

| Amounts in Eur '000               | 31/12/2024    | 31/12/2023    |
|-----------------------------------|---------------|---------------|
| <b>Rights of use assets</b>       |               |               |
| Buildings                         | 18,289        | 18,545        |
| Vehicles                          | 1,272         | 933           |
| <b>Balance at the end of year</b> | <b>19,561</b> | <b>19,478</b> |
| <b>Lease liabilities</b>          |               |               |
| Short-term liabilities            | 3,258         | 2,688         |
| Long-term liabilities             | 17,930        | 18,146        |
| <b>Balance at the end of year</b> | <b>21,188</b> | <b>20,834</b> |

(ii) Amounts recognised in statement of profit or loss

| Amounts in Eur '000                            | 1/1/2024 -<br>31/12/2024 | 1/1/2023 -<br>31/12/2023 |
|------------------------------------------------|--------------------------|--------------------------|
| <b>Depreciation of rights-of-use on assets</b> |                          |                          |
| Buildings                                      | 2,817                    | 2,693                    |
| Vehicles                                       | 414                      | 324                      |
| <b>Total</b>                                   | <b>3,231</b>             | <b>3,017</b>             |
| Interest expense                               | 730                      | 762                      |

| Amounts in Eur '000                          | Buildings     | Vehicles     | Total         |
|----------------------------------------------|---------------|--------------|---------------|
| Acquisition cost on 1 January 2024           | 27,200        | 1,468        | 28,668        |
| Accumulated depreciation on 1 January 2024   | (8,654)       | (536)        | (9,190)       |
| <b>Carrying amount at 1 January 2024</b>     | <b>18,546</b> | <b>932</b>   | <b>19,478</b> |
| Additions                                    | 2,559         | 754          | 3,313         |
| Disposals/write-offs                         | 0             | (300)        | (300)         |
| Depreciation for the year                    | (2,817)       | (414)        | (3,231)       |
| Depreciation of disposals/write offs         | 1             | 300          | 301           |
| Acquisition cost at 31 December 2024         | 29,759        | 1,922        | 31,681        |
| Accumulated depreciation at 31 December 2024 | (11,470)      | (650)        | (12,120)      |
| <b>Carrying amount at 31 December 2024</b>   | <b>18,289</b> | <b>1,272</b> | <b>19,561</b> |

| Amounts in Eur '000                          | Buildings     | Vehicles   | Total         |
|----------------------------------------------|---------------|------------|---------------|
| Acquisition cost on 1 January 2023           | 25,028        | 1,214      | 26,242        |
| Accumulated depreciation on 1 January 2023   | (6,136)       | (695)      | (6,831)       |
| <b>Carrying amount at 1 January 2023</b>     | <b>18,892</b> | <b>519</b> | <b>19,411</b> |
| Additions                                    | 2,347         | 807        | 3,154         |
| Disposals/write-offs                         | (175)         | (553)      | (728)         |
| Depreciation for the year                    | (2,693)       | (324)      | (3,017)       |
| Depreciation of disposals/write offs         | 175           | 483        | 658           |
| Acquisition cost at 31 December 2023         | 27,200        | 1,468      | 28,668        |
| Accumulated depreciation at 31 December 2023 | (8,654)       | (536)      | (9,190)       |
| <b>Carrying amount at 31 December 2023</b>   | <b>18,546</b> | <b>932</b> | <b>19,478</b> |

## 27. Deferred tax assets

The change in the deferred tax assets by category of temporary differences in the year 2024 is analysed as follows:

### Group

| Amounts in Eur '000                                                        | Balance as at<br>1 January<br>2024 | Credit /<br>(debit) to<br>results | Credit / (debit)<br>to other<br>comprehensive<br>income | Balance as at<br>31 December<br>2024 |
|----------------------------------------------------------------------------|------------------------------------|-----------------------------------|---------------------------------------------------------|--------------------------------------|
| Property, plant & equipment and Intangible assets                          | 54                                 | 1                                 | 0                                                       | 55                                   |
| Intangible assets from the acquisition of subsidiaries                     | (688)                              | 68                                | 0                                                       | (620)                                |
| Provisions for impairment on loans and advances to customers               | 5,945                              | 3,551                             | 0                                                       | 9,496                                |
| Other provisions                                                           | 485                                | 537                               | 0                                                       | 1,022                                |
| Retirement benefit obligations                                             | 153                                | 40                                | 34                                                      | 227                                  |
| Financial assets measured at fair value through other comprehensive income | 851                                | 0                                 | (420)                                                   | 431                                  |
| Financial assets measured at fair value through profit and loss            | (954)                              | (549)                             | 0                                                       | (1,503)                              |
| Valuation of carbon emissions                                              | (1,164)                            | 225                               | 0                                                       | (939)                                |
| Valuation of derivatives                                                   | 1,698                              | (985)                             | 0                                                       | 713                                  |
| Leases                                                                     | 298                                | 83                                | 0                                                       | 381                                  |
| Other                                                                      | 1,401                              | (979)                             | 0                                                       | 422                                  |
| <b>Total</b>                                                               | <b>8,079</b>                       | <b>1,992</b>                      | <b>(386)</b>                                            | <b>9,685</b>                         |

| Amounts in Eur '000                                                  | Balance as at<br>1st January<br>2023 | Credit /<br>(debit) to<br>results | Credit / (debit)<br>to other<br>comprehensive<br>income | Balance as at<br>31st<br>December<br>2023 |
|----------------------------------------------------------------------|--------------------------------------|-----------------------------------|---------------------------------------------------------|-------------------------------------------|
| Property, Plant & Equipment and Intangible assets                    | 97                                   | (43)                              | 0                                                       | 54                                        |
| Intangible assets from the acquisition of subsidiaries at fair value | (756)                                | 68                                | 0                                                       | (688)                                     |
| Provisions for impairment on loans and advances to customers         | 3,994                                | 1,951                             | 0                                                       | 5,945                                     |
| Other provisions                                                     | 766                                  | (281)                             | 0                                                       | 485                                       |
| Retirement benefit obligations                                       | 121                                  | 29                                | 3                                                       | 153                                       |
| Financial assets at fair value through other comprehensive income    | 1,957                                | 0                                 | (1,106)                                                 | 851                                       |
| Financial assets at fair value through profit and loss               | 163                                  | (1,117)                           | 0                                                       | (954)                                     |
| Valuation of carbon emissions                                        | 0                                    | (1,164)                           | 0                                                       | (1,164)                                   |
| Valuation of derivatives                                             | (248)                                | 1,946                             | 0                                                       | 1,698                                     |
| Leases                                                               | 181                                  | 117                               | 0                                                       | 298                                       |
| Other                                                                | 78                                   | 1,323                             | 0                                                       | 1,401                                     |
| <b>Total</b>                                                         | <b>6,353</b>                         | <b>2,829</b>                      | <b>(1,103)</b>                                          | <b>8,079</b>                              |

**Bank**

| Amounts in Eur '000                                                        | Balance as at<br>1 January<br>2024 | Credit /<br>(debit) to<br>results | Credit / (debit)<br>to other<br>comprehensive<br>income | Balance as at<br>31 December<br>2024 |
|----------------------------------------------------------------------------|------------------------------------|-----------------------------------|---------------------------------------------------------|--------------------------------------|
| Property, plant & equipment and Intangible assets                          | 49                                 | 0                                 | 0                                                       | 49                                   |
| Provisions for impairment on loans and advances to customers               | 6,078                              | 3,714                             | 0                                                       | 9,792                                |
| Other provisions                                                           | 532                                | 489                               | 0                                                       | 1,021                                |
| Retirement benefit obligations                                             | 143                                | 38                                | 31                                                      | 212                                  |
| Financial assets measured at fair value through other comprehensive income | 849                                | 0                                 | (420)                                                   | 429                                  |
| Financial assets measured at fair value through profit and loss            | (946)                              | (531)                             | 0                                                       | (1,477)                              |
| Valuation of carbon emissions                                              | (1,164)                            | 225                               | 0                                                       | (939)                                |
| Valuation of derivatives                                                   | 1,698                              | (985)                             | 0                                                       | 713                                  |
| Leases                                                                     | 298                                | 83                                | 0                                                       | 381                                  |
| Other                                                                      | 1,401                              | (980)                             | 0                                                       | 421                                  |
| <b>Total</b>                                                               | <b>8,938</b>                       | <b>2,053</b>                      | <b>(389)</b>                                            | <b>10,603</b>                        |

| Amounts in Eur '000                                                        | Balance as at<br>1 January<br>2023 | Credit /<br>(debit) to<br>results | Credit / (debit)<br>to other<br>comprehensive<br>income | Balance as at<br>31 December<br>2023 |
|----------------------------------------------------------------------------|------------------------------------|-----------------------------------|---------------------------------------------------------|--------------------------------------|
| Property, plant & equipment and Intangible assets                          | 93                                 | (44)                              | 0                                                       | 49                                   |
| Provisions for impairment on loans and advances to customers               | 4,048                              | 2,030                             | 0                                                       | 6,078                                |
| Other provisions                                                           | 1,026                              | (494)                             | 0                                                       | 532                                  |
| Retirement benefit obligations                                             | 113                                | 27                                | 3                                                       | 143                                  |
| Financial assets measured at fair value through other comprehensive income | 1,955                              | 0                                 | (1,106)                                                 | 849                                  |
| Financial assets measured at fair value through profit and loss            | 163                                | (1,109)                           | 0                                                       | (946)                                |
| Valuation of carbon emissions                                              | 0                                  | (1,164)                           | 0                                                       | (1,164)                              |
| Valuation of derivatives                                                   | (248)                              | 1,946                             | 0                                                       | 1,698                                |
| Leases                                                                     | 181                                | 117                               | 0                                                       | 298                                  |
| Other                                                                      | 78                                 | 1,323                             | 0                                                       | 1,401                                |
| <b>Total</b>                                                               | <b>7,409</b>                       | <b>2,632</b>                      | <b>(1,103)</b>                                          | <b>8,938</b>                         |

## 28. Other assets

The other assets are broken down as follows:

### Group

| Amounts in Eur '000                                                                                                          | 31/12/2024     | 31/12/2023     |
|------------------------------------------------------------------------------------------------------------------------------|----------------|----------------|
| Derivatives and securities margin accounts                                                                                   | 31,279         | 23,719         |
| Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges | 66,683         | 5,656          |
| Hellenic Deposit and Investment Guarantee Fund                                                                               | 0              | 1,595          |
| Guarantee fund                                                                                                               | 7,404          | 6,397          |
| Auxiliary fund                                                                                                               | 3,606          | 4,096          |
| Energy Stock Exchange                                                                                                        | 1,250          | 1,250          |
| Debtors                                                                                                                      | 2,610          | 2,390          |
| Guarantees                                                                                                                   | 1,796          | 1,140          |
| Carbon emissions inventory                                                                                                   | 38,348         | 40,479         |
| Advances and other receivables accounts                                                                                      | 15,395         | 5,989          |
| Prepaid expenses and accrued revenue                                                                                         | 2,006          | 2,702          |
| Advance on Income tax                                                                                                        | 0              | 415            |
| Other receivables from the Greek State                                                                                       | 84             | 268            |
| Due from brokerage companies                                                                                                 | 9,147          | 9,856          |
|                                                                                                                              | <b>179,608</b> | <b>105,952</b> |
| Less: Impairment Provisions                                                                                                  | (102)          | (102)          |
| <b>Total</b>                                                                                                                 | <b>179,506</b> | <b>105,850</b> |

### Bank

| Amounts in Eur '000                                                                                                          | 31/12/2024     | 31/12/2023     |
|------------------------------------------------------------------------------------------------------------------------------|----------------|----------------|
| Derivatives and securities margin accounts                                                                                   | 31,279         | 23,719         |
| Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges | 66,683         | 5,656          |
| Hellenic Deposit and Investment Guarantee Fund                                                                               | 0              | 1,595          |
| Guarantee fund                                                                                                               | 7,154          | 6,147          |
| Auxiliary fund                                                                                                               | 3,606          | 4,096          |
| Energy Stock Exchange                                                                                                        | 1,250          | 1,250          |
| Debtors                                                                                                                      | 3,479          | 2,575          |
| Guarantees                                                                                                                   | 1,796          | 1,140          |
| Carbon emissions inventory                                                                                                   | 38,348         | 40,479         |
| Advances and other receivables accounts                                                                                      | 15,137         | 5,527          |
| Prepaid expenses and accrued revenue                                                                                         | 1,948          | 2,555          |
| Other receivables from the Greek State                                                                                       | 79             | 82             |
| Due from brokerage companies                                                                                                 | 9,147          | 9,856          |
|                                                                                                                              | <b>179,906</b> | <b>104,677</b> |
| Less: Impairment Provisions                                                                                                  | (102)          | (102)          |
| <b>Total</b>                                                                                                                 | <b>179,804</b> | <b>104,575</b> |

The changes in the balances are mainly due to the account "Clearing accounts and receivables from customers from stock exchange transactions in AXA, CFA & foreign stock exchanges" which concerns sales of the Bank's bonds that have not been cleared.

## 29. Due to banks

The due to other credit institutions are broken down as follows:

### Group

| Amounts in Eur '000               | 31/12/2024     | 31/12/2023    |
|-----------------------------------|----------------|---------------|
| Due to banks - sight deposits     | 421            | 612           |
| Due to banks - time deposits      | 71,035         | 78,443        |
| Bond loan                         | 0              | 2,024         |
| Listed derivatives margin account | 850            | 0             |
| Other deposits                    | 43,257         | 0             |
| <b>Total</b>                      | <b>115,563</b> | <b>81,079</b> |

### Bank

| Amounts in Eur '000               | 31/12/2024     | 31/12/2023    |
|-----------------------------------|----------------|---------------|
| Due to banks - sight deposits     | 421            | 612           |
| Due to banks - time deposits      | 71,035         | 78,443        |
| Listed derivatives margin account | 850            | 0             |
| Other deposits                    | 43,257         | 0             |
| <b>Total</b>                      | <b>115,563</b> | <b>79,055</b> |

The "Other Deposits" line includes the balances of agreements to grant government bonds to credit institutions with parallel repurchase agreements (repo transactions) for the purposes of raising liquidity.

The fair value of liabilities to financial institutions approximates their carrying amount.

## 30. Due to customers

The deposits and other customers' accounts are broken down as follows:

### Group

| Amounts in Eur '000 | 31/12/2024       | 31/12/2023       |
|---------------------|------------------|------------------|
| Sight deposits      | 1,617,438        | 1,337,170        |
| Savings accounts    | 1,494            | 3,963            |
| Time deposits       | 2,701,079        | 1,579,364        |
| Blocked deposits    | 218,071          | 172,614          |
| Other deposits      | 83,261           | 85,944           |
| Cheques payable     | 22,069           | 12,749           |
| <b>Total</b>        | <b>4,643,412</b> | <b>3,191,804</b> |

### Bank

| Amounts in Eur '000 | 31/12/2024       | 31/12/2023       |
|---------------------|------------------|------------------|
| Sight deposits      | 1,623,090        | 1,342,277        |
| Savings accounts    | 1,494            | 3,963            |
| Time deposits       | 2,706,079        | 1,579,364        |
| Blocked deposits    | 218,071          | 172,614          |
| Other deposits      | 83,261           | 85,944           |
| Cheques payable     | 22,069           | 12,749           |
| <b>Total</b>        | <b>4,654,064</b> | <b>3,196,911</b> |

The item "Other Deposits" includes the balances of the brokerage accounts of the Bank's customers.

The fair value of "due to customers" approximates their carrying amount.

### 31. Retirement benefit obligations

#### Group

The amounts recorded in the statement of financial position are the following:

| Amounts in Eur '000                   | 31/12/2024   | 31/12/2023 |
|---------------------------------------|--------------|------------|
| <b>Balance sheet liabilities for:</b> |              |            |
| Lump-sum payments upon retirement     | 1,027        | 692        |
| - Non funded                          | <b>1,027</b> | <b>692</b> |

The amounts recorded in the income statement are the following:

| Amounts in Eur '000                        | Note      | 31/12/2024 | 31/12/2023 |
|--------------------------------------------|-----------|------------|------------|
| Current service cost                       |           | 160        | 137        |
| Finance cost                               |           | 24         | 10         |
| Settlement cost                            |           | 0          | 78         |
| <b>Total included in employee benefits</b> | <b>10</b> | <b>184</b> | <b>225</b> |

The movement in the liability recognised in the statement of financial position is as follows:

| Amounts in Eur '000                                                                | 31/12/2024   | 31/12/2023 |
|------------------------------------------------------------------------------------|--------------|------------|
| <b>Net obligation recognised in the balance sheet at the beginning of the year</b> | <b>692</b>   | <b>550</b> |
| Expenditure to be recorded in the income statement                                 | 184          | 226        |
| Employer contributions paid                                                        | 0            | (96)       |
| Amount recorded in other comprehensive income                                      | 152          | 12         |
| <b>Net obligation recognised in the balance sheet at the end of the year</b>       | <b>1,027</b> | <b>692</b> |

The amount recorded in other comprehensive income is as follows:

| Amounts in Eur '000                                    | 31/12/2024 | 31/12/2023 |
|--------------------------------------------------------|------------|------------|
| <b>Amount recognised in other comprehensive income</b> | <b>152</b> | <b>12</b>  |
| <b>Actuarial (gain) / loss on obligation due to:</b>   |            |            |
| - financial assumptions                                | 43         | (36)       |
| - demographic assumptions                              | 3          | 0          |
| - experience                                           | 106        | 48         |

#### Bank

The amounts recorded on the statement of financial position are the following:

| Amounts in Eur '000                   | 31/12/2024 | 31/12/2023 |
|---------------------------------------|------------|------------|
| <b>Balance sheet liabilities for:</b> |            |            |
| Lump-sum payments upon retirement     | 964        | 650        |
| - Non funded                          | <b>964</b> | <b>650</b> |

The amounts recorded in the income statement are the following:

| Amounts in Eur '000                        | Note      | 31/12/2024 | 31/12/2023 |
|--------------------------------------------|-----------|------------|------------|
| Current service cost                       |           | 151        | 130        |
| Finance cost                               |           | 22         | 9          |
| Settlement cost                            |           | 0          | 68         |
| <b>Total included in employee benefits</b> | <b>10</b> | <b>173</b> | <b>207</b> |



The movement in the liability recognised in the statement of financial position is as follows:

| Amounts in Eur '000                                                                | 31/12/2024 | 31/12/2023 |
|------------------------------------------------------------------------------------|------------|------------|
| <b>Net obligation recognised in the balance sheet at the beginning of the year</b> | <b>650</b> | <b>514</b> |
| Expenditure to be recorded in the income statement                                 | 173        | 208        |
| Employer contributions paid                                                        | 0          | (84)       |
| Amount recorded in other comprehensive income                                      | 141        | 12         |
| <b>Net obligation recognised in the balance sheet at the end of the year</b>       | <b>964</b> | <b>650</b> |

The amount recorded in other comprehensive income is as follows:

| Amounts in Eur '000                                    | 31/12/2024 | 31/12/2023 |
|--------------------------------------------------------|------------|------------|
| <b>Amount recognised in other comprehensive income</b> | <b>141</b> | <b>12</b>  |
| Actuarial (gain) / loss on obligation due to:          |            |            |
| - financial assumptions                                | 41         | (34)       |
| - demographic assumptions                              | 2          | 0          |
| - experience                                           | 98         | 46         |

The main actuarial assumptions used for accounting purposes are as follows:

|                         | 31/12/2024 | 31/12/2023 |
|-------------------------|------------|------------|
| Discount rate           | 2.76%      | 3.45%      |
| Future salary increases | 2.10%      | 2.10%      |
| Inflation               | 2.00%      | 2.10%      |

### Sensitivity analysis

The sensitivity analysis of the defined employee retirement benefit liability is as follows:

|                                                | Effect on the defined benefit liability |          |                |          |              |          |
|------------------------------------------------|-----------------------------------------|----------|----------------|----------|--------------|----------|
|                                                | OPTIMA BANK                             |          | OPTIMA FACTORS |          | OPTIMA AEDAK |          |
|                                                | Increase                                | Decrease | Increase       | Decrease | Increase     | Decrease |
| Discount rate (change in assumption by 0.5%)   | -3%                                     | 3%       | -6%            | 6%       | -3%          | 3%       |
| Salary increase (change in assumption by 0.5%) | 3%                                      | -3%      | 4%             | -4%      | 3%           | -3%      |

## 32. Other liabilities

Other liabilities are broken down as follows:

### Group

| Amounts in Eur '000                                                                                                          | 31/12/2024     | 31/12/2023    |
|------------------------------------------------------------------------------------------------------------------------------|----------------|---------------|
| Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges | 90,971         | 6,215         |
| Taxes and duties payables                                                                                                    | 2,924          | 2,394         |
| Accrued interest and other deferred revenue                                                                                  | 1,857          | 1,991         |
| Other payables                                                                                                               | 27,419         | 28,887        |
| Social security payable                                                                                                      | 1,193          | 999           |
| Due to brokerage companies                                                                                                   | 4              | 181           |
| <b>Total</b>                                                                                                                 | <b>124,368</b> | <b>40,667</b> |

**Bank**

Amounts in Eur '000

Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges

Taxes and duties payables

Accrued interest and other deferred revenue

Other payables

Social security payable

Due to brokerage companies

**Total**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
| 90,971            | 6,215             |
| 2,396             | 1,775             |
| 1,857             | 1,991             |
| 26,559            | 27,966            |
| 1,146             | 954               |
| 4                 | 181               |
| <b>122,933</b>    | <b>39,082</b>     |

The variance in the balances is mainly due to the item " Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges " which concerns purchases of the Bank's bonds that have not been cleared.

**33. Provisions**

The provisions are broken down as follows:

**Group**

Amounts in Eur '000

Provisions for legal cases

Provisions for unaudited fiscal years

Provisions of guarantee letters

**Total**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
| 189               | 257               |
| 331               | 331               |
| 3,647             | 1,778             |
| <b>4,167</b>      | <b>2,366</b>      |

**Bank**

Amounts in Eur '000

Provisions for legal cases

Provisions for unaudited fiscal years

Provisions of guarantee letters

**Total**

| <b>31/12/2024</b> | <b>31/12/2023</b> |
|-------------------|-------------------|
| 188               | 257               |
| 321               | 321               |
| 3,648             | 1,778             |
| <b>4,157</b>      | <b>2,356</b>      |

### 34. Share capital

On 31/12/2024, the share capital amounts to EUR 254,521 thousand (EUR 254,245 thousand as of 31/12/2023) divided into 73,774,142 shares with voting rights and a nominal value of EUR 3.45 per share. The Bank has 9,193 own shares.

|                                                            | Number of Shares       |                              |
|------------------------------------------------------------|------------------------|------------------------------|
|                                                            | Bank                   | Group                        |
|                                                            | No. of ordinary shares | Total no. of ordinary shares |
| <b>Balance as at 1st January 2023</b>                      | <b>7,524,840</b>       | <b>7,524,840</b>             |
| Share capital decrease with losses net off                 | (7,524,840)            | (7,524,840)                  |
| Share capital decrease with split (1 old for 5 new shares) | 37,624,200             | 37,624,200                   |
| Share capital increase with bond loan conversion           | 14,084,435             | 14,084,435                   |
| Capitalization of earnings                                 | 985,507                | 985,507                      |
| Share capital increase                                     | 21,000,000             | 21,000,000                   |
| Purchases of own shares                                    | (107,972)              | (107,972)                    |
| Sales of own shares                                        | 84,674                 | 84,674                       |
| <b>Balance as at 31st December 2023</b>                    | <b>73,694,142</b>      | <b>73,670,844</b>            |
| <b>Balance as at 1st January 2024</b>                      | <b>73,694,142</b>      | <b>73,670,844</b>            |
| Capitalization of earnings                                 | 80,000                 | 80,000                       |
| Purchases of own shares                                    | (302,174)              | (302,174)                    |
| Sales of own shares                                        | 316,279                | 316,279                      |
| <b>Balance as at 31st December 2024</b>                    | <b>73,774,142</b>      | <b>73,764,949</b>            |

### 35. Other reserves

The breakdown of other reserves is as follows:

#### Group

| Amounts in Eur '000                   | 31/12/2024    | 31/12/2023    |
|---------------------------------------|---------------|---------------|
| Statutory reserve                     | 24,123        | 17,204        |
| Special reserves                      | 7,183         | 7,183         |
| Actuarial gain/(loss) reserve         | 314           | 433           |
| Reserve for stock awards to personnel | 0             | 5,326         |
| <b>Total</b>                          | <b>31,620</b> | <b>30,146</b> |

#### Bank

| Amounts in Eur '000                   | 31/12/2024    | 31/12/2023    |
|---------------------------------------|---------------|---------------|
| Statutory reserve                     | 23,746        | 17,008        |
| Special reserves                      | 6,483         | 6,483         |
| Actuarial gain/(loss) reserve         | 322           | 432           |
| Reserve for stock awards to personnel | 0             | 5,326         |
| <b>Total</b>                          | <b>30,551</b> | <b>29,249</b> |

**Statutory Reserve:** According to the Greek Trade Law, the Group is required to withhold from its net accounting profits a minimum of 5% per year as legal reserve. Such withholding ceases to be compulsory when the total legal reserve exceeds 1/3 of the paid-up share capital. This taxed reserve is non-distributable throughout the Group's lifetime and is intended to cover any debit balances of the profit and loss carried forward item.

**Extraordinary Reserves:** The extraordinary reserves have been formed from taxed profits, and therefore no additional tax liability will be imposed in case of their distribution.

### 36. Balance sheet items broken down by expected due date

The classification of balance sheet items by expected due date is analyzed as follows:

#### Group

| Amounts in Eur '000                                                        | Within 1 year    | After 1 year     |
|----------------------------------------------------------------------------|------------------|------------------|
| <b>As at 31st December 2024</b>                                            |                  |                  |
| <b>ASSETS</b>                                                              |                  |                  |
| Cash and balances with central bank                                        | 797,646          | 0                |
| Due from banks                                                             | 162,356          | 8,953            |
| Financial assets measured at fair value through profit or loss             | 238,362          | 26,080           |
| Derivative financial instruments                                           | 2,210            | 0                |
| Loans and advances to customers                                            | 1,627,261        | 1,985,337        |
| Financial assets measured at fair value through other comprehensive income | 29,693           | 17,697           |
| Debt securities at amortised cost                                          | 30               | 413,814          |
| Investment in subsidiaries and associates                                  | 0                | 609              |
| Property, plant and equipment                                              | 0                | 10,717           |
| Intangible assets                                                          | 0                | 11,396           |
| Right of use assets                                                        | 0                | 19,595           |
| Deferred tax assets                                                        | 0                | 9,685            |
| Other assets                                                               | 97,620           | 81,886           |
| <b>Total assets</b>                                                        | <b>2,955,178</b> | <b>2,585,769</b> |
| <b>LIABILITIES</b>                                                         |                  |                  |
| Due to banks                                                               | 115,563          | 0                |
| Due to customers                                                           | 4,639,606        | 3,806            |
| Derivative financial instruments                                           | 5,318            | 0                |
| Lease liabilities                                                          | 3,265            | 17,955           |
| Retirement benefit obligations                                             | 0                | 1,027            |
| Income tax liability                                                       | 5,573            | 0                |
| Other liabilities                                                          | 124,368          | 0                |
| Provisions                                                                 | 0                | 4,167            |
| <b>Total liabilities</b>                                                   | <b>4,893,693</b> | <b>26,955</b>    |

| Amounts in Eur '000                                                        | Within 1 year    | After 1 year     |
|----------------------------------------------------------------------------|------------------|------------------|
| <b>As at 31st December 2023</b>                                            |                  |                  |
| <b>ASSETS</b>                                                              |                  |                  |
| Cash and balances with central bank                                        | 479,323          | 0                |
| Due from banks                                                             | 117,171          | 8,919            |
| Financial assets measured at fair value through profit or loss             | 306,932          | 30,696           |
| Derivative financial instruments                                           | 1,033            | 0                |
| Loans and advances to customers                                            | 1,062,695        | 1,368,219        |
| Financial assets measured at fair value through other comprehensive income | 50,183           | 36,305           |
| Debt securities at amortised cost                                          | 22,702           | 228,686          |
| Investment in subsidiaries and associates                                  | 0                | 260              |
| Property, plant and equipment                                              | 0                | 10,903           |
| Intangible assets                                                          | 0                | 10,805           |
| Right of use assets                                                        | 0                | 19,508           |
| Deferred tax assets                                                        | 0                | 8,079            |
| Other assets                                                               | 30,603           | 75,247           |
| <b>Total assets</b>                                                        | <b>2,070,643</b> | <b>1,797,626</b> |
| <b>LIABILITIES</b>                                                         |                  |                  |
| Due to banks                                                               | 81,079           | 0                |
| Due to customers                                                           | 3,177,580        | 14,224           |
| Derivative financial instruments                                           | 8,497            | 0                |
| Lease liabilities                                                          | 2,696            | 18,165           |
| Retirement benefit obligations                                             | 0                | 692              |
| Income tax liability                                                       | 12,226           | 0                |
| Other liabilities                                                          | 40,667           | 0                |
| Provisions                                                                 | 0                | 2,366            |
| <b>Total liabilities</b>                                                   | <b>3,322,745</b> | <b>35,447</b>    |

### **Bank**

| Amounts in Eur '000                                                        | Within 1 year    | After 1 year     |
|----------------------------------------------------------------------------|------------------|------------------|
| <b>As at 31st December 2024</b>                                            |                  |                  |
| <b>ASSETS</b>                                                              |                  |                  |
| Cash and balances with central bank                                        | 797,645          | 0                |
| Due from banks                                                             | 151,204          | 8,953            |
| Financial assets measured at fair value through profit or loss             | 235,546          | 26,080           |
| Derivative financial instruments                                           | 2,210            | 0                |
| Loans and advances to customers                                            | 1,493,400        | 2,103,200        |
| Financial assets measured at fair value through other comprehensive income | 29,693           | 17,697           |
| Debt securities at amortised cost                                          | 30               | 413,814          |
| Investment in subsidiaries and associates                                  | 0                | 23,972           |
| Property, plant and equipment                                              | 0                | 10,588           |
| Intangible assets                                                          | 0                | 8,193            |
| Right of use assets                                                        | 0                | 19,561           |
| Deferred tax assets                                                        | 0                | 10,603           |
| Other assets                                                               | 98,168           | 81,636           |
| <b>Total assets</b>                                                        | <b>2,807,896</b> | <b>2,724,297</b> |
| <b>LIABILITIES</b>                                                         |                  |                  |
| Due to banks                                                               | 115,563          | 0                |
| Due to customers                                                           | 4,650,258        | 3,806            |
| Derivative financial instruments                                           | 5,318            | 0                |
| Lease liabilities                                                          | 3,258            | 17,930           |
| Retirement benefit obligations                                             | 0                | 964              |
| Income tax liability                                                       | 4,961            | 0                |
| Other liabilities                                                          | 122,933          | 0                |
| Provisions                                                                 | 0                | 4,157            |
| <b>Total liabilities</b>                                                   | <b>4,902,291</b> | <b>26,857</b>    |

| Amounts in Eur '000                                                        | Within 1 year    | After 1 year     |
|----------------------------------------------------------------------------|------------------|------------------|
| <b>As at 31st December 2023</b>                                            |                  |                  |
| <b>ASSETS</b>                                                              |                  |                  |
| Cash and balances with central bank                                        | 479,322          | 0                |
| Due from banks                                                             | 114,706          | 8,919            |
| Financial assets measured at fair value through profit or loss             | 306,302          | 30,692           |
| Derivative financial instruments                                           | 1,033            | 0                |
| Loans and advances to customers                                            | 943,986          | 1,472,086        |
| Financial assets measured at fair value through other comprehensive income | 50,183           | 36,305           |
| Debt securities at amortised cost                                          | 22,702           | 228,686          |
| Investment in subsidiaries and associates                                  | 0                | 9,134            |
| Property, plant and equipment                                              | 0                | 10,738           |
| Intangible assets                                                          | 0                | 7,421            |
| Right of use assets                                                        | 0                | 19,478           |
| Deferred tax assets                                                        | 0                | 8,938            |
| Other assets                                                               | 30,086           | 74,489           |
| <b>Total assets</b>                                                        | <b>1,948,320</b> | <b>1,906,886</b> |
| <b>LIABILITIES</b>                                                         |                  |                  |
| Due to banks                                                               | 79,055           | 0                |
| Due to customers                                                           | 3,182,687        | 14,224           |
| Derivative financial instruments                                           | 8,497            | 0                |
| Lease liabilities                                                          | 2,689            | 18,145           |
| Retirement benefit obligations                                             | 0                | 650              |
| Income tax liability                                                       | 11,491           | 0                |
| Other liabilities                                                          | 39,082           | 0                |
| Provisions                                                                 | 0                | 2,356            |
| <b>Total liabilities</b>                                                   | <b>3,323,501</b> | <b>35,375</b>    |

### 37. Share based payments

With the decision of the Ordinary General Assesmbly dated 23/5/2024, an increase of the Bank's share capital was carried out, through the capitalization of part of the profits of the fiscal year 2023, amounting to €276,000 with the issuance of 80,000 new registered, common, with voting rights, shares with a nominal value of €3.45 each.

At the same time, in the framework of the establishment of a share distribution program, the new shares were made available free of charge to Members of the Board of Directors as well as to top management executives of the Bank at a distribution price of €12.10.

During the comparative year, with the decision of the Ordinary General Meeting dated 7/6/2023, an increase of the Bank's share capital was carried out on 26/7/2023, through the capitalization of part of the profits of the year 2022, amounting to €3,399,999.15 with the issuance of 985,507 new registered, common, voting shares, which were made available free of charge to members of the Board of Directors and staff.

In addition, with the decision of 26/9/2023 of the Board of Directors of the Bank, a parallel sale of 471,327 common, with voting rights, shares was carried out for the members of the Board of Directors of the Bank and the staff with a sale price of €6.48 (reduced by 10% from the final sale price which amounted to €7.20).

The total of the aforementioned benefits amounts to €968 thousand for the year 2024, while the corresponding benefits in the comparative year 2023 amounted to €5,326 thousand.

### 38. Commitments, contingent liabilities and assets

#### a) Contingent liabilities from guarantees

The nominal values of the contingent and undertaken liabilities are broken down as follows:

##### Group

| Amounts in Eur '000         | <b>31/12/2024</b> | <b>31/12/2023</b> |
|-----------------------------|-------------------|-------------------|
| Letters of guarantee issued | 855,132           | 616,459           |
|                             | <b>855,132</b>    | <b>616,459</b>    |

##### Bank

| Amounts in Eur '000         | <b>31/12/2024</b> | <b>31/12/2023</b> |
|-----------------------------|-------------------|-------------------|
| Letters of guarantee issued | 855,132           | 616,459           |
|                             | <b>855,132</b>    | <b>616,459</b>    |

In addition to the above, on December 31, 2024 the credit commitments include approved loan agreements and credit limits of EUR 1,317,046 thousand for the Group (December 31, 2023: EUR 910,560 thousand) and EUR 1,158,890 thousand for the Bank (December 31, 2022: EUR 799,927 thousand).

Approved undisbursed loan agreements and approved credit lines are revocable commitments as they include amounts that can be unconditionally canceled at any time without notice and require the bank's prior approval.

#### b) Contingent tax liabilities

According to Law 4174/2013 (Article 65A as in force and as defined by article 82 of Law 2238/1994), Greek companies whose financial statements are mandatorily audited are obliged to receive an "Annual Tax Certificate" up to the fiscal year 2015, the issuance of which requires the conduct of a tax audit by its statutory auditors. For fiscal years from 01/1/2016 onwards, the Annual Tax Certificate is optional, however the Bank continues to receive it.

The Group has been audited by the tax authorities up to the financial year 2009. It has not been audited by the tax authorities for the year 2010 when the Annual Tax Certificate was not compulsory.

The Bank has obtained a tax certificate from its Auditors without qualifications for the years 2011, 2012, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023. For the years 2013 and 2014, it has obtained a tax certificate from its Auditors without qualifications, but with an emphasis of matter based on the inquiry submitted by the Bank to the Ministry of Finance regarding the tax treatment of loss from the transfer of assets and liabilities to Piraeus Bank.

For the financial year 2024, the Bank is audited by its Auditors. Said audit is in progress and the relevant tax certificate is expected to be issued after the publication of the financial statements for the year 2024. We consider that until the completion of the tax audit, no additional tax liabilities will arise that will have a significant impact on the financial statements.

Within the fiscal year 2024, a tax audit was carried out from the tax authorities for the fiscal years 2019 and 2020 which gave resulted in a decrease of tax losses carried forward by the amount of EUR 405 thousand.

OPTIMA FACTORS S.A. has been tax audited for the years up to and including 2008 and has closed, in terms of taxation the year 2009 in accordance with the provisions of Law 3888/2012. For the year 2010, the limitation provisions of article 72 par. 11 Law 4174/2013 are applicable. For the years 2011, 2012 and 2013 the Company has been audited by its statutory auditors and has received the annual tax certificate of paragraph 5, Article 82 of the Income Tax Code (Law 2238/1994), while for the years 2014 to 2023 a tax certificate has been issued in accordance with Article 65A of Law 4174/2013. For the year 2024, the audit for the issuance of the annual tax certificate is in progress. We consider that until the completion of the audit, no additional tax liabilities would arise that would have a significant impact on the financial statements.

Moreover, OPTIMA ASSET MANAGEMENT S.A. has been tax audited for the years 2011 to and including 2013 and the said tax audit is conducted in accordance with Article 82, para. 5 of Law 2238/1994 and the Decision ref. POL 1159/22.7.2011 of the Minister of Finance. The years 2014 to and including 2023 have been audited in accordance with Article 65 A of Law 4174/2013. For the year 2024, the tax audit is in progress and is expected to be completed within the time limits provided for. We consider that until the completion of the audit, no additional tax liabilities would arise that would have a significant impact on the financial statements.

IBG CAPITAL SA has obtained a tax certificate without qualifications from its Auditors for the financial years 2011 to and including 2013, while for the years 2014 to and including 2018 it has not obtained any tax certificate in accordance with Law 4174/2013, Article 65. For the years 2019 to 2023, the company has obtained a tax certificate without qualifications, while for the year 2024 the audit in the process of the tax certificate is in progress. We consider that until the completion of the audit, no additional tax liabilities would arise that would have a significant impact on the financial statements.

IBG INVESTMENTS S.A. has no tax liabilities in accordance with the tax framework of its country of establishment.

According to the Greek tax legislation and the relevant ministerial decisions, the companies for which a tax certificate without qualification is issued, are not exempted from the imposition of additional taxes and fines by the tax authorities within the framework of the legislative restrictions (five years from the end of the fiscal year in which the relevant tax return should have been submitted). In light of the above, as a general rule, the right of the Greek State to impose taxes until the 2018 financial year is considered to have passed for the Group.

### **c) Contingent legal obligations**

There are no pending legal claims or liabilities that could materially affect the financial position of the Group on December 31, 2024, except for the cases for which a relevant provision has already been formed (note 33).

### **d) Asset commitments**

#### Due from banks:

- Placements of EUR 25,622 thousand relate to derivative instruments transaction guarantees as of 31/12/2024 (EUR 19,565 thousand as of 31/12/2023).



- Amount of a book value of EUR 3,485 thousand (EUR 10,248 thousand on 31/12/2023) relates to counter-guarantees for letters of guarantee issued by cooperating banks. These are cases where we do not have a correspondence relation with the beneficiary's Bank.

#### Investment and trading portfolio securities:

- Amount of a book value of EUR 3,326 thousand on 31/12/2024 (EUR 63,882 thousand 31/12/2023) relates to securities lending to cooperating banking institutions, in the framework of the utilization of the Bank's assets with the parallel receipt of interest income on 31/12/2024.

#### Loans and advances to customers:

The nominal value of EUR 44,438 thousand corresponds to a portfolio of loan receivables from businesses (pool of credit claims) on 31/12/2024, which is pledged in the Bank of Greece as collateral for Eurosystem monetary policy practices.

The upper amount is subject to a 60% cut (haircut) and is ultimately set to EUR 17,775 thousand which is also the maximum potential amount of funding from the Eurosystem against the portfolio of loan claims. As of 12/31/2024, the Bank had not made use of the specific pledge for the purposes of raising liquidity.

### **39. Related party transactions**

All transactions are conducted at arm's length and fall within the scope of the normal activities of the Group. The volume of transactions per category is presented here below.

#### **39.1 Transactions with subsidiaries and associates of Optima Bank**

Amounts in Eur '000

##### **a) Accounts Receivable**

##### **Receivables from subsidiaries**

Loans net of provisions

Other receivables

**Total**

|                         | <b>GROUP</b>      | <b>BANK</b>       |
|-------------------------|-------------------|-------------------|
|                         | <b>31/12/2024</b> | <b>31/12/2024</b> |
| Loans net of provisions | 0                 | 136,877           |
| Other receivables       | 0                 | 869               |
| <b>Total</b>            | <b>0</b>          | <b>137,746</b>    |

##### **Receivables from associates**

Loans net of provisions

**Total**

|                         | <b>31/12/2024</b> | <b>31/12/2024</b> |
|-------------------------|-------------------|-------------------|
| Loans net of provisions | 16,343            | 10,502            |
| <b>Total</b>            | <b>16,343</b>     | <b>10,502</b>     |

Loans net of provisions include an impairment provision of EUR 39 thousand for loans to subsidiaries (EUR 453 thousand 31/12/2023).

Amounts in Eur '000

**b) Accounts payable**  
**Payables to subsidiaries**

Due to clients  
Other liabilities

**Total**

| GROUP      | BANK          |
|------------|---------------|
| 31/12/2024 | 31/12/2024    |
| 0          | 17,575        |
| 0          | 153           |
| <b>0</b>   | <b>17,728</b> |

Amounts in Eur '000

**c) Income**

**Income from subsidiaries**

Interest and similar income  
Fee and commission income

**Total**

| GROUP                    | BANK                     |
|--------------------------|--------------------------|
| 1/1/2024 -<br>31/12/2024 | 1/1/2024 -<br>31/12/2024 |
| 0                        | 7,242                    |
| 0                        | 1,362                    |
| <b>0</b>                 | <b>8,800</b>             |

**Income from associates**

Interest and similar income  
Fee and commission income

**Total**

| GROUP                    | BANK                     |
|--------------------------|--------------------------|
| 1/1/2024 -<br>31/12/2024 | 1/1/2024 -<br>31/12/2024 |
| 935                      | 761                      |
| 173                      | 51                       |
| <b>1,108</b>             | <b>812</b>               |

Amounts in Eur '000

**d) Expenses**

**Expenses from subsidiaries**

Interest expense and similar charges

**Total**

| GROUP                    | BANK                     |
|--------------------------|--------------------------|
| 1/1/2024 -<br>31/12/2024 | 1/1/2024 -<br>31/12/2024 |
| 0                        | (24)                     |
| <b>0</b>                 | <b>(24)</b>              |

**Expenses from associates**

Interest expense and similar charges

**Total**

| GROUP                    | BANK                     |
|--------------------------|--------------------------|
| 1/1/2024 -<br>31/12/2024 | 1/1/2024 -<br>31/12/2024 |
| (1)                      | (1)                      |
| <b>(1)</b>               | <b>(1)</b>               |

Amounts in Eur '000

**a) Accounts Receivable**  
**Receivables from subsidiaries**

Loans net of provisions  
Other receivables

**Total**

| GROUP      | BANK           |
|------------|----------------|
| 31/12/2023 | 31/12/2023     |
| 0          | 103,405        |
| 0          | 13             |
| <b>0</b>   | <b>103,418</b> |

**Receivables from associates**

Loans net of provisions  
Other receivables

**Total**

| GROUP         | BANK         |
|---------------|--------------|
| 31/12/2023    | 31/12/2023   |
| 11,219        | 9,723        |
| 29            | 29           |
| <b>11,248</b> | <b>9,752</b> |

Amounts in Eur '000

**b) Accounts payable**  
**Payables to subsidiaries**

Due to clients

**Total**

| GROUP      | BANK         |
|------------|--------------|
| 31/12/2023 | 31/12/2023   |
| 0          | 6,566        |
| <b>0</b>   | <b>6,566</b> |

Amounts in Eur '000

**c) Income**
**Income from subsidiaries**

Interest and similar income

Fee and commission income

Other income

**Total**

| <b>GROUP</b>                     | <b>BANK</b>                      |
|----------------------------------|----------------------------------|
| <b>1/1/2023 -<br/>31/12/2023</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
| 0                                | 4,159                            |
| 0                                | 888                              |
| 0                                | 176                              |
| <b>0</b>                         | <b>5,223</b>                     |

**Income from associates**

Interest and similar income

Fee and commission income

**Total**

| <b>GROUP</b>                     | <b>BANK</b>                      |
|----------------------------------|----------------------------------|
| <b>1/1/2023 -<br/>31/12/2023</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
| 787                              | 745                              |
| 34                               | 2                                |
| <b>821</b>                       | <b>747</b>                       |

**d) Expenses**
**Expenses from subsidiaries**

Interest expense and similar charges

**Total**

| <b>GROUP</b>                     | <b>BANK</b>                      |
|----------------------------------|----------------------------------|
| <b>1/1/2023 -<br/>31/12/2023</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
| 0                                | (7)                              |
| <b>0</b>                         | <b>(7)</b>                       |

It is noted that the above transactions are carried out within the framework of business as usual, based on the arm's length principle and the usual commercial terms for relevant transactions with third parties (market terms).

### 39.2 Related party transactions with managers, directors and immediate family members

Amounts in Eur '000

**a) Accounts receivable**

Loans

**Total**

| <b>GROUP</b>      | <b>BANK</b>       |
|-------------------|-------------------|
| <b>31/12/2024</b> | <b>31/12/2024</b> |
| 1,848             | 1,848             |
| <b>1,848</b>      | <b>1,848</b>      |

**b) Accounts payable**

Deposits

**Total**

| <b>GROUP</b>      | <b>BANK</b>       |
|-------------------|-------------------|
| <b>31/12/2024</b> | <b>31/12/2024</b> |
| 5,413             | 5,413             |
| <b>5,413</b>      | <b>5,413</b>      |

**c) Income**

Interest and similar income

Fee and commission income

Other income

**Total**

| <b>GROUP</b>                     | <b>BANK</b>                      |
|----------------------------------|----------------------------------|
| <b>1/1/2024 -<br/>31/12/2024</b> | <b>1/1/2024 -<br/>31/12/2024</b> |
| 82                               | 82                               |
| 18                               | 18                               |
| 1                                | 1                                |
| <b>101</b>                       | <b>101</b>                       |

Amounts in Eur '000

**a) Accounts receivable**

Loans

**Total**

| <b>GROUP</b>      | <b>BANK</b>       |
|-------------------|-------------------|
| <b>31/12/2023</b> | <b>31/12/2023</b> |
| 5,572             | 5,572             |
| <b>5,572</b>      | <b>5,572</b>      |

**b) Accounts payable**

Deposits

**Total**

| <b>GROUP</b>      | <b>BANK</b>       |
|-------------------|-------------------|
| <b>31/12/2023</b> | <b>31/12/2023</b> |
| 3,401             | 3,042             |
| <b>3,401</b>      | <b>3,042</b>      |

|                                      | <b>1/1/2023 -<br/>31/12/2023</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
|--------------------------------------|----------------------------------|----------------------------------|
| <b>c) Income</b>                     |                                  |                                  |
| Interest and similar income          | 105                              | 103                              |
| <b>Total</b>                         | <b>105</b>                       | <b>103</b>                       |
|                                      |                                  |                                  |
|                                      | <b>1/1/2023 -<br/>31/12/2023</b> | <b>1/1/2023 -<br/>31/12/2023</b> |
| <b>d) Expenses</b>                   |                                  |                                  |
| Interest expense and similar charges | (7)                              | (6)                              |
| <b>Total</b>                         | <b>(7)</b>                       | <b>(6)</b>                       |

It is noted that the above transactions are carried out within the framework of business as usual, based on the arm's length principle and the usual commercial terms for relevant transactions with third parties (market terms).

### 39.3 Remuneration of Management and members of the Board of Directors

|                                                             | <b>GROUP<br/>1/1/2024 -<br/>31/12/2024</b> | <b>BANK<br/>1/1/2024 -<br/>31/12/2024</b> |
|-------------------------------------------------------------|--------------------------------------------|-------------------------------------------|
| Amounts in Eur '000                                         |                                            |                                           |
| Salaries, social insurance contributions and other expenses | 4,165                                      | 3,716                                     |
| Compensation & other benefits                               | 150                                        | 127                                       |
| Stock awards                                                | 968                                        | 968                                       |
| <b>Total</b>                                                | <b>5,283</b>                               | <b>4,811</b>                              |

|                                                             | <b>GROUP<br/>1/1/2023 -<br/>31/12/2023</b> | <b>BANK<br/>1/1/2023 -<br/>31/12/2023</b> |
|-------------------------------------------------------------|--------------------------------------------|-------------------------------------------|
| Amounts in Eur '000                                         |                                            |                                           |
| Salaries, social insurance contributions and other expenses | 2,937                                      | 2,548                                     |
| Compensation & other benefits                               | 143                                        | 110                                       |
| Stock awards                                                | 3,698                                      | 3,698                                     |
| <b>Total</b>                                                | <b>6.778</b>                               | <b>6.356</b>                              |

### 40. Auditor's fees

The total fees paid by the Bank to the statutory auditor "Deloitte Certified Public Accountants S.A." for the audit and other services they provided are broken down as follows:

|                     | <b>31/12/2024</b> | <b>31/12/2023</b> |
|---------------------|-------------------|-------------------|
| Amounts in Eur '000 |                   |                   |
| Statutory Audit     | 332               | 300               |
| Tax Certificate     | 87                | 87                |
| Non audit services  | 155               | 280               |
| <b>Total</b>        | <b>574</b>        | <b>667</b>        |

### 41. Segment Reporting

Bank's management monitors returns from banking, treasury, and capital market activities on an aggregated basis. The amounts related to the net revenues of the business sectors derive from direct net revenues and do not include internal allocations and financing between sectors.

As regards the costs, they are reported in total, since they are monitored at the level of the business owner by the Bank's management.

At the same time, the Bank's Management monitors separately the results of the Group's subsidiaries.

| Amounts in Eur '000                      |                       |               |               |              |                  |              |              |                  |
|------------------------------------------|-----------------------|---------------|---------------|--------------|------------------|--------------|--------------|------------------|
|                                          | 1/1/2024 - 31/12/2024 |               |               |              |                  |              |              |                  |
|                                          | Banking               | Brokerage     | Treasury      | Other        | Total Bank       | Subsidiaries | Eliminations | Total Group      |
| <b>Income from operating activities</b>  |                       |               |               |              |                  |              |              |                  |
| Net interest income                      | 145,727               | 2,738         | 39,275        | (730)        | <b>187,010</b>   | 2,776        | 71           | <b>189,857</b>   |
| Net fee and commission income            | 27,584                | 9,074         | 0             | 34           | <b>36,692</b>    | 4,640        | 0            | <b>41,332</b>    |
| Gains/losses from financial transactions | 0                     | 0             | 18,126        | 2,043        | <b>20,169</b>    | 138          | 0            | <b>20,307</b>    |
| Other operating income                   | 0                     | 0             | 496           | 2,847        | <b>3,343</b>     | 80           | (196)        | <b>3,227</b>     |
| <b>Total operating income</b>            | <b>173,311</b>        | <b>11,812</b> | <b>57,897</b> | <b>4,194</b> | <b>247,214</b>   | <b>7,634</b> | <b>(125)</b> | <b>254,723</b>   |
| <b>Other non allocated amounts</b>       |                       |               |               |              | (75,084)         | (2,858)      | (139)        | <b>(78,081)</b>  |
| <b>Profit before tax</b>                 |                       |               |               |              | <b>172,130</b>   |              |              | <b>176,640</b>   |
| <b>Profit after tax</b>                  |                       |               |               |              | <b>136,712</b>   |              |              | <b>140,226</b>   |
| <b>Assets 31/12/2024</b>                 | 3,588,389             | 90,987        | 1,707,272     | 145,545      | <b>5,532,193</b> | 186,053      | (177,299)    | <b>5,540,947</b> |
| <b>Liabilities 31/12/2024</b>            | 4,906,620             | 50,978        | 212,484       | 56,066       | <b>4,929,148</b> | 147,499      | (155,999)    | <b>4,920,648</b> |

| Amounts in Eur '000                      |                       |              |               |              |                  |              |              |                  |
|------------------------------------------|-----------------------|--------------|---------------|--------------|------------------|--------------|--------------|------------------|
|                                          | 1/1/2023 - 31/12/2023 |              |               |              |                  |              |              |                  |
|                                          | Banking               | Brokerage    | Treasury      | Other        | Total Bank       | Subsidiaries | Eliminations | Total Group      |
| <b>Income from operating activities</b>  |                       |              |               |              |                  |              |              |                  |
| Net interest income                      | 111,666               | 1,694        | 27,949        | (1,128)      | <b>140,181</b>   | 2,044        | (12)         | <b>142,212</b>   |
| Net fee and commission income            | 21,301                | 7,187        | 0             | 44           | <b>28,531</b>    | 3,518        | 70           | <b>32,119</b>    |
| Gains/losses from financial transactions | 0                     | 0            | 16,439        | 1,404        | <b>17,843</b>    | (179)        | (51)         | <b>17,614</b>    |
| Other operating income                   | 0                     | 0            | 400           | 754          | <b>1,154</b>     | 39           | (182)        | <b>1,012</b>     |
| <b>Total operating income</b>            | <b>132,967</b>        | <b>8,881</b> | <b>44,789</b> | <b>1,074</b> | <b>187,710</b>   | <b>5,422</b> | <b>(176)</b> | <b>192,957</b>   |
| <b>Other non allocated amounts</b>       |                       |              |               |              | (64,555)         | (2,194)      | (263)        | <b>(67,013)</b>  |
| <b>Profit before tax</b>                 |                       |              |               |              | <b>123,155</b>   |              |              | <b>125,944</b>   |
| <b>Profit after tax</b>                  |                       |              |               |              | <b>100,721</b>   |              |              | <b>103,023</b>   |
| <b>Assets 31/12/2023</b>                 | 2,401,273             | 82,987       | 1,279,444     | 91,503       | <b>3,855,207</b> | 130,266      | (117,204)    | <b>3,868,269</b> |
| <b>Liabilities 31/12/2023</b>            | 3,137,062             | 57,659       | 88,169        | 75,987       | <b>3,358,877</b> | 110,124      | (110,809)    | <b>3,358,192</b> |

## 42. Irrevocable payment commitments to the Single Resolution Board (SRB)

The Bank does not make use of the irrevocable payment commitments to the Single Resolution Board. During the financial year 2024 there was no obligation for a payment contribution. The contribution for the financial year 2023 amounted to EUR 737 thousand and burdened the profit before tax.

## 43. Distribution of dividend

Following the decision of the Annual General Meeting of Shareholders dated 23/5/2024, the Bank proceeded to the distribution of gross dividend amounting to EUR 0.44 per share, from the profits of the financial year 2023 for a total amount of EUR 32,461 thousand.

The dividend was paid on 1/7/2024.

#### 44. Disclosures of Law 4261/5.5.2014

In accordance with article 81 of Law 4261/2014, which incorporates into Greek legislation article 89 of Directive 2013/36/EU of the European Parliament and of the Council of June 26, 2013, it is enacted for the first time, the obligation for the Group to disclose information on a consolidated basis for each country in which it operates. The disclosed information includes: the name of the subsidiary company/ companies, the nature of activities, the geographical location, the turnover, the number of full-time employees, results before tax, income tax, as well public subsidies received.

The required information is presented below:

##### Greece

On 31/12/2024 the turnover amounted to EUR 254,715 thousand (EUR 193,167 thousand on 31/12/2023), profits before tax amounted to EUR 176,641 thousand (EUR 126,161 thousand on 31/12/2023), income tax amounted to EUR 36,414 thousand (EUR 22,921 thousand on 31/12/2023) and the number of employees was 575 (500 employees on 31/12/2023).

The following companies are active in the country:

| Company                            | Activity                   |
|------------------------------------|----------------------------|
| OPTIMA BANK S.A.                   | Bank                       |
| IBG CAPITAL S.A.                   | Capital & Holdings Company |
| OPTIMA FACTORS S.A.                | Factoring Company          |
| OPTIMA ASSET MANAGEMENT A.E.D.A.K. | Asset Management Company   |
| OPTIMA LEASING S.A.                | Leasing Company            |

##### British Virgin Islands

On 31/12/2024 the turnover amounted to EUR 7 thousand (EUR 210 thousand on 31/12/2023) and the loss to EUR 0.1 thousand (profit before tax EUR 217 thousand on 31/12/2023). There is no staff and no tax liability. The company operating in the country is as follows:

| Company              | Activity            |
|----------------------|---------------------|
| IBG INVESTMENTS S.A. | Investment services |

Within 2023, the last investment of AKES (Closed-end Mutual Fund), of which IBG Investments is a shareholder, was liquidated.

The Bank estimates that within 2025, the dissolution of IBG Investments will take place.

It is noted that neither the Bank nor any of the Group's companies have received public subsidies.

#### 45. Disclosures of Law 4151/2013

According to the provisions of article 8 par. 3 of L. 4151/2013, any active credit institution established in Greece, is obliged, immediately after the expiry of the twenty-year time limit, to remit to the Greek State collectively, by the end of April of each year, the balances of dormant deposits, plus accrued interest. The Bank has no dormant balances that have reached the twenty-year time limit.

**46. Events after the reporting period date**

There are no events subsequent to the financial statements issue.

**Maroussi, March 20, 2025**

**The Chairman of the Board  
of Directors**

**Georgios Taniskidis**

**The Head of Finance**

**Angelos Sapranidis**

**The Chief Executive Officer**

**Dimitrios Kyparissis**

**The Head of Accounting and Tax  
Services**

**Eleni Peristera**