# Annual Financial Report
# for the year
# January 1 - December 31, 2025

**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.**

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# 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 declared that, to the best of our knowledge:

- The annual financial statements of the banking company named "Optima bank S.A." and its Group for the year ended 31 December 2025 have been prepared in accordance with the applicable accounting standards and present a fair view of the assets and liabilities, the net position and the results of operations of Optima bank S.A. and the companies included in the consolidation taken as a whole.

- The annual report of the Board of Directors for 2025 fairly illustrates the development, the performance and the position of Optima Bank S.A. and the companies included in the consolidation taken as a whole, including a description of the principal risks and uncertainties that they face.

Maroussi, Greece, 02 March 2026

| The Chairman of the Board of Directors | The CEO | Executive Member of the Board of Directors & Chief Financial Officer |
|---|---|---|
| **Georgios I. Taniskidis** | **Dimitrios A. Kyparissis** | **Angelos N. Sapranidis** |

## II. Board of Directors' Annual Report

**Management Report by the Board of Directors for the year ended 31st of December 2025.**

Dear shareholders,

We submit to you the annual report of the Board of Directors for the financial year from 1/1/2025 to 31/12/2025. This report summarises information about the Group of Optima bank SA, financial information aimed at providing shareholders with a general information about the financial position and the results, the overall course and the changes that occurred during the corporate year ended (1/1/2025 to 31/12/2025), as well as the 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 significant transactions entered into between the Bank and its affiliated parties.

## International environment | 2025

The global economy operated in an environment of heightened uncertainty in 2025, as geo-economic tensions intensified and fundamental principles of international economic governance that had been in place for decades were revised. The US shift towards trade protectionism, with the imposition of high tariffs on almost all of its trading partners, has created strong volatility in international markets and fuelled concerns about the risk of prolonged trade fragmentation. But, despite the successive crises that the global economy has faced, it has remained more resilient than expected.

More specifically, global GDP recorded an annual growth rate of 3.2% in the first half of 2025, while economic indicators for the second half of the year suggest continued economic growth close to 3.0%[1]. In many advanced economies such as the US, Japan, France and Italy, private consumption growth has been sluggish, reflecting weak consumer confidence, which has been contributed to, among other things, by higher food prices. Investment continued to have a limited impact on growth momentum, reflecting the environment of heightened uncertainty. Political instability in major European economies has heightened concerns about widening budget deficits. At the same time, the attempt to weaken the independence of the US Federal Reserve (the "Fed") has reinforced market expectations of greater inflation tolerance from the central bank. In contrast, in emerging economies, cyclical factors, such as (a) the strong growth of agricultural output in Brazil, (b) the strong performance of the services sector in India and (c) the easing of uncertainty in Turkey, helped to maintain relatively high rates of economic growth. According to the International Monetary Fund's projections (October 2025), global GDP growth is expected to slow marginally to 3.2% in 2025, from 3.3% in

2024, albeit with an upward revision compared to the April 2025 projections, mainly due to less than expected trade disruption[1]. Favourable international financial conditions, combined with more effective economic policies in recent years, have strengthened the resilience of less developed economies and supported international economic activity. In the advanced economies as a whole, economic growth is expected to reach 1.6% in 2025, compared to 1.8% in 2024[2].

In 2025, the strengthening of trade protectionism exerted a mild upward effect on **global inflation**, partly reflecting the strong profit margins of previous years, which allowed firms to absorb some of the increased costs arising from the imposition of tariffs. However, the effect on prices varied across economies, as tariffs are a negative supply shock for countries that impose them and a negative demand shock for countries that export to them. At the same time, the depreciation of the US dollar, due to reduced investor confidence in the outlook for the US economy and a possible reassessment by markets of the risks associated with US dollar-denominated asset valuations, contributed to strengthening inflationary pressures in the United States and, at the same time, to lower prices of imported goods in other economies. In advanced economies, rising food prices, combined with persistently high services inflation, have acted as a brake on the faster decline in inflation. Globally, inflation is estimated to fall to 4.2% in 2025, from 5.8% in 2024. In particular, in the advanced economies as a whole, inflation is projected to reach 2.5% in 2025, compared to 2.6% in 2024, as the gradually increasing trickle-down of tariffs on consumer prices in the United States partly offset the deflationary effects stemming from the easing of the labour market. In contrast, in emerging and developing economies, inflation is expected to decelerate more sharply, falling to 5.3% in 2025 from 7.9% in 2024[2].

The **US** economy has been highly volatile in the first half of 2025 amid high uncertainty regarding economic and trade policy. More specifically, GDP contracted by 0.6% in Q1 2025 due to a dramatic increase in imports in anticipation of high tariffs on US trading partners. Nevertheless, the second quarter recovered strongly at a rate of 3.8% , as imports declined to a large extent and private consumption strengthened, developments which more than offset the decline in private investment. The economy's growth momentum is expected to be restricted in the second half of the year, mainly due to weakening consumption consistent with low levels of consumer confidence, sluggish employment growth and a slight rise in unemployment. Overall, the US growth rate for 2025 is projected to fall to 2.0% from 2.8% in 2024, before recovering slightly to 2.1% in 2026, supported by fiscal easing. Inflation has been rising since April 2025 and is expected to remain above the central bank's target in 2026, due to the higher trickle-down of tariffs to consumer prices. The tighter US immigration policy leads to a tighter labour supply, which thus increases the risk of wage and inflationary

[1] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece
[2] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

pressures in the short run and lower potential output in the long run. The US current-account deficit is estimated to remain unchanged at 4% of GDP in 2025 and subside to 3.6% of GDP in 2026[2].

In **China**, GDP slowed to 5.2% in Q2 2025, from 5.4% in Q1[2], as the strong export growth in Q1 was smoothed out, which was precautionary, to some extent, in view of the escalation of tariffs by the US, while the contribution of net exports declined. In the Q3 of the year, growth slowed to 4.8% despite measures to support domestic demand, the rerouting of trade flows and the increase in exports to third countries. Overall, for 2025, GDP growth is expected to decline slightly to 4.8%, from 5.0% in 2024. Inflation remained low and was negative in August and September 2025, mainly due to the fall in food prices, and stood at 0.7% in November. For the full year, inflation is expected to be zero, compared to 0.2% in 2024[3].

**India's** economy will continue to grow strongly at 6.6% in 2025 despite a significant escalation of tariffs by the US in August 2025, which is expected to depress external demand and reduce goods exports by 3.4% in 2025. For 2025 as a whole, inflation is estimated at 2.8% compared to 4.6% in 2024, mainly due to lower prices for food, energy and administration-defined prices[3].

In **Japan**, the economy recovered from stagnation in 2024, despite tariffs and political instability during 2025, with domestic demand, especially private investment, and exports in the second quarter contributing positively to growth. Total GDP is projected to grow by 1.1% in 2025, as rising real wages support private consumption, but only by 0.6% in 2026, due to high uncertainty and weakening global demand. Japan's new prime minister is expected to support the economy with fiscal measures and structural reforms. For 2025 as a whole, inflation is estimated to remain high, especially for food products, and reach 3.3% in 2025, while in 2026 it will fall close to the target of 2.0%[3].

In the **United Kingdom**, growth remains sluggish due to low business confidence, continued gradual easing of the labour market, an increase in the domestic tax burden in the context of fiscal consolidation and a slowdown in global trade in goods amid tariffs and high uncertainty. For 2025 and 2026, GDP growth is estimated to accelerate slightly to 1.3%, from 1.1% in 2024, with downside risks to growth. Annual inflation since autumn 2024 has been on the rise, reaching 3.8% in September 2025, mainly due to increases in administration-defined prices and food prices, although it eased slightly to 3.5% in November. The Bank of

England predicts that the rise in inflation is temporary, but is monitoring closely for any secondary inflationary effects from wage increases[3].

The **Eurozone** growth rate fluctuated significantly in the first half of 2025. More specifically, the euro area GDP grew by 0.6% in Q1 and 0.1% in Q2, reflecting first the increase in exports in anticipation of higher tariffs and then the reversal of this effect. Economic activity accelerated in Q3 at a growth rate of 0.3%[3], significantly higher than the European Central Bank's September forecast. This acceleration was mainly driven by the reduction in uncertainty thanks to trade agreements, which is expected to lead to a further recovery. Growth in services, especially tourism and digital sectors, continued in the third quarter, while manufacturing remained sluggish under the negative impact of higher tariffs, still high uncertainty and the strong euro. GDP is expected to grow over the medium term, supported by rising real incomes, reduced uncertainty about economic and trade policy, an expected boost to defence and infrastructure spending and the gradual easing of the restrictive effects of monetary policy. Overall, in 2025, Eurozone GDP is estimated to grow by 1.4%, compared to 0.9% in 2024, while for 2026 GDP is projected to slow to 1.2%[4].

Inflation the euro area is expected to stabilise at 2% over the medium term, as slower wage growth, rising productivity and the appreciation of the euro help to contain inflationary pressures. Inflation in November and October remained at the same level, at 2.1%. In November, the components of inflation rose in services (3.5% from 3.4%) and energy (-0.5% from -0.9%), while in food (2.4% from 2.5%) and non-energy industrial goods (0.5% from 0.6%) they fell. According to forecasts of Euro-system experts (December 2025), inflation will fall from 2.1% in 2025 to 1.9% in 2026 and 1.8% in 2027. Inflation excluding energy and food is estimated to decelerate from 2.8% in 2025 to 2.2% in 2026 and 1.9% in 2027, mainly reflecting the decline in services inflation, the appreciation of the euro and declining pressures on the unit labour cost side.

## The Greek Economy | 2025

The Greek **economy** continued growing at a steady pace in 2025, showing remarkable resilience and outpacing the growth rate of the euro area.  Private consumption, investment and exports contributed mainly to GDP growth, while the strong investment activity combined with the high import content of domestic consumption is expected to cause a rapid increase in imports, making the contribution of the external sector to GDP negative. Inflation, as in the previous year, remained at a relatively high level, as the decline in energy and industrial goods prices was offset by a persistent rise in services and unprocessed food prices. As regards the labour market, employment showed positive annual change in 2025, albeit slowing down compared to

[3] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

[4] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

2024. Unemployment is easing further, while labour market tightness appears to be easing slightly, but remains a major challenge for the economy.

The country's fiscal performance remains consistent and credible, reflecting the steady outperformance of tax revenues and improving tax compliance. The fiscal policy pursued by the Greek economy in recent years and the efforts to fight tax evasion have yielded clear results, as they have led to a permanent strengthening of revenues through the broadening of the tax base and have created sustainable fiscal space. This dynamic has allowed the adoption of permanent tax measures from 2026, with a focus on reducing the tax burden on the middle class, families with children and young workers. The de-escalation of public debt via early repayments further enhances the credibility of economic policy, reduces future interest payments, reduces interest rate risk and implies lower fiscal adjustment needs in the future. The resilience of the Greek economy and the significant strengthening of the fiscal position led to new upgrades of the country's sovereign credit rating in 2025 by major international rating agencies, contributing to the reduction of borrowing costs and the broadening of the investment base for Greek government securities.

Risks to the sustainability of public debt appear to be manageable in the medium term, subject to a commitment to the achievement of budgetary targets and the efficient use of European resources. However, in the longer term, increased uncertainty is expected, as the gradual refinancing of debt obligations will increase the exposure of the Greek government to interest rate and market risk, which eliminates the scope for fiscal easing.

The Greek economy should remain committed to a fiscal path in line with European rules and to further strengthening fiscal sustainability in the long run. At the same time, reforms should be continued, the economy's outward orientation should be strengthened and the use of the resources of the European recovery instrument Next Generation EU (NGEU) should be accelerated in order to boost productivity and growth rates.

More specifically, GDP continued to grow in the first nine months of 2025 by 2.0% compared with the corresponding period of 2024, exceeding the average growth rate of 1.5% in the euro area. Private consumption and net exports contributed positively to this increase, due to the increase in exports of goods and services and the parallel decrease in imports. Finally, the contribution of investment to growth was also positive, due to the strengthening of fixed investment in both production equipment and construction in the second and third quarters of the year. Economic activity indicators estimate a continuation of the growth momentum in the Q4 2025[5].

[5] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

Inflation reached 2.9% at the 11-month period of 2025 compared with 3.0% in 2024, mainly fuelled by persistent services inflation and unprocessed food inflation, fluctuating strongly as it decelerated sharply in September and October, but returned to its 11-month average in November. Processed food, non-energy industrial goods and energy goods contributed to the small decline in inflation. Overall, annual inflation in 2025 is expected to reach 2.8%, before easing significantly to 2.1% in 2026[5].

Private consumption grew by 2.5% compared to 2.6% in 2024, and continued serving as a key component of the upturn in economic activity, due to the strengthening of real household income supported by continued employment growth, the increase of nominal wages, government support measures and the reduction of inflation[5]. Public consumption increased during the first nine months of the year, contributing positively to GDP growth. Consumer spending continued to grow in the first eight months of 2025 as reflected in the annual increase in retail sales volume by 5.3% in October 2025 compared to the corresponding index of October 2024[6].

At the first nine months of 2025, investment continued growing, as all major categories of fixed assets increased. More specifically, gross fixed capital formation decreased by -6.4% in the nine-month period of 2025, compared to an increase of 3.1% in the corresponding 2024 period. Investments in "Transport equipment", which increased by 18.1%, investments in "Machinery and weapon systems", which increased by 2.5%, investments in "Other constructs", which increased by 7.8%, and investments in "Residential buildings", which increased by 14.5%, all contributed positively to this increase[5]. Investments in " Other products" noted a marginal increase of 1.8%. On the contrary, investments in "Information and communication technology equipment" showed a significant decrease of 7.4%[7].

In the first nine months of 2025, the current-account deficit narrowed by €1.8 billion, compared to the respective period of 2024, and amounted to €8.1 billion due to the improvement mainly in the balances of goods and primary income as well as, to a lesser extent, in the services balance, while the secondary income balance deteriorated. More specifically, the goods deficit narrowed due to a reduction in the deficit of the fuel balance, which was partly offset by an increased deficit in the balance of other goods (non-fuel), as imports increased more than the respective exports. As regards the services balance, it showed a larger surplus linked to the improvement of the traveling balance, although its positive impact on the current account was limited by the deterioration in the transport and other services balances. The primary income deficit narrowed in the

[6] Source: Retail Trade Business Cycle Index of the Hellenic Statistical Authority (ELSTAT), October 2025

[7] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

January-October 2025 period compared to the corresponding period in 2024, mainly due to a decrease in net interest payments. Finally, the secondary income balance recorded a smaller surplus compared to the corresponding quarter of 2024, as net receipts of other sectors of the economy decreased and net payments of the general government increased[7].

The labour market has experienced strong growth in recent years, resulting in a reduction in the unemployment rate. The positive trend continued in the first nine months of 2025, albeit at a slower pace compared to the corresponding period of 2024 despite the significant challenges caused by the tight labour market and the increasing difficulty for businesses to recruit the necessary staff. The unemployment rate in the first nine months of 2025 de-escalated to 9.0%. The unemployment rate fell for both men and women, although it remained significantly higher for women than for men. In comparison, it was 7.3% for men and 11.3% for women. At the same time, the unemployment rate of young people aged 20-29 years decreased to 16.2% and the long-term unemployment rate decreased to 5.0%[7].

Employment grew by 1.4% in the first nine months of 2025, compared to the same period in 2024, when it grew by 1.9%. Paid employment increased by 5.5%, while the number of other employees fell by 7.7%[7], mainly reflecting a significant decrease in the number of self-employed persons without employees and assistants in the family business. Self-employed persons with staff also recorded a small increase. It should be noted that at a sectoral level, the increase in employment in the first nine months of 2025 came mainly from the rise in the number of self-employed people in commerce (5.8%), education (4.4%), professional, scientific and technical activities (11.0%), construction (9.1%), and administrative and support activities (11.1%). On the contrary, employment decreased in agriculture (-14.2%), tourism-related activities (-1.0%), human health activities (-2.2%), and public administration and defence (-0.9%)[8].

According to data from the Business Service Information System of the Hellenic Ministry of Labour (ERGANI), labour market developments remained favourable, as the balance of flows in the private-sector salaried employment in the first quarter of 2025 was positive and remained at levels similar to the corresponding period of 2024. More specifically, 188,086 new jobs were created in the first ten months of 2025, compared to 171,253 in the corresponding period of 2024. As regards individual sectors of economic activity, the largest increase in recruitment was recorded in tourism-related activities [8].

[8] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

In December 2025, the economic sentiment index continued to improve further and stood at 107.4 points from 105.9 points in November 2025, according to the latest data from the Foundation for Economic & Industrial Research (IOBE). This increase stems from the improvement in expectations in most sectors with the sole exception of retail trade. The downward trend in consumer confidence is halting, as the pessimistic forecasts of households about their financial situation is narrowing. The average of the index for the whole of 2025 is close to 107.4 points, about the same as in 2024, which suggests a stability in the expectations of businesses and citizens for the year just ended. Finally, on a general assessment, the overall picture for the year ended showed minor fluctuations, with some sectoral variations, but with a generally stable picture compared to the previous year[9].

According to the Bank of Greece's forecasts, the growth momentum of the Greek economy will continue in the coming years exceeding the average projected growth rate of the euro area and thus remaining on a path of real income convergence. The growth rate of the Greek economy is expected to reach 2.1% in 2025 to 2027, and to change marginally to 2.0% in 2028. 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[8].

## Greek Economy | Developments and prospects 2025

The growth momentum of the Greek economy in 2025 is expected to continue in the coming years, according to Bank of Greece forecasts, exceeding the average projected growth rate of the euro area and reducing, albeit very gradually, the deviation from the average level of real GDP per capita in the European Union. The growth rate of the Greek economy is estimated to reach 2.1% in 2025, 2026 and 2027, and recover marginally to 2.0% in 2028. The main driver of growth in the coming years will be consumption, while investment and exports will continue to make a positive contribution. In the short term, investments are expected to be supported by the remaining resources available in the Recovery and Resilience Facility (RRF), as only 1/3 of these have so far been channelled to the real economy. Thus, investment is estimated to grow at a high rate of 7.3% in 2025-2026, while at the end of the Next Generation EU implementation period the growth rate will moderate in 2027 and 2028. On the other hand, the contribution of the external sector is expected to be marginally negative, as strong investment activity is expected to cause imports to increase at a pace similar to that of exports[10].

In an international and mainly European environment of low energy prices and further decline in inflation, Greek inflation is expected to continue to decelerate, albeit at a moderate pace, within the forecast period. In

[9] Source: Results of Economic Sentiment Surveys (December 2024), IOBE

[10] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

2025, it is projected to remain high at 2.8%, reflecting the persistence of services inflation, driven by increases in labour and rents, pressures from high tourism demand and higher indirect taxes on restaurants and accommodation, as well as inflation in unprocessed food. In 2026, inflation is expected to fall to 2.1% and in 2027 to remain essentially unchanged at 2.2%. In 2028, inflation is projected to accelerate to 2.5%, as a result of the inclusion of the impact of the expanded emissions trading scheme in the energy component of the Harmonised Index of Consumer Prices[10].

Private consumption is expected to grow in the coming years at an average rate close to 2.0%, supported by a strengthening of real disposable household income, as employment is expected to continue to recover, wages are expected to rise and inflation is expected to gradually decline. In contrast, the contribution of public consumption to growth in the coming years is expected to be much more mild[10].

Domestic investment is projected to continue to grow at a high rate, averaging 7.3% in 2025-2026, while with the passing of the Next Generation EU implementation period in 2026, the growth rate will be moderated in 2027-2028. However, the implementation of the investments is projected to have secondary effects, affecting economic growth beyond 2026. Although all loans from the RRF will be disbursed by the end of 2026, the loan component will continue to finance the economy, as the intermediaries, mainly commercial banks, will continue to disburse loan tranches after 2026. Private investment (excluding housing), which accounts for about 60% of total investment and is the most productive, is projected to grow at a faster pace than in the previous period as an additional mobilisation of private investment is expected, due to the high levels of investment that preceded it. In 2027, public investment is projected to register a strong negative rate of change due to the completion of the payment of funds from the RRF. Finally, residential investment is expected to continue to grow in the coming years, covering part of the gap as a percentage of GDP[10].

Total goods and services exports are projected to continue to grow in the coming years at an average rate of 3.4%, combined with the enhanced competitiveness of Greek products and the expected increase in external demand. However, the contribution of the external sector to GDP is estimated to be marginally negative in the coming years, due to the strong investment activity that will trigger rapid import growth rates and the high import content of domestic consumption[11].

The current account deficit as a share of GDP is expected to narrow in the coming years, driven by strengthening exports of goods and services and inflows from both the RRF and the EU's Multiannual Financial

[11] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

Framework (2021-2027) despite rising imports of capital goods. More specifically, for 2026, the rise in domestic investment, together with RRF-financed projects, will contribute to an increase in imports of capital goods and thus to a deterioration in the goods balance. However, the increase in tourist arrivals, coupled with the extension of the tourist season, the opening of new markets and the continued momentum in cruise travel will contribute to the growth of travel service revenue, albeit at a lower rate.

Unemployment is estimated to reach 9.2% in 2025, gradually declining to 8.0% in 2028. This reflects the continued recovery of economic activity in the coming years. 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 a high rate of around 4.0% per annum, as a result of the tight labour market. In contrast, labour productivity for the economy as a whole is estimated to grow at a lower rate compared to real wages per employee. Thus, if there are no similar developments in the country's trading partners, then these trends may affect the competitiveness of the Greek economy[11].

## Greek Banking System | 2025

According to the Bank of Greece's Monetary Policy Report for 2025, Greek banks have particularly strong fundamentals, with improved profitability and high capital adequacy and liquidity ratios. The non-performing loans ratio declined slightly during the year, further reducing the gap with the European average. At the same time, the results of the pan-European 2025 stress simulation exercise confirm the increased resilience of the Greek banking system. Even under the adverse macroeconomic scenario, Greek banks maintain capital levels that exceed both regulatory requirements and the European average. This strong performance is reflected in the continuous upgrades of banks' credit ratings, a development that also reflects the strengthening of the macroprudential framework and the positive effects of sovereign credit rating upgrades.

The profitability of Greek banks remained high in the first nine months of 2025 due to the strengthening of net funding to the real economy on the one hand, and to the increase in net income from commissions and other sources on the other. This development was also positively influenced by the extraordinary deferred tax income, which resulted from the merger transaction through the absorption of Alpha Services and Participations by Alpha Bank, in the context of hive-down reversal. The capital adequacy ratios of Greek banks remained at high levels, having now converged, on average, with their European counterparts.

In addition to improved net profitability, the issuance of additional Tier-1 securities and the issuance of subordinated bonds (Tier 2) had a positive impact.

The asset quality of Greek banks showed a mild improvement in the first nine months of 2025 compared to the end of 2024. In particular, the NPL ratio on an individual basis, which had declined significantly in December 2024 compared to September of the same year, remained low in September 2025. At the same time, the percentage of non-performing loans with increased credit risk compared to the initial recognition (Stage 2) decreased as a percentage of total loans on an individual basis. Regarding banks' liquidity, despite the small decrease in both the Liquidity Coverage Ratio (LCR) and the Net Stable Funding Ratio (NSFR), compared to the end of 2024, both ratios remain at levels significantly higher than supervisory requirements, as well as the corresponding ratios of euro area banks. Moreover, the loan-to-deposit ratio continues to be significantly lower for Greek banks than for euro area credit institutions.

More specifically, in the first nine years of 2025, profitability and performance of the equity of Greek banks remained high on an annual basis, as banks recorded profits after tax and discontinued operations which amounted to €3.58 billion compared to €3,30 billion in the corresponding period of 2024[12].

As shown in the table below, Greek banks' operating income decreased marginally by 0.1% compared to the corresponding period of the previous year and amounted to €8,7 billion. Net interest income decreased by 3.8% compared to the first nine months of 2024 and amounted to €6.5 billion. Interest income decreased by 8.0%, reaching €11.2 billion, which was the result of the reduction in the Eurosystem's base interest rates. Interest expenses decreased to €4.7 billion compared to around €5.5 billion in the corresponding period of 2024, a change of 13.2%. An increase of 13.3% is observed in net fee and commission income, as well as 32% in other income, while income from financial operations shows a decrease of 6.5%. Net income from commissions strengthened, driven by a positive contribution from portfolio management and payment operations revenues and in line with the increase in funding, contributing to revenue diversification and resilience[12].

As for operating expenses, they increased by 12.4% due to an increase in personnel costs by 12.6%, administrative costs by 16.0% and depreciation/amortisation by 4.3%[12].
In the first nine months of 2025, the cost of credit risk increased year-on-year, as part of banks' actions to further improve the quality of their assets. Specifically, provisions for credit risk totalled €857 million, compared to €843 million in the first nine months of 2024[13].

[12] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

[13] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

Taking all of the above into account, bank profitability increased in the first nine months of 2025, foreshadowing the maintenance of high levels of profitability for the full year. This should allow systemically important banks to achieve their medium-term objectives, in particular to further strengthen their capital and increase funding to non-financial corporations, as well as to support their plans to accelerate the amortisation of final and settled deferred tax credits (DTCs).

Below is the table of the Greek banks' profit and loss accounts:

**Financial results of the Greek banking sector**

| ***amounts in EUR million*** **(Nine-month period of 2025)** | **9M 2025** | **9M 2024** | **Change % 9M 24-25** |
|---|---|---|---|
| **Operating income** | **8,746** | **8,750** | **-0.1%** |
| **Net interest income** | 6,467 | 6,719 | -3.8% |
| ***- interest income*** | *11,206* | 12,177 | *-8.0%* |
| ***- interest expenses*** | *-4,739* | -5,457 | *-13.2%* |
| **Net revenue from non-interest-bearing operations** | 2,279 | 2,031 | 12.2% |
| ***- net fee and commission income*** | *1,741* | 1,537 | *13.3%* |
| ***- revenue from financial operations*** | *279* | 299 | *-6.5%* |
| ***- other income*** | *258* | 195 | *32.0%* |
| **Operating expenses** | **-3,328** | **-2,961** | **12.4%** |
| **Staff costs** | -1,690 | -1,500 | 12.6% |
| **Administrative costs** | -1,133 | -976 | 16.0% |
| **Depreciation** | -506 | -485 | 4.3% |
| **Net income (operating income - operating expenses)** | **5,418** | **5,790** | **-6.4%** |
| **Provisions for credit risk** | -857 | -843 | 1.6% |
| **Other impairment losses**[1] | -188 | -595 | -68.5% |
| **Non-recurring gains / losses** | 5 | 3 | 54.4% |
| **Profit / loss before tax** | **4,378** | **4,354** | **0.5%** |
| **Taxes** | -806 | -1,108 | -27.3% |
| **Profit / loss from discontinued operations** | 12 | 54 | -77.6% |
| **Profit / loss after tax** | **3,584** | **3,300** | **8.6%** |

*Source: data from the publication: Monetary Policy Interim Report 2025 (December 2025) of the Bank of Greece, using financial statements of the four Significant Institutions (SIs) and supervisory data for the Less Significant Institutions (LSIs).*
[1] *Impairment of securities and of tangible and intangible assets*

The liquidity of the Greek banking system for 2025 remained at high levels. Customer **deposits** continued their upward trend, showing a stronger cumulative increase compared to the corresponding period of 2024 (mainly due to a significant increase in household deposits), reflecting the satisfactory economic growth. The positive change in deposits came from overnight deposits, as time deposits decreased due to the decline in their interest rates.

More specifically, the **balance of private-sector (household and business) deposits** amounted to €213.2 billion in December 2025, of which €154.8 billion were deposits of individuals and non-profit institutions (INPOs), €54.3 billion were deposits of non-financial corporations (NFCs), €0.5 billion were deposits of insurance corporations and professional insurance funds and €3.5 billion were deposits of financial institutions. More specifically, the stock of private sector deposits recorded a cumulative increase of around €9.6 billion, due to the recovery of business deposits (NFCs) by €5.3 billion, while the rise in household and non-profit institutions (INPOs) deposits was more limited and recorded a cumulative increase of €4.5 billion[14].

The significant increase in household deposits is due to the favourable development of nominal disposable income in 2024 and early 2025, as well as to developments in lending to households, as positive net financing flows were recorded for most of the period under review. Bank deposits continue to consist mainly of liquid assets held in overnight accounts and account for 76% of private sector deposits in December 2025. In December 2025, the single-day deposit balance was up by 9% for NFCs compared to December 2024, while for households the corresponding increase was 7%. For other deposits, the change compared to 2024 was 17% for NFCs and -8% for households and INPOs[14].

Regarding the same period in 2025, central government deposits in banks rose slightly by €1.1 billion, while general government deposits rose by €10.6 billion. As regards other sectors, deposits of insurance corporations and other financial institutions weakened marginally by €0.2 billion, and total deposits of non-residents and residents of other euro area countries increased by €1.5 billion[14].

[14] Source: https://www.bankofgreece.gr/statistika/nomismatikh-kai-trapezikh-statistiki/katatheseis-twn-pistwtikwn-idrymatwn

Demand for deposits is expected to increase in the period ahead, in line with GDP growth and, for households in particular, with disposable income. The forthcoming implementation of tax relief and wage support measures is expected to have a positive impact on household disposable income and, by extension, on the level of deposits. On the contrary, if deposit rates continue falling, especially in real terms, the attractiveness of bank deposits as a means of holding wealth is likely to be reduced.

**Total private sector financing (households and corporations)** in the Greek banking system amounted to €129.7 billion in December 2025, of which financing to corporations amounted to €91.7 billion, accounting for about 71% of total private sector financing by Greek credit institutions. The largest concentration is in non-financial corporations (NFCs) corresponding to €81.8 billion, which account for 89% of total financing to corporations. More specifically, private sector financing recorded a cumulative increase of around €7.0 billion, which breaks down into an increase in financing to businesses of €8.0 billion and a decrease in financing to individuals and private non-profit institutions of €0.8 billion. There was also a smaller decrease in financing to the self-employed, farmers and sole proprietorships of €0.2 billion. Funding to individuals and private non-profit institutions amounted to €34.1 billion, accounting for 26% of total private-sector funding, while funding to the self-employed, farmers, and sole proprietorships amounted to approximately €3.8 billion (3% of total funding)[15].

The acceleration in financing to businesses is linked to a strengthening demand for bank loans, mainly due to the pick-up in economic activity and the reduction in bank lending rates. As regards the supply of bank loans, Greek banks in 2025 maintained their liquidity by raising significant funds mainly from inflows of customer deposits but also from the foreign interbank market and through the issuance of bonds. Liquidity withdrawal from the Eurosystem declined over the same period and the overall Eurosystem borrowing balance has now reached a very low level. The granting of bank loans to businesses was significantly supported during the current year by the co-financing and guarantee programmes of the European Investment Bank Group, as well as the corresponding programmes of the Hellenic Development Bank. In the same direction, bank co-financing loans under the Recovery and Resilience Facility (RRF) contributed to the same direction, with disbursements showing a slight increase in the first ten months of 2025 compared to the corresponding period of 2024.

The upward trend in consumer credit is consistent with the positive development of private consumption, including expenditure on consumer durables, to the extent that consumer confidence has strengthened. At the same time, the annual increase in the average gross mortgage loan flow is linked to the upward trend in the house price index, the reduction in bank mortgage rates in the first ten months of the year compared to

[15] Source: https://www.bankofgreece.gr/statistika/nomismatikh-kai-trapezikh-statistiki/xrhmatodothsh-ths-ellhnikhs-oikonomias

the corresponding period of 2024, as well as the implementation of the 'My House II' programme. These developments have had a supportive effect on the demand for housing finance. It is noted that during the first ten months of 2025, a gradual increase in the absorption of the new 'My House II' programme was recorded, which is being implemented as a continuation of the first programme, which was largely absorbed in 2024, and is managed by the Hellenic Development Bank. According to the approved programme budget, €1 billion is expected to be channelled through the banking system. These resources are used by banks to co-finance loans, which are complemented by public funds from the RRF, also totalling €1 billion[16].

In the period 2025-2026, it is estimated that the projected GDP growth combined with the lower level of bank lending rates compared to previous years will continue to support bank lending to non-financial corporations. At the same time, it cannot be excluded that the absorption of loan resources under the Recovery and Resilience Mechanism will be further enhanced during this two-year period. Finally, the Group's financing programmes of the European Investment Bank and the Hellenic Development Bank are expected to continue to contribute substantially to the channelling of bank business loans.

The quality of the loan portfolio of Greek banks in the first nine months of 2025 showed a slight improvement compared to the corresponding period of 2024. The **reduction in non-performing loans** (NPLs) continued, resulting in a ratio of NPLs to total loans of 3.6% in the first nine months of 2025 compared to 4.6% in the first nine months of 2024 (3.8% in the first twelve months of 2024). In line with the medium-term business plans of credit institutions, further convergence of the NPLs ratio towards the European average is expected. At the same time, the share of non-performing loans with an increased credit risk compared to their initial recognition (Stage 2) decreased as a percentage of total loans on an individual basis, which remains consistently lower than the European average. More specifically, the loan-to-value ratio in Stage 2 was 6.5% in the nine-month period of 2025 compared to 7.9% in the nine-month period of 2024 and 7.4% in the twelve-month period of 2024[17].

The **capital adequacy of Greek banks**, according to the Bank of Greece's Monetary Policy Report, remained at high levels, having converged on average with the corresponding European indicators. In addition to the improved net profitability, the issuance of Additional Tier 1 (AT1) securities, as well as the issuance of subordinated bonds (Tier 2) contributed positively to this development. Since the beginning of the year, there have been issued AT1 securities totalling €2.2 billion and Tier 2 bonds with a nominal value of €1.4 billion, compared to issuances of €300 million and €2.5 billion respectively in 2024[16]. It is noted that the major banks have achieved the final binding target of the Minimum Requirement for Own Funds and Eligible Liabilities (MREL), with a reference date of 30 June 2025. This target was achieved, inter alia, through the issuance of

[16] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece
[17] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

senior bonds, which amounted to €3.8 billion in 2025, compared to €5.0 billion in 2024. Of the total amount issued in 2025, €2.3 billion is for "green" bonds[17].

Specifically, the Common EquityTier 1 ratio (CET1 ratio) on a consolidated basis decreased slightly to 15.9% in the first nine months of 2025 compared to December 2024 (16.0%), while it increased compared to September 2024, when it stood at 15.5%. The Total Capital Ratio (TCR) increased in September 2025 to 20.1% from 19.4% in September 2024 and December 2024 (19.8%)[17].

As regards the liquidity of Greek banks, it remained at high levels on an annual basis, far exceeding both statutory requirements and the corresponding bank ratios in the Eurozone. According to the latest available data from the Bank of Greece, the liquidity coverage ratio of Greek banks stood at 209.3% in the first nine months of 2025 compared to 219.2% in the first nine months of 2024 and 217.6% for the full year 2024, while the ratio for the corresponding periods in the Eurozone stood at 157.8% (first nine months of 2025) compared to 159.4% (first nine months of 2024) and 158.4% (for the full 2024 year)[20]. Also, the loan-to-deposit ratio remains significantly lower in Greek banks compared to euro area banks and reached 70.4% in the first nine months of 2025 compared to 67% in the first nine months of 2024 and 68.8% for the full year 2024, while the ratio for the corresponding periods in the euro area was 102.2% (first nine months of 2025) compared to 102.1% (first nine months of 2024) and 100.4% (for the full year 2024)[18].

Overall, the Greek banking sector continues to strengthen its profitability and resilience despite an environment of heightened risk and uncertainty. This progress creates the conditions for further expansion of the activities of Greek banks, which is already reflected in the development of new partnerships, as well as in mergers and acquisitions with foreign credit institutions and other financial institutions.

However, the growing uncertainties in the international financial system continue to be an important source of potential risks for euro area banks, including Greek banks. In this light, it is crucial that Greek banks continue on a positive path and remain on track to achieve their medium-term targets, so that the ongoing improvements and possible further upgrades act as a buffer against the environment of increased uncertainty.

## Developments concerning the Optima bank S.A. Group | 2025

[18] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

**Ordinary General Meeting of the Shareholders of Optima Bank S.A.**

Optima Bank held its second Ordinary General Meeting of its shareholders on 29/04/2025, upon the listing of its stocks on the Athens Stock Exchange. The Ordinary General Meeting approved the financial statements for 2024, which presented a net profit of €140.2 million for the Group, and decided to distribute a dividend of €0.57 per share for a total gross amount of €42,051,260.94. At the same Ordinary General Meeting, the following were decided, among others: (a) the split of the Bank's shares with the issuance of three (3) new shares in replacement of one (1) old share, with a reduction of each share's nominal value from €3.45 to €1.15, and (b) the establishment of a Share Buy-back Programme.

**Announcement of dividend distribution for profits of fiscal year 2024**

The Ordinary General Meeting held on 29/04/2025 decided to distribute dividend from the profits of fiscal year 2024 (01/01/2024 – 31/12/2024) at €0.57 per stock (gross) before legal tax withholding, i.e. a total amount of €42,051,260.94.

Regarding the dividend distribution, the Ordinary General Meeting approved the dividend cut-off date, the date for the determination of dividend beneficiaries, and the commencement of dividend payment for the fiscal year 2024 as follows:

i. Date of dividend cut-off: Monday 23 June 2025
ii. Date for determining the dividend beneficiaries: Tuesday 24 June 2025
iii. Commencement of dividend payment day: Friday 27 June 2025.

The payment of the dividend for the fiscal year 2024 was carried out through the Bank itself acting as paying bank.

The Ordinary General Meeting also authorised the Board of Directors to take any necessary or appropriate action in the context of the implementation of the above-mentioned decision of the Ordinary General Meeting.

**Split of the Bank's shares with a ratio of issuing three (3) new shares in replacement of one (1) old share.**

The Ordinary General Meeting of the shareholders decided to split all the existing shares of the Bank without any change in the share capital, with three (3) new shares replacing one (1) old share, through a simultaneous reduction of the nominal value of each new share from €3.45 to €1.15, with a simultaneous increase in the total number of shares of the Bank from 73,774,142 ordinary registered shares to 221,322,426 ordinary registered shares.

The Ordinary General Meeting also authorised the Board of Directors to take any necessary or appropriate action in the context of the implementation of the above-mentioned decision of the Ordinary General Meeting.

It should be noted that the stock split of all existing shares of the Bank followed the process of dividend cut-off, determination of beneficiaries and commencement of dividend payment.

The demerger of the bank's shares was completed on 09/07/2025 and approved by the Athens Exchange, of the listing of the Bank's new shares, on 04/07/2025.

**Establishment of a Share Buy-back Programme**

The Ordinary General Meeting of the shareholders held on 29/04/2025, approved the purchase of the Bank's own shares, namely the acquisition of up to 2,608,695 ordinary shares of the Bank, at a price range per share from €1.15 (minimum price) to €8.00 (maximum price), as the total number of shares of the Bank and their nominal value are formed after the split and within a period of 24 months from the date of the decision of the General Meeting. The total cost for the acquisition of treasury shares under the programme will not exceed the amount of €3,000,000.00 while the total number of treasury shares to be acquired in each case will not exceed 10% of the paid-up share capital.

The Ordinary General Meeting also authorised the Board of Directors to take any necessary or appropriate action in the context of the implementation of the above-mentioned decision of the Ordinary General Meeting.

The commencement date of the plan was 19 December 2025, following the approval of the Bank of Greece (for the repurchase of the Bank's own shares) on 10/12/2025 and the relevant decision of the Board of Directors on 18/12/2025.

The purchase of the Bank's own shares will be carried out via the Bank.

**Election of an Independent Non-Executive Member to the Board of Directors in replacement of a resigned Member / Board of Directors change in composition**

The Board of Directors of the Bank, at its meeting on 20.03.2025 and having taken into account the recommendation of the Remuneration and Nomination Committee dated 18.02.2025 and following the evaluation conducted by the Board of Directors itself, unanimously elected, in replacement of Ms. Kleio

Lymperi, the resigned independent non-executive member, Ms. Ioanna Zour of Christos and Alexandra, as Independent Non-Executive Member of the Board of Directors, whose term of office will last until the expiry of the term of office of the above resigned Board member, elected by the Extraordinary General Meeting of Shareholders of 23.03.2023, i.e. until 10.09.2027 at the latest.

Following the above election of the new Board member, the Board of Directors was reconstituted as follows:

1. Georgios Taniskidis of Ioannis and Olga, President, Non-Executive Member,
2. Petros Tzanetakis of Tzanibeis and Maria, Vice President, Non-Executive Member,
3. Dimitrios Kyparissis of Apostolos and Fotini, Managing Director, 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 Efthys of Ilias and Malama, Independent Non-Executive Member,
8. Ioanna Zour of Christos and Alexandra, Independent Non-Executive Member,
9. Pavlos Kanellopoulos of Dimitrios and Eleni, Independent Non-Executive Member,
10. Georgia Kontogianni of Vasileios and Anastasia, Independent Non-Executive Member, and
11. Georgios Kyriakos of Konstantinos and Nantia, Independent Non-Executive Member.

The term of office of the Board of Directors will expire with the election of a new Board of Directors by the Ordinary General Meeting to be held no later than 10.09.2027.

The composition of the Committees of the Board of Directors, namely:
i) the Control Committee
ii) the Risk Management Committee
iii) and the Remuneration and Nomination Committee
shall remain in force for the remainder of the term of the current Board of Directors, as determined at the BoD meeting of 08.11.2024.

The election of the new Independent Non-Executive member of the Board of Directors was announced at the General Meeting of Shareholders of the Bank on 29.04.2025, which unanimously ratified it.

**Launch of Optima Leasing**

Optima bank, on 13.01.2025, announced the launch of Optima leasing S.A. Optima leasing S.A. established on 11/11/2024, is a 100% subsidiary of the Optima bank Group and offers specialised solutions for businesses and professionals with development orientation. It concerns all sectors of the economy, such as industry, trade, transport, tourism, services and construction.

Optima leasing S.A. introduces services and products for the leasing of real estate, movable assets and equipment for businesses and freelancers, tailored to the Greek market and focusing on the needs and business objectives of each company. 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 utilisation of investment projects maximizing the company's potential.

**Issuance of €150.000.000 of Tier 2 Bonds**

Optima bank S.A. (the Bank) successfully completed on 18.06.2025 the issuance of unsecured subordinated bonds (T2) (the "Bonds") of one hundred and fifty million euros (€150,000,000), under the Bank's euro medium term note (EMTN) programme, for a total nominal amount of up to five hundred million euros (€500,000,000). The Bonds have a maturity of 10.25 years, with an optional call option by the Bank at 5.25 years (25 September 2030) and will be traded on the MTF market of the Luxembourg Stock Exchange. The settlement date is 25 June 2025.

The Bonds were rated by Moody's Ratings and received a B1 rating.

The issuance aims to further strengthen the Bank's capital position and the funds raised will be used to serve the Bank's business purposes and to meet its financing needs.

The bond issuance attracted strong investor interest with the total demand amounting to €1,665 billion (oversubscription by 11.1 times). 72% of the issuance was made available to foreign investors. As a result of strong investor interest, the yield on the Bonds decreased by 62.5 basis points, down from 6.125% at the initial offering to 5.5%.

Goldman Sachs Bank Europe SE acted as Global Coordinator and Goldman Sachs Bank Europe SE and Morgan Stanley were appointed as Joint Bookrunners of the issuance, acting as joint bookrunners of the offering. The Bank also participated in the issuance as Co-Manager.

**Expansion of the Optima bank branches network**

Within the 2nd half of 2025, and specifically on Tuesday 08 July 2025, Optima bank continues to expand its branch network with the opening of a new bank branch in Komotini, an area of national importance for our country.

Specifically, the management of Optima bank opened its first branch in Komotini, as part of its growth strategy in the region, essentially expanding its presence in the largest cities of Greece. With the new branch in Komotini, Optima bank will have a network of 30 branches in total, 9 of which located in cities outside Athens.

## Business Activity

Optima bank is active in the private and corporate finance market in Greece. The Bank, which is the parent company of the Group, via its customer service network and through cooperation with the individual Group companies, offers from the second quarter of 2019 onwards, a wide range of products and services covering the following areas:

**Private Banking or Retail Banking**

The Bank includes in its **retail banking** activities all natural persons, including freelancers and sole proprietorships, focusing mainly on high-income clients (Affluent/Private clients), who have significant assets under management. Both Affluent and Private clients are served by relationship managers and enjoy preferential pricing on a variety of products and services. In addition, Affluent and Private clients have the possibility to receive exclusive investment analyses and strategies issued by specialised departments, in order to provide them with more complete information and to shape their portfolio. The basic banking relationship is initiated either by physical presence in the Bank's branch network or through the digital on-boarding procedure and includes the provision of a deposit account, debit card and access to the electronic banking services offered. The Bank provides retail customers with deposit accounts, debit/credit cards and loan products, payment services, as well as investment and brokerage services.

**Corporate Banking**

The Bank's **corporate banking activities** include legal entities of any form, Greek or foreign, focusing mainly on companies with an annual turnover of more than €2.5 million. In terms of corporate banking, the focus is on (a) small businesses (Business Banking), with a turnover of more than €2.5 million and up to €7.5 million, (b) small and medium-sized enterprises (SMEs), with a turnover of between €7.5 million and €50 million, and (c) large corporates with a turnover of more than €50 million.

They concern companies that are export-oriented, profitable and active in various sectors of the economy. The Bank provides its corporate banking clients with a range of products and services aimed at fully servicing the company's transactional activity and covering its borrowing needs of any type and form. Small businesses are assigned to relationship managers in the branch network who have the exclusive responsibility of servicing the relevant customers, while SMEs and large businesses with specialised needs for more complex financing solutions/products are assigned to relationship managers in the Bank's competent unit. The Bank offers its customers, who are legal entities, products and services that meet the needs of a modern business, such as working capital and investment loans (short and long-term) in the form of loan and open account credit agreements, opening of letters of credit, issuing letters of guarantee of all kinds, 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 borrower/counterparty of the Bank, such as assignment of receivables, pledge of intangible securities, assignment of invoices, personal or corporate guarantee and pledging of deposits.

**Other services**

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

- Making transfers within Optima bank and to other banks in Greece and abroad.
- Payments to public & private bodies.
- Updating personal data of private customers through 'eGov KYC'.
- Push notifications for the secure approval of e-banking transactions and online purchases.
- Making transactions with 'Google Pay' and 'Apple Pay' digital wallets.
- Online opening of term deposit (e-term deposit.)
- Digital card facilities, such as card activation, card loss and re-issue, PIN sending, temporary lock/unlock.
- Easy access to digital copies of products (e-statements).
- 'Live chat' for real-time communication with a bank representative.

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

***Call Centre:*** Telephone representatives are available to inform customers on how to use the Bank's services and products and how to make seamless use of the upgraded digital services.

***ATMs:*** Each branch of the Bank's network has an external automatic teller machine (ATM) to serve customers who wish to use their debit/credit cards to make cash withdrawals or balance inquiries.

**Capital Management and Business Receivables Agency Services**

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

**Business Claims Agency Services**

The Group provides a 'bundle' of services in the field of factoring, developing synergies with the Optima bank Group's sponsoring divisions in order to cover the needs of businesses. Business receivables agency services are provided through the fully-owned subsidiary Optima factors.

## Development in the figures and profit or loss of Optima bank SA Group | 2025

During the semester 01/01/2025 - 31/12/2025, the Group's key figures and profit or loss as well as their changes were as follows:

**Balance sheet**

As at 31/12/2025, Optima bank Group's **total assets** amounted to €7,558.4 million from €5,540.9 million on 31/12/2024, an increase of €2,017.5 million. This change is further broken down into the increase in loans receivable from customers as a result of the increase in deposit funding and the increase in cash and cash equivalents.

**Total loans and receivables from customers** before accumulated impairment losses amounted to €5,118.0 million as at 31/12/2025 (including credit facilities for the purchase of margin accounts), up by a total of €1,460.5 million compared to €3,657.5 million as at 31/12/2024. **Accumulated impairments** appear to have increased by €23.4 million compared to 31/12/2024 and amounted to €68.3 million for the twelve-month period of 2025 compared to €44.9 million as at 31/12/2024, mainly due to the increase in the Bank's loan portfolio.

On the liabilities side, as at 31/12/2025, total **liabilities to customers** amounted to €6,298.6 million (an increase of €1.655.2 million compared to 31/12/2024).

The **ratio of loans after provisions to deposits** as at 31/12/2025 amounted to 80% (compared to 78% as at 31/12/2024).

**Total equity** amounted to €747.2 million in the twelve-month period of 2025 compared to €620.3 million in the twelve-month period of 2024, an improvement by €126.9 million. This improvement is mainly due to the formation of profits of approximately €170.1 million after tax for the Optima bank Group, increased by €29.8 compared to year 2024.

**<u>Profit and loss account</u>**

Regarding the Group's results:

Optima bank Group's **net interest income** amounted to €210.0 million from €189.9 million, an increase of 10.6% compared to 31/12/2024, mainly due to the increase in interest on loans in amortised cost resulting from the Bank's credit expansion.

**Net fee and commission income** as at 31/12/2025 amounted to €61.8 million from €41.3 million in the corresponding period last year, representing an increase of 49.4% mainly due to the increase in net fees related to the granting/renewal of loans, brokerage commissions and letters of guarantee.

Optima bank Group's **total operating expenses** for the reporting period amounted to €66.5 million, from €57.9 million in the corresponding period of 2024, an increase of 14.9%. The increase in operating expenses came from the increase in staff salaries and expenses (+11.3%) due to the increase in human resources (the number of employees at Group level gradually rose from 575 persons, as at 31/12/2024, to 626 persons as at 31/12/2025), with the majority of recruitments having been made to cover the Bank's operational needs. As at 31/12/2025, depreciation and amortisation also increased compared to 31/12/2024 (+11.5%) and amounted to €9.3 million, up from €8.3 million, at Group level, mainly due to the depreciation of buildings and facilities with right of use and amortisation of multi-year depreciation expenses.

The amount of new investments (additions) in fixed assets of Optima bank Group amounted to €1.9 million at the end of 2025 compared to €1.8 million at the end of 2024 consolidated level. Similarly, the amount of new investments (additions) in intangible assets amounted to €3.1 million in 2025 compared to €3.7 million in 2024, on a consolidated level[19].

[19] The item "Other "Intangible assets" includes recognition of intangible assets attributable to customer relationships and trademarks from the acquisitions of Optima F and Optima asset management (AEDAK) subsidiaries.

As a result of the above, **earnings before provisions, impairments and taxes** for 31/12/2025 amounted to €231.0 million compared to €196.8 million for Optima bank Group as at 31/12/2024. Taking into account the credit risk provisions, Optima bank Group's **earnings before tax** for the financial year 31/12/2025 amounted to €205.9 million compared to the €176.6 million earnings before tax for the corresponding financial year 2024. Optima bank Group's **net profit after tax** for the twelve-month period of 2025 amounts to €170.1 million compared to €140.2 million in the twelve-month period of 2024.

**Supervisory indicators**

As at the end of December 2025, the Bank's total regulatory capital amounted to €816.76 million (€836.42 million for the Group) , while risk-weighted assets (RWAs) amounted to €5,367.7million (€5,624.9 million for the Group), resulting in Optima bank's Total Requirement Capital Ratio (TCRR) Category 1 of Optima Bank amounting to 15.22% (14.87% for the Group), influenced by the expansion of the Bank's loan and investment portfolio and the overall results of this financial year. As of 1/1/2025, the CRR III regulatory framework is in force, signalling a revision of the existing standards of Basel III. 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 to climate neutrality. The revised framework introduces key amendments aiming at ensuring adequate minimum capital requirements by revising the calculations for risk-weighted assets in relation to 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 specialised consultant, a project that is currently underway.

At Bank level, the liquidity coverage ratio (LCR) amounted to 201.65% (against the minimum permissible limit: 100%) and the nest stable funding ratio (NSFR) was 123.50% (against the minimum limit: 100%) as at 31/12/2025.

**The supervisory ratios for both the Bank and the Group are summarised in the table below for both the reporting period 31/12/2025 and the corresponding period of the previous year (31/12/2024):**

| | Bank | | Group | |
|---|---|---|---|---|
| | **31/12/2025*** | **31/12/2024** | **31/12/2025*** | **31/12/2024** |
| CET-1 (%) | 12.41% | 14.42% | 12.19% | 14.40% |
| TRCR (%) | 15.22% | 14.42% | 14.87% | 14.40% |
| LCR (%) | 201.65% | 237.59% | 204.14% | 246.54% |
| NSFR (%) | 123.50% | 123.81% | 127.97% | 127.11% |

Source: Optima bank financial department

** Funds have been calculated including the profit for the period and the dividend distribution on 2025 profits, which is subject to approval by the competent institutions.*

**Conclusion on the continuation of business activity**

The Board of Directors of the Bank, having taken into account the main business risks relating to Optima bank, which mainly stem from the macroeconomic environment in which Optima bank operates and develops, in combination with its strategy, liquidity and capital position, concluded that the Bank and the Optima bank Group are subject to the going concern principle.

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

## Staff

Employees are a particularly important asset for the development of Optima bank. The Bank continues to ensure that it recruits the appropriate personnel so that, on the one hand, it has the critical mass to achieve its business objectives and, on the other hand, it creates long-term and mutually beneficial cooperative relationships with them.

The number of employees of Optima bank, as at 31/12/2025, amounted to 591 (626 for the Group), compared to 575 for the Group and 550 for the Bank as at 31/12/2024.

At Group level, 50% of this number are women, while 88% of the employees educational level is graduate and postgraduate education.

## Number of branches / Central services

As at 31/12/2025, the Bank operated in 30 branches. More specifically, 21 out of the 30 branches are located in Athens, 3 in Thessaloniki, 1 in Corinth, 1 in Larissa, 1 in Patras, 1 in Komotini and 2 in Crete.

The central services are located in the building at 32 Aigialias and Paradise Streets and the 4th floor of building “Paradise” in Maroussi, Attica. As of 16 December 2024, the bank moved parts of its headquarters to the 3rd floor of the B' building complex Monumental Plaza at 44 Kifissia Ave.

## Intangible resources

The business model of Optima bank is supported by a comprehensive set of intangible resources that serve as key drivers of value creation. Organizational know-how, operational processes, digital technology, and innovation capabilities are critical components that underpin the provision of banking, investment, and financing services. At the same time, the human capital through expertise, training, a culture of integrity, and commitment to customer service enhances the quality of services provided and strengthens the relationship of trust with clients. Social capital, which encompasses the community engagement, ethical business conduct, and transparency, forms the foundation for responsible business practices. These intangible resources enable the development of innovative solutions, the ongoing improvement of customer experience, the enhancement of security and data protection, and directly contribute to sustainable value creation for all stakeholders.

## Share capital

The share capital as at 31/12/2025 amounts to €254,521 thousand divided into 221,322,426 shares with voting rights of a nominal value of €1.15 each. As at 31/12/2025, the Bank held 248,366 treasury (own) shares, 28,366 of which are from Market-making activity and 220,000 for the variable compensation plan.

| | Number of shares | | |
|---|---|---|---|
| | **Company** | | **Group** |
| | **Shares issued** | **Treasury shares** | **Net number of shares** |
| **Balance at 1 January 2024** | **73,694,142** | **(23,298)** | **73,670,844** |
| Capitalisation of profits | 80.000 | | 80.000 |
| Purchases of treasury shares | | (302,174) | (302,174) |
| Sales of treasury shares | | (316,279) | (316,279) |
| **Balance at 31 December 2024** | **73,774,142** | **(9,193)** | **73,764,949** |
| | | | |
| **Balance at 1 January 2025** | **73,774,142** | **(9,193)** | **73,764,949** |
| Reduction of nominal shares value with a simultaneous increase in the number of shares (1 old one to 3 new ones) | 147,548,284 | (18,386) | 147,529,898 |
| Purchases of treasury shares | | (1,511,998) | (1,511,998) |
| Sales of treasury shares | | 1,219,211 | 1,291,211 |
| **Balance at 31 December 2025** | **221,322,426** | **(248,366)** | **221,074,060** |

The share capital on 1 January 2023 amounted to €160.279 thousand divided into 7.524.840 shares with voting rights and a nominal value of €21.30 per share.

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

Furthermore, it was decided to convert the Convertible Bond Loan into share capital of €48,591 thousand divided into 14,084,435 shares of nominal value €3.45 and into a share premium reserve of €11,409 thousand. According to the decision of the Ordinary General Meeting of 07/6/2023, on 26/7/2023 the Bank increased its share capital by capitalizing part of the profits of the financial year 2022, amounting to €3,399,999.15, with the issuance of 985,507 new nominal, common, voting shares.

The share capital increase of the Bank was completed successfully on Friday 29 September 2023 through a public offering for listing its shares on the Athens Stock Exchange. The final selling price was € 7.2 per share, and the funds raised amounted to € 150.9 million. A total of 21,000,000 new Bank ordinary registered shares were sold.

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, common, registered shares with voting rights, with a nominal value of €3.45 each, by capitalizing an equal part of the undistributed profits of financial year 2023. Following the above share capital increase, the Bank's nominal share capital amounts to €254,520,789.90 and is divided into 73,774,142 registered shares with a nominal value of three euros and forty-five cents (€3.45) per share. Trading of the new shares on the Athens Exchange commenced on 20/06/2024.

On 29/04/2025, the Ordinary General Meeting of the Bank decided a stock split for the Bank without any change in the share capital, with the ratio of three (3) new shares replacing one (1) old share through a reduction of the nominal value of each new share from €3.45 to €1.15, with a simultaneous increase in the total number of shares of the Bank from 73,774,142 ordinary nominal shares to 221.322.426 ordinary nominal shares. Trading of the new shares on the Athens Exchange commenced on 09/07/2025.

On 29/04/2025, the Ordinary General Meeting of the Bank decided to establish a Share Buy-back Programme for the acquisition of up to 2,608,695 common shares of the Bank, corresponding to 1.18% of the share capital, in a price range per share from €1.15 to €8.00 and within a period of 24 months from the date of the decision of the General Meeting, i.e. until April 28, 2027, with a maximum total acquisition cost of up to €3,000,000.

Within the framework of the authorizations provided by the above Ordinary General Meeting and after receiving the relevant approvals from the competent supervisory authorities (BoG),The Board of Directors, during its meeting of 18.12.2025, determined the specific terms of the Share buy-back Programme, with the aim of allocating shares to the Bank and Group staff, in accordance with the Board of Directors Remuneration Policy and the Bank's Staff Remuneration Policy.

During the fourth quarter of 2025, purchases of 220,000 treasury shares were made within the framework of the Share buy-back Programme, which will be granted free of charge to executives and staff of the Bank and the Group companies.

## Significant events after 2025

There are no other events later after 31.12.2025.

## Transactions with related parties

In accordance with the relevant regulatory framework, this report must include the most significant transactions with related parties. All related party transactions are carried out in the ordinary course of business, are conducted on market terms and conditions, are approved by the competent authorities and, other than as detailed below (note 40 of the financial statements), are not considered significant for the Group's financial performance and results.

## Risk Management

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

Following with particular attention the dynamic nature of the economic and institutional environment in which it operates, the Group adapts and evolves its risk management mechanisms, in terms of organisational structure, policies, procedures and computer 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 the task of defining a risk management strategy, based on the current Business Plan and Risk Tolerance Policy.

The RMC recommends to the Board of Directors the Group's overall present and future risk strategy, risk appetite and capital management, defines the principles that should govern the management of risks in terms of their identification, prediction, measurement, monitoring, control and mitigation, based on the business strategy in place and the adequacy of available resources.

The RMC shall also provide guidance to the Risk Management Division (hereinafter, "RMD") on the implementation of the risk appetite strategy, including compliance with the applicable regulatory capital framework, and shall monitor the independence, adequacy and effectiveness of the Risk Management Division.

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

**Risk Tolerance Policy**

The process of adaptation to the evolving institutional environment and the care for upgrading the functions that determine the level of risk management (policies, systems, etc.) require the investment of significant resources, which the Group utilises through transparent evaluation procedures, so that the result produced corresponds to the intended outcome and the relevant expenditure is within the framework of the respective budget.

All risks are defined by the Risk Tolerance Policy of the Bank and its Subsidiaries, which (like all policies) has been approved by the Board of Directors. This Policy makes distinct the levels of maximum risk tolerance, the desired degree of risk assumption and the actual level of risk, orienting and coordinating the work of the individual units, so that it converges in the direction of the strategic choices of the Management. To serve this objective, the Risk Tolerance Policy provides for the maintenance of specific price levels for a large number of indicators, which reflect the structural picture of all areas of high interest, both for the Bank and for the supervisory authorities (capital adequacy, liquidity, loan portfolio quality, profitability, etc.). This Policy is updated on an annual basis and on an ad-hoc basis whenever appropriate.

**Credit Risk**

Credit risk is defined as the potential risk of loss that may arise from the failure of a counterparty to fulfil its contractual obligations to the Bank and the Group.

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

- Concentration risk
- Counterparty risk

In terms of credit, the Bank assesses the credit risk it assumes by determining the creditworthiness of its customers, both by applying one of the most reliable independent credit rating models and by using a series of techniques and criteria compatible with the current institutional framework. These tools are described and implemented within the framework of the Credit Risk Management Policy, the Credit Policy and the Credit & Risk Management Policy. Institutional Counterparty Credit Risk Management Policy. In this context, both the approval process and the approval levels are also clearly defined, where the role of the certification committees becomes distinct.

**Operational Risk**

Operational risk (OR) is defined as the risk of loss caused by:

- the inadequacy or failure of internal procedures, including the lack or absence of adequate procedures or their incorrect application;
- the human factor, including deliberate omissions/internal fraud;
- systems and digital service providers, e.g. interruption or malfunction of systems and telecommunications, [based on the requirements arising from the Information and Communication Technologies (ICT) Regulations and the Digital Operational Resilience Act no. 2554/2022 (DORA)]; or
- external events including physical (natural) damage and theft.

Legal risk is included in OR, while Strategic and Reputation risk is not included as it is very difficult to assess and quantify on an internationally harmonised basis. However, these risks are taken seriously into account in the various management processes of OR, due to their significant impact on the Bank and its Subsidiaries.

The Bank has established appropriate Policies and Procedures for the management of Operational Risk. In addition, the Bank maintains an Operational Loss Database (ODB) application. In addition, Key Risk Indicators (KRIs) have been set in business units. The Operational Risk Department of the RMD, by monitoring the progress of the indicators, especially in cases of sharp fluctuations, checks the reasons for the change and, if it identifies operational risks, puts in place measures to mitigate 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 incurred in the Bank's portfolio due to unexpected fluctuations in the market value of individual areas of that portfolio. Portfolios facing this possibility are those exposed to interest rate risk and/or currency risk and/or price risk.

Through its activities in financial products, the Group is exposed to market risk, which may result in losses of capital from changes in interest rates, share/bond prices, share indices and exchange rates. Therefore, it seeks to effectively control the market risks arising from all its activities through a risk management framework consisting of policies, procedures and methodologies for assessing, measuring, monitoring and managing risk, as well as limit structures, which are compatible with the requirements of the supervisory authorities.

For effective market risk management, the RMD calculates on a daily basis the Maximum Potential Loss (MPL), the Value at Risk (VAR) using the variance-covariance method at a confidence level of 99% and a holding period of one day, and informs the relevant units and the Group's Management accordingly. Based on the composition of the portfolios, the methods used to hedge open positions, and the daily measurement, monitoring and analysis of results, as discussed below, it is found that the Bank's exposure to market risk is within the risk tolerance level set by the Risk Management Committee through a clearly defined risk allowance framework (RAF).

**Interest-rate Risk in the Bank Portfolio**

Interest-rate risk is the risk arising from changes in interest rates that affect the exposures of the banking book and has an impact on both the Bank's capital and earnings.

Changes in interest rates lead to changes in the present value (PV) and future cash flows of the Bank's assets, liabilities and off-balance sheet exposures and, consequently, in the economic value of its equity (Economic Value of Equity - EVE). Changes in interest rates also affect the Bank's profits by changing income and expenses that are sensitive to such changes. Consequently, the Bank's net interest income (NII) is affected.

**Liquidity risk**

Liquidity risk is defined as the risk that a bank, although solvent, does not have sufficient financial resources to meet its obligations when they fall due, or can only do so at high borrowing costs.

The Treasury & Capital Markets Division is responsible for managing the Bank’s liquidity by monitoring and managing core accounts, loan capital and investments in capital markets, in accordance with the desired level of risk as determined by the Assets-liabilities Committee (ALCO), the Risk Management Committee and the Bank’s Board of Directors. The Risk Management Division monitors the Bank’s liquidity in relation to the established limits.

**Climate and Environmental Risks**

The Bank recognises the importance of risks arising from environmental factors, particularly climate change. In line with the EBA guidelines on climate and environmental risks, it has started the process of elaborating 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 have a positive or negative impact on the organisation, while increasing compliance requirements add to the complexity. Furthermore, ESG risks may directly affect the Bank’s operations and/or performance, lead to potential capital reinforcement needs to address them, and have an impact on its reputation.

Climate and environmental risks include two key risk drivers:

- Natural Risk: 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 & Chronic
- Transition: This refers to the financial loss that may arise, directly or indirectly, from the process of adjusting to a more environmentally sustainable economy.

In line with regulatory guidelines, the Bank recognises that climate and environmental risks directly affect the other key risks to which it is exposed, such as credit, market, operational and liquidity risks. Indicative examples include:

- Credit: The probability of default and the loss given default for exposures within sectors or geographical areas vulnerable to natural hazards may be affected, for example, by lower valuations of collateral in real estate portfolios due to increased flood risk,
- Market: Serious natural events can lead to changes in market expectations and could result in a sharp revaluation, increased volatility and a decline in the value of assets in certain markets,
- Operational: The institution's activities may be disrupted due to physical damage to its premises, branches and data centres caused by extreme weather events.

- Liquidity: Liquidity risk may arise if customers withdraw money from their accounts to finance damage repairs.

The risks of liability of institutions' counterparties may arise not only from environmental and climate 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 the ways in which an organisation is governed 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 could be directly affected by climate change, initially conducted a materiality assessment to identify the sectors of the economy where its loan exposures are most sensitive to climate-related risks, taking into account both natural risks and transition risks

**Other Risks**

At regular intervals, as specified in the Risk Tolerance Policy, the Bank calculates and monitors risk tolerance ratios based on financial results and confirms that it operates in accordance with the risk levels set by the Board of Directors. If a breach of one of the indicators is observed, the activity that is causing the indicator to be breached is identified and appropriate practices are implemented, so that the risk is brought back to acceptable levels. It is worth noting that the RMD, under the supervision of the RMC, keeps bringing internal changes so as to meet the requirements of Regulations (EU) 2024/1623 of 31.05.2024 (CRR 3) and (EU) 2022/2554, in cooperation with the other competent units.

The relevant supervisory reports summarise and systematise the picture of the risk management framework in all its dimensions. Financial risk management is described in detail in note 4 of the Financial Statements and the Consolidated Financial Statements of 31.12.2025.

## Outlook | 2026

**Global economy**

The global economy remained more resilient than expected in 2025, despite a significant increase in uncertainty due to the US trade war with almost all countries. In the first quarter of 2025, economic activity strengthened significantly, mainly on the back of robust growth in industrial production and exports, as a result of a strong pick-up in import demand ahead of the implementation of higher tariffs. Subsequently, the easing of tariffs and uncertainty, in the context of trade agreements between the United States and its key trading partners, helped further support economic activity. Despite the better-than-expected export performance in many economies, the resilience of the global economy remains vulnerable to a number of risks. By November 2025, the United States' weighted tariff rate on all its imports decreased compared to April, reaching 18.6%[18]. However, it is still at levels never seen before since the early 1930s. In addition to trade restrictions, ongoing geopolitical tensions and heightened political uncertainty in major advanced economies are expected to continue to exert downward pressure on global economic growth in the coming years, keeping it below the long-term trend expected before the trade war started.

Global **GDP** growth in 2025 is estimated to slow to 3.2%, down from 3.3% in 2024, and to 3.1% in 2026. In advanced economies, GDP growth is estimated to fall to 1.6% in 2025 and 2026, from 1.8% in 2024. In emerging and developing economies, GDP growth is also estimated to slow to 4.2% in 2025 from 4.3% in 2024, with the estimate heavily dependent on tariffs, reduced external financing and cuts in international development assistance. For 2026, a further reduction to 4.0% is expected. In the US, GDP growth for 2025 is expected to slow to 2.0% and partially recover to 2.1% in 2026, supported by fiscal easing. Eurozone GDP for 2025 is estimated to grow at 1.4%, while for 2026 it is expected to be 1.2%. In the United Kingdom, GDP growth will rise to 1.3% and remain stable in 2026. In Japan it will accelerate to 1.1% in 2025, while in 2026 it will fall to 0.6%[20].

Global **inflation** is expected to decline to 4.2% in 2025, from 5.7% in 2024, and to 3.7% in 2026. In advanced economies, it is estimated to rise from 2.6% in 2024 to 2.5% in 2025 and 2.2% in 2026, as the gradually larger trickle-down of tariffs on consumer prices in the US offset the easing of the labour market. By contrast, in emerging and developing economies, inflation is projected to drop to 5.3% in 2025, from 7.9% in 2024, while in 2026 it will drom even more, at 4.7%[20].

The **risks** surrounding the outlook for global economic growth are multiple and predominantly downside risks. A possible escalation of tariffs, as well as non-tariff barriers, could further disrupt global supply chains and inhibit investment and productivity growth. Moreover, prolonged uncertainty about economic policy may further weaken private consumption and limit the implementation of new investment projects. In particular, putting pressure on the independence of institutions, such as the Federal Reserve, will undermine the credibility of economic policy and lead to higher levels of inflation. At the same time, they could lead to lower growth

[20] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

rates, higher risk premiums as a result of increased concerns about US fiscal sustainability, and a sharp repricing of risks in international financial markets. Sharp swings in cryptocurrency valuations pose risks to investor confidence and economic resilience, while a potential correction in technology sector stock prices, due to a lower-than-expected impact of AI on productivity, could negatively affect overall valuations. Furthermore, sharp changes in commodity prices, due to extreme climatic events or continued geopolitical tensions, pose additional downside risks to economic growth, especially for countries with a high dependence on energy imports. Finally, a sharper contraction in labour supply, in the context of tighter migration policies, may slow down GDP growth, especially in economies facing demographic ageing and skill shortages. Conversely, an eventual easing of trade restrictions and faster progress in the development and widespread deployment of AI technologies could boost investment, productivity and medium-term growth prospects.

**Eurozone**

Despite the challenges stemming from the external environment, the euro area economy grew at 0.3% in Q3 2025, higher than forecast in September. The first half of the year saw strong volatility reflecting the impact of front-loaded GDP growth amid uncertainty over US trade policy, but also large swings in Ireland's GDP[21].

Euro area **GDP** for 2025 is estimated to grow at 1.4%, up from 0.9% in 2024, supported by rising real incomes, reduced uncertainty about economic and trade policy, the expected boost to defence and infrastructure spending and the gradual easing of the restrictive effects of monetary policy. For 2026, GDP is projected to slow to 1.2%, before accelerating to 1.4% in 2027 and 2028[21].

Euro area **inflation** is close to the European Central Bank's target and is expected to stabilise at 2% over the medium term, as slower wage growth, rising productivity and the appreciation of the euro help to contain inflationary pressures. It is projected to decline to 1.9% in 2025, to 1.8% in 2027 and to 2.0% in 2028, from 2.4% in 2024, mainly reflecting the downward impact of energy prices and the slowdown in other components[21].

The risks surrounding the economic outlook for the euro area appear broadly balanced, with important factors continuing to exert pressure in both negative and positive directions. Despite the relative easing of uncertainty following the conclusion of trade agreements, the possibility of a further deterioration in trade relations remains a clear risk as it could hit exports and negatively affect investment and private consumption. At the same time, a deterioration in financial market sentiment could lead to tighter financing conditions and increased risk

[21] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

aversion, with negative consequences for overall economic activity. Ongoing geopolitical tensions, such as the war in Ukraine and the unstable situation in the Middle East, continue to add to the uncertainty. On the other hand, there are factors that could support growth beyond expectations. Higher-than-expected spending on defence and infrastructure, combined with productivity-enhancing structural reforms, should contribute positively to the economy's momentum. Moreover, strengthening business confidence could in itself boost private investment, while economic sentiment and activity would be further strengthened if geopolitical tensions ease or pending trade disputes are resolved more quickly.

The inflation outlook continues to be characterised by increased uncertainty, mainly linked to the volatile international environment of trade relations. A further appreciation of the euro against other currencies could lead to a larger-than-expected disinflation. In addition, inflation could be lower if higher tariffs reduce export demand for euro area products and encourage countries with overcapacity to increase their exports to the euro area. Trade tensions could also intensify volatility and risk aversion in financial markets, constraining domestic demand and putting downward pressure on inflation. On the contrary, inflation could exceed projections in the event of further fragmentation of global supply chains, which would increase the prices of imports and reinforce capacity constraints in the domestic economy. At the same time, a significant increase in defence and infrastructure spending could have inflationary implications over the medium term. Finally, the increasing risks stemming from extreme weather events and the climate crisis constitute a bullish factor for inflation, to the extent that they could lead to higher food price increases than those incorporated in the current projections.

**The Greek economy**

According to the Bank of Greece's current forecasts, **GDP** growth in 2025 is expected to be 2.1%, and to remain at the same level in 2026 and 2027, while it will marginally change to 2.0% in 2028. According to the same source, **inflation** is projected to reach 2.8% in 2025, while in 2026 and 2027 inflation will fall to 2.1% and 2.2% respectively. In 2028, a small one-off acceleration is expected, to 2.5%[22].

The risks to growth in the Greek economy are mainly downside risks. Specifically, risks to the outlook for the Greek economy according to the Bank of Greece's forecasts include: (a) any worsening of the geopolitical crisis in Ukraine and the Middle East and the consequent impact on the international economic environment; (b) strengthening of trade protectionism internationally; (c) persistent inflation; (d) tightness in the labour market and possible wage pressures; (e) extreme weather events (floods and fires), (f) a lower than expected rate of absorption and utilisation of Recovery and Resilience Mechanism funds; and (g) delays in the implementation of reforms, which would slow down the process of enhancing the productivity of the economy

[22] Source: Monetary Policy - Interim Report of 2025 (December 2025), Bank of Greece

and the competitiveness of enterprises. Any upside risks relate to: a) a higher-than-expected fiscal multiplier for 2026 and 2027 and b) better-than-expected developments in tourism. Last, the risks to the sustainability of public debt appear to remain contained, in the near future, provided that fiscal targets are met and European resources are efficiently used. In the longer term, however, it is estimated that uncertainty will intensify, as the gradual replacement of official sector financing with market-based lending is expected to increase the exposure of the Greek government to both interest rate and market risk, which limits the scope for fiscal easing in the coming years.

For 2026, Optima bank aims to maintain the successful course of the previous years, guided by the prospects of the market in which it operates and, most importantly, by its business plan for the period 2026-2028. The main strategic objectives of Optima bank continue to be to increase the volume of activities, strengthen market shares, increase revenues by employing all alternative channels of approaching customers, find new sources of income, tight control of operating expenses, with the aim of further enhancing profitability and increasing shareholder value.

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

Maroussi, 02 March 2026

FOR THE BOARD OF DIRECTORS

| The Chairman of the Board of Directors | The CEO |
|---|---|
| George Taniskidis | Dimitrios Kyparissis |

**Statement of Corporate Governance**

## 1. Introduction

According to article 152 of Law 1 and Article 153, par. 3 of Law 4548/2018, Law 4706/2020 and the Greek Corporate Governance Code, the Annual Management Report of the Board of Directors of the banking société anonyme "Optima Bank S.A." (hereinafter referred to as the "Bank") includes the Corporate Governance Statement for the fiscal year 01.01.2025 - 31.12.2025. The reporting date of the Statement is December 31, 2025 (hereinafter referred to as the "Reporting Date").

This consolidated Corporate Governance Statement relates to the Bank and the companies in which the Bank directly or indirectly participates and which are included in its consolidated financial statements, in accordance with IFRS 10 "Consolidated Financial Statements" (the "Group").

The information required in cases (c), (d), (e), (g) and (h) of par. 7 of Article 4 of Law 3556/2007, is recorded in detail in the Annual Management Report of the Board of Directors.

## 2. Overview|2025

During 2025, among other things, the following events relating to corporate governance took place:

- The election of Ms Ioanna Zour as an Independent Non-Executive Director of the Board of Directors of the Bank, replacing the resigned Independent Non-Executive Director Ms Kleio Lymperi, following a relevant recommendation of the Remuneration and Nomination Committee and the evaluation of the fulfilment of the suitability criteria and independence requirements set by the legislative and regulatory framework.
- The reconstitution of the Board of Directors as a body, following the election of Ms. Joanna Zour as a new Director, in accordance with the above.
- The periodic reassessment of the collective suitability of the Directors in accordance with Act No. 224/1/21.12.2023 of the Executive Committee of the Bank of Greece and the Policy on the Suitability of Members of the Board of Directors of the Bank.
- The stock split of all the Bank's shares, without changing the share capital, at a ratio of three (3) new shares replacing one (1) old share, by reducing the nominal value of each new share from €3.45 to €1.15, with a simultaneous increase in the total number of the Bank's shares from

73,774,142 ordinary registered shares to 221,322,426 ordinary registered shares and the consequent amendment of the Bank's Articles of Association.

- The approval of the Bank's Share buy-back Programme for the acquisition of up to 2.608.695 common nominal shares of the Bank (representing 1,18% of the Bank's shares), at a price range per share from €1,15 (minimum price) to €8,00 (maximum price), with a maximum total purchase price of €3.000.000 and for a period of 24 months from 29.04.2025, the date on which the General Meeting of shareholders passed the relevant resolution, in accordance with article 49 of Law 4548/2018 and the determination of the specific terms of the Programme, with the purpose of allocating shares to the Bank's and the Group's staff, in accordance with the Remuneration Policy for Board Members and the Bank's Staff Remuneration Policy.
- The amendment of the Policy on the Suitability of the Bank's Directors.
- The amendment to the Bank's Directors Remuneration Policy.
- Amendment of the Bank's Staff Remuneration Policy and approval of the Procedure for Identifying Persons with a Material Impact on the Bank's Risk Profile (Material Risk Takers).
- The approval of the Bank's medium-term note (EMTN) program with a total nominal amount of up to €500,000,000, in accordance with Articles 59-74 of Law 4548/2018 in conjunction with Article 14 of Law 3156/2013, for the purpose of including it in the Bank's capital adequacy, on an individual and consolidated basis.
- The adoption of the Bank's Sustainable Development Policy.
- The updating of the Bank's Rules of Procedure following the adoption of the Sustainable Development Policy and the amendment of the procedures i) compliance of persons discharging managerial responsibilities and persons closely associated with them, as defined in paragraphs 25 and 26, respectively, of par. 1 of Article 3 of Regulation (EU) 596/2014, including the obligations arising from the provisions of Article 19 of Regulation (EU) 596/2014 and (ii) the management of privileged information and proper information to the public.
- The approval of the procedure (plan) for the succession of Board Members and Board Committees.
- The submission to the Bank of Greece of a progress report on the revised ESG Roadmap for the gradual incorporation of the first four of the thirteen expectations contained in the Single Supervisory Mechanism's (SSM) guidance document on the effective management of ESG risks, which credit institutions are required to implement in order to meet the targets set in the Paris Agreement with the United Nations Framework Convention on Climate Change.
- The approval and submission to the Bank of Greece of the extension of the Bank's ESG Roadmap to incorporate the next six SSM expectations for the effective management of ESG risks.

- The updating, for approval by the competent corporate bodies, of the Bank's corporate governance documents, including its Rules of Procedure and its Annexes, in the context of their harmonisation and compliance with Act No. 243/2/07.07.2025 of the Executive Committee of the Bank of Greece [*Internal Governance Framework - Adoption of the European Banking Authority's Guidelines on Internal Governance (EBA/GL/2021/05) - Repeal of PD/TE 2577/9.3.2006 'Framework of operating principles and evaluation criteria for the organisation and internal control systems of credit and financial institutions and relevant responsibilities of their management bodies' (A/59)*].

## 3. General Meeting of Shareholders

According to article 116 of Law 4548/2018, and Article 22 of the Bank's Articles of Association, as amended by the decision of the Ordinary General Meeting of the Bank's shareholders, dated 29.04.2025, and which is posted on the Bank's website (https://www.optimabank.gr/media/mqrfsf4i/katastatiko_optima_bank_tgs_290425_akrives_antigrafo_gemi.pdf), the Bank's highest governing body is its General Meeting of Shareholders.

The General Meeting alone is competent to decide on the following matters:
(a) amendment to the Articles of Association, which includes an increase or decrease of the share capital;
(b) elect the Directors and the auditors;
(c) approve the overall management in accordance with the legislation in force and the discharge of the auditors;
(d) approve the annual and any consolidated financial statements of the Bank;
(e) distribution of annual profits;
(f) approval of the provision of fees or advance payment of fees pursuant to Article 109 of Law 4548/2018 and approval of the remuneration policy according to articles 110 et seq. of Law 4548/2018;
(g) merger, division, conversion, revival, extension of the duration or dissolution of the Bank,
(h) appointment of liquidators; and
(i) any other matter provided for by law or the Bank's Articles of Association.

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

## General Meetings for the year 2025

During 2025, the General Meeting convened once, in a regular session on April 29, 2025, attended either in person or by proxy by shareholders representing 67.07% of the Bank's share capital, with the following items on the agenda, on which the following decisions were taken:

| S/N | ITEMS ON THE AGENDA | DECISIONS | VOTING RESULTS |
|---|---|---|---|
| 1 | Submission and approval of the Annual Financial Report (Bank & Group) in accordance with the International Financial Reporting Standards for fiscal year 01.01.2024 - 31.12.2024, along with the relevant Reports of the Board of Directors and of the Certified Auditors - Accountants. | Approved the Annual Financial Report of the Bank and its Group for the fiscal year from 01.01.2024, to 31.12.2024, together with the relevant Reports and Statements of the Board of Directors and the Audit Report of the Certified Public Accountant. | IN FAVOUR: 99.98%<br><br>AGAINST: 0.00%<br><br>ABSTENTION: 0.02% |
| 2 | Approval of the overall management that took place during the period 01.01.2024 – 31.12.2024, in accordance with Article 108 of Law 4548/2018 and discharge of the Chartered Auditors - Accountants for the same year, in accordance with Article 117 of Law 4548/2018. | Approved the overall management carried out by the Board of Directors during the fiscal year 2024 and the discharge of the Bank's Certified Public Accountants from any responsibility for the activities of the said fiscal year. | IN FAVOUR: 99.975%<br><br>AGAINST: 0.001%<br><br>ABSTENTION: 0.024% |
| 3 | Election of Certified Public Accountants for the fiscal year 2025 and approval of their remuneration | Decided to assign the regular audit of the individual and consolidated annual financial statements for the fiscal year 2025 (01.01.2025 - 31.12.2025), the review of the interim financial statements as of 30.06.2025, the review and assurance of the 2025 Sustainability Report, the review and assurance of | IN FAVOUR: 99.82%<br><br>AGAINST: 0.18%<br><br>ABSTENTION: 0.00% |

| S/N | ITEMS ON THE AGENDA | DECISIONS | VOTING RESULTS |
|---|---|---|---|
| | | the information in the 2025 Year-End Performance Report, the tax audit for the 2025 fiscal year and the pre-agreed procedures reports for T.E.E.K.E. and the Guarantee Fund, to the Certified Public Accountants firm "DELOITTE S.A.", based in Marousi, Attica, at 3a Fragokklisias & Granikou Street, with GEMI General Commercial Registry (GCR) No. 001223601000, TIN 094394788, SOEL (THE INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS OF GREECE) REG. No.: E120, for a total fee of €477.000,00 plus VAT, broken down as follows:<br>➢ €305,000.00 for the regular audit of the 2025 fiscal year and the review of the interim financial statements of 30.06.2025;<br>➢ €92,000.00 for the tax audit for the period from 01.01.2025 to 31.12.2025;<br>➢ €10,000.00 for the assurance report on the completeness of the information contained in the Remuneration Report of the Directors for the year 2025;<br>➢ €5,000.00 for reports on pre-agreed procedures for T.E.K.E.;<br>➢ €5,000.00 for reports on pre-agreed procedures for the Guarantee Fund; and<br>➢ €60,000.00 for auditing and ensuring the submission of the 2025 Sustainability Report.<br>The Bank's Regular and Deputy Certified Public Accountant shall be appointed after consultation between the Bank and said audit firm. Furthermore, the General Meeting authorised the Board of Directors of the Bank to negotiate with the audit firm any differences from the above mentioned fee related to additional audit work that may be required and to send the written notice - instruction to the elected audit firm within five (5) days from the date of its election. | |
| 4 | Approval of profit appropriation and dividend distribution for fiscal year 2024. | Approved the distribution of net profits for the fiscal year 2024 amounting to €120,945,683.28; a) for the distribution of a dividend for the 2024 fiscal year in the amount of €0.57 per share and a total gross | IN FAVOUR: 100%<br><br>AGAINST: 0.00% |

| S/N | ITEMS ON THE AGENDA | DECISIONS | VOTING RESULTS |
|---|---|---|---|
| | | amount of €42,051,260.94; and b) for the purpose put forward for discussion and voting under No. item 11 of the Agenda below, the amount referred to therein.<br><br>Regarding the dividend distribution, the General Meeting approved the dividend cut-off date, the date for the determination of dividend beneficiaries, and the commencement of dividend payment for the fiscal year 2024 as follows:<br><br>i. Date of dividend cut-off: Monday 23 June 2025<br>ii. Date for determining the dividend beneficiaries: Tuesday, 24 June 2025<br>iii. Commencement of dividend payment day: Friday 27 June 2025.<br><br>The payment of the dividend for the fiscal year 2024 shall be carried out through the Bank itself acting as paying bank.<br>Finally, the General Meeting authorised the Board of Directors to do anything necessary or appropriate in the context of the implementation of this decision of the Ordinary General Meeting.<br>It should be noted that the process of determining the dividend, identifying beneficiaries, and initiating dividend payments will precede the process of splitting all of the Bank's existing shares (stock split), in accordance with item 10 of the Agenda. | ABSTENTION: 0.00% |
| 5 (a) | Announcement of the election by the Board of Directors of a new Director to replace a resigned Director. | It was noted that, in accordance with Article 82, par. 1 of Law 4548/2018 and Article 10 par. 1 of the Bank's Articles of Association, the Board of Directors, following a relevant recommendation by the Remuneration and Nomination Committee and after assessing the fulfilment of the suitability criteria and independence requirements set by the legislative and regulatory framework, at its meeting on 20.03.2025, decided to elect Ms. Ioanna Zour as an Independent Non-Executive Director, replacing the resigning Independent Non-Executive Director Ms. Kleio Lyberi, whose term of office will last until the end of the term of office of the resigning | NO VOTE |

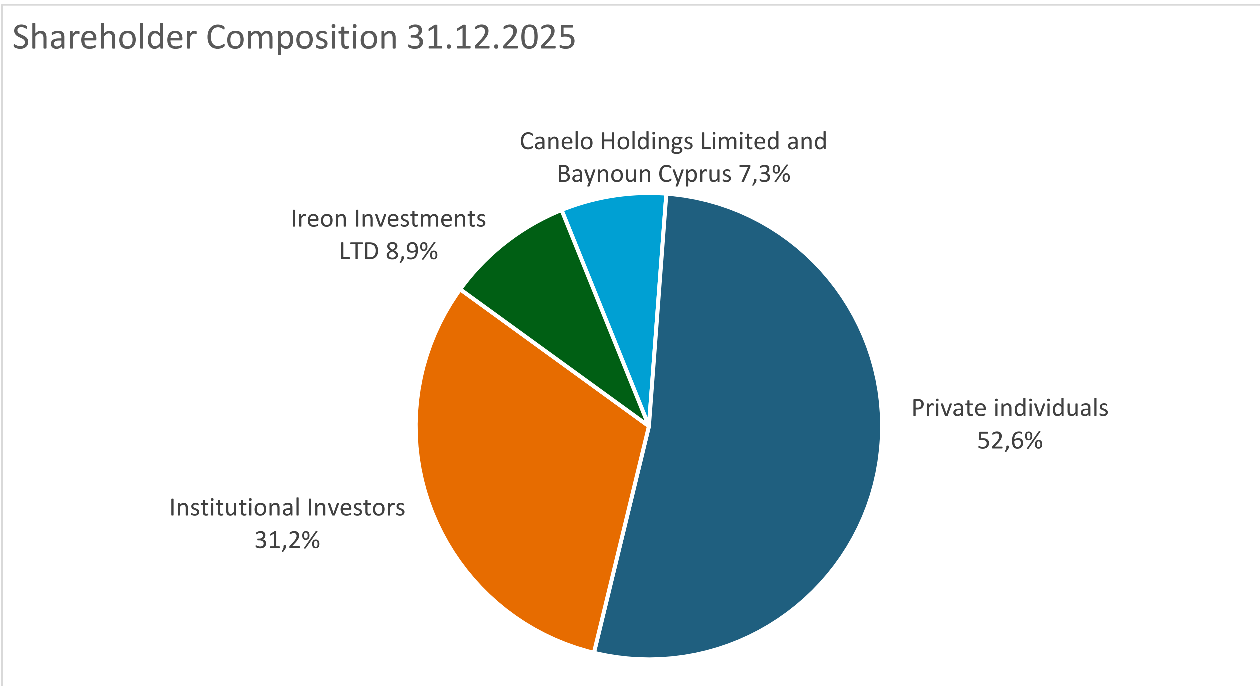
| S/N | ITEMS ON THE AGENDA | DECISIONS | VOTING RESULTS |
|---|---|---|---|
| | | member of the Board of Directors whom she replaces (i.e. until 10/9/2027). | |
| 5 (b) | Ratification of the election of a new Board Member as an Independent Non-Executive Director to replace a resigned Member. | It ratified the election of Ms. Ioanna Zour, who meets the independence criteria in accordance with Article 9 of Law 4706/2020, as an Independent Non-Executive Director, replacing the resigning Member Ms. Kleio Lyberi, for the remainder of the term of the current Board of Directors elected by the Extraordinary General Meeting of Shareholders on 23.03.2023, i.e. until September 10, 2027 at the latest. | IN FAVOUR: 100%<br><br>AGAINST: 0.00%<br><br>ABSTENTION: 0.00% |
| 6 | Submission of the Activity Report of the Audit Committee for 2024, in accordance with Article 44(1)(i) of Law 4449/2017. | Took note of the Audit Committee's Activity Report for the year 2024, in accordance with Article 44, par. (1) case (i) of Law 4449/2017. | NO VOTE |
| 7 | Submission of a report by the independent non-executive Directors in accordance with Article 9, par. 5 of Law 4706/2020. | Took note of the Report of the independent non-executive Director in accordance with Article 9, par. 5 of Law 4706/2020. | NO VOTE |
| 8 | Submission for deliberation of the Remuneration Report for fiscal year 2024, in accordance with Article 112 of Law 4548/2018. | Voted in favour of the Remuneration Report for the fiscal year 2024, in accordance with Article 112 of Law 4548/2018, without expressing any comments or remarks on its content. | IN FAVOUR: 87.03%<br><br>AGAINST: 12.97%<br><br>ABSTENTION: 0.00% |
| 9 | Approval of the remuneration paid to Directors for fiscal year 2024 and determination of the amount of such remuneration through participation in the profit of fiscal year 2025 up until the Ordinary General Meeting of 2026, in | Decided to approve regular and extraordinary remuneration, and in general expenses and compensation of all kinds paid to the Directors for the period from 01.01.2024, to 31.12.2024 and the determination of the amount and pre-approval of these remuneration for the fiscal year 2025 and until the Ordinary General Meeting of 2026, in accordance with the relevant recommendation of the Board of Directors, which the General Meeting accepted and approved in its entirety. It further authorised the Board of Directors to take all necessary actions to implement the above decision | IN FAVOUR: 86.21%<br><br>AGAINST: 13.79%<br><br>ABSTENTION: 0.00% |

| S/N | ITEMS ON THE AGENDA | DECISIONS | VOTING RESULTS |
|---|---|---|---|
| | accordance with Article 109 of Law 4548/2018. | and to determine the remuneration and amend the terms of the relevant contract of the Non-Executive Chairman, as proposed by the Board of Directors and approved by the General Meeting. The Board of Directors may delegate part of these responsibilities to one or more of its members or to officers of the Bank. | |
| 10 | Split of the Bank's shares at a ratio of three (3) new shares for each old share, with a reduction in the nominal value of each share from €3.45 to €1.15. Corresponding amendment to Article 5 of the Bank's Articles of Association – Granting of authorisations. | Approved the stock split of all existing shares of the Bank, without changing the share capital, at a ratio of three (3) new shares replacing one (1) old share, by reducing the nominal value of each new share from €3.45 to €1.15, while increasing the total number of the Bank's shares from 73,774,142 ordinary registered shares to 221,322 426 ordinary registered shares and the relevant amendment of Article 5 of the Bank's Articles of Association concerning share capital, specifically the amendment of paragraph 1 and the addition of a new paragraph 1.14. It also authorised the Board of Directors to take all necessary steps to implement this decision.<br>The completion of the Bank's stock split and the commencement of trading of the new shares resulting therefrom, in accordance with this item, will follow the ex-dividend dates, determination of beneficiaries, and commencement of dividend payment in accordance with the provisions of the 4th item of the Agenda. | IN FAVOUR: 100%<br><br>AGAINST: 0.00%<br><br>ABSTENTION: 0.00% |
| 11 | Distribution of part of the profits for the fiscal year 2024, as a one-off extraordinary bonus for the achievement of targets to members of the Board of Directors and Bank staff – Granting of authorisations. | Following the decision taken on the fourth item on the agenda, it approved the distribution of part of the net profits for the 2024 financial year as a one-off extraordinary bonus (Bonus) totalling up to €4,800,000.00 to the Executive Directors, Senior and Middle Management, and other Bank staff, as a reward for their contribution to the achievement of the Bank's profitability and objectives during the 2024 financial year, and authorised the Board of Directors to implement this decision, determining the final allocation of the amount per beneficiary and the appropriate timing of the payment, and to manage all procedural matters related to this decision. The Board of Directors may delegate part of these responsibilities to one or more of its Directors or to Bank officers. | IN FAVOUR: 86.23%<br><br>AGAINST: 13.77%<br><br>ABSTENTION: 0.00% |

| S/N | ITEMS ON THE AGENDA | DECISIONS | VOTING RESULTS |
|---|---|---|---|
| 12 | Establishment of a share buy-back programme in accordance with Article 49 of Law 4548/2018 - Granting of authorisations. | Decided to establish a Share Buyback Program in accordance with the relevant recommendation of the Board of Directors, and specifically:<br>a) approved the Bank's Share Buyback Program for the acquisition of up to 2,608,695 ordinary shares of the Bank, at a price range per share from €1.15 (minimum price) to €8.00 (maximum price), as the total number of shares of the Bank and their nominal value is determined after the split and within a period of 24 months from the date of the decision of this General Meeting. The total cost of acquiring treasury shares under the Program will not exceed €3,000,000.00, while the total number of treasury shares to be acquired in any case will not exceed 10% of the paid-up share capital, in accordance with the provisions of the Law.<br>b) Authorised the Board of Directors to determine, at its discretion, any other details and specific terms and to take all necessary actions at the time and in the manner it deems appropriate for the implementation of this decision, including the possibility of further delegating part or all of these powers to Directors and/or officers of the Bank. | IN FAVOUR: 99.90%<br><br>AGAINST: 0.10%<br><br>ABSTENTION: 0.00% |
| 13 | Approval of amendments to the Policy for the Suitability of Members of the Board of Directors | Approved the amendment to the Policy on the Suitability of Members of the Bank's Board of Directors, as proposed by the Board of Directors, following a relevant recommendation by the Remuneration and Nomination Committee. | IN FAVOUR: 99.999%<br><br>AGAINST: 0.001%<br><br>ABSTENTION: 0.000% |
| 14 | Update (amendment) of the Bank's Board of Directors Remuneration Policy. | Approved the updated and amended Remuneration Policy for Members of the Board of Directors, in accordance with Articles 110 and 111 of Law 4548/2018, as proposed by the Board of Directors, following a relevant recommendation by the Remuneration and Nomination Committee. | IN FAVOUR: 86.24%<br><br>AGAINST: 13.76%<br><br>ABSTENTION: 0.00% |
| 15 | Other topics – Miscellaneous | There were no other issues or announcements. | NO VOTE |

## 4. Shareholders

The Bank’s shareholding composition (for descriptive, non-regulatory purposes) was as follows on the Reference Date:




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

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

The Bank’s Administrative, Management, and Supervisory Bodies are the Board of Directors and its committees (namely, the Remuneration and Nomination Committee, the Audit Committee, and the Risk Management Committee), the Executive Committee, and the Head of Internal Audit, Ms. Afroditi Samara. Furthermore, all members of the Executive Committee are senior executives of the Bank.

**Implementation of a corporate governance framework**

The Bank has adopted and complies with the legislative framework on corporate governance for companies with securities listed on a regulated market and for 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, which was drawn up by the Hellenic Corporate Governance Council (HCGC) as published in June 2021 and meets the requirements of the current regulatory framework, as the HCGC has been recognised as a body of recognised standing 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_diakybernisis_2021.pdf).

In addition, the Bank has adopted 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). 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 control system, including the functioning of the Internal Audit Department, the Risk Management Department and the Compliance Department, as well as all the policies and procedures referred to in par. 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, with the aim of facilitating the exercise of their rights and active dialogue with them (shareholder engagement), which has been drawn up in accordance with Article 13, par. 1(c) or Law 4706/2020, as well as the assessment procedure for the Bank's corporate governance system, which has been drawn up in accordance with Article 4 of Law 4706/2020. The Bank has also adopted and implements a Sustainable Development Policy, which is included in its Rules of Procedure. It is clarified that, in compliance with Act No. 243/2/07.07.2025 of the Executive Committee of the Bank of Greece, the Bank's Rules of Procedure and its Annexes have been updated and submitted for approval to the competent corporate bodies.

It should also be noted that, based on the assessment carried out by the Board of Directors at its meeting on 02. 03.2026 based on the financial data of the subsidiaries as at the Reference Date, it was found that no subsidiary is considered a Significant Subsidiary, as defined in Article 2 of Law 4706/2020.

The Bank has an Internal Audit Department headed by Ms. Afroditi Samara, appointed by decision of the Bank's Board of Directors on 11.04.2013, and a Regulatory Compliance Department headed by Mr. Alexandros Diolis, appointed under the decision of the Board of Directors of the Bank dated 10.08.2023, as well as a Risk Management Department, headed by Mr. Sotirios Papakonstantinou, as appointed under the decision of the Board of Directors of the Bank dated 30.06.2022. At the same time, the Bank also operates a Shareholder Services and Corporate Communications Department, headed by Mr. Konstantinos Vatousis, appointed by decision of the Bank's Board of Directors on 16.05.2023, who has also been appointed as the person responsible for communicating with shareholders and investors, and whose details are posted on the Bank's website (http://www.optimabank.gr/about-us/investor-relations).

Finally, the Bank has approved and implemented a Remuneration Policy for Members of the Board of Directors and a Staff Remuneration Policy for its senior and middle management and employees, which are subject to periodic review for updating purposes as provided for in the applicable regulatory framework. Similarly, it has approved and implemented a Policy on the Suitability of Members of the Board of Directors in accordance with a) the provisions of Law 4261/2014 of Article 3 of Law 4706/2020 and the guidelines of the Hellenic Capital Market Commission (updated Circular No. 60/29.04.2025; b) the Act of the Executive Committee of the Bank of Greece No. 224/1/21.12.2023 on the procedure for assessing suitability for appointment as 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 assessment of the suitability of members of the management body and persons who hold key functions in accordance with Directive 20 13/36/EU and Directive 2014/65/EU (EBA/GL/2021/06). The above Remuneration Policy for Members of the Board of Directors and Suitability Policy for Members of the Board of Directors of the Bank are posted on the Bank's website (https://www.optimabank.gr/about-us/corporate-governance/principles). It should be noted that the Bank's Board Member Suitability Policy is currently being updated in order to harmonise and comply with Article 3A of Law 4706/2020.

The following documents of the Bank are kept posted on its website (https://www.optimabank.gr/about-us/corporate-governance/principles) in accordance with the provisions of Law 4706/2020: its current Articles of Association, the Remuneration Policy for Members of the Board of Directors & the Suitability Policy for Members of the Board of Directors, the Rules of Procedure of the Board Committees, in summary form, the Rules of Procedure of the Board of Directors, the CVs of the members of the Board of Directors and the Senior Management of the Bank, a report on gender balance on the Board of Directors, as well as the contact details of the Head of the Shareholder Services and Corporate Communications Department for communication with the Bank's shareholders and investors.

**Board of Directors**

**Composition of the Board of Directors and Mode of Operation**

According to the Bank's Articles of Association (Article 9), it is managed 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 directors, 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 Directors shall be elected by the General Meeting of Shareholders of the Bank or appointed by the Board of Directors in accordance with paragraph 4 of Article 9 of Law 4706/2020, as applicable, shall not be less than one third (1/3) of the total number of members of the Board of Directors and, in any case, may not be less than two (2). If this number is a fraction, it is rounded to the nearest integer.

The Directors are elected for a four-year term, which begins upon their election and ends with the election of a new Board of Directors by the Ordinary General Meeting convened during the year of the expiration of their term. The term of office may not be extended beyond five (5) years.

The Bank's Board of Directors was elected by the Extraordinary General Meeting on 22.03.2023, for a four-year term, ending with the election of the new Board of Directors by the Ordinary General Meeting in the year of the expiry of their term of office (i.e. until 10.09.2027) and was constituted as a body by its decision dated 23.03.2023. Pursuant to the decision of the Ordinary General Meeting of 23 May 2024, the number of the Bank's Directors was increased from ten (10) to eleven (11) with the election and addition of Mr. Nikolaos Giannakakis to the Board of Directors of the Bank as a Non-Executive Director, for the remainder of the term of the current Board of Directors elected by the Ordinary General Meeting of Shareholders on 23.03.2023, i.e. until 10.09.2027 at the latest, and the Board of Directors was reconstituted by its decision of 27.05.2024. On 31.10.2024, Ms. Kleio Lyberi resigned from her position as Independent Non-Executive Member of the Bank's Board of Directors, and the Board of Directors decided, pursuant to Article 82 of Law 4548/2018 and Article 10, par. 2 of the Bank's Articles of Association, to continue to manage and represent the Bank without temporarily replacing the resigning member until he is replaced by a new member of the Board of Directors, and reconstituted itself with the remaining members. Subsequently, the Bank's Board of Directors, at its meeting on March 20, 2025, elected Ms. Ioanna Zour as an Independent Non-Executive Director to replace the resigning member and was reconstituted and has since consisted of eleven (11) members, namely nine (9) non-executive members, of whom five (5) are Independent Non-executive directors, and two (2) executive members. The election of the new Independent Non-Executive Director was announced at the General Meeting of the Bank's Shareholders on 29.04.2025, which unanimously ratified it.

Accordingly, the current Board of Directors of the Bank consists of the following Directors:

| Full Name | Position on the Board of Directors | Capacity |
|---|---|---|
| **Georgios Taniskidis, son of Ioannis** | Chairman | Non-Executive Director |
| **Petros Tzannetakis, son of Tzanibeis** | Vice Chairman | Non-Executive Director |
| **Dimitrios Kyparissis, son of Apostolos** | CEO | Executive Director |
| **Angelos Sapranidis, son of Nikolaos** | Director | Executive Director |
| **Theofanis Voutsaras, son of Christos** | Director | Non-Executive Director |
| **Nikolaos Giannakakis son of Konstantinos** | Director | Non-Executive Director |
| **Theodoros Efthys, son of Ilias** | Director | Independent non-executive Director |
| **Ioanna Zour, daughter of Christos** | Director | Independent non-executive Director |
| **Pavlos Kanellopoulos, son of Dimitrios** | Director | Independent non-executive Director |
| **Georgia Kontogianni, daughter of Vasileios** | Director | Independent non-executive Director |
| **Georgios Kyriakos, son of Konstantinos** | Director | Independent non-executive Director |

According to Article 13, par. 2 of the Bank's Articles of Association, when the Chairman is absent or unable to attend, they are replaced by the Vice-Chairman and, if more than one Vice-Chairman has been elected, by one of them, as decided by the Board of Directors. In case 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 Directors, at the date of their election, fulfilled and continue to fulfil the independence requirements set out in Article 9 of Law 4706/2020. The fulfilment of the independence requirements of the members of the Board of Directors was reviewed, in accordance with Article 9, par. 3 of Law 4706/2020 and confirmed by the Board of Directors at its meeting dated 02.03.2026.

Two (2) women are members of the Bank's Board of Directors, representing 25% of its total membership, rounded up, in accordance with Article 3, par. 1 case (b) of Law 4706/2020, as in force until the entry into force of Article 3A of Law 4706/2020 on 30.06.2026 (pursuant to Article 42, par. (2) of Law 5178/2025). Within this period, the Bank will increase the above percentage in accordance with the specific provisions of article 3A of Law 4706/2020. Specifically, the Remuneration and Nomination Committee, within the scope of its responsibilities and in accordance with the Bank's approved and applicable Directors Suitability Policy, will take steps to identify and propose to the Board of Directors a person or persons suitable for membership of the Bank's Board of Directors, who will meet the individual and collective suitability criteria, in accordance with applicable law and the Bank's Directors Suitability Policy.

The above composition of the Board of Directors is in accordance with the provisions of the Directors Suitability Policy, which is available on the Bank's website (https://www.optimabank.gr/media/troekoet/p56_politiki_katallilothtas_melon_ds_optima_bank.pdf).
The CVs of the members of the Directors are posted on the Bank's website, https://www.optimabank.gr/about-us/corporate-governance/board-of-directors.

The Board of Directors exercises its powers 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 Rules of Procedure of the Board of Directors.

The CVs of the Directors are as follows:

- **Georgios Taniskidis, Chairman of the Board of Directors, Non-Executive Director:** With 35 years of experience in banking, Mr. Georgios Taniskidis has been the Chairman of Optima bank since July 2019. He began his career as an attorney at the law firm Rogers & Wells in New York. Returning to Greece, he joined Motor Oil Hellas. His career in banking started in 1990 at Xiosbank, as Head of Consumer Business Group and Branch Network. Following the acquisition of Xiosbank (late 1998) by Piraeus Bank, Mr. Taniskidis took over as 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 achieve its objectives much earlier than expected. During the same period, he led the acquisition of a banking institution in Turkey renamed Millennium bank Turkey and served as a member of its Board of Directors. From the end of July to October 2011, Mr. Taniskidis served as Proton Bank's Interim CEO during the transition period, where he successfully maintained the bank's liquidity and access to markets during 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 Banking Association for many years. He currently sits on the Boards of Directors of various companies in the trade, manufacturing and shipping sectors. In addition, Mr. Taniskidis has been an active member of the international leadership organisation YPO since June 2002. He was a member of the Regional Council of Europe for eight consecutive years and was Chairman of the Executive Committee of the European Regional Conference held in Athens in 2016, with great success. He played a key role in the acquisition of Marfin Bank Romania (now VISTA BANK). He envisioned the creation of a bank without a burdensome history in Greece. He pursued his goal and eventually succeeded in the acquisition of the Investment Bank of Greece (now Optima bank). The Bank already has an admirable track record and is a benchmark bank in the Greek banking sector. Mr. Taniskidis holds a law degree from the University of Athens Law School, where he graduated first in his class, and a Master of Laws (LL.M.) from the University of Pennsylvania Law School.

- **Petros Tzannetakis, Vice Chairman, Non-Executive Director:** Mr. Petros Tzanetakis 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 became Chief Financial Officer (CFO) and in 2005 Deputy CEO of the Motor Oil Group of Companies. He is a member of the Board of Directors and the Group's Executive Committee. He leads all Corporate, Finance, Treasury, Banking and Investor Relations functions and participates in all corporate decisions, in addition to financial decisions. Among his major achievements are the initial public offering of Motor Oil (Greece) in 1999-2001, the introduction of the Group to the Greek, European and American investment community, the placement of Motor Oil (Greece) shares which doubled the free float of the company attracting foreign institutional investors 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 Industrial & Commercial Marine Oil Limited Liability Company, Motor Oil Holdings LTD, Coral SA (former Shell Hellas SA), Coral Gas SA, LPC SA, Petroventure Holdings Limited). He is also Chairman of the Board of Directors of Korn Ferry International SA. He was a member of the Board of Directors of M.I. Mailis Commercial and Industrial SA (packaging company), Incadea Group GmBH (automotive retail solutions provider), and Olympic DDB Holding S.A. (advertising company). Mr. Tzannetakis holds a BA, Economics from the University of Surrey (UK) and an MA, European Union Economics from the University of Sussex (UK).

- **Dimitris Kyparissis, CEO, Executive Director:** With over 30 years of experience in banking, Mr. Dimitris Kyparissis holds the position of CEO of the Bank. He started his career at Xiosbank in 1993, where he set up the car finance division before taking responsibility for all retail credit. In 2000, Mr. Kyparissis, as a member of the founding team of the newly established Novabank, created the bank's credit departments. In 2002, he was in Turkey, where he launched Novabank's newly established subsidiary, BankEuropa. Upon his return in 2004, he took on 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 Postal Savings Bank, responsible for retail banking. Between 2016 and 2018, he was head of the retail network of Eurobank. In January 2019, he participated in the acquisition of the Investment Bank of Greece, with the aim of transforming it into a successful commercial bank, now known as Optima Bank, where he holds the position of CEO. Mr. Dimitris Kyparissis holds a B.Sc., Accounting & Finance from the American College of Greece and an MBA, Financial Services Management from the University of Sheffield, UK.

- **Angelos Sapranidis, Executive Director:** With over 40 years of experience in banking, Mr. Angelos Sapranidis currently holds the position of Chief Financial Officer of Optima bank. He began his career in 1981 in the Finance & Accounting Department of Bank of Macedonia-Thrace S.A. and left in 1991 as Deputy Director of the Finance & Accounting Division. In 1991 he participated in the founding team of Egnatia Bank as Head of the Financial Services Department. He was subsequently promoted to Deputy General Manager, reporting directly to the CEO, and also assuming responsibility for the Central Operations and Administrative Services Departments. In 2007 he became CFO of Marfin Egnatia Bank Group. In 2013 he moved to the Financial Services Department of Piraeus Bank Group, with responsibility for the proper transfer and financial clearance of the assets of the Greek activities of the Cypriot Banks transferred to it. In 2018 he became Deputy CEO of the Investment Bank of Greece S.A. (now Optima bank). Mr. Sapranidis holds a degree in Economics from the School of Law and Economics of the Aristotle University of Thessaloniki.

- **Theofanis Voutsaras, Non-Executive Director:** 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) specialising in Industrial Relations & Personnel Management. He has 30 years of experience in managerial positions (Banking sector, Construction sector). He has been working at Motor Oil since 2010.

- **Nikolaos Giannakakis, Non-Executive Director:** He was born in 1971. He holds a BSc in Physics, an MSc in Industrial Systems Management, and a degree from the International Institute for Management Development - IMD (Lausanne, Switzerland). He has 15 years of international experience in IT Director and General Manager positions in prominent Multinational Groups. He was named one of the top 100 Chief Information Officers for 2019. He joined Motor Oil in November 2019.

- **Theodoros Efthys, Independent Non-Executive Director:** With over 30 years of experience in banking, Mr. Theodoros Efthys holds the positions of non-executive Director 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, Head of Portfolio Management. In 2005 he found him in Greece, where he worked as an independent consultant. In 2008 he joined Postal Savings Bank, as Deputy Treasurer & Bond trader, while after the merger of Postal Savings Bank with Eurobank, he worked in the Asset Management & Depository sectors. From 2019, Mr. Efthys has been a non-executive Director of VISTA Bank Romania, member of the Nomination Committee and Chairman of the Internal Audit Committee & Risk Management of the bank. Mr. Efthys holds a B.Sc. Economics from Queen Mary College, University of London. He also holds FSA (UK Capital Markets), Series 3 & 7 (NASD USA), C level certification (Bank of Greece) & a certificate from the Board of Directors of the National Bank of Romania.

- **Ioanna Zour, Independent Non-Executive Director:** Ms Zour has over 30 years of experience in banking, specialising in strategic marketing, corporate communications and business transformation. She began 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 to 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. She then 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 Group Communications and Marketing. She has been recognised for its 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 has led. Ms. Zour holds a BA in Economics from the University of Bristol, an MSc from the London School of Economics and a PhD in Economics from the University of Oxford (Dissertation: Greek Banking Policy from 1958 to 1980).

- **Pavlos Kanellopoulos, Independent Non-Executive Director:** Mr. Kanellopoulos has over 28 years of experience in accounting and finance, mainly at senior level and has been a member of the Board of Directors of Optima bank since March 2020. He started his career in 1996 in the International Banking Department of the Bank of Tokyo-Mitsubishi in London. Since 2003, he has served as CFO for various companies listed on the Athens Stock Exchange and the New York Stock Exchange, which operate 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 one of the leading online gaming platforms in Europe and is a subsidiary of OPAP S.A. Mr. Kanellopoulos holds a BSc in Economics from the Athens University of Economics and Business, an MSc in Economics from the University of Warwick and an MSc in Behavioural Science from the London School of Economics.

- **Georgia Kontogianni, Independent Non-Executive Director:** With over 15 years of experience in banking and investment banking, 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 began her career in 2008 at Alpha Bank's Capital Markets Division as a corporate client manager in the bond, interest rate, and foreign exchange markets, and continued at Marfin Egnatia Bank's Capital Markets Divisions in Greece and England. In 2013, she moved to Zurich, where she joined Tallon Trading as Director of Global Markets, specializing in oil and emissions trading products. Since 2018, she has been based in London, continuing her successful career at Tallon Commodities as Director of Trading, heading energy commodity derivatives trading and corporate client risk management. Ms. Kontogianni is a postgraduate of 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 Director:** With 35 years of experience, Mr. Georgios Kyriakos has held senior and top management positions in Greek and multinational companies as well as in the banking sector, in Greece and abroad. He is currently a non-executive Director of Optima bank and Chairman of the Remuneration and Nomination Committee. He served as Secretary of the Ministry of Finance in the field of Public Enterprises and Privatisation. 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 and has attended a series of Executive Trainings at INSEAD in Business Administration.

### *Board meetings in 2025*

In 2025, the Board of Directors met sixteen (16) times. The average attendance rate of the Board of Directors' members at the meetings was 97%.

### *Individual percentages of participation of Directors in meetings of the Board of Directors and its Committees for the year 2025*

The percentage of participation of each Director in the meetings of the Board of Directors and the Board of Directors’ Committees during the fiscal year 01.01.2025 - 31.12.2025 is shown in the table below:

| | Board of Directors | | Audit Committee | | Remuneration and Nominations Committee | | Risk Management Committee | |
|---|---|---|---|---|---|---|---|---|
| **Total number of meetings** | **16** | | **13** | | **7** | | **31** | |
| | Participation rate | Number of meetings | Participation rate | Number of meetings | Participation rate | Number of meetings | Participation rate | Number of meetings |
| **Chairman of the Board of Directors, Non-Executive Director** | | | | | | | | |
| **George Taniskidis** | 100% | 16/16 | - | - | - | - | - | - |
| **Vice-Chairman, Non-executive Director** | | | | | | | | |
| **Petros Tzannetakis** | 100% | 16/16 | 100% | 13/13 | - | - | - | - |
| **Executive Members** | | | | | | | | |
| **Dimitris Kyparissis, CEO** | 100% | 16/16 | - | - | - | - | - | - |
| **Angelos Sapranidis** | 100% | 16/16 | - | - | - | - | - | - |
| **Non-Executive Members** | | | | | | | | |
| **Theofanis Voutsaras** | 94% | 15/16 | - | - | 100% | 7/7 | - | - |
| **Nikolaos Giannakakis** | 94% | 15/16 | - | - | - | - | - | - |
| **Independent Non-Executive Directors** | | | | | | | | |
| **Theodoros Efthys** | 100% | 16/16 | 100%<br>C | 13/13 | - | - | 97% | 30/31 |
| **Ioanna Zour (from 20.03.2025)*** | 100% | 12/12 | - | - | - | - | - | - |
| **Pavlos Kanellopoulos** | 88% | 14/16 | 100% | 13/13 | 100% | 7/7 | 100%<br>C | 31/31 |
| **Georgia Kontogianni** | 94% | 15/16 | - | - | - | - | 97% | 30/31 |
| **Georgios Kyriakos** | 94% | 15/16 | - | - | 100% | 7/7 | - | - |

**EXPLANATIONS:**

**C:** Chairman

**-:** The Member does not participate in this Committee of the Board of Directors.

* She was elected as a Director on 20.03.2025 and has therefore participated in 12 of the 16 Board meetings for 2025.

### *Directors Suitability Policy*

The Bank implements a Suitability Policy for the Directors, which has been drawn up in accordance with the applicable legislative and regulatory framework and is posted on the Bank's website (https://www.optimabank.gr/media/troekoet/p56_politiki_katallilothtas_melon_ds_optima_bank.pdf). It should be noted that the Bank's Board Member Suitability Policy is currently being updated in order to harmonise and comply with Article 3A of Law 4706/2020.

***Policy objectives***

The objectives of the Policy are:

i. To define the principles and rules governing the selection or replacement of Directors, as well as the renewal of term of existing Directors.

ii. To assist the Remuneration and Nomination Committee (the "Committee") in the performance of its duties regarding the selection, review and drawing up of nomination proposals for the Bank's Directors to be elected by the General Meeting (or by the Board), in accordance with the Bank's Articles of Association and the law, as well as regarding the replacement of Directors, by establishing a transparent, effective and time-efficient process for validating suitability and nominating candidates.

iii. To establish transparent and effective criteria for the selection and suitability assessment of nominations and the internal suitability assessment procedure.

iv. To ensure that the composition of the Bank's Board meets high standards in terms of suitability (both on an individual and collective level), moral authority and competence.

v. To define the inclusiveness and diversity criteria for the selection of Directors.

Individual and Collective Suitability

The Bank seeks to appoint individuals of integrity, reputation, and high credibility to the Board of Directors, and this is the responsibility of the Board of Directors and, specifically, the Remuneration and Nomination Committee. The Directors have a good reputation and they possess sufficient knowledge, skills and experience so as to be able to understand the Bank's activities, while at the same time they can devote the time required to carry out their duties.

The composition of the Board of Directors as a whole covers a sufficiently broad range of knowledge and experience in each field, 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. Compliance with the legislative and regulatory framework, transparency, inclusiveness, diversity and meritocracy are the principles that govern the Policy. In particular:

***Individual Suitability***

The individual suitability of Board Members is assessed in particular on the basis of the degree to which a person is considered to have:

i. sufficient knowledge, skills and experience;

ii. a good reputation, honesty, integrity and a good moral character;

iii. independence of mind;

iv. an absence of a conflict of interest in terms of performing their duties; and

v. sufficient time available for the performance of their duties in the Bank.

*Collective Suitability*

Collective Suitability means the suitability of the Directors as a whole. The Board must be competent to exercise its powers, and its composition must ensure the effective management of the Bank and balanced decision-making. The Directors must be able to take appropriate decisions collectively, taking into account the business model, the risk appetite, the strategy and the markets in which the Bank operates, in order to effectively monitor and judge the decisions made by senior management.

***Succession Plan***

In compliance with the applicable legislative and regulatory framework governing its operation and in order to ensure the smooth continuity of its management and decision-making following resignations or other cases of loss of membership of the Board of Directors and its committees, the Bank has established and implements an appropriate succession plan for Directors and its committees. In particular, the relevant procedure aims to ensure the timely filling of positions by replacing Directors and its committees in cases of resignations or sudden or unforeseen events that result in the loss of membership of the Directors or committee membership and the mandatory replacement or substitution thereof. The selection of new members of the Board of Directors and its committees is carried out in accordance with the specific provisions of the Bank's Directors Suitability Policy and the applicable legislative and regulatory framework, in order to meet all the criteria of individual and collective suitability.

The succession framework for Directors is differentiated according to the categorisation and the basic qualities of the Directors as a) Executive Directors, b) Non-Executive Directors and c) Independent Non-Executive Directors. Specifically with regard to the CEO, the Committee ensures that the required qualitative characteristics that should in any case be met in the person of the CEO are identified, while with regard to the identification and nomination of candidates for Independent Non-Executive Directors, (who, in addition, participate as a majority in the Bank's Board committees) and in order to identify persons who meet the independence requirements, the Committee, in cooperation with the Human Resources Department, may appoint a specialised consultant of recognised standing with expertise in the search for senior management.

The succession procedure and any modification thereof shall be approved by the Board of Directors, following a recommendation from the Remuneration and Nomination Committee.

***Inclusiveness, diversity and representation regardless of gender***

The Bank prioritises inclusiveness and diversity in the Board but also at every level, in accordance with the applicable legislative and regulatory framework, with a view to promoting independent opinions and good decision-making in the Board.

Specifically, measures shall be taken to ensure that there are no exclusions due to discrimination on grounds of sex, race, colour, ethnic or social origin, religion or belief, property, birth, disability, age, sexual orientation or any other aspect not connected to employment. The criteria for individual suitability specified in the Suitability Policy play a unique role in the selection process. The achievement of substantial, not merely typical diversity within the Board constitutes an important guarantee for its overall effectiveness.
The Bank undertakes to promote equality and diversity within the Board, as well as to promote a culture that appreciates and respects diversity, on the one hand, and recognizes that people from different backgrounds and with different experiences can have a valuable contribution to the Board's work, on the other hand. The Bank's broader objective is to be an inclusive organization, which provides equal opportunities across the entire spectrum of employment therein, including the recruitment, training and development of Directors and employees.

In this context, and with the aim of achieving balanced gender representation on the Board of Directors and ensuring equal treatment and equal opportunities between the sexes, adequate representation by gender is also provided for, at least as defined by the applicable legislation as a percentage of the total number of Board members. The Committee proposes targets for achieving diversity on the Board and recommends their adoption by the Board, which is responsible for improving one or more aspects of diversity and evaluating the corresponding progress.

Specifically, with respect to its current composition, the BoD of the Bank consists of eleven (11) members in total, of which two (2) are Executive and nine (9) are Non-Executive. Both Executive Members of the BoD are male, while, among the nine (9) Non-Executive Members of the BoD, seven (7) are male and two (2) are female. Therefore, each gender is adequately represented on the BoD, in accordance with paragraph 1 case b of article 3 of Greek law 4706/2020, as applicable until the entry into force of article 3A of L. 4706/2020 on 30.06.2026 (in accordance with par. 2 of art. 42 of L. 5178/2025).

Within the aforesaid deadline, the Bank will take all necessary measures and required actions to ensure that female participation on the BoD meets, the quota of 33% of total BoD members as required by Article 3A of Greek law 4706/2020. Specifically, the Bank's Remuneration and Nomination Committee, within its responsibilities and in accordance with its approved and applicable Suitability policy for the members of the Board of Directors, will take actions to identify and propose to the BoD suitable candidates for the acquisition of the status of member of the Bank's BoD, who meet the individual and collective suitability criteria under the applicable legislation and the Bank's Suitability policy for the members of the BoD. The aim is to nominate candidates whose election by the General Meeting of Shareholders will ensure adequate gender representation on the BoD.

The obligation to appoint a female representative as an Executive Member of the BoD does not apply in this case, in accordance with paragraph 4 of article 3A of Greek law 4706/2020, since the Executive Members of the BoD of the Bank are two (2).

In general, the diversity criteria concern not only the Directors, but also upper and/or senior management. In fact, the Remuneration and Nomination Committee, in collaboration with the Human Resources Department, proposes and the Board of Directors approves specific gender representation targets, as well as timetables for achieving these targets for these executives.

Information on diversity and inclusiveness, which the Bank applies in its administrative, management, and supervisory bodies in terms of gender representation, as well as at all levels, is also included in the sustainability report of the Optima Bank Group's management report for the 2025 fiscal year. Additionally, a Report on the gender-balanced representation on the BoD of the Bank, in accordance with article 3C of L. 4706/2020, is posted on the Bank's website https://www.optimabank.gr/media/b0jijevl/report_on_gender_balanced_representation_on_the_bod_en.pdf

***<u>Approval of the Directors Suitability Policy - Policy Review - Implementation at Group level</u>***

- The Policy is approved by the Board and submitted for approval to the Bank's General Meeting. Changes to the Policy shall be approved by the Board and, if they are material, they shall be submitted for approval to the General Meeting in accordance with Article 3, par. 3 of Law

4706/2020. The Policy and any material changes thereto shall be valid from the moment they are approved by the General Meeting.

- The Policy that is valid at a given time shall be posted on the Bank's website.
- This Policy is in line with the general framework on corporate governance, corporate culture and risk appetite set out by the Bank.
- The Policy is adopted at the Bank's group level, i.e. it is adopted and implemented to the extent possible (based on their size, internal organisation, scale and complexity of operations) and by the subsidiaries included in the Bank's consolidated financial statements.

***Implementation of the Suitability Policy***

The composition of the Board of Directors as a whole covers a wide range of knowledge and experience by subject and ensures the effective management of the Bank and balanced decision-making. To ensure the individual and collective suitability of the Directors, due account has been taken of:

- their detailed CVs, listing their knowledge, skills, experience and other qualifications;
- their other professional obligations and commitments;
- their cooperation and functioning as a whole in the performance of their tasks;
- their overall assessment of their individual and collective competences; and
- the provisions of the legislative and regulatory framework in force, the approved Suitability Policy of the Bank and the Hellenic Corporate Governance Code.

It was further found that within 2025:

- the number of independent non-executive Directors at the Reporting Date was higher than the number required by the applicable legislation, which ensures a high level of independence of the Board of Directors and its Committees (5 out of 11 Directors were independent, i.e. a percentage of more than 45%),
- each gender was adequately represented on the Board of Directors, in a percentage of at least twenty-five percent (25%), in accordance with Article 3, par. 1 case (b) of Law 4706/2020, as in force until the entry into force of Article 3A of Law 4706/2020 on 30.06.2026, following its amendment by Law 5178/2025, with the female gender represented by the participation of two (2) women in the Board of Directors and
- the suitability criteria set out in the applicable legislative and regulatory framework and in the Bank's Suitability Policy have been met and continue to be met in full.

The collective suitability of the Board of Directors was reassessed by the Bank's Remuneration and Nomination Committee at its meeting on March 19, 2025, in accordance with Act No. 224/1/21.12. 2023 of the Executive Committee of the Bank of Greece and the Policy on the Suitability of Members of the Bank's Board of Directors, without making any recommendations, judging the results to be entirely satisfactory. The relevant conclusions were submitted to the Board of Directors at its meeting on the 20th of March 2025, as well as to the Bank of Greece, as the competent supervisory authority.

***Board of Directors Training***

The Bank has established a Training Policy for the members of the Board of Directors, the management executives, as well as its other executives, in the context of its compliance with the provision of article 14 par. 3 (k) of Law 4706/2020. The Bank's objective is to develop a culture of continuous training and professional development of its executives, enhancing their personal development in combination with the sustainable development of the Bank. In fact, the strengthening of the soft and technical skills of the employed staff is a key priority of the Human Resources Directorate in the context of the continuous training and education of the Bank's associates.

Specifically, said Policy sets the principles of continuous training and information of its executives via:
- internal trainings, presentations and work meetings on specialized topics.
- External conferences and informational events.
- Professional certification programs.
- Personalized development programs for executives.

The Bank has developed a special introductory (onboarding) seminar for each new member appointed to its Board of Directors.

During 2025, in the context of continuous training, education and cultivation of professional and personal skills of the members of the Bank's Board of Directors, the following training programs took place:
- Informative presentation of the Regulatory Compliance Directorate for purposes of internal training of the members of the Board of Directors on issues of Anti-Money Laundering & counter-Terrorist Financing.

• Training of Members of the Board of Directors on new technologies and Artificial Intelligence (AI).
• Participation in external training programs on management (leadership).

**Committees**

**Committees of the Board of Directors**

***Audit Committee***

The Audit Committee has been established in accordance with PD/TE 2577/2006 and Article 44 of Law 4449/2017, as amended by Law 4706/2020. The type of the Audit Committee, its term, as well as the number and capacities of its members are decided by the Bank's General Shareholders Meeting. By the decision of the Extraordinary General Meeting of the Bank's Shareholders of 22.03.2023, it was determined 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, the majority of whom shall be independent, within the meaning of the provisions of Article 9 of Law 4706/2020 and its term of office shall coincide with that of the Bank's Board of Directors, i.e. it shall be four years, automatically extended until the first regular General Meeting after the end of their term, but not exceeding five years.

The composition of the Audit Committee, as at the Reporting Date, was and continues to be as follows:

1. Theodoros Efthys, son of Ilias, Independent Non-Executive Director, Chairman of the Audit Committee
2. Pavlos Kanellopoulos, son of Dimitrios, Independent Non-Executive Director, Member of the Audit Committee and
3. Petros Tzannetakis, son of Tzanibeis, Non-Executive Director, Member of the Audit Committee.

The above members are all non-executive Directors, 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. banking, due to their professional status and experience, as evidenced by their CVs (see section *"Board of Directors"/Composition of the Board of Directors and Mode of Operation"*).

In addition, the Chairman of the Audit Committee, Mr. Theodoros Efthys has sufficient knowledge and experience in auditing and accounting, as evidenced by his CV above.
Therefore, the composition of the Audit Committee meets the requirements set out in Article 44 of Law

4449/2017, as amended and in force.

The current Rules of Procedure of the Audit Committee are posted on the Bank's website http://www.optimabank.gr/media/tpbmqtoy/c3_kanonismos_leitourgias_epitropis_elegxou.pdf.

It should be noted that, in compliance with Act No. 243/2/07.07.2025 of the Executive Committee of the Bank of Greece, the Rules of Procedure of the Audit Committee have been updated and submitted for approval to the competent corporate bodies.

***Audit Committee meetings in 2025***

During 2025 the Audit Committee met thirteen (13) times. The Committee members' average meeting attendance rate was 100%. Based on its Rules of Procedure, the Audit Committee meets six (6) times a year or on an ad hoc basis, if circumstances so require.

***Proceedings of the Audit Committee meetings for the year 2025***

During 2025, the Audit Committee met thirteen (13) times and all its decisions were taken unanimously, based on a thorough review of the supporting material and further clarifications provided during the meetings by the Head of Financial Services, the Head of the Internal Audit Department, the Head of the Regulatory Compliance Department, relevant senior executives, regular certified auditors, and other external auditors. The Audit Committee, among other things:

- reviewed the annual financial statements of the Bank and the Group for the fiscal year 2024 as well as the interim quarterly, interim half-yearly, interim nine-monthly financial statements 2025, prior to their publication.
- Reviewed, and proposed to the Board of Directors, Deloitte's remuneration for audit and non-audit services for the year ending December 31, 2025, and was informed about Deloitte's audit plan and audit procedures.
- It also reviewed the annual financial statements for the 2024 fiscal year of the subsidiaries Optima Factors Single Member S.A. and Optima Leasing S.A.
- Monitored on a quarterly basis the progress of corrective actions resulting from the findings of the three-year assessment of the Internal Audit System, in accordance with Bank of Greece Governor's Act 2577/2006 (as applicable) by the auditing firm Mazars.
- Was informed about the audit report on the Bank's IT systems (IT Audit).
- Reviewed and pre-approved the Annual Report of the Responsible Executive Officer for Money Laundering, Combating the Legalisation of Proceeds from Illegal Activities and Financing of Terrorism for 2024, which was submitted to the Bank of Greece.

- Took note of the findings of the independent auditor's report on the annual audit of the safekeeping of financial instruments and client funds and product monitoring obligations under PEE (act of the executive committee) 147/2018.
- Took note of the 2024 annual report of the Regulatory Compliance Department and the 2024 annual report of the Internal Audit Department, which were submitted to the Bank of Greece.
- It was informed about the updating of the institutional framework regarding the internal governance of credit institutions with the issuance of Act No. 243/2/07.07.2025 of the Executive Committee of the Bank of Greece and the actions taken to ensure the Bank's compliance with this framework.
- It was informed about the report on the audits conducted by the Internal Audit Department for the year 2024, approved the Annual Audit Plan for the year 2025, and monitored its implementation.
- It was periodically informed about work and issues related to the responsibilities of the Compliance Department (Prevention and Suppression of Money Laundering & Terrorist Financing and monitoring of the Institutional Framework).
- It was informed of the significant audit findings (from regular and specific audits) and the replies of the Departments in relation to the timetable and actions to resolve the findings.
- It prepared the Committee's Report on its activities, which was submitted to the Annual General Meeting of the Bank's Shareholders on 29 April 2025.
- Took note of the assurance report of the independent certified public accountant on the completeness of the information contained in the Remuneration Report for the year 2024.
- Was informed about the overview of the updated draft of the Remuneration Policy for Directors by the Regulatory Compliance Department and the Internal Audit Department.
- Was informed on the submission to the Bank of Greece of the time schedule for the implementation of pending corrective actions that emerged based on the Supervisory Review and Evaluation Process (SREP).
- Was informed about the on-site inspections carried out by the supervisor (Bank of Greece).

***Remuneration and Nominations Committee***

The Remuneration and Nominations Committee of the Bank comprises at least three (3) members, appointed by the Board of Directors. These members are all non-executive Directors and most of them are independent within the meaning of Article 9 of Law 4706/2020. The Committee is chaired by an independent non-executive Director. By decision of the Board of Directors of 23.03.2023, a single Remuneration and Nominations Committee was established, in accordance with Article 10, par. 2 of Law 4706/2020.

On the Reference Date, the composition of the Remuneration and Nomination Committee was, and still is, as follows:

- Georgios Kyriakos, son of Konstantinos, independent non-executive Director, Chairman of the Remuneration and Nominations Committee;
- Theofanis Voutsaras, son of Christos, non-executive Director, Member of the Remuneration and Nominations Committee; and
- Pavlos Kanellopoulos, son of Dimitrios, independent non-executive Director, Member of the Remuneration and Nominations Committee.

The above-mentioned members are non-executive, while two out of three members, including its Chairman, are independent. Therefore, the composition of the Remuneration and Nominations Committee is in line with Article 10 of Law 4706/2020. The members of the Remuneration and Nominations Committee are appointed to serve a four-year term of office, coinciding with the term of the Board of Directors of the Bank, which shall be extended automatically up until the first Ordinary General Meeting to be held after expiry of their term, but it may not exceed five years.

The current Rules of Procedure of the Remuneration and Nomination Committee are posted on the Bank's website
http://www.optimabank.gr/media/cuslmnfi/kanonismos_leitourgias_epitropis_apodoxon_ypopsifiotiton.pdf.

It should be noted that, in compliance with Act No. 243/2/07.07.2025 of the Executive Committee of the Bank of Greece, the Rules of Procedure of the Remuneration and Nomination Committee have been updated and submitted for approval to the competent corporate bodies.

***<u>Meetings of the Remuneration and Nominations Committee in 2025</u>***

In 2025, the Remuneration and Nomination Committee met seven (7) times. The Committee members' average meeting attendance rate was 100%.

***<u>Proceedings at the meetings of the Remuneration and Nominations Committee in 2025</u>***

In 2025, the joint Remuneration and Nomination Committee:

- Assessed the individual suitability of the candidate Director Ms Ioanna Zour and the collective suitability of the Board of Directors and recommended to the Board the election of a new Director in replacement of the Director Mr Kleio Lymperi, who resigned and in particular, it nominated Ms Ioanna Zour for the position of Independent Non-Executive Director.

- Introduced the Procedure (plan) for the succession of Directors and members of the Board Committees in accordance with the Bank's Directors Suitability Policy and recommended its approval by the Bank's Board of Directors.
- Evaluated bids for the project of updating the Remuneration Policy and formulating a variable remuneration framework (for Material Risk Takers & C-Level).
- Approved the adjustment of fixed remuneration and the limit for covering professional expenses of Senior Management (Members of the Executive Committee).
- Re-evaluated the collective suitability of the Bank's Directors, submitting the results and relevant documentation to the Board of Directors.
- Expressed to the Board of Directors its agreement with the submission to the Bank's Ordinary General Meeting of Shareholders of the Remuneration Report for fiscal year 2024, in accordance with Article 112 of Law 4548/2018.
- Was informed about the Process for Identifying Persons with Material Impact on the Bank's Risk Profile (MRT), the Risk Indicators (KRIs), as well as the list of the Bank's MRTs, as identified by the Human Resources Department, under the above Process and recommended to the Board of Directors for their approval.
- Reviewed the business expense costs of the Bank's current Compensation Policy and recommended to the Board that the Board adjust the lease rates for company cars.

Furthermore, the Remuneration and Nomination Committee made recommendations to the competent corporate bodies on the following issues:

- the approval of the remuneration of the Directors for the fiscal year 2024 and the determination of the amount of such remuneration through participation in the profits for the fiscal year 2025 until the Ordinary General Meeting of 2026, in accordance with the provisions of Article 109 of Law 4548/2018;
- the distribution of part of the profits for the fiscal year 2024, as a one-off extraordinary bonus for the achievement of targets to the Executive Members of the Board of Directors, Senior and Middle Management, and other Bank staff. Following the approval of the Bank's Ordinary General Meeting of Shareholders on April 29, 2025, a proposal was submitted to the Board of Directors for the payment of variable remuneration to reward the results for the 2024 financial year, based on the Annual Bonus Scheme, in accordance with the Bank's current Staff Remuneration Policy.

- The amendment of the Directors Suitability Policy;
- the updating of the Remuneration Policy for the members of the Board of Directors of the Bank; and
- the updating (amendment) of the Bank's Staff Remuneration Policy.

***Risk Management Committee***

The Bank's Risk Management Committee consists of at least three (3) non-executive Directors, who are appointed by decision of the Board of Directors and are predominantly independent non-executive Directors. The members of the Risk Management Committee have, individually and collectively, the appropriate knowledge, skills, and expertise to understand and monitor the institution's risk strategy. The Chairman of the Committee is appointed by the Board of Directors and is always an independent non-executive Directors who is able to judge objectively.

On the Reference Date, the composition of the Risk Management Committee was, and still is, as follows:

- Pavlos Kanellopoulos, son of Dimitrios, Independent Non-Executive Director, Chairman of the Risk Management Committee;
- Theodoros Efthys, son of Ilias, Independent Non-Executive Director, Member of the Risk Management Committee; and
- Georgia Kontogianni, daughter of Vasileios, Independent Non-Executive Director, Member of the Risk Management Committee.

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

The term of office of the members of the Risk Management Committee is in line with that of the members of the Board of Directors.

The Rules of Procedure of the Risk Management Committee were amended by the decision of the Bank's Board of Directors dated 10.11.2025, with the aim of harmonising them and ensuring compliance with Act No. 243/2/07.07.2025 of the Executive Committee of the Bank of Greece and posted on the Bank's website https://www.optimabank.gr/media/nzhfmpzq/c5_epitropi_diaxeirisis_kindinon.pdf.

***Risk Management Committee meetings for the year 2025***

In 2025, the Risk Management Committee met thirty-one (31) times. The Committee members' average meeting attendance rate was 98%.

## Executive Committee

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

| Full Name | Director / non-Director | Job title within the Bank |
|---|---|---|
| **Dimitrios Kyparissis, son of Apostolos** | Member of the Board of Directors | CEO, Executive Director |
| **Angelos Sapranidis, son of Nikolaos** | Member of the Board of Directors | Executive Director, Head of Finance |
| **Theodoros Georgakopoulos, son of Nikolaos** | Non-Director | Head of Credit and Recoveries |
| **John Parnis, son of Dimitrios** | Non-Director | Head of Human Resources |
| **Konstantinos Vatousis, son of Charalambos** | Non-Director | Head of Strategy, Investor Relations and Sustainable Development |
| **Alexandros Vlagoulis, son of Panagiotis** | Non-Director | Head of Marketing and Products |
| **Paschalis Giouchas, son of Pelopidas** | Non-Director | Head of Technology and Operations |
| **Paris Oikonomou, son of Polycarpos** | Non-Director | Head of Wholesale Banking |
| **Dimitrios Papageorgopoulos, son of Georgios** | Non-Director | Head of Retail Networks |
| **Anastasia Petsinari, daughter of Theocharis** | Non-Director | Head of Corporate Governance & Legal Services (General Counsel) |
| **Antonios Mouzas, son of Athanasios** | Non-Director | Head of Brokerage |

The Executive Committee has Rules of Procedure.

According to the Rules of Procedure of the Executive Committee:

- The Executive Committee meets regularly once a week and whenever the needs of the Bank so require, at the call of its Chairman. A quorum requires the participation of more than fifty percent (50%) of the members of the Committee, either in person or via teleconference. If the Chairman is absent, they are replaced by a member of the Executive Committee, appointed by decision of the Chairman, who performs the duties of Chairman of the Executive Committee.

- Its decisions are taken by an absolute majority of the participating members. In the event of a tie, the Chairman has the casting vote.
- Upon authorisation by the Board of Directors of the Bank, the Executive Committee has i) Administrative Planning powers, including, but not limited to: monitoring the implementation of the Bank's Business Plan and taking the necessary decisions to achieve the objectives contained therein, pre-approval of the budget guidelines and submission of the budget to the Board of Directors; and ii) approval powers (within the scope of its powers and within its respective approval limits), including, but not limited to: approval of the marketing strategy, the Rules of Procedure of the Units, the Bank's Basic Policies, in accordance with the applicable institutional and regulatory framework, except for those for which approval by a higher approval body or other committee is required, as well as Bank Procedures, expenses, investments, liquidations, and strategic or non-strategic business participations (acquisition, change, exit) within a budget of €300,000 to €1,000,000, excluding expenses and investments for IT systems or matters, which fall under the approval authority of another committee, outsourcing of critical, essential, or important functions that do not exceed the maximum risk tolerance limits set by the Board of Directors, projects/collaborations/contractual arrangements for the use of IT services that fall within critical or important functions in accordance with Regulation (EU) 2022/2554 (DORA), following a relevant assessment by the IT Strategy and Planning Committee. The Executive Committee may, upon relevant decision, delegate or assign the above responsibilities to management committees, members of the Committee or Bank officers.

The CVs of the members of the Executive Committee are available on the Bank's website: www.optimabank.gr/about-us/corporate-governance/executive-committee/.

The CVs of the members of the Executive Committee (except for those members of the Executive Committee who are also Directors, for whom see *Section "Board of Directors"/ "Composition of the Board of Directors and Mode of Operation")* are as follows:

- **Theodoros Georgakopoulos, Head of Credit & Recoveries:** With over 30 years of experience in banking, particularly in Corporate & Retail Banking Credit Risk Management, Mr. Theodoros Georgakopoulos holds the title of Head of Credit & Recoveries at Optima bank. He began his career in 1994 at the Ergasias Bank, where he worked in the Corporate Banking sector as a Senior Credit Analyst in the areas of Small and Medium-sized Enterprises and Small Business Loans. In 2001, he joined the Novabank team, where he conceived and implemented the design and creation of the Bank's Credit Division. From 2005 to 2008 he was Head of the Business Banking Credit Division of

Optima bank

Millennium Bank. He was subsequently promoted to Deputy Chief Credit Officer of the Bank and remained in this 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 Division of Piraeus Group. In 2018 he moved to Romania, where he took over the position of Deputy CEO of Marfin Bank Romania (now Vista Bank) following the acquisition of the Bank by the Vardinogiannis 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 40 years of experience in banking, Mr. Giannis Parnis holds the position of Head of Human Resources at Optima bank. He started his career at the Shipping Branch of Barclays PLC in 1984, where he worked in various positions in the Customer Service Division. In 1991, he joined Xiosbank as Branch Manager, and in 1996 he transferred to the Personal Banking Division, where he remained until 2000. In 2000, he moved to Telesis Investment Bank for a short period as Director of the Private and Personal Banking Network. 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 department, where he took on the position of Head, contributing to the Bank being awarded the 3rd "Best Working Environment" Award (2009), initiating an organisational structure of transparency and meritocracy, combined with a pleasant everyday environment. At the end of 2013, when Millennium Bank merged with Piraeus Bank, he took on the position of Senior Director of Group Human Resources & Organisational Health. From April 2019, he participated in the conversion of the Investment Bank of Greece into Optima Bank as the person 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, Investor Relations and Sustainable Development:** With over 25 years of experience in the financial industry (Investment Banking), Mr. Konstantinos Vatousis is the Head of Strategy and Shareholder Services at Optima bank. He began his career in 2000 at KPMG Advisors, where he was an executive in the Corporate Finance department, specialising in mergers and acquisitions, company valuations and fairness opinions, special financial audits (due diligence), and corporate debt restructurings. In 2007, he became head of Investment Banking at Millennium Bank, where he successfully completed a series of transactions in the areas of mergers and acquisitions, valuations, and capital market operations. In 2011, he joined Core Capital Partners, an independent financial advisory services company, as a Senior Investment Banker, specialising 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 (former IBG) as Head of Strategy & IR, having a leading role in the development of the Bank's long-term strategic plan and in the transformation of the Investment Bank of Greece from a brokerage bank to a modern commercial bank (Optima bank) as well as in the Bank's relationship with its investors\/shareholders. Mr. Vatousis holds a degree in Economics from the University of Macedonia (Thessaloniki) and a Master of Science degree in Money, Banking & Finance from the University of Sheffield.

- **Alexander Vlagoulis, Head of Marketing & Products:** With 25 years of experience in Asset Management and Retail Banking, Mr. Alexandros Vlagoulis is currently Head of the Marketing & Products Department of Optima bank. He began his career at Citibank International Plc in 2000 as a Citigold executive and held various positions at Citibank Greece over the following years. In 2005, he was appointed 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 the Affluent Segment & Analysis Department, with responsibilities including designing and implementing the Affluent Customer Strategy. From February 2019, he participated in the conversion of the Investment Bank of Greece into a commercial bank. Mr. Vlagoulis holds a Bachelor of Business Economics from the University of East London and a Master of Management from the University of Surrey.

- **Paschalis Giouchas, Head of Technology and Operations:** With over 25 years of experience in banking, Mr. Akis Giouchas holds the position of Chief Operating Officer of Optima bank. He began his career at Accenture (Germany) in 1995, where he participated in major transformation and restructuring projects for leading German banks and credit card processing companies. In 2001, he joined the founding team of the newly established Proton Bank (Greece) as 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 consulting services within Accenture's financial services division. In this capacity, he implemented various strategic projects in the field of information technology. Later, he became Head of Infrastructure, Operations, and Security for all divisions. In June 2019, he joined the executive team at Optima

Bank with a mandate to transform the bank's IT operations and systems into a digital driving force. Mr. Giouchas holds a Master's degree in Computer Science from the Technical University of Berlin.

- **Paris Oikonomou, Head of Wholesale Banking:** With over 20 years of experience in the financial sector, Mr. Paris Oikonomou is currently Head of Wholesale Banking at Optima bank. In 2004, he joined Laiki Bank of Cyprus as an analyst in the Large Enterprises department. In 2006, he took up the position of Relationship Manager in the Corporate & Investment Banking department of Millennium Bank, where he remained until 2013. In 2013, following the merger of Millennium Bank with Piraeus Bank, he joined the Large Enterprises department, which he headed and represented in a series of important transactions and debt restructurings in various sectors. In 2017, he joined Ernst & Young as an Associate Partner in the Transaction Advisory Services department and worked on a number of restructuring and consulting projects. He joined the management team of Optima Bank in March 2019 as Head of Wholesale Banking. Mr. Oikonomou holds an MSc in Economics from the University of Aberdeen and an MSc in Economics and Finance from the University of Warwick.

- **Dimitrios Papageorgopoulos, Head of Retail Networks:** With over 35 years of experience in banking, Mr. Dimitris Papageorgopoulos currently holds the position of Head of Retail Networks at Optima bank. He began his banking career at the National 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 Director of Mortgage Lending and Director of the Southern Greece until 2011. In 2011, he took up the position of Deputy General Manager at Postal Savings Bank of Greece, where he was responsible for the Bank's retail banking activities. Between 2013 and 2018, he served as Head of the Branch Network of Postal Savings Bank of Greece and Network Manager of Eurobank in Athens and Western Greece. From February 2019 to July 2019, he participated in the acquisition process 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 of Optima bank, as well as Corporate Secretary. Since the beginning of her professional career in 1997, she has been involved in financial law, providing legal services to domestic and foreign credit institutions. Since 2003, she has held important positions as a legal executive in banks, such as head of the Legal Department of Omega Bank (2003-2006), Proton Bank (2006-2011), and subsequently New Proton Bank (2011-2013). In 2013 she joined Eurobank and took up the position of Deputy Director in the Legal Services Department of Eurobank and then in 2014 she joined Alpha Bank, where she remained until 2019, initially as Deputy Director and then as Director in the Senior Legal Services Department of Alpha Bank, with responsibility for legal support of the entire range of Alpha Bank's banking operations. In the past, she has also provided legal services as Of Counsel, mainly in matters of investment, construction of large projects, and claims management, while also specialising in information technology and communications. She has extensive experience in shaping organizational and business strategies based on corporate governance principles, as well as in-depth knowledge of Greek and European banking legislation, having gained a thorough understanding of both the legal and business aspects of banking. Ms. Anastasia Petsinari holds a Bachelor of Law and a Master's in Law (LL.M) in Banking & Finance. 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 of Panteion. Political Sciences. She also holds an MBA from the National Technical University of Athens and the Athens University of Economics and Business and a Master of Science (MSc) in Management in Science & Technology from the Athens University of Economics and Business. She is also specialised and certified in Negotiations, at Harvard Law School, Program on Negotiations, and is an Accredited Mediator of the Ministry of Justice, Transparency & Human Rights.

- **Antonios Mouzas, Head of Brokerage:** Mr. Mouzas has extensive experience in management positions in Banks and multinationals as well as a member of the Boards of Directors of Greek and foreign banks. He currently holds the position of Head of Brokerage at Optima bank. He started his career in banking at the Consumer Credit Department of XiosBank in 1994, and then worked at Toyota Hellas Group. In 2000, he moved to Millennium Bank as Credit Products Manager, Head of Mortgage Lending, and in 2013, after returning from abroad, as General Manager of Corporate and Investment Banking. He has worked abroad, from 2006 to 2013, as General Manager and member of the Board of Directors at Millennium Bank in Turkey and Romania with various responsibilities, such as Financing of Large and Small Enterprises, Credit, IT, Branch Network, restructuring, and collection of overdue loans. Between 2014 and 2017, he worked in investment banking transactions (Core Capital Partners & Fedra Capital), mainly in syndicated loan restructurings and company acquisitions in Greece, Turkey, and Romania, with a total transaction value of over €1 billion. In 2017, he joined the Vardinogiannis Group team that acquired Marfin Bank Romania (later Vista

Bank), where he served as CEO until 2020. Mr. Mouzas holds a degree in Economics from the School of Economics & Law at the Aristotle University of Thessaloniki, an MBA from ALBA Business School and a postgraduate degree from INSEAD.

**Professional obligations & number of shares of members of the administrative, management and supervisory bodies, Senior Management**

For the Directors of the Bank, the members of the Audit Committee, the Head of the Internal Audit Department, Ms Afroditi Samara, the members of the Remuneration and Nominations Committee and the members of the Risk Management Committee, which are the administrative members, management and supervisory bodies of the Bank, as well as the senior management of the Bank, as reflected above in the section "*Administrative, Management and Supervisory Bodies and Senior Management*", the following applies as of the Reference Date:

1. Apart from their activities related to their capacity and position in the Bank, and those activities related to their participation in administrative, management and supervisory bodies referred to in point 2 of this section, they shall not engage in any other professional activities outside the Bank and its subsidiaries that are important to the Bank, with the following exceptions:
   - Mr. Petros Tzannetakis, Vice-Chairman, Non-Executive Director and member of the Audit Committee, holds the position of Deputy CEO of Motor Oil.
   - Mr. Theofanis Voutsaras, Non-Executive Director and member of the Remuneration and Nomination Committee, holds the position of General Manager of Human Resources of Motor Oil Group (MOH Group).
   - Mr. Nikolaos Giannakakis, Non-Executive Director, holds the position of General Manager of Information Technology of Motor Oil Group (MOH Group).

2. As at the Reference Date, they have been members of the administrative, management and supervisory bodies of another company or legal entity, excluding the Bank's subsidiaries, as shown in the table below:

| FULL NAME | S/N | NAME OF LEGAL ENTITY | CAPACITY |
|---|---|---|---|
| **Georgios Taniskidis, son of Ioannis** | 1 | CORE CAPITAL PARTNERS S.A. | Chairman of the Board |
| | 2 | LOULIS FOOD INGREDIENTS S.A. | Independent Non-executive Director |
| | 3 | EUROSEAS LTD | Director |
| | 4 | EURODRY LTD | Director |
| | 5 | EUROHOLDINGS LTD | Director |
| **Petros Tzannetakis, son of Tzanibeis** | 1 | MOTOR OIL (GREECE) CORINTH REFINERIES S.A. | Executive Director |
| | 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 Director |
| | 6 | CORAL S.A. | Non-Executive Director |
| | 7 | CORAL GAS SINGLE MEMBER AEBEY | Non-Executive Director |
| | 8 | LPC SINGLE MEMBER S.A. | Non-Executive Director |
| | 9 | MOTOR OIL RENEWABLE ENERGY (MORE) SINGLE MEMBER S.A. | Executive Director |
| | 10 | WIND RES SINGLE MEMBER S.A. | Chairman of the Board Executive |
| | 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 Board Non-executive |
| | 15 | NRG SUPPLY & TRADING S.A. | Non-Executive Director |
| | 16 | CORINTHIAN OIL LIMITED (UK) | Director |
| | 17 | TALLON COMMODITIES LTD (UK) | Director |
| | 18 | VERDE SINGLE MEMBER S.A. FOR SUSTAINABLE | Member of the Board of Directors |

| FULL NAME | S/N | NAME OF LEGAL ENTITY | CAPACITY |
|---|---|---|---|
| | | PRODUCTS AND SERVICES | |
| **Dimitrios Kyparissis, son of Apostolos** | 1 | HELLENIC BANK ASSOCIATION | Member of the Board of Directors |
| **Georgios Kyriakos, son of Konstantinos** | 1 | NOTOS COM HOLDINGS AEBE | Member of the Board of Directors |
| | 2 | OTROPAY PAYMENTS INSTITUTION SINGLE MEMBER S.A. | Non-Executive Chairman of the Board |
| | 3 | HELLENIC WINERIES S.A. | Member of the Board of Directors |
| | 4 | INNOVATIVE TECHNOLOGIES SUPPORT ΜΟΝΟΠΡΟΣΩΠΗ Α.Ε. | Deputy Chairman (Non-Executive) |
| | 5 | Hellenic Gaming Commission (HGC) | Director |
| **Pavlos Kanellopoulos, son of Dimitrios** | 1 | KAIZEN DIGITAL SERVICES S.A. | Senior Executive |
| | 2 | KAIZEN GAMING LTD | Senior Executive |
| | 3 | DIGIFY INTERNATIONAL LTD | Member of the Board of Directors |
| **Theodoros Efthys, son of Ilias** | 1 | VISTA BANK (ROMANIA) SA | Independent Non-executive Director & Chairman of the Joint Audit Committee & Risk Committee |
| **Theofanis Voutsaras, son of Christos** | 1 | AVINOIL SINGLE MEMBER S.A. - INDUSTRIAL, COMMERCIAL AND SHIPPING OIL COMPANY | Member of the Board of Directors |
| | 2 | MOTOR OIL RENEWABLE ENERGY (MORE) SINGLE MEMBER S.A. | Member of the Board of Directors |
| | 3 | LPC SINGLE MEMBER S.A. PROCESSING AND MARKETING OF LUBRICANTS AND OIL PRODUCTS | Member of the Board of Directors |
| | 4 | CORAL GAS SINGLE MEMBER AEBEY | Member of the Board of Directors |
| | 5 | KORAKIA REAL ESTATE S.A. | Vice Chairman |

| FULL NAME | S/N | NAME OF LEGAL ENTITY | CAPACITY |
|---|---|---|---|
| | 6 | TECHNICAL REAL ESTATE AND COMMERCIAL WORKS KTIMA S.A. | Member of the Board of Directors |
| **Nikolaos Giannakakis son of Konstantinos** | 1 | MOTOR OIL RENEWABLE ENERGY (MORE) SINGLE MEMBER S.A. | Non-Executive Director |
| | 2 | NOVA INFORMATION AND COMMUNICATION TECHNOLOGIES S.A. | Non-Executive Director |
| | 3 | THREATSCENE GREECE SINGLE MEMBER S.A. | Chairman of the Board Non-executive |
| | 4 | INDICE S.A. | Vice Chairman of Board |
| **Theodoros Georgakopoulos, son of Nikolaos** | 1 | TIRESIAS S.A. | Member of the Board of Directors |
| **Antonios Mouzas, son of Athanasios** | 1 | ELTON INTERNATIONAL AEBE | Independent Director |

3. As at the Reporting Date 31 December 2025, they held the following number of shares of the Bank:

| FULL NAME | CAPACITY | NUMBER OF SHARES |
|---|---|---|
| Georgios Taniskidis, son of Ioannis | Chairman / Non-executive Director | 1,792,509 |
| Petros Tzannetakis, son of Tzanibeis* | Vice-Chairman / Non-executive Director | 60,000 |
| Dimitrios Kyparissis, son of Apostolos* | Executive Director, CEO | 368,121 |
| Angelos Sapranidis, son of Nikolaos | Executive Director, Head of Finance | 57,000 |
| Theofanis Voutsaras, son of Christos* | Non-Executive Director | 21,184 |
| Nikolaos Giannakakis son of Konstantinos | Non-Executive Director | - |
| Theodoros Efthys, son of Ilias | Independent, non-executive Director | - |
| Ioanna Zour, daughter of Christos | Independent, non-executive Director | - |
| Pavlos Kanellopoulos, son of Dimitrios | Independent, non-executive Director | 21,000 |
| Georgia Kontogianni, daughter of Vasileios | Independent, non-executive Director | - |
| Georgios Kyriakos, son of Konstantinos | Independent, non-executive Director | - |

* these persons hold joint ownership of shares through JointInvestor Shares.

| FULL NAME | CAPACITY | NUMBER OF SHARES |
|---|---|---|
| Konstantinos Vatousis, son of Charalambos | Head of Strategy, Shareholder Services and Sustainable Development | 75,615 |
| Alexandros Vlagoulis, son of Panagiotis | Head of Marketing and Products | 87,024 |
| Theodoros Georgakopoulos, son of Nikolaos | Head of Credit and Recoveries | 41,804 |
| Paschalis Giouchas, son of Pelopidas | Head of Technology and Operations | 126,909 |
| Antonios Mouzas, son of Athanasios | Head of Brokerage | 70,000 |
| Dimitrios Papageorgopoulos, son of Georgios* | Head of Retail Networks | 126,000 |
| John Parnis, son of Dimitrios | Head of Human Resources | 88,800 |
| Anastasia Petsinari, daughter of Theocharis* | Head of Legal Services | 85,566 |
| Afroditi Samara, daughter of Georgios | Head of the Internal Audit Department | 870 |
| Paris Oikonomou, son of Polycarpos | Head of Wholesale Banking | 161,751 |

## 6. Evaluation of the Corporate Governance System

Given that the Bank will be listed on the Athens Exchange in October 2023 and in accordance with Article 4, par. (1) of Law 4706/2020 on periodic evaluation at least every three (3) fiscal years, the first evaluation of the Corporate Governance System (CGS) will be carried out with a reference date of 31.12.2026.

## 7. Internal Audit System

The Audit Committee and the Bank’s Board of Directors are responsible for ensuring the operation of an adequate and effective Internal Audit System.

The Internal Audit System (IAS), according to PEE 243/2/07.07.2025 is a set of audit mechanisms and processes which covers, on a constant basis, every activity of the Bank and contributes to its efficient and safe operation. The Bank develops and maintains a culture that encourages the adoption of a positive attitude towards risk control and regulatory compliance within the Group, as well as a sound and comprehensive internal audit framework.

The IAS is adopted and implemented by the Group'' subsidiaries based on their size, internal organisation, scale, and complexity of operations.

In particular, it ensures:

- Effective and efficient operations,
- prudent business practices and consistent implementation of the business strategy with effective use of available resources,
- proper identification, measurement, and mitigation of risks,
- reliability of financial and non-financial reports submitted internally and externally,
- sound administrative and accounting procedures, and
- compliance with laws, regulations, supervisory requirements, and the Bank's internal policies, procedures, rules, and decisions.

In order to safeguard the IAS, the Bank has assigned responsibilities to independent units (Risk Management, Internal Audit and Regulatory Compliance) and the BoD Committees. For the implementation of the IAS, the Bank implements the Three Lines Model.

**First line of defence:** It concerns the administratively and operationally responsible units, which manage risks in the context of their everyday operations. Also, they are responsible for the development of processes and audit points for the efficient handling of risks and for the implementation of corrective actions in cases of recognized weaknesses on processes and audit points.

**Second line of defence:** It concerns the business operations that the Management has defined and staffed for supervising risks, with the purpose of them supporting the further enhancement and/or monitoring the processes and audit points which the first line of defence develops. Such operations are the following Departments: Risk Management and Regulatory Compliance.

The Department for Risk Management of the Bank methodically approaches the risks related to its activity, with the purpose of contributing to the continuation of its activities and its sustainable growth. The Department for Risk Management has relevant Rules of Procedure and processes. The purpose of the processes of the Department for Risk Management is assessing and highlighting of any kind of risk which may affect the smooth operation and sustainability of the Bank, the determination and clear allocation of roles and responsibility limits in managing risks, the efficient management of risks and the direct taking of measures for their extermination where required, the timely submission of reports and consultation with

Management or the Supervisor for critical matters, as well as the constant communication and information on new possible risks.

At the same time, the Bank has a Regulatory Compliance Department that examines compliance in accordance with the letter and, above all, the spirit of the laws, institutional and supervisory rules and principles, codes of conduct, market best practices, with the aim of minimising the risk of non-compliance, financial loss or damage to the Bank's reputation as a result of its failure to comply with a rule. The Department for Regulatory Compliance reports operationally to the Bank's BoD via the Audit Committee, while for administrative issues it reports to the CEO.

**Third line of defence:** The Internal Audit Department, having a high degree of independence, provides objective safeguarding on the efficiency of the internal audit system, including the way in which the first and second lines of defence achieve their goals.

The Internal Audit Department operates in a way which is determined by the Ethical Code and the International Professional Practices Framework (IPFF) of the Institute of Internal Auditors, Law 4706/2020 and the relevant decisions of the Hellenic Capital Market Commission, and has relevant Rules of Procedure for the Internal Audit Department.

**Internal Audit Department**

The Internal Audit Department is an objective, independent organisational unit whose purpose is to monitor and improve the Bank's operations and policies with regard to the Internal Audit System and the Group's subsidiaries. It is independent of the controlled activities and is not combined with other functions of the Bank and the Group. It reports functionally to the Bank's Audit Committee and administratively to the Chief Executive Officer.

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

**Responsibilities**

The Department has, among others, the following basic responsibilities:

- monitoring, control and evaluation of implementation of:

α) the Bank's Rules of Procedure and

β) the adequacy and effectiveness of the Internal Audit System of the Bank and its subsidiaries;

γ) the quality assurance mechanisms and

δ) the corporate governance mechanisms and compliance with the commitments contained in the Bank's prospectuses and business plans regarding the use of funds raised on the regulated market.

- Assessment, through the audits it conducts, of the degree of implementation and effectiveness of the procedures established for risk management and the calculation of the parameters on which the capital adequacy assessment of the Bank and the Group companies was based, where applicable, as well as the degree of integration of the risk management framework into decision-making mechanisms (use tests).
- Confirmation to the Bank of Greece of the completeness and validity of the above procedures and, in particular, of the procedures for assessing the parameters on which the estimate of the amount of the potential loss was based.
- Assessment of the organisational structure, allocation of responsibilities and duties, human resource management, and the extent to which appropriate corporate governance policies and procedures have been established.
- Assessment of the organisation and operation of systems and mechanisms relating to the production of reliable, complete, and timely financial and administrative information, where such information is provided.
- Assessment of the organisation and operation of IT systems and services in accordance with par. 15 of PEE 190/2/16.6.2021 as well as accounting systems.
- Assessment of the extent to which the Bank's collective bodies and units or functions and the Group entities:

  i. use effectively the means and resources available to them to implement the operational strategy in a consistent manner;

  ii. comply with the guidelines and procedures established by the competent authorities with a view to systematically monitoring and managing the risks assumed (e.g. setting and maintaining limits);

  iii. ensure the completeness and accuracy of the data and information required for the preparation of reliable financial statements in accordance with applicable accounting principles;

  iv. ensure that appropriate preventive and repressive control mechanisms and safeguards (controls) are built into all processes and transactions carried out.

- Preparing reports for the controlled units with any findings, the risks arising from them and recommendations for improvement, if any.
- Monitoring the implementation and effectiveness of corrective measures by the audited units of the Bank and Group entities in order to adequately address any weaknesses or deficiencies identified in the Bank's corporate governance framework, the improvement of existing procedures and practices resulting from the audit and other observations recorded in audit reports of any kind, with relevant information to the senior management of the Board of Directors and the Audit Committee.
- Submission of reports to the Audit Committee at least every three (3) months, including the most important issues and proposals regarding the tasks mentioned above, which the Audit Committee presents and submits together with its comments to the Board of Directors.
- Adopting and establishing a single audit methodology for the Department for Internal Audit.
- Conducting all kinds of audits on all units, activities, and providers of material activities of the Bank's Group.
- Informing the Board of Directors, through the Audit Committee and senior management, of the progress and results of audits, the achievement of internal audit objectives with regard to the Bank and Group entities, and follow-ups.
- Cooperation with Supervisory and other Authorities.
- Providing information to Board members, upon their request, on matters relating to risks, the internal control framework and compliance with applicable rules.
- Information on the results of the audits carried out by the regular statutory auditors for the annual financial year, the statutory auditors carrying out the triennial assessment of the adequacy of the internal control system, and other annual reports submitted to the Supervisory Authorities.
- Recommendation to the Audit Committee for the selection of external auditors for the triennial evaluation of the adequacy of the Internal Audit system for the Bank and the Group and informing the Bank of Greece on the scope of the audit.
- Conducting audits as specified by the Capital Market Commission.
- Participation in an advisory capacity in various stages of the development of Policies and Procedures.
- Establishment of a Policy and procedure for the periodic evaluation of the Internal Audit System (IES) and any revision thereof, and a recommendation to the Audit Committee.

- Evaluation of the adequacy and effectiveness of the Risk Management and Compliance Departments' procedures.
- Ensuring compliance with the requirements of the institutional framework for the prevention and suppression of money laundering and terrorist financing.
- Conducting an independent review of the design, implementation, and impact of the Bank's and Group;s remuneration policy on their risk profile, as well as how these impacts are managed.
- Central review of the remuneration policy regarding compliance with applicable legislation, policies, procedures and internal rules of the Group.

**Head of the Internal Audit Department**

The Head of Internal Audit is appointed by the Bank's Board of Directors, following a recommendation by the Audit Committee. He or she is a full-time employee, personally and functionally independent and objective in the performance of his duties, and has a high level of knowledge and sufficient professional experience in audit methods and best international practices. He/She is administratively subject to the CEO and operationally subject to the Audit Committee. As the Head of the Department for Internal Audit, he/she cannot be a member of the BoD or a member with the right to vote in consistent committees of the Bank and have a close relationship with anyone having one of the above capacities in the Bank or a Group company. In order to be appointed as head, the relevant suitability requirements set out in PEE 224/1/21.12.2023 must be met.

Their main responsibilities are described in the Department's Rules of Procedure.

The Bank's Board of Directors, at its meeting held on 11.04.2013, following a recommendation by the members of the Audit Committee, appointed Ms. Afroditi Samara, daughter of Georgios, as Head of the Internal Audit Department, in accordance with the applicable legal framework. Ms. Afroditi Samara is a full-time employee of the Bank, personally and functionally independent and objective in the performance of her duties, has a high level of knowledge and sufficient professional experience in auditing methods and best international practices, and has no close ties to any member of the Bank's Board of Directors or any company in the Group, or a member with voting rights on standing committees.

Ms. Afroditi Samara has many years of professional experience in financial and investment services and has been an Internal Auditor at the Bank since 2004. She is registered with the Chamber of Finance, in the register of internal auditors of the private sector under Law 4849/21, with registration number 604. She started her career in 1991 at Exelixis Investment, where she worked in the Stock Exchange Investment

Division and then in 1995 she joined the human resources of ABN AMRO Bank N.V., where she held 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 Investment Bank of Greece S.A. (now Optima Bank), a position she still holds today. Ms Samara has significant expertise and professional training certifications in auditing methods, international best practices in internal audit and mortgage lending, and has been assessed for her competence and suitability as Head of Internal Audit by the supervisory authority (Bank of Greece).

**Regulatory Compliance Department**

The Compliance Department is permanent, effective and administratively independent from the business areas and internal units or functions it controls and has sufficient authority, standing and resources to ensure that conflicts of interest are avoided in the exercise of its responsibilities and has unhindered access to all data and information of the Bank and the Group necessary for the fulfilment of its mission.

The Department for Regulatory Compliance consists of the following departments:

- AML/CFT & Authorities Investigations and
- Regulatory Compliance.

Every department is lead by one Head.

The Department for Regulatory Compliance reports operationally to the Bank's BoD via the Audit Committee, while for administrative issues it reports to the CEO.

Its staff has sufficient and specialised knowledge, skills, and experience in compliance and related procedures, is trained on a regular basis, particularly on developments in the regulatory framework relevant to their respective responsibilities, and is sufficient in number.

The Department has Rules of Procedure, which are approved by the Board of Directors upon recommendation by the Audit Committee. The Rules of Procedure of the 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 an amendment to the Bank's Rules of Procedure.

*Responsibilities*

The Regulatory Compliance Department (RCD) 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 when providing 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 Management, the business units, and the Regulatory Compliance Officers of the subsidiaries in fulfilling their obligations under the above framework. The main responsibilities of the Department are:

- Ensuring the Bank's compliance with the legal and regulatory framework relating to the prevention and suppression of money laundering and terrorist financing.
- Providing assistance and appropriate guidance to Departments/operational units on matters within its remit.
- The establishment and implementation of appropriate procedures and the preparation of a relevant annual programme for the following year with the aim of achieving full and continuous compliance of the Bank with the applicable regulatory framework and internal regulations in a timely manner and to have a full picture at all times of the extent to which this objective has been achieved.
- Making recommendations to the Management on issues relating to the formulation and implementation of the Bank's policies and procedures, taking into account the regulatory framework for the supervision of the financial system.
- Assessing the potential impact of any changes to current legislation on the Bank's activities and regulatory compliance framework.
- Ensuring that staff are kept up-to-date on 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 business units and its subsidiaries, in the event of amendments to the regulatory framework in force.
- Positioning on conflict of interest issues.
- Ensuring, through appropriate procedures, that the deadlines for meeting the obligations set out in the above regulatory framework are met.
- Monitoring and controlling 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 Bank's Management and the Board of Directors of any significant breach of the regulatory framework or any significant deficiencies identified.
- Regular monitoring and evaluation of the Complaints Management Policy and Procedure.

- Participation (at least) in an advisory capacity in the design of new procedures on issues relating to business decision-making, in conjunction with the other departments of the Internal Audit System.
- Receiving information from the relevant Units regarding deviations from the regulatory framework identified during audits conducted by Supervisory Authorities, Internal and External Auditors, and monitoring the implementation of the required corrective actions.
- Communicating and maintaining good relations with supervisory authorities and bodies. The Compliance Department has been designated by the Bank's Management as the central point of communication with the supervisory bodies and authorities.
- Participating in Board committees and other internal corporate functions in reviewing and evaluating the Bank's remuneration policy to ensure alignment with the Bank's strategy and risk management framework, as well as in the process of identifying specific members of staff whose professional activities have a material impact on the Bank's risk profile in accordance with PEE 231/1/15.07.2024.
- Submits an annual report on regulatory compliance issues, including any significant deficiencies and violations of the regulatory framework, to the Bank's Board of Directors through the Audit Committee, in accordance with PEE 243/2/07.07.2025. The report contains a review of the previous year, actions that have been completed or are already underway, institutional issues, findings from any special investigations, and proposals for improvements/new projects. After being evaluated by the company's Board of Directors, the report is submitted to the Bank of Greece.
- Communicates with the Risk Management Department on issues related to the Bank's compliance risk and its management, exchanging information to perform the tasks within their responsibilities.
- Submits an annual report to the Bank of Greece within the framework of PDTE 2501/2002.

**Head of Compliance**

The Head of Regulatory Compliance is a selected full-time employee with sufficient knowledge of banking and investment activities and is responsible for this function throughout the Bank. whose appointment and replacement is made by the Bank's Board of Directors and notified to the Bank of Greece (hereinafter referred to as the "BoG"), together with their contact details. In order to be appointed as head, the relevant suitability requirements set out in PEE 224/1/21.12.2023 must be met.

The Head of the Regulatory Compliance Department has been appointed as the Bank's Responsible Executive Officer within the meaning of Article 38 of Law 4557/2018 on "Prevention and suppression of money laundering (ML) and terrorist financing (TF)”. The Responsible Executive Officer, as well as his/her deputy, are appointed by the Bank’s Board of Directors based on criteria such as ethics, integrity, prestige, scientific competence, experience in related work, and knowledge of the Bank’s operations.

The Responsible Executive Officer and his/her deputy do not hold any other position in the Bank that conflicts with the obligations arising from their position.

The Head of the Department has the following duties:

A) As Head of the Compliance Department, among other things:

- Supervises, controls, and is responsible for the proper performance of the duties of the Regulatory Compliance Officers and the smooth operation of the Department.
- Makes recommendations for meeting identified needs in terms of material and human resources.
- Supervises and monitors compliance with the regulatory framework governing the activities and services for which the Bank and its subsidiaries have been licensed. Informs Management of any significant breaches of the regulatory framework or significant deficiencies in compliance with it.
- Coordinates the work of the heads of regulatory compliance of subsidiaries falling within the scope of supervisory consolidation, so that all comply fully with the requirements of PEE 243/2/07.07.2025.
- Reports at least quarterly to the Audit Committee of the Board of Directors on matters under the responsibility of the C.S. Department and makes relevant recommendations\/advice to ensure compliance with applicable laws, rules, regulations and standards. They also assess the impact that any changes to current legislation may have on the Bank’s activities and regulatory compliance framework.
- Regularly informs management on issues related to their area of responsibility. They may also attend the meetings of the Bank’s Board of Directors, whenever deemed necessary, in order to inform the Board of Directors on matters falling within their remit.
- Prepares an annual program for the following year with the aim of achieving full and ongoing compliance by the Bank with the applicable regulatory framework and its internal regulations in a timely manner.
- Acts as a liaison with regulators and bodies.

B) As Responsible Executive Officer:

- Assesses the effectiveness of the regulations applied in the area of ML & TF and submits, through the Audit Committee, to the Bank's Board of Directors an annual report on issues related to the fight against money laundering and terrorist financing. This report, after being evaluated by the members of the Audit Committee, is sent to the BoG.
- Supervises, coordinates, monitors, and manages the effective countering of money laundering and terrorist financing risks.
- Evaluates the findings of the Internal Audit Department, the external auditors and the Supervisory Authorities and recommends corrective measures in matters of prevention and suppression of ML and TF.
- Submits reports of Suspicious/Unusual Transactions to the Authority for Combating Money Laundering under Article 47 of Law 4557/2018.
- It maintains direct contact with the Authority for Combating Money Laundering under Article 47 of Law 4557/2018.
- Assesses the adequacy of knowledge on ML & TF issues of the Bank's candidate Affiliated Representatives.
- Investigates the training needs of the staff in ML and TF and collaborates with the relevant Department for the preparation and implementation of an appropriate annual training programme.
- Oversees the organization of appropriate educational workshops or seminars on ML.

The duties of the Head of the Compliance Department are described in detail 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 of the Kingdom as Head of the Compliance Department, in accordance with the applicable legal framework, who was appointed as Responsible Executive Officer within the meaning of Art. 38 of Law 4557/2018 and Coordinator of Article 38 par. (2) of Law 4557/2018 of the Competent Executive Officers of the Group at the meeting of the Board of Directors on 23.03.2023. He has been assessed for his adequacy and suitability by the supervisory authority (Bank of Greece).

**Risk Management Department**

The Risk Management Department comprises the following departments, whose operation and responsibilities are specified in its Rules of Procedure:

- Credit Risk
- Market & Liquidity Risk

- Operational Risk
- Capital Adequacy Management
- Regulatory Affairs
- 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 subordinated to the Credit & Recoveries Department of the Bank, without in any way affecting its functional independence as described above.

The Department has an Operating Regulation, which is approved by the Board of Directors of the Bank on the recommendation of the Risk Management Committee. The Risk Management 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**

The Risk Management Department (RMD) is responsible for designing, specifying, and implementing policy on risk management and capital adequacy issues, in accordance with the guidelines of the Board of Directors. The RMD is specialised and independent, in accordance with the provisions of PEE 243/2/ 07.07.2025 and covers the entire range of activities and all forms of risk that the Bank undertakes or to which it may be exposed, including operational risk. It also has sufficient powers, authority, and resources to be able to implement risk policies. Its staff is sufficient in terms of quantity and quality, full-time and full-time, and has sufficient and specialised knowledge, skills and experience in risk management techniques and procedures, as well as in purchasing and products, and is trained on a regular basis. The RMD has access to all operational areas, functions, departments, and divisions of the Bank, as well as to all necessary information relating to the above that may pose risks to the Bank itself, its subsidiaries, and its affiliated companies. In particular, the Department, among other things, performs the following:

- Provides independent information, analysis and expert reports on exposures at risk.
- Advises on proposals and decisions of the Divisions, Departments and business units in general, and informs the Board of Directors, through the Risk Management Committee, on whether these are consistent with the Bank's risk strategy and risk appetite.
- It is actively involved, at an early stage, in shaping the Bank's risk strategy and ensures that the Bank has effective risk management procedures in place. It also provides the Board of Directors,

through the Risk Management Committee, with all information relating to risks in order to facilitate the determination of the Bank's risk appetite.

- Assesses the adequacy and sustainability of the risk strategy and risk appetite and ensures that the latter is appropriately expressed through specific risk limits and the risk strategies and risk appetite of the Divisions, Departments, and business units in general, including the targets proposed by the business units, which are reasonable and consistent with the Bank's risk strategy, and is involved prior to the decision being taken by the Board of Directors.
- Before decisions are made on significant changes or unusual and/or extraordinary transactions, it participates in assessing their impact on the overall risk of the Bank and the Group, reports the findings to the Board of Directors through the Risk Management Committee and assesses how the identified risks could affect the Bank's or the Group's ability to manage its risk profile, liquidity, and sound capital base under normal or adverse conditions.
- Ensures the existence of an appropriate risk management framework, as well as the identification, assessment, measurement, monitoring, management, and appropriate reporting of all risks by the respective units of the Bank.
- Ensures that transactions with related parties are controlled and that the risks arising from them are identified and assessed in an appropriate manner.
- Ensures that all identified risks are effectively monitored by the business units.
- It regularly monitors the Bank's actual risk profile and thoroughly investigates it in relation to the Bank's strategic objectives and risk appetite in order to facilitate decision-making by the Board of Directors and their critical review by the non-executive Directors.
- Analyses trends and identifies new or emerging risks and instances of increased risks arising from changing circumstances and conditions. It also reviews on a regular basis the actual risks arising compared to previous assessments (through back testing) in order to assess and improve the accuracy and effectiveness of the risk management process.
- Uses appropriate methods to manage the risks that the Bank generally undertakes or to which it may be exposed, including the use of models to predict, identify, measuring, monitoring, hedging, mitigating, and reporting them. Ensures that the identification and assessment of risks are not based solely on quantitative information or data derived from the use of models, but also on qualitative approaches, and informs the Board of Directors, through the Risk Management Committee, of the assumptions on which the models and risk analyses are based, as well as any potential shortcomings thereof.

- It specifies (in cooperation with the relevant departments/divisions) the Bank's risk limits by identifying/defining the individual parameters by type of risk and by counterparty category, sector, country, currency, type of credit, form of financial securities, shares, derivatives, business area, operation, activity, product, system, etc., and monitors compliance with them by establishing the appropriate procedures.
- It shall establish criteria for an early warning system for individual and aggregate portfolios and recommend appropriate procedures and measures for increased monitoring, on an ongoing or periodic basis, depending on the nature of the risks.
- It shall recommend to the Risk Management Committee appropriate techniques for adjusting risks to acceptable levels.
- Sets criteria for early warning systems in individual and overall portfolios and recommends appropriate procedures and measures for increased monitoring, either continuously or periodically, depending on the nature of the risks.
- Conducts annually (with year-end or half-year data) stress tests with scenarios tailored to the nature of the Bank's activities and/or following instructions from the Bank of Greece for all types of risk, in particular credit, market, interest rate and liquidity risks, analyses their results, recommends appropriate policies, and submits the relevant results to the supervisory authorities, as defined from time to time.
- Prepares the reports required for the adequate information of the Management and the Board of Directors on matters within its competence, at least on a quarterly basis.
- It is actively involved in determining capital requirements and develops methodologies for assessing them in order to cover all risks to which the Bank is exposed, and recommends policies for managing them.
- Evaluates possible ways of reducing risks and, to this end, its reports to the Board of Directors through the Risk Management Committee include recommendations for appropriate measures to reduce risks.
- Independently assesses any breaches of risk appetite or risk limits, including determining the cause and preparing a legal and financial analysis of the actual cost of closing, reducing, or offsetting the exposure against the potential cost of maintaining it. It also informs the relevant departments and operational units in general, as well as the Board of Directors, through the Risk Management Committee, and proposes possible corrective actions and reports to the Board of Directors through the Risk Management Committee any significant violations that are identified. The Risk Management Department also reports to any other internal functions and committees of the Bank.

- Ensures that decisions based on its recommendations are taken at the appropriate hierarchical level, are complied with by the relevant Departments/operational units, and are communicated in an appropriate manner to the Board of Directors and the Risk Management Committee.

**Head of Risk Management**

The Head of the Division is appointed by the Board of Directors (upon recommendation by the Risk Management Committee) and his appointment, as well as any replacement, is notified to the Bank of Greece. To qualify, the suitability requirements set out in PEE 224/1/21.12.2023 must be met. Among other things, they have a high level of knowledge and sufficient experience in risk management issues, relevant methods, and international best practices, sufficient expertise, independence, and an appropriate level of seniority to critically review decisions that affect the Bank's risk exposures. They are employed on a full-time, exclusive basis and are independent and have no responsibility for functions other than risk management. They report to the Board of Directors through the Risk Management Committee.

Regarding the responsibilities of the Head of the Risk Management Department, indicatively:

- Provides detailed and comprehensible information on risks and makes recommendations to the members of the Board of Directors through the Risk Management Committee, facilitating their understanding of the overall risk profile of the Bank and the Group.
- Participates in the decision-making process for determining the terms of financing that is not subject to predetermined or general parameters.
- Participates, in an advisory capacity (without voting rights), in the IT Strategy and Planning Committee for the assessment of third-party IT providers' risks under Regulation (EU) 2022/2554 (DORA), as well as in the Executive Committee in the context of assessing the risks of third-party outsourcing and IT providers based on Regulation (EU) 2022/2554 (DORA) for critical functions.
- Submits an annual report to the Board of Directors, through the Risk Management Committee, on matters falling within the competence of the Department.
- Participates in the formulation of recommendations and proposals directly to senior management and through the Risk Management Committee to the Board of Directors for changes in the composition of the Bank's portfolios for the restructuring/regulation of existing loans and the diversification of the provisioning policy.
- Participates in the process of assessment by the supervisory authorities of the adequacy of financial and supervisory capital.

- Supervises and coordinates the activities of the Bank's Risk Management Department and all Group risk management functions.
- Supervise the Risk Management Department in the context of its proper functioning.
- Contributes to the prevention of incidents and, more generally, failures and malfunctions related to risks.
- Participates in the development of quantitative and qualitative metrics for identifying, analysing, controlling, and managing all forms of risk.
- Contributes to the development of resilient, risk-aware processes and operations.
- Supports the work of the RMC.
- Assesses the impact of extraordinary events on the risk level, makes recommendations to the Risk Management Committee and the Board of Directors, and regularly informs the Risk Management Committee of the results of the risk tolerance indicators.
- Recommends the preparation of the RMD budget to ensure the necessary resources for the smooth running of the RMD's work.
- Submitting to the SSC at least quarterly the reports of the Risk Management Department as required by the applicable regulatory framework.
- They are available at all times to the non-executive members of the Board of Directors, who are able to communicate directly with the Head of Risk Management on important risk issues, including any developments that may not be related to the Bank's risk strategy and risk appetite.

The detailed responsibilities of the Head of the Risk Management Department are described in the Rules of Procedure of the Department.

The Board of Directors of the Bank, at its meeting on 30.06.2022, following the recommendation of the members of the Risk Management Committee, appointed Mr.Sotirios Papakonstantinou of Ilias as Head of the Risk Management Department, in accordance with the applicable legal framework. Mr Papaconstantinou has been assessed for his competence and suitability by the supervisory authority (Bank of Greece).

**Evaluation of the Internal Audit System**

The Bank has established a Policy and procedure for the 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 par. 3 of Law 4706/2020), which describes how to assess the adequacy of the IAS. The Policy and the procedure include the description of the objects under audit, the periodical character of the IAS assessment, the range of assessment, as well as the assignment and monitoring of its results.

The latest Assessment Report on the adequacy of the Group's Internal Audit System covered the three-year period 2021 – 2023 and was conducted in accordance with the provisions of Act No. 2577/2006 of the Governor of the Bank of Greece, in June 2024, by Forvis Mazars S.A., submitted to the Bank's Board of Directors through the Audit Committee and subsequently to the Bank of Greece. As a result of the assessment based on the audit procedures performed, 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 Business Claims Agencies Single-Member S.A." and "Optima Asset Management Mutual Fund Management Company S.A."

## 8. Remuneration Policy

Specifically, the Bank adopted a Remuneration Policy for the Members of the Board of Directors in accordance with the provisions of Articles 109-112 of Law 4548/2018, as in force, which fully complies with the provisions of Law (4548/2018), Law 4261/2014, and PEE 231/15.07.2024. The Remuneration Policy applies to the payment of remuneration from the 2023 financial year onwards and is valid for a period of four years. It is subject to periodic review for updating purposes, in accordance with the applicable regulatory framework and is posted, as applicable, on the Bank's website https://www.optimabank.gr/media/bzkpmf0r/p43_politiki_apodoxon_melon_ds.pdf. The Remuneration Policy is equal between genders, in accordance with 2 of Article 84 of Law 4261/2014.

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

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

**Sustainable Development Management Committee**

In virtue of the decision of the Bank's Board of Directors dated 03.10.2024, a Sustainable Development Management Committee was introduced in executive level, as an operating committee of the Bank and its Rules of Procedure was approved, as posted on the Bank's website https://www.optimabank.gr/media/l55cyso2/c35_epitropi_diaxeirisis_viosimis_anaptyxis.pdf.

Purpose of the Committee:

- Provide strategic direction to the Board of Directors on the ESG (Environmental, Social and Corporate Governance) initiatives of the Bank and the Group.
- Assess the ESG Strategy before its adoption.
- Integrate the ESG Strategy elements into the business plan and operations of the Bank and the Group companies.
- Ensure the proper implementation of the Bank's and Group's ESG-related policies and procedures, 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:

| **Full Name** | **Director / non-Director** | **Job title within the Bank** | **Title within the Sustainable Development Management Committee** |
|---|---|---|---|
| **Dimitrios Kyparissis, son of Apostolos** | Member of the Board of Directors | CEO, Executive Director | Chairman |
| **Angelos Sapranidis, son of Nikolaos** | Member of the Board of Directors | Executive Director, Head of Finance | Permanent Director |
| **Theodoros Georgakopoulos, son of Nikolaos** | Non-Director | Head of Credit and Recoveries | Permanent Director |
| **John Parnis, son of Dimitrios** | Non-Director | Head of Human Resources | Permanent Director |
| **Konstantinos Vatousis, son of Charalambos** | Non-Director | Head of Strategy, Investor Relationsand Sustainable Development | Permanent Director |
| **Alexandros Vlagoulis, son of Panagiotis** | Non-Director | Head of Marketing and Products | Permanent Director |
| **Paschalis Giouchas, son of Pelopidas** | Non-Director | Head of Technology and Operations | Permanent Director |
| **Paris Oikonomou, son of Polycarpos** | Non-Director | Head of Wholesale Banking | Permanent Director |

| Full Name | Director / non-Director | Job title within the Bank | Title within the Sustainable Development Management Committee |
|---|---|---|---|
| **Dimitrios Papageorgopoulos, son of Georgios** | Non-Director | Head of Retail Networks | Permanent Director |
| **Anastasia Petsinari, daughter of Theocharis** | Non-Director | Head of Corporate Governance & Legal Services (General Counsel) | Permanent Director |
| **Antonios Mouzas, son of Athanasios** | Non-Director | Head of Brokerage | Permanent Director |
| **Sotirios Papakonstantinou, son of Ilias** | Non-Director | Head of Risk Management | Regular Participant (non-voting) |

The Chairman of the Committee may invite any Director, executive of the Bank or its subsidiaries, or other person (employee, associate) whom the Committee deems capable of assisting it in the performance of its duties.

***Responsibilities of the Committee***

The main tasks and responsibilities of the Committee are:

1. Evaluating the ESG strategy and recommending to the Board of Directors ESG-related initiatives, in alignment with the strategic directions set out in the overall Business Plan of the Bank and the Group.
2. Ensuring regulatory compliance and alignment of the Bank and the Group with applicable Greek and European legislation on ESG issues (e.g., the EU Taxonomy, the ECB's expectations for CR&E risks, Corporate Sustainability Reporting Directive (CSRD), ESG Pillar 3 Reporting], and Greece's National Climate Action Plan, etc.).
3. Approval and monitoring of the implementation of specific ESG action plans and projects, which must be aligned with the ESG strategy and objectives of the Bank and the Group, as well as assigning tasks to the appropriate Departments/units for ESG-related issues.
4. Approval of relevant ESG policies, such as the Sustainability Policy, amendments to lending policies incorporating ESG factors, etc.

5. Regularly reviewing ESG-related KPIs, monitor progress against ESG targets and performance and ensuring that all relevant commitments are met.
6. Adherence to the terms of the Partnership for 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 decides or where appropriate.
7. Evaluating and approving ESG reports and ensuring that ESG reports are in compliance with the relevant Standards and Guidelines (Sustainability Report, Environmental Report, etc.).
8. Evaluating and approving ESG education and awareness initiatives.
9. Establishing any ESG-related KPIs linked to variable pay and performing incentive plans and submit them to the relevant Bank committees for final approval.
10. Updating the risk management frameworks and policies of the Bank and the Group to incorporate procedures for identifying, measuring, and effectively managing climate and environmental risks (CR&E risks) and identifying the Bank's and the Group's activities and assets exposed to CR&E risks, as well as measuring the impact. The Risk Management Department is ultimately responsible for this planning, but the Committee will provide support and input where necessary.
11. Approving the introduction of Green Products and Services.
12. Developing Sustainability Communications through reports and external communication campaigns.

***Meetings of the Sustainable Development Management Committee within 2025***

During 2025, the Sustainable Development Management Committee met three (3) times. The Committee members' average meeting attendance rate was 100%.

**Enhancing the existing governance in order to integrate the management of climate related and environment risks (CR&E risks)**

**A. ESG Roadmap**

As part of the implementation of the Bank's action plan for the gradual integration of the expectations set out in Annex 1 of the guidance document published by the Single Supervisory Mechanism (SSM) on the effective management of ESG risks (**ESG Roadmap**), the Bank has taken the following actions to strengthen its existing governance for the integration of climate and environmental risk management (CR&E risks) by 2025:

I. In January 2025, the Bank submitted a progress report to the Bank of Greece on the progress made in implementing the actions of the Bank's updated action plan for the initial phased integration of the first four of the thirteen expectations listed in Annex 1 of the Single Supervisory Mechanism (SSM) guidance document on the effective management of ESG risks (ESG Roadmap).

II. In February 2025, the Sustainable Development Management Committee, at its meeting held on 24.02.2025:

- Decided to extend the roadmap in order to meet the expectations set out in No. 5,6,7,8,9,11 of the SSM on the effective management of ESG risks (ESG Roadmap). In this context, it adopted 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 existing risks. The Bank's objective is to integrate climate and environmental (CR&E) risks into its risk management framework by identifying existing risk management processes in which CR&E risk should also be taken into account. In addition, responsibility is to be shared across all three lines of defence for the holistic oversight of climate and environmental risks. This action plan (ESG Roadmap), which incorporates the above expectations of the SMM, was approved by the Bank's Board of Directors at its meeting on 05.03.2025, and submitted to the Bank of Greece.

-Approved an integrated sustainable development strategy, in which specific commitments, targets and performance indicators are developed to monitor the implementation of the objectives set in the areas of environment (E), society (S) and corporate governance (G), as formulated by the Strategy, Shareholder Services and Sustainable Development Department, in cooperation with the relevant business areas and under the guidance of an external consultant. The above targets, which have 2024 as their base year, are planned to be implemented over a two-year period (2026) and are included in the sustainability report that forms part of the Optima Bank Group's annual management report for the 2025 financial year.

III. In November 2025, the Sustainability Management Committee, in accordance with the guidelines of the CSRD (corporate sustainability reporting directive), confirmed that the following issues, which were identified as the most material for the sustainable operation of the Bank through the Double Materiality Analysis conducted in 2024, remain the most material for the sustainable operation of the Bank in 2025.

Identified Material Topics 2025:

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

Based on these issues, the Bank makes specific disclosures in its sustainability report, which forms part of the Optima Bank Group's annual management report for the 2025 fiscal year.

**B. Sustainable Development Policy**

By decision of the Board of Directors, dated 16.01.2025, upon recommendation of the Sustainable Development Management Committee, the Bank approved the Sustainable Development Policy included in its Rules of Procedure and posted on its website: 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 December 2022 amending Regulation (EU) No. 537/2014, Directive 2004/109/EC, Directive 2006/43/EC, and Directive 2013/34/EU, regarding the submission of sustainability reports by companies, which has already been transposed into Greek law by Law 5164/2024 and in accordance with Article 14, par. 3 case (l) of Law 4706/2020.

The purpose of the Policy is to set the basis for integrating sustainability into all of the Bank's operations, with the aim of creating value for environmental protection, promoting social well-being, and strengthening governance practices.

Following the Bank's accession to the United Nations Global Compact (UN Global Contact) in May 2025, the Sustainable Development Management Committee unanimously approved and recommended to the Bank's Board of Directors the updating of the Sustainable Development Policy at its meeting on 21.11.2025, unanimously approved and recommended to the Bank's Board of Directors the updating of the Sustainable Development Policy. The updated Sustainable Development Policy refers to the Bank's commitment to respect human rights, its alignment with the Ten Principles of the United Nations Global Compact, and the equal treatment of all its stakeholders.

**C. Environmental Policy**

By decision of the Sustainable Development Management Committee of 21.11.2025, the Bank adopted an Environmental Policy, which is posted on its website: https://www.optimabank.gr/media/rjyj3iqj/p66_perivallontiki_politiki.pdf

This Policy was developed as part of the implementation of an Environmental Management System undertaken by the Bank to ensure the proper and effective management of its environmental aspects.

The Policy sets out the Bank's commitments to reducing its environmental footprint and complying with the regulatory framework, as well as its priorities for energy saving, effective resource management, and the integration of environmental criteria into credit rating procedures. Finally, special mention is made of the importance of training and raising staff awareness of environmental issues.

**D. Development of a Sustainable Finance Framework**

The Bank, in collaboration with a service provider and with co-financing from the EBRD (European Bank for Reconstruction and Development), has begun developing a sustainable finance framework. The aim of this project is, on the one hand, to create a sustainable finance framework that will define the criteria for classifying loans as sustainable/green and, on the other hand, to develop a platform that will be fed with customer/business and loan data in order to categorise them accordingly.

**E.** Further detailed information on ESG issues is also provided in the sustainability report, which forms part of the Optima Bank Group's management report for the 2025 fiscal year.

## 10. Transactions with related parties

The Bank has established and implements policies and procedures on Related Party Transactions in order to identify, evaluate, approve, and disclose its transactions with Related Parties appropriately. Detailed information is included in note 40 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'). According to the ESMA definition, a non-IFRS measure is a measure of historical or future financial performance, financial position or cash flows that excludes or incorporates amounts that would not have the corresponding adjustments in the comparative IFRS measures.

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 | 2025 | 2024 |
|---|---|---|---|
| **Loans and receivables from pre-provisions customers** | 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 | 5,118,017 | 3,657,499 |
| **Provisions for write-downs of loans and other claims by clients** | Provisions for write-downs of loans and other claims by clients | 68,256 | 44,901 |
| **Due to customers** | Customer deposits and checks payable - Calculation: Demand Deposits + Savings Deposits + Term Deposits + Restricted Deposits + Other Deposits + Checks Payable | 6,298,580 | 4,643,412 |
| **Index of loans after provisions to deposits (LDR)** | 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) | 80.17% | 77.80% |
| **Total operating expenses** | Total operating expenses | 66,508 | 57,879 |
| **Profit or loss before tax** | Total results before provisions and taxes | 231,045 | 196,844 |
| **Risk weighted assets (RWAs)** | Assets and off-balance sheet items, determined on a risk-weighted basis, in accordance with Regulation (EU) 575/2013 | 5,624,931 | 3,988,249 |
| **Common Equity Tier 1 capital ratio (CET 1)** | 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. | 12.19%* | 14.40% |
| **Total capital adequacy ratio (TCR)** | 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. | 14.87%* | 14.40% |
| **Liquidity coverage Ratio (LCR)** | 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. | 204.14% | 246.54% |
| **Net stable funding ratio (NSFR)** | The net stable funding ratio is defined as the amount of available stable funding in relation to the amount of fixed funding required. | 127.97% | 127.11% |

* 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 2025 financial year submitted to the Ordinary General Meeting of the Bank's shareholders contains detailed information with reference date 31.12.2025, 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, 31st 2025, 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 two hundred and twenty-one million three hundred and twenty-two thousand four hundred and twenty-six (221,322,426) common registered voting shares with a nominal value of one euro and fifteen cents (EUR 1.15) 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 2025, 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 | 19,806,504 | 8.95% |
| IOANNIS VARDINOYANNIS | 2 | 16,066,575 | 7.26% |

1. The above 19,806,504 shares of the Bank are indirectly held by MOTOR OIL (HELLAS) CORINTH REFINERIES S.A., through its 100% owned subsidiary IREON INVESTMENTS LTD

   The above 16,066,575 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 12,894,501 shares of the Bank, i.e. 5.83%) and

   - BAYNOUN LIMITED (owner of 3,172,074 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 Ordinary General Meeting of the shareholders held on 29/04/2025, approved the purchase of the Bank's own shares, namely the acquisition of up to 2,608,695 ordinary shares of the Bank, at a price range per share from €1.15 (minimum price) to €8.00 (maximum price), within a period of 24 months from the date of the decision of the General Meeting. The total cost for the acquisition of treasury shares under the programme will not exceed the amount of €3,000,000.00 while the total number of treasury shares to be acquired in each case will not exceed 10% of the paid-up share capital.

The Ordinary General Meeting also authorised the Board of Directors to take any necessary or appropriate action in the context of the implementation of the above-mentioned decision of the Ordinary General Meeting.

The commencement date of the plan was 19 December 2025, following the approval of the Bank of Greece (for the repurchase of the Bank's own shares) on 10/12/2025 and the relevant decision of the Board of Directors on 18/12/2025.

**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 for Members of the Board of Directors and the Bank's Staff Remuneration Policy (Severance Compensation), contracts with members of the Board of Directors of the Bank executive management, and senior management may include special terms providing for specific compensation in the event of mutual termination or early 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, the Chief Executive Officer, and the Executive Board Member) as well as with senior executive personnel (Members of the Executive Committee) providing for the payment of compensation equal to the total of 24 gross monthly earnings in the event of mutual termination of the agreement or 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.

**Sustainability Statement of Optima bank Group**

# General information

## ESRS 2 General Disclosures

## Basis for preparation

### BP-1 – General basis for preparation of sustainability statements

This Sustainability Statement of the Optima bank Group (the "Group") covers the period from 1 January to 31 December 2025 and reflects its performance in the Environment, Society and Governance (ESG) sector. The Sustainability Statement of the Optima bank Group ("Statement") has been prepared on a consolidated basis, as have the financial statements, and relates to Optima bank S.A. (the "Bank" or "Optima bank") and its subsidiaries.

As part of the Double Materiality Assessment ("DMA"), the Impacts, Risks and Opportunities ("IROs") associated with the Group's entire value chain are examined, where feasible. Upstream activities include services and products from suppliers, as well as the impact of external financial, geographical and regulatory parameters. Downstream activities cover the full range of the Group's services, such as corporate and retail banking, investment services, asset management, factoring and leasing, with a focus on corporate and retail clients.

No subsidiary included in the consolidation is excluded from the consolidated Sustainability Statement, and no information relating to intellectual property, know-how or innovation has been omitted. Upcoming developments and ongoing discussions are also included in the Statement.

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

The Group applies the time horizon determinations - short, medium and long term - as prescribed by the European Sustainability Reporting Standards ("ESRS").

For estimates and uncertainties related to the Group's supply chain, please refer to section E1-6.

It is worth noting that, compared to the previous reporting period (2024), no errors have been recorded. Additionally, the following change has been made to accurately reflect the management levels included in the "top management," as defined by the Group:

- S1-9: Top management includes personnel up to two levels below the executive and supervisory bodies (N-2, where N = the Chief Executive Officer). Consequently, the data for the year 2024 (47 female – 34% and 91 male – 66%) have been recalculated to include the corresponding personnel in both years to ensure comparability.

The disclosures of the Sustainability Statement are made in accordance with the requirements of the European Corporate Sustainability Reporting Directive ("CSRD"). At the same time, section ESRS S4 makes use of a disclosure derived from the GRI Standards, namely 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) | Corporate Governance Statement |

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

Although the Group's average number of employees does not exceed the average number of 750 employees during the 2025 financial year, the Sustainability Statement discloses information as required by ESRS S1 and ESRS S4, which have been assessed as material under the DMA due to the Group's commitment to enhancing accountability and transparency.

## Governance

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

Optima bank is managed by the Board of Directors ("Board" or "BoD"), in accordance with Article 9 of the Bank's Articles of Association and Article 77 par. 1 of Law 4548//2018. The Board operates in accordance with Greek legislation and the Bank's Articles of Association, and was elected by the Extraordinary General Meeting of 22.03.2023, for a four-year term of office, which expires with the election of a new Board of Directors by the Annual General Meeting in the year of expiry of the term of office, i.e. until 10.09.2027. It was constituted as a body on 23.03.2023.

By decision of the Annual General Meeting of 23 May 2024, the number of members of the Board of Directors was increased from ten (10) to eleven (11) with the election of an additional Non-executive Member for the remainder of the term of the Board elected on 23.03.2023, i.e. until 10.09.2027. The Board of Directors was reconstituted by the decision of 27.05.2024 consisting of eleven (11) members.

Following the resignation of an independent non-executive member of the Board of Directors on 31.10.2024, the Board decided unanimously, in accordance with Article 82 of Law no. 4548/2018 and Article 10 par. 2 of the Bank's Articles of Association, to continue temporarily to manage and represent the Bank without replacing the member until he/she is replaced by a person who meets the criteria of individual and collective suitability in accordance with the applicable legislation and the Suitability Policy for the Members of the Board of Directors of the Bank and is reconstituted with the remaining members. Thereafter, the Board of Directors of the Bank at its meeting of 20 March 2025 elected a new Independent Non-Executive Director to replace the resigned member and reconstituted the Board of Directors. Therefore, as of 31.12.2025 the Board of Directors consisted of eleven (11) members, namely two (2) executive members and nine (9) non-executive members, of which five (5) are independent, representing 45.5% of the total. Regarding the gender composition of the Board of Directors, nine (9) members are male and two (2) members are female, i.e. a percentage corresponding to 25% of the total number of its members, after rounding, in accordance with article 3 par. 1(b) of L. 4706/2020 and the average ratio of female to male Board members is 2:9. Therefore, each gender is adequately represented on the Board.

The curricula vitae of the members of the Board of Directors are available on the Bank's corporate website and in the Corporate Governance Statement, where details of their experience in the banking industry are presented. Although there is no employee representation on the Board of Directors, trade union bodies retain co-decision rights. Any substantial operational change requires information or consultation with the most representative trade union bodies, in accordance with the current legal framework.

In the reporting period, roles and responsibilities have been defined to monitor, manage and oversee impacts, risks and opportunities at three levels: Board of Directors, Management and operational level. This governance structure ensures the integration of sustainability issues into core business processes and oversight of ESG issues (including impacts, risks and opportunities).

The administrative, management and supervisory bodies consist of the Board of Directors and its committees, namely: Remuneration and Nominations Committee, Audit Committee, Risk Management Committee ("RMC"), Executive Committee (“ExCo”) and the Head of Internal Audit. The RMC oversees climate and sustainable development risks, while the Audit Committee assesses the effectiveness of internal audit, governance and risk management practices in relation to ESG risks. The Remuneration and Nominations Committee aligns the performance objectives of senior management with the sustainable growth strategy and risk tolerance. Further information on the composition, expertise and experience of these bodies is set out in the Corporate Governance Statement.

At management level, the Sustainability Management Committee (“SMC”) is responsible for reviewing, approving and monitoring the implementation of the Sustainability Strategy. At an operational level, the Strategy, Investor Relationships (“IR”) and Sustainable Development Division leads all ESG-related initiatives. The Sustainable Development Department, which is part of this Division, recommends the strategy to the Management and the Board, ensuring that the business objectives are aligned with the creation of value for society and the environment, in accordance with best practices. The responsibilities of the ESG Coordinator include, among others, participation in the development and recommendation of the Group's sustainable development strategy, management of ESG initiatives, monitoring the broader ESG framework in order to make proposals for the incorporation of standards or best practices, ensuring alignment with regulatory and prudential requirements, promoting the Bank's sustainable development to its stakeholders (investors, customers, shareholders, etc.), communicating with institutional bodies and supervisory authorities on ESG issues, coordinating employee training programs on sustainable development issues, working with the relevant Divisions to identify any environmental, social or governance related risks and opportunities that the Bank could exploit, etc.
The ESG Risk Officer in the Regulatory Affairs Department of the Risk Management Division is responsible, among other responsibilities, for reviewing and updating policies, procedures and risk thresholds to incorporate climate-related & environmental (“CR&E”) risks and align them with the Bank's broader strategic objectives. Finally, there is a cross-functional sustainable development community that is responsible for integrating CR&E in day-to-day operations, decision-making and performance management.

## Board of Directors

The Board of Directors has full responsibility as well as oversight of the sustainability strategy, including all matters related to climate and environmental risks, performance in the respective areas and reporting of the relevant results. At the same time, it ensures that this strategy is fully aligned with the Group's vision, mission and values. Sustainable development issues are included in the agenda of the Board of Directors' meetings, in line with internationally recognised best practices.
Senior management is responsible for the implementation of policies and procedures relating to climate and environmental risks, as well as for the integration of the respective risks into the Group's main business functions and activities. At the same time, senior management establishes a clear governance structure and allocates roles and responsibilities for environmental and climate issues to different levels of the organisation. Finally, it promotes a culture of awareness and commitment to these risks, both among employees and other stakeholders. The Board of Directors approves the Bank's environmental strategy and risk management framework, together with the corresponding policies, and oversees their implementation. At a more specific level, the Risk Management Committee oversees sustainable development risks and advises the Board of Directors on the definition and monitoring of acceptable risk tolerance. At the same time, it assesses the implementation of the risk management strategy by senior management. The RMC also reviews the solvency and liquidity profile of the organisation, submitting the Risk Appetite Framework (RAF) to the Board of Directors for final approval. On the other hand, the Audit Committee provides the Board of Directors with an independent assessment of ESG risks, reviews the effectiveness of internal controls and corporate governance mechanisms, and ensures that appropriate practices are in place to manage ESG risks.

## Sustainability Management Committee

To ensure effective oversight of sustainable development issues, the Sustainability Management Committee has been established at the executive level as an operational committee of the Bank. The SMC is chaired by the CEO and the heads of the following sectors participate as full members: Strategy, IR and Sustainable Development, Legal Services & Corporate Governance, Credit and Recoveries, Technology and Operations, Retail Networks, Wholesale Banking, Brokerage, Finance, Human Resources ("HR"), Products and Marketing. The Head of Risk Management participates as a regular participant without voting rights.

**Main responsibilities of the SMC:**

- Formulation and recommendation of sustainability strategies to the Board of Directors.
- Monitoring compliance with european and national legislative frameworks
- Adoption of sustainable development projects, policies and actions
- Evaluation of ESG indicators and targets
- Strengthening international cooperation and participation in standards
- Adoption of reports and reports
- Development of educational actions to raise awareness
- Defining KPIs and linking them to the remuneration programs
- Review of risk management frameworks with integration of environmental parameters
- Decisions on new 'green' products
- Designing a communication policy on sustainability issues

The implementation of the objectives set and approved by the Board is monitored through periodic reviews and data analysis, using key performance indicators. This ongoing evaluation process allows both the SMC and the Board to monitor progress, adjust actions where necessary and ensure that the strategic focus is maintained. Tools such as performance dashboards and sustainability reports are the main means of monitoring implementation progress.

The SMC shall meet quarterly or as appropriate. A quorum requires the presence of 50% +1 of the members, and decisions are taken by an absolute majority of the members present. In the event of a tie, the Chairperson shall have the casting vote. The SMC is supported by a secretary to organize the issues, record the minutes and prepare the agenda. The SMC reports to both the Executive Committee and the Board of Directors through quarterly reports. The SMC has access to all the necessary resources and can make use of external consultants.

During 2025, the SMC met 3 times. At the meetings, the following items were discussed and approved:

- Sustainable Development Policy
- Submission of progress reports to the Bank of Greece regarding the action plan prepared by the Bank for the management of environmental and climate risks
- Results of Double Materiality Analysis
- Publication of the Sustainability Statement
- Sustainable development strategy (Objectives and commitments)

## Strategy, IR and Sustainable Development Division

The Strategy, IR and Sustainable Development Division reports administratively to the Chief Executive Officer of the Bank and is supervised by the Head of the Division. Among its main objectives are the definition of the Group's strategy, the preparation of a strategic and business plan based on its vision, as well as the strengthening of business activity through partnerships, mergers or acquisitions. In addition, the Strategy, IR and Sustainable Development Division manages shareholder relations and ensures effective communication with the investment community. At the same time, it sets sustainable development targets and monitors relevant ESG performance indicators.

The **Sustainability Department of the Strategy, IR and Sustainability Division** plans and proposes a strategy for the Group's sustainability to the Group's leadership and the Board of Directors, ensuring that business objectives are in line with social and environmental responsibility. The Sustainability Department keeps abreast of best practices at national and international level, sets targets aligned with the broader strategy and monitors their implementation. The Department also ensures the Group's inclusion in non-financial performance indicators and international initiatives and prepares relevant supervisory or other reports.
The ESG Coordinator reports to the Strategy, Investor Relations and Sustainable Development Division, with the aim of overseeing all sustainability initiatives and the faster, more effective adoption of sustainable development practices, in collaboration with the Head of Strategy, IR and Sustainability. Propose actions on sustainable development issues in cooperation with the relevant divisions and monitor KPIs related to the targets set. It participates in the formulation of the sustainable development strategy and responds to requests from investors or other stakeholders regarding the Group's environmental, social or governance performance. The ESG Coordinator is also responsible for creating content that promotes the Group's sustainable development to stakeholders and for producing non-financial reports resulting from legislative or regulatory requirements. The ESG Coordinator works with the relevant divisions, in particular the Risk Management Division, to identify risks related to environmental, social or governance issues, as well as to seek opportunities that the Group could exploit. The ESG Coordinator communicates with institutions and regulatory authorities on relevant issues, takes initiatives for the Group's participation in international organisations and sustainable development metrics and coordinates employee training programmes on sustainable development issues, ensuring that all employees are informed about the optimal practices of sustainable development.

## Other business units

The Group's business units ensure the integration of ESG parameters in their daily operations, decision-making processes, as well as in the monitoring and evaluation of performance. From 2024, a clear division of roles and responsibilities for environmental and climate risk management has been established, and through the relevant committees, communication channels have also been defined at organisational level. The aim of this approach and the redistribution of responsibilities between the committees involved is to strengthen the oversight of environmental and climate risks.
This updated structure supports systematic risk assessment, the integration of impact, risk and opportunity management into the Group's structure, the development of mitigation measures where required and the strengthening of the decision-making process. At the same time, the Group invests in the strengthening of control systems and internal processes related to sustainable development issues, in order to achieve optimal and effective management.
In addition, the Group implements training programs to enhance the knowledge and skills of its executives on ESG issues. In 2025, in addition, through LinkedIn's learning platform (LinkedIn learning), 35% of staff were trained on topics related to the key principles of sustainable development. The aim of this training was to enhance the understanding and application of sustainable development principles in daily work and in the formation of a more responsible and sustainable banking organisation. Finally, all employees have

the opportunity to participate in conferences and training programmes through professional networks and bodies of which the Group is a member, at local or international level.

During 2025, no specific sustainability training programmes were conducted for the Board of Directors. However, the Board Members were informed on issues related to sustainable development through the relevant committees (Audit Committee, Risk Management Committee), as mentioned below. In addition, in order to ensure that the skills of the Board Members are linked to the strategy for sustainable development and responsible governance, the Bank intends to consider and design targeted programmes and partnerships to enhance the Board Members' knowledge on sustainability issues.

The Group maintains a clear commitment to high ethical standards and corporate governance principles to ensure transparency and responsible operation in all aspects of its business. This approach enhances the effectiveness of the Group's actions and forms effective communication with shareholders and other stakeholders. The relevant management and supervisory bodies are responsible for guiding and supervising ethical conduct and standards of conduct. The Board of Directors regularly evaluates the implementation of the corporate governance framework, with the aim of ensuring compliance with ethical principles, legal requirements and the Group's strategy. It is responsible for defining the corporate values, approving the strategy and business plan, and monitoring their implementation. At the same time, it regularly reviews policies, procedures and the Code of Ethical Conduct and Ethics, ensuring that a culture of integrity is created and reinforced. This structured approach supports effective strategic decision-making. In addition, business risks and opportunities are assessed, and the desired culture is embedded in all management systems and functions of the Group.

The Audit Committee monitors compliance with regulatory requirements and supervisory obligations through quarterly reports to the competent authorities. These reports cover issues such as anti-money laundering, avoiding conflicts of interest, anti-monopoly regulation and consumer protection. The Remuneration and Nominations Committee ensures the unbiased selection and nomination of the members of the Board of Directors and the Audit Committee who are not members of the BoD, as well as the determination of their remuneration, with the aim of protecting the interests of shareholders. Nevertheless, the Board of Directors bears the ultimate responsibility for defending the interests of the Group.

The Risk Management Committee ensures the development and continued effectiveness of the risk management system by integrating requirements into operational decision-making for all types of risks. Supervision extends to all activities of the Bank and its subsidiaries, covering the monitoring and addressing of business conduct issues. The Executive Committee and the Internal Audit Division are responsible for implementing and enforcing internal policies and procedures, ensuring that any problems are promptly identified and dealt with effectively.

The expertise of the administrative, management and supervisory bodies in matters of business conduct is reflected in their CVs, which are reported in the Corporate Governance Statement. Furthermore, specifically for the Board Members, the criteria of individual suitability, namely competence, knowledge, skills and experience as well as reputation, honesty, integrity and guarantees of good moral character as stated in the Suitability Policy for the members of the Board of Directors are fulfilled. In addition, the CVs of the Members of the Executive Committee and the Head of the Internal Audit Division are included in the Corporate Governance Statement.

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

In the year 2024, the Group started to formulate its sustainability strategy through the preparation of a comprehensive action plan, the implementation of which started in 2025 (with a base year of 2024) and will continue to be implemented during 2026. In this context, and in full compliance with the requirements of the CSRD, it has identified the material impacts, associated risks and opportunities related to sustainable development. Based on this information, the sustainability strategy was formulated, accompanied by performance indicators to monitor progress. The targets and metrics are endorsed by the SMC and the Board of Directors, and progress of actions is planned to be monitored on a six-monthly basis. At the same time, an action plan has been prepared and submitted to the Bank of Greece on the expectations of the Single Supervisory Mechanism (SSM) regarding the management of climate and environmental risks.

The Risk Management Division applies best practice methods to analyse and address risks related to both the business activity and the internal and external environment. The outreach strategy follows a structured process, aiming at business continuity and enhancing sustainability. At the same time, the Division recommends to the Risk Management Committee the best techniques for adjusting and managing risks within acceptable limits.

The Risk Management Committee is responsible for keeping the Board of Directors fully informed about the risk management strategy and the acceptable level of risk exposure in the exercise of its operational responsibilities. This oversight ensures that all forms of risk are adequately covered, assessed and managed at all operational levels of the Group. The RMC ensures the development and continuous effectiveness of the internal risk management system, integrating the relevant processes into strategic decision-making, in all the Group's activities and services. Decisions on material transactions and investments are included, and the Board of Directors takes into account the respective impacts, risks and opportunities as part of its strategic oversight.

During 2025, the Risk Management Committee discussed in a total of 4 meetings on the integration of ESG criteria into the Bank's operations. Indicatively, the main issues discussed were the following:

1. Presentation of an Action Plan to incorporate an additional six SSM expectations for the effective management of ESG Risks (ESG Roadmap).
2. Revision of the RAF policy, incorporating ESG indexes.
3. Presentation of the 'Business Environment Report' and 'Materiality Assessment Report', as well as the quarterly response letters to the Bank of Greece in the context of the ESG Roadmap progress report.
4. Enriching the calculation of the portfolio Expected Credit Loss by incorporating ESG criteria.

The BoD regularly reviews all material impacts, risks and opportunities, monitoring and evaluating the status and effectiveness of management strategies and actions related to sustainability issues. According to the Operating Regulations of the Sustainability Management Committee, the SMC is required to prepare and submit a quarterly report (statement) to the Board of Directors, analysing the progress of the issues within its scope. The statement includes the management of sustainability issues identified by the Board of Directors for the period, as well as an assessment of the performance of policies, actions, indicators and strategic objectives.

For more information about the SMC and the BoD, please refer to the section "GOV-1 – The role of the administrative, management, and supervisory bodies".

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

To date, sustainability related performance has not been incorporated in incentive schemes; therefore, so no direct correlation between remuneration and sustainable development criteria has been established. However, under the revised Staff Remuneration Policy, climate and environment related risk factors have been qualitative incorporated into the performance evaluation criteria, while criteria such as customer satisfaction score (NPS), contribution to the promotion and development of the Bank's sustainable development policy and alignment of operations with the sustainability-related framework and objectives are considered on a qualitative basis way. These revisions represent a fundamental step in integrating CR&E risks into the Bank's overall remuneration framework. As the Bank's ESG strategy and related KPIs are further developed, additional enhancements to remuneration policies are expected to ensure continued alignment with evolving sustainability objectives.

Similarly, the remuneration of the members of the Board of Directors is not dependent on their performance in sustainability matters. However, under the revised Board of Directors Remuneration Policy, qualitative non-financial criteria are taken into consideration in variable remuneration, such as criteria related to the Bank's corporate social responsibility, as well as criteria of compliance, alignment with risk appetite,

customer satisfaction, and achievement of strategic objectives, including climate and environmental risk. Specifically, in this policy it stated that all components of variable remuneration recognised for Directors, are linked to the Bank's performance, they ensure prudent risk management and promote the achievement of long-term strategic objectives.
Alignment of the incentives with the Group's strategic objectives in the area of sustainability is expected to be implemented in the coming years. This approach may involve setting specific targets and indicators, such as reducing carbon emissions, improving energy efficiency or promoting social responsibility actions, which, when achieved, will be linked to variable remuneration elements.
The HR Division, in collaboration with the Strategy, IR and Sustainable Development Division, plans to introduce specific ESG-related KPIs linked to variable pay and performance schemes. These metrics will be submitted for approval to the relevant committees, namely the SMC and the Remuneration and Nominations Committee. In the course of this process, the percentage of variable pay that will depend on sustainability-related objectives or impacts will be determined.

## GOV-4 – Statement on due diligence

| **CORE ELEMENETS OF DUE DILIGENCE** | **PARAGRAPHS IN THE SUSTAINABILITY STATEMENT** |
|---|---|
| a) Embedding due diligence in governance, strategy and business model | GOV-2 – Information provided to and sustainability matters addressed by the undertaking's 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 undertaking's 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 workers and workers' representatives about impacts<br>S4-2 – Processes for engaging with consumers and end-users about impacts<br>E1-2 – Policies related to climate change mitigation and adaptation<br>E5-1 – Policies related to resource use and circular economy<br>S1-1 – Policies related to own workforce<br>S4-1 – Policies related to consumers and end-users<br>G1-1 – Business conduct policies and corporate culture<br>ES – Policies related to entity-specific topic |
| c) Identifying and assessing adverse impacts | IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities<br>SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model |
| d) Taking actions to address those adverse impacts | E1-3 – Actions and resources in relation to climate change policies<br>S1-4 – Taking action on material and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches |
| e) Tracking the effectiveness of these efforts and communicating | E1-4 – Targets related to climate change mitigation and adaptation<br>E1-5 – Energy consumption and mix<br>E1-6 – Gross Scopes 1, 2, 3 and total GHG emissions |

| | |
|---|---|
| | S1-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities<br>S1-16 – Remuneration and pay gap metrics |

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

The Group's Internal Control System (ICS) consists of three independent units: the Internal Audit Division, the Risk Management Division and the Compliance Division. These units are supervised by the relevant ccommittees of the Board of Directors, namely the Audit Committee and the Risk Management Committee and constitute a fully functional and effective internal control framework. The policies and procedures governing the ICS are approved by the Board of Directors of Optima bank, while its implementation is aimed at identifying and managing all risks assumed by the Group, as well as ensuring the accuracy and reliability of the data and information used for the proper presentation of the financial position and the preparation of reliable financial statements. In addition, specific responsibilities have been assigned not only to the above independent units but also to the relevant Board committees.

As far as the Sustainability Statement is concerned, the internal divisions are responsible for the collection and preparation of qualitative and quantitative data, ensuring the accuracy and completeness of the information. These divisions cooperate with the Strategy, IR and Sustainability Division, which is responsible for consolidating the data and overseeing the process, ensuring full alignment with the sustainability strategy and the requirements of the CSRD. The SMC shall ensure, prior to final approval by the Audit Committee and the Board of Directors, that all sustainability-related issues are accurately and effectively captured. In addition, independent third-party assurance provides limited assurance on the information included in the Sustainability Statement to enhance its credibility, ensure compliance with ESRS standards and enhance stakeholder confidence. This process underlines the Group's commitment to transparency, accuracy and accountability in relation to the Sustainability Statement. The above approval process followed is the same as that followed for the financial statements, and includes approval by the Sustainability Management Committee, before final approval by the Audit Committee and the Board of Directors, which provides the highest level of oversight and accountability. The Group has adopted a proactive approach to the identification and prioritisation of sustainability risks. Although to date no formal assessment framework or specific prioritisation methodology has been established for the risks included in the Sustainability Statement, the Group's strategy focuses on further strengthening the relevant management processes. In the future, it is envisaged to strengthen internal controls to ensure the integrity of the Statement and to effectively address any risks that may arise in future reporting periods. In the current period, the Risk Management Division has been following the developments of the Sustainability Statement. In addition, through the "Risk and Control Environment Self-Assessment" (RCSA) process, any operational risks that exist and may prevent the timely and effective submission of the Statement and other supervisory or regulatory reports are regularly reviewed. During 2025 no risks were identified that may affect the process of developing and submitting the Sustainability Statement. As the SMC is composed of representatives of different operational units, any findings during the reporting period are immediately communicated to the relevant Directorate in order to initiate appropriate actions immediately. This process contributes substantially to the establishment of a culture of continuous improvement and proactive management in all areas of sustainability. Continuous monitoring ensures close cooperation with the relevant divisions, timely response to issues, implementation of corrective actions and overall monitoring of the evolution of actions. With regard to sustainability statements, the administrative, management and supervisory bodies receive regular updates from the Sustainability Management Committee and the Risk Management Committee in case findings are identified from the risk assessment and internal controls. Monthly, quarterly or annual updates report on developments, obstacles and new risks in the area of sustainability reporting (statements), keeping decision-makers fully informed.

It is noted that the Sustainability Statement is externally assured and receives a related limited assurance statement to enhance its credibility, comply with ESRS standards and build confidence in stakeholders.

## Strategy

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

The Group, with Optima bank as parent company, maintains an active presence in the Greek market by providing retail and corporate finance services through an extensive service network and by working closely with its subsidiaries to provide integrated financial services. The solutions offered cover the needs of clients in areas such as Corporate and Retail Banking, Asset Management, Factoring, Leasing and Investment Banking. Via these services, the Group seeks to offer an optimal banking experience, to strengthen long-term trust relationships and to contribute to the financial stability of the Greek market. It is noted that there were no material changes in the business sectors or customer groups served, compared to the previous year (2024), and there are no restrictions or prohibitions on offering products and services in specific markets.

As at 31/12/2025, the Group had 626 employees, of which 591 were employed by the Bank, all within the Greek territory.

With regard to the analysis of total revenues according to the ESRS standard areas, the European Commission has not issued a Delegated Act that defines ESRS sectors. As a result, no additional significant ESRS sectors were considered in the materiality assessment. In addition, disclosure requirements regarding revenues in industries such as fossil fuels, natural gas, chemicals, controversial weapons and tobacco products are not applicable due to the nature of the Group's business activities.

The Group's sustainability strategy is based on three key pillars, which are linked to important sustainability issues. The ultimate goal is to integrate sustainability into all the Bank's business activities. The strategy sets out the ambitions, commitments, individual targets and the corresponding performance indicators linked to sustainability, taking into account the results of the Double Materiality Assessment and the Group's business priorities.

The three pillars include:

- **Supporting the energy transition:** The Group is committed to reducing its carbon footprint and integrating environmental considerations into business risk management, while developing transition plans aligned with sustainable practices and goals.
- **Creating value for people and society:** The Group focuses on enhancing customer and employee satisfaction, equal opportunities, data protection and the use of digital solutions to optimise efficiency and experience.
- **Maintaining sound corporate governance:** The Group promotes a culture of ethics, integrity and transparency, ensures the strengthening of anti-corruption and anti-bribery policies, and ensures the protection of whistle-blowers.

The strategy fully covers all material matters that the Bank affects or is affected by through related risks or opportunities that arise, and incorporates financial data, such as revenues, thus providing a comprehensive picture of the Group's sustainability actions and initiatives.

| INFLOWS | CREATION OF VALUE | OUTFLOWS | RESULTS |
|---|---|---|---|
| Financial Capital (Equity, Debit Instruments, Deposits) | Corporate banking<br>Retail banking<br>Asset Management | Net interest income<br>Net fee income / net income / Trading income<br>Total assets<br>Market Share | Climate change adaptation & mitigation<br>Energy/Waste<br>Working conditions<br>Equal treatment and equal opportunities for all |
| Productive capital (Branches and Headquarters, Data Centre, Leased Vehicles) | | Investments in Branches, Buildings and Data Centres | |
| Manufactured Capital (Water, Energy sources, paper) | Factoring services<br>Investment banking<br>Leasing services | Energy consumption<br>Emissions<br>Waste<br>Water | Information related impacts for consumers and/or end-users<br>Innovation and Digitalization<br>Business culture<br>Corruption and Bribery<br>Protection of whistleblowers |
| Social Capital (Stakeholders' engagement, Ethical Business Practices) | | Customer growth rate<br>Customer Satisfaction<br>Finance Access | |
| Human capital (Management and Leadership, Employee Wellbeing, Talent Acquisition and Recruitment) | | Training hours<br>Payroll<br>Satisfaction and Growth of Employees | |
| Intellectual Capital (Processes and Procedures, Technology Integration and Innovation) | | Innovation and Digitalization<br>Social Networks<br>Cloud transition | |

The Group operates in the financial sector, leveraging a wide range of capital - financial, manufactured, physical, social, human and intellectual - to create long-term value. Its sources of funding include equity, debt instruments and deposits, and its operations are based on physical infrastructure, technology and responsible resource management. Its operations are guided by ethical principles, stakeholder engagement, employee development and the encouragement of innovation. The key results of this business include net interest and fee income, asset growth, market share expansion, enhanced customer satisfaction and digital transformation.

The Group's strategy is supported by investments in infrastructure, sustainability initiatives and the strengthening of human capital, reinforcing its overall business approach. The value chain includes upstream financial institutions, suppliers of products and services and depositors, while downstream it serves corporate and retail customers through the branch network and digital channels.

The Group promotes strong strategic partnerships, fully complies with regulations and sustainability initiatives and ensures resilience and sustainable value creation in the long term.

## SBM-2 – Interests and views of stakeholders

In any business process, the role of stakeholders is particularly important in decision-making. Optima bank, together with the Group's subsidiaries, maintain continuous communication with all stakeholder groups through multiple communication channels to ensure that their positions, concerns and expectations are effectively incorporated into the decision-making process.

Key stakeholder groups include customers, employees, investors and shareholders, suppliers and business partners, society and local communities, as well as governmental and regulatory bodies. The Group ensures that cooperation with stakeholders is carried out on a consistent and systematic basis, covering all groups, in a consistent and effective manner.

Specialised Bank and Group executives coordinate the Bank's and the Group's interaction with stakeholders and are responsible for appropriate communication with all stakeholder groups. These executives ensure that open lines of communication are maintained with each individual team, using multiple communication channels, as detailed in the table below.

| STAKEHOLDERS | COMMUNICATION CHANNELS |
|---|---|
| **Customers & Clients** | • Customer satisfaction survey<br>• Daily communication with the Bank's branches<br>• Customer relationship managers<br>• Call center<br>• "Send us your message" platform<br>• Complaint form on the Bank's website<br>• Double Materiality Assessment |
| **Employees** | • Visits by the Human Resources Department to the Bank's branches<br>• Internal portal for daily communication<br>• Regular meetings with the HR Division<br>• Training sessions<br>• Volunteering and Corporate Social Responsibility (CSR) initiatives<br>• Double Materiality Assessment |
| **Investors and Shareholders** | • Financial Statements<br>• Annual Report<br>• Roadshows<br>• General Assemblies<br>• Press releases<br>• Face-to-face meetings |

| | |
|---|---|
| | • Events for communication with Investors<br>• Double Materiality Assessment |
| **Suppliers and Partners** | • Face-to-face meetings<br>• Terms of supply agreements<br>• Annual Reports<br>• Double Materiality Assessment |
| **Society and Communities** | • Financial contributions to associations<br>• Contact with representatives of local communities through shops<br>• Direct communication<br>• Annual Reports<br>• Donations / Corporate Social Responsibility (CSR) programs<br>• Double Materiality Assessment |
| **Government and Regulators** | • Communication with state authorities<br>• Cooperation with the Bank of Greece and other regulatory authorities<br>• Regulatory reports<br>• Meetings<br>• Answer to Questions/Enquiries<br>• Support for public initiatives |

Employees is a key stakeholder group, and communication with them is implemented through visits by the HR Division to the stores, the use of an internal platform for daily interaction, regular meetings with the same Division, volunteer and corporate social responsibility activities and through training programmes. With regard to the strategy and business model, the interests, views and rights of the Group's employees are of essential importance in their development, nevertheless they are not directly involved in determining these areas. However, their views are taken into account in the Group's assessment and final decision-making on its strategy and business model. At the same time, through various actions, initiatives, policies and institutionalised procedures, the Group seeks to ensure optimal working conditions and to strengthen equality and equal opportunities for all.

Interaction with customers is focused on satisfaction surveys, daily communication through the Bank's branches, service centres, the "send us your message" online platform and the complaint form available on the Bank's website. Similarly, the Bank seeks frequent communication with its shareholders and investors. In addition to the scheduled annual meetings, such as the General Meeting of Shareholders, the Bank seeks a continuous dialogue with its investing public in order to understand to their priorities. It is worth noting that during 2025, the Strategy, IR and Sustainable Development Division met with approximately 150 investors to discuss their priorities and the requirements they have from the Group. Similarly, the Group's strategy and business model are also based on a commitment to the protection of customers' human rights, especially regarding privacy and access to quality information. The Group applies strict data protection protocols to ensure the security of customers' personal information. In addition, it promotes transparency and easy access to information for every customer. Through direct communication and the use of feedback tools, the Group constantly seeks to optimise its practices. The purpose of stakeholder engagement is to gather their feedback, understand their concerns and integrate them into the Group's decision-making process, to align with their expectations and enhance their level of satisfaction. The Group has developed a flexible stakeholder analysis mechanism, which includes details of communication channels, engagement strategies and frequency of communication with each group throughout the year. Meaningful stakeholder engagement is considered critical to the achievement of the Group's objectives, as it provides meaningful data through continuous communication. The Group remains alert to changing needs, new expectations and potential risks as perceived by its stakeholders, while maintaining open lines of communication. The results of stakeholder engagement are incorporated into the Group's policies, strategies and business operations, which demonstrates the Group's readiness to listen and continuously improve its services and actions. This approach is also integrated into the sustainable development strategy. As mentioned above, to reinforce its commitment to sustainable growth, the Group has developed a business model that is aligned with the needs and expectations of its stakeholders. This is achieved by understanding the interests and views of key stakeholders, which are integrated into both the strategy and the business model. The Group actively participates in processes of due diligence and analysis of material issues in order to analyse and understand the interests and views of stakeholders through these methods. The information collected and the feedback provided during these processes are analysed to identify the main issues that are important to stakeholders, as well as any improvement actions, measures and initiatives that may be necessary to meet their expectations. By integrating this information into its business model and strategy, the Group can address any potential impacts, risks and opportunities.

At the same time, the Group focuses on creating mechanisms to monitor and evaluate the effectiveness of its initiatives, with the aim of enhancing accountability and ensuring continuous improvement. The integration of this information and feedback from stakeholders is not only relevant to the current strategy but also serves as a tool to adapt to a dynamic environment where social, environmental and economic conditions are constantly changing. Through this approach, the Group not only effectively meets the demands and expectations of its stakeholders but also lays the foundation for developing more sustainable practices in the future. The Group's sustainability strategy now incorporates the dimension of the impact of its business activities on both the environment and society, as well as its contribution to addressing critical challenges such as climate change, social inequality and the need to strengthen responsible corporate conduct. The Group adopts a holistic approach to sustainability, focusing on effective measures, actions and partnerships that strengthen its long-term relationships with stakeholders and increase the overall value it creates for all stakeholders.

The administrative, management and supervisory bodies are regularly informed by the Sustainability Management Committee of the views and interests of affected stakeholders on the Group's sustainability impacts. This Committee plays a crucial role in reviewing and addressing stakeholder comments, taking them to the highest governance bodies through quarterly reports and scheduled updates during the year or whenever necessary.

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

The table below shows the material impacts resulting 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 | The Group's in-house operations contribute to climate change through the release of greenhouse gas emissions. | – | actual | | ✓ | |
| E1 | Climate change adaptation | Contribution to climate adaptation by offering environmentally friendly and green financial products and services that support sustainable business practices and investments. | + | actual | | | ✓ |
| E1 | Energy | Provision of financial products and services that reduce energy consumption and improve efficiency, promoting sustainable energy use. | + | actual | | | ✓ |
| E1 | Climate change adaptation | Upgrading operational systems and processes to achieve lower energy consumption and to strengthen the Group's capacity to adapt to climate change. | + | actual | | ✓ | |
| E5 | Waste | Contribution to improved waste management and the circular economy by providing financing to sectors for implementing sustainable resource and waste practices. | + | actual | | | ✓ |
| E5 | Waste | Adoption of eco-friendly and recyclable practices and initiatives contributes to waste management and enhances resource efficiency. | + | actual | ✓ | ✓ | ✓ |
| S1 | Working conditions | Supporting and creating direct, indirect, and induced employment across the value chain while providing fair working conditions and provide competitive wages and benefits to employees. | + | actual | ✓ | ✓ | ✓ |
| S1 | Working conditions | Supportive working conditions and improved employee retention through competitive, merit-based remuneration and recognition. | + | actual | | ✓ | |
| S1 | Working conditions | Promoting and safeguarding employees' right to free association, enabling collective representation and participation. | + | actual | | ✓ | |
| S1 | Working conditions | Enhancing and supporting work-life balance through the implementation of targeted policies and initiatives. | + | actual | | ✓ | |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| S1 | Working conditions | Supporting employees with family responsibilities through extra family leave days, child allowances, and comprehensive family assistance programs. | + | actual | | ✓ | |
| S1 | Working conditions | Supporting employee well-being by providing a stable, positive, and supportive working environment with high-quality conditions. | + | actual | | ✓ | |
| S1 | Equal treatment and opportunities for all | Implementation of policies, measures, and actions on gender, sexual orientation, ethnic, and racial inclusion that contribute to a non-discriminatory and inclusive working environment, enhancing employees' sense of belonging, diversity and equal treatment. | + | actual | | ✓ | |
| S1 | Equal treatment and opportunities for all | The existence of a gender pay gap contributes to employee dissatisfaction and reduced motivation, which can affect teamwork and employees' performance. | – | actual | | ✓ | |
| S1 | Equal treatment and opportunities for all | Supporting employees' growth by providing training, skills development, and talent management programs that enhance their potential capacity, while creating job and career advancement opportunities within and beyond the Group. | + | actual | | ✓ | |
| S1 | Working conditions | Facilitating financial support and wellbeing by providing staff access to low-interest loans. | + | actual | | ✓ | |
| S4 | Information-related impacts for consumers and/or end-users | Delivering high-quality banking services and accessible information, and supporting informed decisions, drives increased customer satisfaction. | + | actual | | | ✓ |
| S4 | Information-related impacts for consumers and/or end-users | Robust internal management and cybersecurity systems and processes protect stakeholders' data privacy, minimize data breaches and leaks, and enhance customers' trust in the Group's secure handling of information. | + | actual | | | ✓ |
| Entity specific | Innovation & digitalization | Adopting and offering innovative services by providing fast and user-friendly banking solutions enhances customer experience and efficiency. | + | actual | | ✓ | ✓ |
| G1 | Corporate culture | Monitoring and enforcing ethical standards and human rights principles protects from human rights violations and strengthens stakeholders' confidence across the Group and its value chain. | + | actual | ✓ | ✓ | ✓ |
| G1 | Corporate culture | Dissemination of an ethical corporate culture fosters integrity and transparency, strengthens employees' ethical conduct, and creates a positive and conscious work environment that encourages responsible decision-making. | + | actual | | ✓ | |
| G1 | Corporate culture | Low or zero incidents of non-compliance with laws and regulations ensure that stakeholders feel enhanced trust and sense of security. | + | actual | ✓ | ✓ | ✓ |
| G1 | Corruption and bribery | Implementation of robust anti-corruption, anti-bribery, and anti-money laundering practices fosters a culture of transparency, fair competition, and | + | actual | ✓ | ✓ | ✓ |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | integrity, protecting stakeholders and promoting their confidence in the Group's ethical conduct. | | | | | |
| G1 | Corruption and bribery | Absence of corruption-related incidents ensures business continuity and protects employees, customers, and other stakeholders, reinforcing public and stakeholder confidence. | + | actual | ✓ | ✓ | ✓ |
| G1 | Protection of whistleblowers | Effective whistleblower protection mechanisms contribute to a safe and trusted working environment, encourage reporting without fear of retaliation, and foster transparency among stakeholders. | + | actual | ✓ | ✓ | ✓ |

The table below shows the material risks and opportunities arising 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 | 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 | | ✓ | |
| E1 | Climate change adaptation | Physical flooding risk on retail mortgage loan portfolio with incorporation into credit risk. | Risk | ✓ | ✓ | ✓ |
| E1 | Climate change adaptation | Transition risk on corporate and SME loan portfolio, arising from the transition to net zero, with incorporation into credit risk. | Risk | ✓ | ✓ | ✓ |
| E1 | Energy | Decrease in energy consumption through specifical initiatives/ activities reduces operating costs. | Opportunity | | ✓ | |
| E5 | Waste | Financing waste management industry offers a new clientele and opportunities for profitability. | Opportunity | | ✓ | ✓ |
| 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, retention rates for employees and enhance 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 behaviours that create a desirable workplace, can lead to employee attraction and retention and generally improve Group's 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 strategic goals. | Opportunity | ✓ | ✓ | ✓ |
| S1 | Equal treatment and opportunities for all | The need for continuous training in order to keep up the development of employees with specialised 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 | Continuous 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 provided financial products and services which could mislead the stakeholders and causing reputational damage and operational costs. | Risk | ✓ | ✓ | ✓ |

Material impacts, risks and opportunities were identified from the DMA that fall within the ESRS topics: Climate Change (E1), Circular Economy (E5), Own workforce (S1), Consumers and End-Users (S4), Business conduct (G1), and Innovation and Digitalization, as an entity-specific topic. In particular, in terms of Impact Materiality, 25 impacts were identified as material, while in terms of Financial Materiality, 15 material risks and opportunities were identified, which are presented in the Sustainability Statement.

Compared to the previous reporting period, no changes were observed in the material topics. However, according to the update of the results of the DMA, in terms of material impacts, risks and opportunities, two new environmental risks have been identified, and two material impacts have been consolidated.

The implementation of the DMA process and the identification of material impacts, risks and opportunities ensure the full integration of sustainability factors in the Group's business operations and at all stages of the value chain. This approach strengthens the Group's resilience and its ability to adapt to changing conditions. The factors identified, together with their individual impacts, risks and opportunities, clearly illustrate their key contribution to the sustainability strategy. Through the DMA, the critical points where the business model, value chain and decision-making processes intersect with sustainability issues were highlighted. By focusing on material impacts, risks and opportunities, the Group can allocate resources appropriately and monitor progress against sustainability objectives. This ensures that actions and initiatives remain aligned with stakeholder expectations.

The Group's material impacts can have positive or negative effects on people and the natural environment, across the entire value chain, both through its own operations (such as energy consumption), its financing activities (e.g. products and services) and internal policies (such as social issues), in all time horizons-short, mid and long term. As already mentioned, these impacts interact with the Group's strategy and business model, as strategic planning focuses on supporting sustainable development. For example, the adoption of energy-saving practices, the integration of environmental and recycling initiatives, the provision of targeted financial products and services, as well as the support of employee well-being, are elements of an integrated approach to sustainability-related challenges and lead to substantial positive results.

During the reporting period, no financial effects arising from the Group's material risks and opportunities were identified in relation to its financial position, performance or cash flows. With respect to paragraph 48(e) of ESRS 2 SBM-3, the Group applies the phased-in provision as listed in Appendix C of ESRS 1.

The adaptation of the business model to sustainability requirements and the integration of ESG topics into the strategy enhance the Group's resilience. The assessment of ESG topics that may affect the strategy allows the Group to better prepare for future challenges and opportunities. In addition, the existence of a robust risk management framework covering all business functions and taking into account ESG risks, in line with the current action plan, further enhances the Group's resilience. This overall approach confirms the Group's readiness to face any upheavals and its ability to mitigate risks effectively. Enhancing operational resilience also relies on documented processes, appropriate resources and mechanisms for the continuation of essential functions. These elements are developed and maintained to ensure stability in the provision of critical services and products, even in the event of foreseeable disruptions. This readiness ensures the smooth operation of the Group and its ability to meet the expectations of its stakeholders, even under adverse conditions.

## Impacts, risks and opportunities management

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

The DMA is a key process for the identification and assessment of the Group's strategic priorities for sustainable development. Through this assessment, the Group identifies and manages the impacts arising from its activities and business relationships throughout the value chain. The implementation of this assessment aims to identify material impacts, risks and opportunities for the Group through the implementation of the Double Materiality Assessment, in accordance with ESRS. This assessment involves two dimensions:

**Impact materiality (inside-out perspective):** How business practices directly or indirectly affect people and/or the environment, resulting in positive or negative impacts.

**Financial materiality (outside-in perspective):** How sustainability can affect the economic performance of enterprises by highlighting risks or seizing opportunities.

In FY2025, the Group did not conduct a new DMA, but proceeded to update the material impacts, risks and opportunities originally identified in the 2024 DMA. In this context, the Group has reviewed the material topics that had been identified with a view to assessing their continued relevance, taking into account updated information relating to the current period. The review did not reveal any variations in the list of ESRS topics (ESRS E1, E5, S1, S4, ES, G1), compared to the previous reporting period.

The process of updating the material topics was carried out through the following steps. First, a comparative analysis of the material topics and sustainability trends of industry competitors was carried out. The process included a comparative analysis of the Group's prior material topics with those disclosed by Greek and European banks, with the aim of assessing common key sustainability issues and confirming their alignment. Subsequently, an update of the list of material impacts, risks and opportunities was carried out, an internal review by the relevant business units to identify any amendments to the material impacts, risks and opportunities and the identification of two new environmental risks under the topical ESRS E1. The last step to update the material topics involved the finalisation and approval of the final list of material topics by the SMC. This process identified twenty-five material positive, negative, actual impacts and thirteen material risks and opportunities for the reporting period.

The process presented below describes the methodology followed by the Group to identify and assess the impacts, risks and opportunities for the two dimensions of the Double Materiality Assessment.

### Impact materiality

Through the impact materiality process, the Group identifies, evaluates and prioritises the positive and negative, actual and potential impacts related to its activities and business relationships on people and the environment. The impact assessment takes into account elements such as competitive and industry analysis, internationally recognised standards and available standards. This process is part of the Group's wider approach to due diligence and its interaction with stakeholders throughout the year. Impact materiality focuses on activities and business relationships that cause impacts arising from both the Group's operations and those arising from its portfolio and business partnerships along the value chain.

As already noted, the Group maintains continuous communication with affected stakeholders, which allows the incorporation of their views and expectations in the impact assessment process. Impacts have been assessed on the basis of criteria such as scale, scope and irremediability - elements that determine severity - as well as on the likelihood of occurrence in the case of potential impacts, in full accordance with ESRS

1. In addition, the assessment incorporates different time horizons - short, mid and long-term - as defined by ESRS 1.

Financial materiality

To perform financial materiality, the Group considers risks and opportunities arising from impacts, dependencies and other relevant factors. The evaluation process is based on a comparative analysis, using sustainability statements of competing companies, sectoral studies based on best practices and standards, as well as analyses by specialised rating agencies. The Group explores the interrelationship between them - between impacts, dependencies and the potential risks and opportunities arising from them - which contributes to the identification of critical parameters directly linked to its business operations and strategic objectives. The assessment of risks and opportunities was performed based on the severity and likelihood of financial impact, in accordance with the requirements of ESRS 1.

The assessment process covers three-time horizons - short, medium and long-term - ensuring a comprehensive approach to the potential financial impact of the Group. The contribution of senior executives from the Group's Divisions is crucial as through their experience and expertise, risks and opportunities arising from sustainability issues are prioritised by assessing their likelihood and magnitude.

Note that during 2025, Optima bank conducted a quantitative materiality assessment to evaluate how environmental and climate risks affect the Bank's overall risk profile. For more information, please refer to the *Description of processes to identify and assess material environmental impacts, risks and opportunities.*

Scoring Impacts, Risks and Opportunities

The assessment of impacts, risks and opportunities shall be carried out in accordance with the principles set out in ESRS 1 and ESRS 2. The scoring of impacts as mentioned above is based on the assessment of specific parameters such as scale, scope, irremediability (for negative impacts) and likelihood of occurrence (for potential impacts). The assessment of financial materiality focuses on how the impacts, risks and opportunities associated with sustainability may affect the Group's financial position. The scoring of risks and opportunities takes into account the magnitude and likelihood of their economic outcomes. For both dimensions, a threshold of materiality is set to identify the impacts, risks and opportunities that are considered material for the Group. The aim of the process is to determine the relative materiality of the topics, both from an impact and financial perspective, to ensure a comprehensive and informed assessment of sustainability topics.

Validation of Impacts, Risks and Opportunities

The results of the Double Materiality Assessment are reviewed and validated by the Sustainability Management Committee. The SDMC assesses the methodology applied, the consistency of the criteria used and the documentation behind the scoring of the topics. At the same time, it ensures that material topics are aligned with the Group's sustainability strategy, regulatory requirements and the expectations of key stakeholders.

### *Description of the processes to identify and assess material entity specific-related impacts, risks and opportunities*

The process of identifying material impacts, risks and opportunities related to Innovation and Digitalization is guided by the structured methodological approach already presented. This process utilises analyses to accurately identify areas of material impact and potential risks, ensuring consistency with the Group's sustainability strategy. The key assumptions are based on internal performance data, interaction with stakeholders and compliance with international standards. The approach focuses on fundamental factors such as the development and delivery of digital services, dependence on third-party technology providers and the benefits of digital initiatives.

Emphasis is placed on areas of increased risk, in particular digital transformation projects and actions, with a systematic assessment of their potential impacts on people and the environment. Particular attention is paid to the dependence on technology providers and services, especially in relation to cybersecurity issues and the dependence that may result from the extensive use of external systems - factors that may affect the continuation of business activities in a crisis. This assessment takes into account both the direct impacts of business activities and the indirect impacts resulting from partnerships and business relationships. The Group systematically consults with affected stakeholders, seeking a thorough understanding of the full range of potential impacts. Active collaboration with customers, employees and regulators ensures that their views and concerns are incorporated into decision-making.

The Group's approach to the materiality of impacts is based on the assessment of parameters such as the scale, scope and likelihood of occurrence, following on from what has already been analysed.

### *Description of the processes to identify and assess material Business Conduct-related impacts, risks and opportunities*

During the DMA, the Group thoroughly analysed all areas related to business conduct in order to identify material impacts, risks and opportunities. Among the fundamental strategic pillars is corporate culture, which is reinforced through adherence to the Code of Ethical Conduct and Ethics and commitment to basic ethical principles. This approach ensures full respect for human rights within the Group.

In addition, the Group has developed clear anti-corruption and anti-bribery policies, which contribute to the creation of a culture of integrity, preventing money laundering and enhancing transparency. At the same time, it is committed to protecting people who report inappropriate conduct by providing the opportunity to report incidents without fear of retaliation or any form of negative consequence.

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

In identifying, analysing and prioritising risks and opportunities with potential financial impact, the Group aligns key elements of its operations with corresponding financial risks and opportunities. In applying the Double Materiality Assessment, it identified six actual impacts (five positive and one negative), three risks and three opportunities related to the environment.

The actual impacts relate to the Group's indirect contribution to supporting waste management practices by funding specific industries, enhancing the ability of funded entities to reduce and manage their waste. At the level of its own activities, the Group implements environmentally friendly initiatives, such as issuing debit cards made of recyclable materials and the use of digital signatures, aiming to reduce the use of paper documents.

Opportunities are identified in the dynamic growth of the financial industry of waste management and environmentally friendly projects, creating new opportunities to attract customers and enhance profitability, as the demand for sustainable financial solutions in this sector continues to grow. At the same time, reducing energy consumption is an opportunity to reduce operating costs.

The methodologies and tools used in this assessment are fully aligned with the CSRD and ESRS, ensuring effective identification of both impacts and financial risks and opportunities. During the process of identifying material impacts, risks, and opportunities, the Group engages with its stakeholders in order to understand their views on the circular economy, to align these views with those of the Group, and to take them into account in guiding its strategy regarding the efficient use of resources and the reduction of its environmental footprint, as well as other environmental matters that were not deemed material through the DMA, such as pollution, water resources, and biodiversity. In addition, Optima bank is a member of the Hellenic Banking Association, a central institutional body for the financial sector, which promotes dialogue and exchange of best practices between banks, with an emphasis on sustainable strategies. This participation offers the Bank access to industry developments, newer regulatory requirements, as well as cooperation opportunities linked to the principles of the circular economy.

Through the Double Materiality Assessment, the Group identified and analysed the impacts of its activities on climate change. In this context, it identified three critical areas of potential risk (physical and transition risks):

- The lack of strategic planning on green financing that delivers environmental benefits could affect the Bank's competitiveness, market share, reputation and profitability.
- Physical flood risk, in the retail mortgage loan portfolio with inclusion in credit risk.
- Transition risk in the corporate and SME loan portfolio, resulting from the transition to zero net cost, incorporated in credit risk.

In alignment with the guiding principles of the ESRS E1 standard, the Group's operational activities were reviewed to identify key sources of greenhouse gas (GHG) emissions, resulting in three critical impact areas:

- **Impacts from operational activities:** GHG emissions were mainly identified in the Group's internal operations, with an emphasis on energy consumption in offices and stores. The Group is committed to continuously monitoring and reducing these emissions through actions that enhance energy efficiency and utilize renewable energy sources.
- **Upgrading of IT infrastructure:** Recognising the energy burden of data centres, the Group has implemented an upgrade plan aimed at reducing energy consumption. Promoting the use of virtual servers is expected to make a key contribution to achieving the emission reduction targets.
- **Financial support for energy efficiency:** By providing financing for the purchase of energy-efficient equipment and advanced machinery, the Group supports global efforts to reduce energy consumption and GHG emissions.

Based on the above, the Group has assessed its contribution to addressing climate change, both by reducing emissions within its internal operations and by offering targeted financial solutions to its customers. Total greenhouse gas (GHG) emissions are regularly monitored and disclosed, ensuring transparency on the progress of the Group's climate strategy and its alignment with sustainability targets and corresponding commitments.

During 2025, the Group, in alignment with the European Central Bank's guidelines for the management of environmental and climate risks, carried out an assessment. The approach to assessing these risks is aligned with the qualitative materiality assessment as set out in the Risk Apetite Framework, i.e:

• A qualitative assessment shall be carried out when assessing high-level risks, based on the judgment staff with expertise and significant experience in the field, comparative (in terms of time and sectoral) evaluation, and the impact of adverse effects.

• This analysis contributes to the assessment of the strengths and weaknesses of the Bank's risk policy, as it is a comprehensive approach that takes into account data from competitors, the Bank's overall performance, the financial statements of counterparties, environmental factors and a series of additional information, depending on its relevance to the risk being estimated.

• The qualitative assessment of the materiality of risks is carried out jointly by the Risk Management Division, the Credit and Recoveries Division, the business units and other administrative units.
units,

Overall, the development and implementation of risk management methodologies, which is carried out by the Risk Management Division, leverages the available knowledge at Bank level, contributes to the general acceptance of the methodologies, encourages the participation of all business units and,
ultimately, it unifies the risk tolerance culture across the entire range of the Bank Group's activities.

In this assessment, the significance of the impact of Climate & Climate Change has been examined. Environmental risks to the existing risk categories.

- The tables below summarise the magnitude estimates, scores and impact timeframe of the identified risks, i.e., the Transition and Physical l Risks. In the summary of the first Table, a cautious approach has been adopted, taking the maximum magnitude score between the Transition and Physical risk subcategories as the overall score for the risk area in question.
- According to the European Central Bank's guidance, on the basis of which the Bank has arrived at the identification of climate risks, climate and climate-related risks environment is commonly understood to include two main risk factors:

  **Physical risk** refers to the economic impacts of a changing climate, including more frequent extreme weather events and gradual changes in climate, as well as environmental degradation, such as air, water and soil pollution, water stress, biodiversity loss and deforestation. Physical risk is therefore categorised as "acute" when it results from extreme events such as droughts, floods and storms, and "chronic" when it results from progressive changes such as rising temperatures, sea level rise, water stress, biodiversity loss, land use change, habitat destruction and resource scarcity.

  **Transition risk** refers to the financial loss an institution may incur, directly or indirectly, from the process of adapting to a low-carbon and more environmentally sustainable economy. This could be caused, for example, by a relatively abrupt adoption of climate and environmental policies, technological progress or changes in climate and market preferences.

| Transition Risk | | | |
|---|---|---|---|
| Risks assessed | Magnitude rating | Score | Time horizon of impact[1] |
| Credit risk | High | 4 | ST/MT/LT |

[1] The time horizons are aligned with the Bank's time horizon definitions, namely: Short-term (ST): 0-1 year, medium-term (MT): 1-5 years and long-term (LT): >5 years. The timeframes given are estimates and are based on the understanding gained through qualitative analysis.

| | | | |
|---|---|---|---|
| Profitability risk (incl. Strategic risk) | Medium | 3 | MT/LT |
| Market risk | Medium | 3 | MT/LT |
| Liquidity risk | Low | 2 | MT/LT |
| Operational risk | Medium | 3 | ST/MT/LT |
| Conduct, ethics & reputational risk | High | 4 | ST/MT/LT |
| Capital risk | High | 4 | MT/LT |
| Interest Rate risk in the Banking Book (IRRBB) | Low | 2 | MT/LT |
| Compliance risk | High | 4 | ST/MT/LT |
| Information and Communication Technology (ICT) risk | High | 4 | MT/LT |

| Physical Risk | | | |
|---|---|---|---|
| Risks assessed | Magnitude rating | Score | Time horizon of impact[2] |
| Credit risk | High | 4 | ST/MT/LT |
| Profitability risk (incl. Strategic risk) | Medium | 3 | MT/LT |
| Market risk | Medium | 3 | MT/LT |
| Liquidity risk | Medium | 3 | MT/LT |
| Operational risk | Medium | 3 | ST/MT/LT |
| Conduct, ethics & reputational risk | High | 4 | MT/LT |
| Capital risk | High | 4 | MT/LT |
| IRRBB | Medium | 3 | MT/LT |
| Compliance risk | Low | 2 | MT/LT |
| ICT risk | Medium | 3 | MT/LT |

In addition, it has been determined whether the identified effect is likely to occur in the short, medium or long term, or a combination thereof. The assessment considers how Climate and Environmental Risks may manifest themselves, both from the perspective of Physical Risk and Transition Risk, taking into account extreme scenarios.

In general, when Physical Risk is high, Transition Risk tends to be lower, as policy and regulatory interventions are not sufficient to reduce it. Conversely, when the Physical Risk is low, the Transition Risk may be higher, as policy and regulatory changes are more stringent and succeed in reducing the impacts of climate change.

[2] The time horizons are aligned with the Bank's time horizon definitions, namely: Short-term (ST): 0-1 year, medium-term (MT): 1-5 years and long-term (LT): >5 years. The timeframes given are estimates and are based on the understanding gained through qualitative analysis.

In the context of this analysis, the scenarios of the Network for Greening the Financial System (NGFS) have been combined at a general level. Note that the scenarios used follow the NGFS assumptions and drivers and do not have identifiable critical climate-related assumptions:

• **"Disorderly"**, which is characterised by high Transition Risk and low Physical Risk; and

• "**Hot House World**", which is characterised by low Transition Risk and high Physical Risk, in order to identify impacts that combine high Transition and high Physical Risk.

This approach has been adopted to ensure that all potential risks, both transition and physical, are taken into account in the context of this qualitative assessment.

**Credit risk and conduct, ethics & reputational risk** have been identified as the risks most likely to be affected by the Climate & Environmental Risk. Credit Risk is also expected to be potentially affected in the short, medium and long term by both Physical and Transition Risk and has therefore been identified as the risk with the greatest potential sensitivity to CR&E risks.

**Market risk, IRRBB** have been assessed as having limited exposure, particularly from a Transition Risk perspective, taking into account Optima bank's business model.

More specifically, **credit risk may be significantly affected by both Physical and Transition risk.** The transition to a low-carbon economy may affect the financing of SMEs, particularly in sectors that depend on high-carbon activities. Changes in regulatory policy and market conditions may affect mortgage loans and property values, increasing Expected Credit Losses (ECLs). On the Physical Risk side, extreme weather events, such as floods or heat waves, could affect the value of collateral, especially in high-risk areas. If insurance cover becomes limited, the loss given default (LGD) may increase.

As regards **profitability risk** (including strategic risk), the transition to a zero-carbon economy could require strategic adjustments and increased investment in green initiatives. If customer conduct changes and regulatory requirements become more stringent, the Bank may need to review its business model.

Natural risks, such as climate disruptions in key economic sectors (agriculture, real estate), may cause revenue losses and reduce loan demand.

**Market risk** is not expected to be particularly high in terms of transition risk. At the same time, increased volatility in markets due to changes in investor attitudes towards unsustainable sectors could affect the value of financial assets. At the same time, long-term climate changes, such as rising sea levels or droughts, may affect macroeconomic conditions and sovereign bonds.

**Liquidity risk** is not expected to be particularly high, but new regulatory requirements may arise. In addition, in the event of severe economic instability due to climatic events, the Bank's liquid collateral could be reduced.

**Operational risk** could increase if technological or procedural changes are required to comply with climate regulations. Transition risk may trigger new regulatory requirements, while natural risks, such as natural disasters, could disrupt the operation of branches, IT infrastructure or suppliers.

**Conduct, ethics & reputational risk** could be a significant challenge if the Bank is perceived as not sufficiently aligned with green initiatives. If investors, customers or regulators assess that the Bank's strategy is not in line with market trends, the Bank may face a loss of confidence and a possible reduction in customers.

**Capital risk** could be affected by possible tighter capital requirements. If regulators impose stricter capital buffer requirements due to climate risks, the Bank may need to adjust its strategy. In addition, if physical risks increase, regulators may impose stricter capital adequacy guidelines.

**IRRBB** are not expected to be directly affected by transition risk, but macroeconomic changes due to climate change could introduce volatility in interest rates, affecting the pricing and returns of financial instruments.

**Compliance risk** may increase as environmental regulatory requirements become more stringent. Non-compliance with transparency and reporting standards (such as CSRD, EU Taxonomy) could lead to sanctions or supervisory intervention.

**ICT risk** may increase if technological adaptations are required to comply with regulatory requirements. The transition to a zero-carbon economy could introduce cyber vulnerabilities as banks adopt new digital monitoring and reporting tools.

## IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement

Following the DMA, which identified the material impacts, risks and opportunities, the Group assessed the information considered to be material in relation to the above, as well as its ability to meet the decision-making needs of stakeholders. This assessment focused on the needs of investors, regulators, users of the Sustainability Statement and other stakeholders seeking a full understanding of the impacts, risks and opportunities associated with the Group's business. The Group notes that only information that meets the fundamental criteria of relevance, materiality and ability to support effective decision-making, in accordance with the requirements of ESRSs, is disclosed. The relevant disclosures reflect both the Group's priorities and the needs of the stakeholders affected by them.

It is worth noting that information relating to disclosure requirements of ESRS E2, E3, E4, S2 and S3 is not included. Although they were examined during the DMA process, these topics were not considered to be material for the reporting period and are therefore not disclosed.

The following table contains a list of disclosure requirements that were complied with in the preparation of the Sustainability Statement based on the results of the DMA.

| Disclosure requirements | | Reference to the Sustainability Statement |
|---|---|---|
| ESRS 2 General Disclosures | Disclosure Requirement BP-1 – General basis for preparation of sustainability statements | BP-1 – General basis for preparation of sustainability statements |
| ESRS 2 General Disclosures | Disclosure Requirement BP-2 – Disclosures in relation to specific circumstances | BP-2 – Disclosures in relation to specific circumstances |
| ESRS 2 General Disclosures | 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 Disclosures | 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 undertaking's administrative, management and supervisory bodies |
| ESRS 2 General Disclosures | 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 Disclosures | Disclosure Requirement GOV-4 – Statement on due diligence | GOV-4 – Statement on due diligence |
| ESRS 2 General Disclosures | 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 Disclosures | Disclosure Requirement SBM-1 – Strategy, business model and value chain | SBM-1 – Strategy, business model and value chain |
| ESRS 2 General Disclosures | Disclosure Requirement SBM-2 – Interests and views of stakeholders | SBM-2 – Interests and views of stakeholders |
| ESRS 2 General Disclosures | 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 Disclosures | 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 Disclosures | Disclosure Requirement IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement | IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement |

| | | |
|---|---|---|
| ESRS 2 General Disclosures | Minimum disclosure requirement – Policies MDR-P - Policies adopted to manage material sustainability matters | E1-2 – Policies related to climate change mitigation and adaptation<br>E5-1 – Policies related to resource use and circular economy<br>S1-1 – Policies related to own workforce<br>S4-1 – Policies related to consumers and end-users<br>ES – Policies related to the entity-specific topic<br>G1-1 – Business conduct policies and corporate culture |
| ESRS 2 General Disclosures | Minimum disclosure requirement – Actions MDR-A - Actions and resources in relation to material sustainability matters | E1-3 – Actions and resources in relation to climate change policies<br>E5-2 – Actions and resources related to resource use and circular economy<br>S1-4 – Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches<br>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<br>ES - Taking action on material impacts and approaches to mitigate the material risks in relation to the entity-specific topic and effectiveness of those actions<br>G1-4 – Confirmed incidents of corruption or bribery |
| ESRS 2 General Disclosures | Minimum disclosure requirement – Metrics MDR-M - Metrics in relation to material sustainability matters | E1-5 – Energy consumption and mix<br>E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions<br>E5-5 – Resource outflows<br>S1-6 – Characteristics of employees<br>S1-7 – Characteristics of non-employees in the own workforce<br>S1-8 – Collective bargaining coverage and social dialogue<br>S1-9 – Diversity metrics<br>S1-10 – Adequate wages<br>S1-11 – Social protection<br>S1-15 – Work-life balance metrics<br>S1-16 – Remuneration and pay gap metrics<br>S1-17 – Incidents, complaints and severe human rights impacts<br>ES – Targets related to advancing material positive impacts and managing material risks<br>G1-4 – Confirmed incidents of corruption or bribery |

| | | |
|---|---|---|
| ESRS 2 General Disclosures | Minimum disclosure requirement – Targets MDR-T - Tracking effectiveness of policies and actions through targets | E1-4 – Targets related to climate change mitigation and adaptation<br>E5-3 – Targets related to resource use and circular economy<br>S1-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities<br>S4-5 – Targets related to advancing material positive impacts and managing material risks and opportunities<br>ES - Targets related to advancing material positive impacts and managing material risks<br>G1-4 – Confirmed incidents of corruption or bribery |
| 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 the 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 |
| ESRS E5 Resource use and Circular 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 Resource use and Circular Economy | Disclosure Requirement E5-1 – Policies related to resource use and circular economy | E5-1 – Policies related to resource use and circular economy |

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| ESRS E5 Resource use and Circular 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 Resource use and Circular Economy | Disclosure Requirement E5-3 – Targets related to resource use and the circular economy | E5-3 – Targets related to resource use and circular economy |
| ESRS E5 Resource use and Circular Economy | Disclosure Requirement E5-5 – Resource outflows | E5-5 – Resource outflows |
| ESRS E5 Resource use and Circular Economy | Disclosure Requirement E5-6 – Anticipated financial effects from resource use and circular economy-related material risks and opportunities | Phased in |
| ESRS S1Own 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 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 workforce | Disclosure Requirement S1-1 – Policies related to own workforce | S1-1 – Policies related to own workforce |
| ESRS S1 Own 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 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 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 and approaches | S1-4 – Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches |
| 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 impacts, advancing positive impacts, as well as to risks and opportunities |
| ESRS S1 Own workforce | Disclosure Requirement S1-6 – Characteristics of the undertaking's employees | S1-6 – Characteristics of 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-employees in the 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 – Remuneration and pay gap metrics |
| ESRS S1 Own workforce | Disclosure Requirement S1-17 –Incidents, complaints and severe human rights impacts | S1-17 – Incidents, complaints and severe human rights impacts |

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| ESRS S4 Consumers and 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 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 |
| ESRS S4 Consumers and End-users | Disclosure Requirement S4-1 –Policies related to consumers and end-users | S4-1 – Policies related to consumers and end-users |
| ESRS S4 Consumers and End-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 Consumers and End-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 Consumers and End-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 Consumers and End-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 material positive impacts and managing material risks and opportunities |
| Entity-specific - Innovation & Digitalization | Disclosure Requirement related to 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 Business 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 Business 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 Business Conduct | Disclosure Requirement G1-1 – Business conduct policies and corporate culture | G1-1 – Business conduct policies and corporate culture |
| ESRS G1 Business Conduct | Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery | G1-3 – Prevention and detection of corruption and bribery |
| ESRS G1 Business 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 described in ESRS 2 Appendix B, identifying where these data points can be found in the Sustainability Statement and highlighting those that are assessed as 'Not material'.

| **Disclosure requirement and relevant data point** | **SFDR reference** | **Pillar 3 reference** | **Benchmark Regulation reference** | **EU Climate Law reference** | **Reference to the Sustainability Statement / not material** |
|---|---|---|---|---|---|
| ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d) | Indicator number 13 of Table #1 of Annex 1 | | Commission Delegated Regulation (EU) 2020/1816, Annex II | | GOV-1 – The role of the administrative, management and supervisory bodies |

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| ESRS 2 GOV-1 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 Statement on due diligence paragraph 30 | Indicator number 10 Table #3 of Annex 1 | | | | GOV-4 – Statement on due diligence |
| ESRS 2 SBM-1 Involvement in activities related to the fossil fuel activities paragraph 40 (d) i | Indicator number 4 Table #1 of Annex 1 | Article 449a Delegated 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 Involvement in activities related to chemical production paragraph 40 (d) ii | Indicator number 9 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1816, Annex II | | SBM-1 – Strategy, business model and value chain |
| ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii | Indicator number 14 Table #1 of Annex 1 | | Delegated Regulation (EU) 2020/1818, Article 12(1), Delegated Regulation (EU) 2020/1816, Annex II | | SBM-1 – Strategy, business model and value chain |
| ESRS 2 SBM-1 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 Transition plan to reach climate neutrality by 2050 paragraph 14 | | | | Regulation (EU) 2021/1119, Article 2(1) | Not material |
| ESRS E1-1 Undertakings excluded from the 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 GHG emission reduction targets paragraph 34 | Indicator number 4 Table #2 of Annex 1 | Article 449a of Regulation (EU) No 575/2013; Commission Implementing | Delegated Regulation (EU) 2020/1818, Article 6 | | E1-4 – Targets related to climate change mitigation and adaptation |

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| | | Regulation (EU) 2022/2453, Template 3: Banking book - Climate change transition risk: alignment metrics | | | |
| ESRS E1-5 Energy consumption from fossil sources disaggregated by source (only high climate impact sector) 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 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 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44 | Indicator 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, Articles 5(1), 6 and 8(1) | | E1-6 – Gross Scopes 1, 2, 3 and total GHG emissions |
| ESRS E1-6 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: Bank 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 GHG removals and carbon credits paragraph 56 | | | | Regulation (EU) 2021/1119, Article 2(1) | Not material |
| ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66 | | | Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II | | Not material |
| ESRS E1-9 Disaggregation of monetary amounts by acute and chronic material risk paragraph 66 (a) ESRS E1-9 | | Article 449a Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, | | | Not material |

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| Location of significant assets at material physical risk paragraph 66 (c) | | paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk. | | | |
| ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c) | | Article 449a Regulation (EU) No 575/2013; 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 |

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| ESRS E1-9 Degree of portfolio exposure_to climate-related opportunities, paragraph 69 | | | Delegated Regulation (EU) 2020/1818, Annex II | | Not material |
| ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRTR 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 |
| ESRS E3-1 Water and marine resources paragraph 9 | Indicator number 7 Table #2 of Annex 1 | | | | Not material |
| ESRS E3-1 Dedicated policy paragraph 13 | Indicator number 8 Table #2 of Annex 1 | | | | Not material |
| ESRS E3-1 Sustainable oceans and seas paragraph 14 | Indicator number 12 Table #2 of Annex 1 | | | | Not material |
| ESRS E3-4 Total water recycled and reused paragraph 28 (c) | Indicator number 6.2 Table #2 of Annex 1 | | | | Not material |

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| ESRS E3-4 Total water consumption in $m^3$ per net revenue on own operations paragraph 29 | Indicator number 6.1 Table #2 of Annex 1 | | | | Not material |
| ESRS 2- IRO 1 - E4 paragraph 16 (a) i | Indicator number 7 Table #1 of Annex 1 | | | | Not material |
| ESRS 2- IRO 1 - E4 paragraph 16 (b) | Indicator number 10 Table #2 of Annex 1 | | | | Not material |
| ESRS 2- IRO 1 - E4, paragraph 16 (c) | Indicator number 14 Table #2 of Annex 1 | | | | Not material |
| ESRS E4-2 Sustainable land / agricultural practices | Indicator number 11 Table #2 of Annex 1 | | | | Not material |

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| or policies paragraph 24 (b) | | | | | |
| ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c) | Indicator number 12 Table #2 of Annex 1 | | | | Not material |
| ESRS E4-2 Policies to address deforestation paragraph 24 (d) | Indicator number 15 Table #2 of Annex 1 | | | | Not material |

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| ESRS E5-5 Non-recycled waste, paragraph 37 (d) | Indicator number 13 Table #2 of Annex I | | | | E5-5 – Resource outflows |
| ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39 | Indicator number 9 Table #1 of Annex 1 | | | | Not material |
| ESRS 2 - SBM3 - S1 Risk of incidents of forced labour paragraph 14(f) | Indicator number 13 Table #3 of Annex I | | | | SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model |
| ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g) | Indicator number 12 Table #3 of Annex I | | | | SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model |
| ESRS S1-1 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 Due diligence policies on issues addressed 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 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 |

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| ESRS S1-1 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 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 workers to raise concerns |
| ESRS S1-14 Number of fatalities and number and rate of work-related | Indicator number 2 Table #3 of Annex I | | Delegated Regulation (EU) 2020/1816, Annex II | | Not material |

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| accidents paragraph 88 (b) and (c) | | | | | |
| ESRS S1-14 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 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 and pay gap metrics |
| ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b) | Indicator number 8 Table #3 of Annex I | | | | S1-16 – Remuneration and pay gap metrics |
| ESRS S1-17 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 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, Delegated Regulation (EU) 2020/1818 Art 12 (1) | | S1-17 – Incidents, complaints and severe human rights impacts |
| ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b) | Indicators number 12 and n. 13 Table #3 of Annex I | | | | Not material |
| ESRS S2-1 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 Policies related to value chain workers paragraph 18 | Indicator number 11 and n. 4 Table #3 of Annex 1 | | | | Not material |
| ESR S2-1 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, Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not material |
| ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 19 | | | Delegated Regulation (EU) 2020/1816, Annex II | | Not material |
| ESRS S2-4 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 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 |

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| ESRS S3-1 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, Delegated Regulation (EU) 2020/1818, Art 12 (1) | | Not material |
| ESRS S3-4 Human rights issues and incidents paragraph 36 | Indicator number 14 Table #3 of Annex 1 | | | | Not material |
| ESRS S4-1 Policies relating 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 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, Delegated Regulation (EU) 2020/1818, Art 12 (1) | | S4-1 – Policies related to consumers and end-users |
| ESRS S4-4 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 United Nations Convention against Corruption paragraph 10 (b) | Indicator number 15 Table #3 of Annex 1 | | | | G1-1 – Business conduct policies and corporate culture |
| ESRS G1-1 Protection of whistle-blowers paragraph 10 (d) | Indicator number 6 Table #3 of Annex 1 | | | | G1-1 – Business conduct policies and corporate culture |
| ESRS G1-4 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 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

During 2025, the Group measured its financed emissions for the first time in order to identify those sectors that account for the largest share of its indirect (Scope 3) emissions. The results of this measurement will form the basis for setting specific portfolio targets and defining, in the coming years, a transition plan towards minimising greenhouse gas emissions and climate neutrality. This plan will set out the Group's long-term strategy to minimise greenhouse gas (GHG) emissions, integrate climate risks and opportunities into its financial planning and support the transition to a low-carbon economy.

In the same direction, and for a more complete mapping of the portfolio, the Group is in the process of developing a sustainable financing framework in order to systematically monitor sustainable financing and promote projects and businesses that promote the energy transition, while identifying the corresponding risks (climate and environmental risks).

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

Climate risks can be classified as either physical l or transition. Physical l risks may arise from extreme weather events or the long-term effects of climate change, which affect physical assets and infrastructure. Transition risks include policy risks arising from changes in policies and regulations that promote adaptation to a more sustainable and less polluting economic model, as well as limiting practices that contribute to climate instability and environmental degradation. They also include legal risks associated with lawsuits against institutions and their representatives when they fail to take action to address climate change or fail to disclose essential climate and environmental information. In addition, market risks arising from changes in the demand and supply of products and services are identified. Finally, transition risks include reputational risk arising from the changing perception of stakeholders, in particular customers, as to whether or not financial institutions are meeting expectations for climate and environmental action.

The Group has identified a material negative climate risk (transition) related to climate change adaptation and linked to green finance. This risk includes the possibility of loss of reputation due to a change in the preferences of customers who are now looking for viable banking solutions. Moreover, it is related to changing market dynamics, as expectations about the financial products offered change, affecting the competitiveness of banking services.
The bank defines climate risk related to green financing as a transitional risk, reflecting its exposure to market changes in the context of a broader transition to a low-carbon economy.
As the Group recognises these risks, it makes sure to follow market trends and adapt to market expectations in order to safeguard its reputation and avoid operating costs or potential loss of profitability. In this context, it has launched the development of a Sustainable Financing Framework and a corresponding software (platform) for the evaluation of customers and financing, based on sustainability criteria. In this way, the Bank will be able to identify sustainable financing opportunities in order to promote environmentally sustainable loans and manage the balances accordingly.

The Group carried out a qualitative and quantitative materiality assessment to assess the significance of climate and environmental risks within the existing risk categories. This assessment took into account both natural and transitional risks, considering their potential impact on credit risk, market risk, liquidity risk, interest rate risk in the banking book, profitability risk (including strategic risk), capital risk, regulatory compliance risk, operational risk, conduct, ethics and reputation risk, and information and communication technology (ICT) risk. Given the cross-cutting nature of climate and environmental risks, their analysis follows a holistic approach, aligned with the Bank's Risk Appetite Framework. This approach enhances the identification of the strengths and weaknesses of the Bank's risk policy, incorporating competitive data, Group performance, counterparty economic conditions, environmental parameters and any relevant information related to the risk to be assessed.

The resilience analysis conducted in 2025 was part of the Bank's broader risk assessment framework, aligned with the European Central Bank's guidelines and the Bank of Greece's supervisory requirements. Climate risk scenarios were incorporated, based on the standards established by the NGFS (Network for Greening the Financial System), namely the Disorderly (high transition risk, low physical risk) and Hot House World (high physical risk, low transition risk) scenarios. This methodological choice ensured that all forms of risk were fully integrated into the study. The study was based on the expertise of specialised staff, comparative analysis and the examination of economic and environmental data, while the Risk Management Division, the Credit and Delays Division and other business units participated. The Bank has identified the relevant risks based on three-time horizons: short-term (0-1 year), medium-term (1-5 years) and long-term (>5 years).

The results show that the most significant influence of climate and environmental risk is found in credit risk and ethical, moral and reputational risk. Credit risk is vulnerable to regulatory changes, market fluctuations and climate risks affecting counterparties, and its influence extends across all time horizons. It is therefore considered the most vulnerable risk category in relation to climate and the environment. In contrast, market, liquidity and interest rate risks are assessed as lower, given the nature of the Group's business model and the limited transition risk.

A prerequisite for long-term success is the strategic restructuring of the product and service portfolio, closing existing gaps in sustainable financing and exploiting new opportunities to ensure the resilience of the Group's strategy over time. The Group intends to continue to strengthen the integration of climate parameters into financial decisions and overall risk management policy.

In addition, for the effective monitoring and management of these risks, the following KRIs (key risk indicators) were developed and integrated into the Risk Appetite Framework during the year. For more information, please refer to ESRS 2 IRO-1.

Compliance KRIs (Compliance)

- Number of findings or violations identified by the Bank of Greece on climate and environmental issues.
- Number of breaches identified regarding compliance with climate and environmental regulations

Credit Risk KRIs (Credit)

- Percentage of mortgage loans where the underlying collateral is backed by an energy performance certificate of B3 or higher
- Percentage of the loan portfolio to high-emitting sectors.
- Percentage of loans to SMEs that have measured and disclosed carbon emissions (Scope 1 and Scope 2)

Operational Risk KRIs (Operational)

- Number of cases of system failure due to extreme weather events
- Number of cases of activation of business continuity plans due to extreme weather events
- Number of store closures due to extreme weather events
- Number of absences due to extreme weather events

The following table is a detailed illustration of the above, showing the potential magnitude of each risk category (transitional or natural risk), broken down by subcategory of risk.

Summary of potential magnitude assessments[1]

| CR&E risk categories | CR&E risk subcategory | Credit Risk | Profitability risk (incl. Strategic risk) | Market risk | Operational Risk | Liquidity risk | Conduct, ethics & reputational risk | Capital risk | IRRBB | Compliance risk | ICT risk |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Transition Risks | Policies & Legislation | High | Medium | Medium | Low | Medium | High | High | Low | High | Medium |
| | Market Psychology | High | Medium | Medium | Low | Low | High | Medium | Low | Medium | Low |
| | Technology | Medium | Low | Medium | Low | Medium | Low | Low | Low | Low | High |
| Physical Risks | Floods/ Rising sea levels | High | Medium | Low | Low | Medium | High | High | Low | Low | Medium |
| | Drought/ heatwaves | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Low | Medium |
| | Storms/hurricanes | High | Medium | Low | Low | Medium | Medium | Medium | Low | Low | Medium |
| | Water levels | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Low | Medium |
| | Loss Biodiversity & Land Use | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Low | Medium |

[1] While potential risk mitigation actions have been taken into account when assessing the potential magnitude of risk, as these actions are currently being developed and/or are to be enhanced in the coming years, the assessments have not been based on 'net' risk but a conservative approach has been applied to the distribution of the assessment. Note that this analysis was based on the scenarios defined by the NGFS and there were no other critical climate assumptions.

## Impacts, risks and opportunities management

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

The Group places particular emphasis on environmental management, incorporating clear commitments to the environment and climate in its Sustainable Development Policy. Its strategic objectives focus on material impacts, risks and opportunities identified in the three ESG pillars, highlighting aspects such as climate change adaptation and mitigation, enhancing the energy efficiency of internal processes and promoting sustainable banking practices. To ensure effective implementation of the objectives, the Sustainability Management Committee closely monitors progress, informing the Board of Directors. Ongoing monitoring and engagement with stakeholders contribute directly to the enhancement of improvement processes. The Sustainability Policy, under the responsibility of the Sustainability Department of the Strategy, IR and Sustainable Development Division, is applied horizontally to all business partners, Group companies and all stakeholder groups, without exceptions. It extends to every area of the banking function and throughout the value chain to ensure that sustainability parameters are fully integrated. In addition, it is aligned with internationally recognised standards and frameworks, such as the United Nations Sustainable Development Goals. This policy is available on Optima bank's corporate website and internal portal, ensuring full accessibility and transparency for all stakeholders.

The Sustainable Development Policy covers the areas of climate change mitigation and adaptation, energy efficiency and renewable energy development. It highlights the Group's commitment to minimise its carbon footprint through energy efficient practices, to ensure responsible energy procurement, to adopt technologies that reduce emissions, to integrate green energy parameters into its strategic planning, to strengthen the financing of sustainability projects and to prioritise the efficient management of natural resources.

The strategic objective is to integrate green energy elements into the business direction, based on legislative requirements and best practices. Through its financing, advisory and product activities, the Group supports businesses of all sizes in their transition to sustainable models and clean technologies. To this end, during 2025, the Group developed an Environmental Management System and prepared a separate Environmental Policy, which is available on its website. The Bank's Environmental Policy sets out the framework of actions and targets for environmental protection and sustainable development, committing the Bank to compliance with applicable legal requirements and to continuous improvement of its environmental performance. The policy covers material impacts related to energy consumption, greenhouse gas emissions, natural resource use and waste management, as well as indirect impacts through financial products and services. Monitoring and reviewing is carried out through the Environmental Management System (EMS), which provides a framework for setting and evaluating measurable objectives and risk management plans.

The policy applies to all of the Bank's operations and facilities, covering internal activities and relationships with suppliers and partners, and does not include activities outside the Bank's business scope. It addresses the whole value chain, focusing on direct operations and indirect impacts through financial products, and takes into account the needs and expectations of stakeholders such as customers, employees, investors, suppliers and society.

The ultimate responsibility for the implementation of the policy lies with the Sustainable Development Management Committee, while the Strategy, IR and Sustainable Development Division is responsible for its preparation and monitoring, in cooperation with the Procurement and Administrative Support Division. The policy is aligned with the international standard ISO 14001:2015 and the principles of EMAS, incorporating best practices in environmental management.

In defining the policy, particular emphasis has been placed on stakeholder expectations and enhancing transparency. The policy is available to all employees and external stakeholders through the internal network and the Bank's official website, and is accompanied by training and awareness-raising activities to support its implementation.

The policy reflects the Bank's commitments to reduce its environmental footprint and harmonise with the regulatory framework, as well as the priorities it has set for energy conservation, efficient resource management and the integration of environmental criteria in its credit assessment procedures. In addition, special reference is made to the importance of staff training and awareness of environmental issues in order to ensure the correct implementation of the policy by all staff and the integration of environmental criteria in the daily operation of the Bank. The creation, certification and development of the Environmental Management System ensures the implementation of these policies and provides a comprehensive framework for the integration of environmental parameters and climate risk management in full alignment with the regulatory environment and international standards. It is noted that ESG risks have been incorporated in all risk management policies.

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

The Group, through an integrated plan, aims to contribute effectively to reducing the impacts of climate change through specific actions that will mark its path towards climate neutrality, in line with the objectives of the Paris Agreement.

### Approach of the Group

The Group implements targeted carbon reduction strategies throughout the value chain in order to drastically reduce its carbon footprint and reduce greenhouse gas emissions to the maximum extent possible. Through targeted ongoing actions in all departments, the Group achieves a substantial reduction in energy consumption, following a complex and holistic approach. The upgrading of the data centre and the adoption of virtual servers by the IT departments contribute significantly to energy efficiency. At the

same time, HPE GreenLake, an innovative hybrid cloud solution that offers flexibility in managing the Group's services while maintaining full control of data, has been integrated.
Many of the Group's operational activities support the reduction of energy consumption and energy efficiency, both in terms of design and construction choices in the building sector and the selection of environmentally friendly materials and equipment, as well as in the context of regular monitoring and maintenance of electromechanical infrastructure, and through the integration of an organised materials recycling programme in its Central Services.
The Group's key initiatives are classified into individual carbonisation levers, as follows.

**Energy Efficiency Improvements and Reduction of Greenhouse Gas (GHG) Emissions:**

The Group has taken significant measures to reduce energy consumption related to its activities and, consequently, to reduce its emissions through the upgrade of its data centre and the use of virtual servers. The IT department's implementation of HPE GreenLake further enhances energy efficiency by optimizing resource management on cloud platforms.
In all the Bank's premises, the external shell (walls, external frames, glazing, roofs, etc.) is constructed with strict thermal insulation criteria, checked for proper and smooth operation and regularly maintained. LED lighting contributes significantly to reducing electricity consumption, while light/motion sensors at key points help to control the lighting operating time and contribute significantly to achieving the objective of this lever without affecting the quality of service. Regular inspections of the mechanical equipment to monitor energy consumption and of course regular and thorough maintenance of the machines enhance their proper and energy efficient operation. The adoption of environmentally friendly refrigerants for air conditioning units and the use of bio-based detergents also support this driver.

**Electrification:**

An important pillar is the use of plug-in hybrid and electric company vehicles, which make up around 65% of the Group's fleet. This shift reduces dependence on traditional fuels and actively contributes to reducing the carbon footprint.

**Circular Economy Practices:**

Through the collaboration with Polygreen's 'Just Go Zero' circular economy initiative, the Group aims to minimise its footprint. The use of recyclable materials is also promoted (e.g., in debit cards). The Central Services have joined a programme of organised recycling of specific materials (paper, plastic, aluminium, toners) and drying of organic waste in special machines installed in the kitchens of the buildings. Thus, in collaboration with the certified company Polygreen, the Group incorporates the principles of the circular economy into its core operations.

**Sustainable Finance:**

The Group promotes green financial products, with an emphasis on renewable energy sources, providing customers with the opportunity to finance energy efficient and environmentally compatible projects. Participation in renewable energy financing through the Bank's loan portfolio around 408mln- is an essential contribution to the energy transition.

**Nature-based solutions:**

In the context of the implementation of the circular economy model, the Group, in cooperation with Polygreen, recycled organic waste and cigarette butts and converted them into 664.46 kg of soil fertilizer.

This initiative supports carbonisation, improving soil quality and reducing methane emissions from organic waste in landfills.

**Environmental Management System**

Optima bank, in cooperation with an external partner, proceeded with the implementation and certification of an Environmental Management System in accordance with the ISO 14001 International Standard, in order to create and adopt a framework for environmental protection, which seeks to manage its environmental responsibilities in a systematic way, which contributes to the environmental pillar of sustainability. The system will cover water consumption, energy consumption, refrigerant use and waste. Thus, whereas in the past actions were limited to simple movements and initiatives with a theoretical outcome, now needs and expectations become obligations to comply through established procedures and measurable and updated targets. The Group establishes, implements, monitors and keeps up-to-date the procedures while planning to take actions to address the significant environmental aspects.

As part of the development of the Environmental Management System, an independent Environmental Policy has been developed and is available on the Group's website.

The above actions collectively support the Group's strategy to move towards climate neutrality, in line with its carbon plan and its commitment to mitigate the impacts of climate change, in full compliance with the Paris Agreement. The Group is committed to further strengthening these actions, aiming for continuous progress towards sustainable development.

The year (2024) has been set as the base year for measuring the Group's greenhouse gas (GHG) emissions. There is a target to reduce its overall emissions through initiatives that focus on both operational efficiency and offering sustainable financial products. The results of these efforts have been documented and reported in the individual sections of this report. These actions are aligned with the Group's commitment to support the reduction of climate change impacts in line with EU sustainability standards under the ESRS.

The implementation of climate transition actions, including energy restructuring plans and the electrification fleet, depends on the availability and allocation of financial resources. Resources are managed through the preparation and adoption of a budget linked to supplies and operational adjustments. On the basis of the approved budget, the relevant departments implement the relevant investments. This approach ensures effective management of mitigation and adaptation actions without compromising financial stability, while maintaining flexibility in the face of changes in supply and demand.

The Group's planned actions do not require significant financial resources in the form of capital (CapEx) or operating (OpEx) expenditures and therefore do not have corresponding lines or notes in the financial statements.

Capital and operating expenditure reflects the Group's actions aimed at reducing emissions from its operating activities and implementing a carbon reduction strategy. In the framework of compliance with the EU Classification Regulation, as set out in Delegated Regulation (EU) 2021/2178, the Group has started the analysis of the alignment of its loans with the Technical Screening Criteria (TSC), the Do No Significant Harm (DNSH) principle and the Minimum Social Safeguards (MSS). As part of the implementation of the Green Asset Ratio-GAR, the Bank aligns its loan portfolio with the requirements of the EU Taxonomy by analysing eligible and aligned assets, based on available public counterparty data. To this end, in 2025, the Bank launched the development of a sustainable finance framework to define the criteria for categorising financing as sustainable or not. The ultimate objective is to ensure proper mapping of financing (new or existing) on the one hand, and to use the framework to promote sustainable financing on the other.

**Metrics and targets**

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

| DESCRIPTION OF GROUP TARGET | TIMEFRAME | BASE YEAR | BASE VALUE | PERFORMANCE in 2025 | Percentage change |
|---|---|---|---|---|---|
| 100% renewable energy in the same functions by 2026 | 2026 | 2024 | 0% | 95% | +95% |
| 34% reduction in scope 1 emissions (mobile combustion) gases | 2030 | 2024 | 93.24 tCO2eq | 93.63tCO2eq | + 0.4% |

The Group has set greenhouse gas (GHG) emission reduction targets, which are aligned with its Sustainable Development Policy and its environmental commitments to address climate change. Its strategy focuses on reducing operational emissions through the use of renewable energy sources and the gradual electrification of the fleet. These actions accelerate the transition to low-carbon energy sources, in line with the Group's broader sustainability commitments.

The main objectives include:

- achieving 100% renewable energy use within its operational units by 2026; and
- replacing all conventional vehicles with electric or Plug-in Hybrid Electric Vehicles (PHEVs) by 2030, with an expected 34% reduction in Scope 1 emissions.

The renewable energy target covers Scope 2 market-based emissions related to electricity consumption, while the electrification target covers Scope 1 emissions from bank- owned vehicles. In order to achieve the first target, in 2025, the Group proceeded to purchase guarantees of origin from the electricity providers of its buildings/properties, i.e. both its leased stores and the office buildings where the Head Office is housed. Guarantees of Origin (GRs) are electronic certificates that prove that a certain amount of electricity has been produced from renewable energy sources (RES) or cogeneration (CHP). These guarantees are issued, transferred and cancelled through an electronic registry, such as the RES and GR Manager (DAPEEP) in Greece, and promote the consumption of energy from sources with a lower environmental footprint. Regarding the second target, for the year 2025, a marginal increase is observed, which is due to the expansion of the Group and the increase in personnel, both of which created additional energy needs. The impact is temporary and does not alter the Bank's commitment to achieve 34% reduction.

The above targets are 'gross', do not incorporate emissions removals, offsets or carbon credits and focus only on the Group's activities - i.e., no upstream or downstream value chain is included. The base year is 2024, with a review foreseen every five years from 2030 onwards. The implementation schedule is:

- on renewable energy: 2024- 2026;
- and for the fleet: 2024-2030.

No intermediate milestones have been set, nor long-term targets for 2050. The identification methodology was based on energy consumption and fleet composition data, combined with market trends, regulatory requirements and technology availability. The targets are linked to the national and European strategic objectives for renewable energy and sustainable mobility, and further assessment for their full alignment with international carbon pathways is pending. At present, no scientific standards have been formulated that limit warming to 1.5°C.

The study for setting the objectives included an internal benchmarking of the banking industry and an assessment of the Group's activities through cooperation between relevant departments. There has been no external validation of the targets. The key assumptions include:

- the evolution of renewable energy production capacity
- the adequacy of electric vehicles on the market
- possible incentives or regulatory restrictions

In addition, the dynamics of customer preferences, economic developments and technological advances may affect the progress towards the targets, which will be monitored over time.

The target setting process was primarily based on internal evaluations. The Group has so far not held formal consultations with external stakeholders, such as regulators, customers or industry associations, on these targets. However, through its participation in the Hellenic Bankers' Association, the UN Global Compact and in its communication with shareholders and investors, it listens to domestic and international requirements and adapts its targeting accordingly.

Compared to the previous year (2024), which is the base year for measuring emissions, there are no changes to the targets, the selected methodologies or the corresponding metrics. Any subsequent adjustment will be accompanied by a justification and disclosed in accordance with the principles of transparency. The Strategy, IR and Sustainable Development Division coordinates the monitoring of the targets set in collaboration with the Procurement & Administration Division. The targets are monitored by the relevant Divisions, which report measurable results on an annual and, where feasible, biannual basis, upon request from the Sustainable Development Department. In the event of a delay or deviation from the targets set, the Sustainable Development Department, in cooperation with the Procurement & Administration Department, looks for factors that may delay the achievement of the targets and adjusts the planned actions accordingly to ensure timely achievement of results. The results of the objectives set in the framework of the sustainable development strategy developed at the beginning of 2025 (based on 2024) are reflected in the individual sections of this Report. It is noted that, to date, the objectives are being implemented without any deviations from the predefined timetable.

## E1-5 – Energy consumption and mix

Energy consumption and energy mix

| ENERGY CONSUMPTION | UNIT | PERFORMANCE in 2024 | PERFORMANCE in 2025 |
|---|---|---|---|
| Energy consumption from fossil sources | MWh | 2,227.57 | 521.79 |
| Share of fossil sources in total energy consumption | % | 100 | 24% |
| Energy consumption from nuclear sources | MWh | - | - |
| Share of consumption from nuclear sources in total energy consumption | % | - | - |

| | | | |
|---|---|---|---|
| Fuel consumption for renewable sources, including biomass (which also includes industrial and municipal waste of biological origin), biofuels, biogas, renewable hydrogen, etc.) | MWh | - | - |
| Consumption of electricity, heat, steam and cooling purchased or obtained from renewable sources | MWh | - | 1,666.99 |
| Consumption of self-produced energy from renewable sources not as fuel | MWh | - | - |
| Total energy consumption from renewable sources | MWh | - | 1,666.99 |
| Share of renewable sources in total energy consumption | % | - | 76% |
| Total energy consumption | MWh | 2,227.57 | 2,188.78 |

Please note: The Group does not consume energy from nuclear sources.

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

Gross emissions of scopes 1, 2 and total greenhouse gas emissions

| EMISSIONS | UNIT | AMOUNT 2024 | AMOUNT in 2025 |
|---|---|---|---|
| Scope emissions 1 | $tCO_2eq$ | 128.32 | 115.78 |
| Scope 2 greenhouse gas emissions based on location | $tCO_2eq$ | 872.01 | 645.66 |
| Scope 2 greenhouse gas emissions based on market | $tCO_2eq$ | 636.11 | 41.51 |
| **Total (Scope 1&2) greenhouse gas emissions (location- (based on location)** | $tCO_2eq$ | 1,000.33 | 761.44 |
| **Total (Scope 1&2) greenhouse gas emissions (market- based)** | $tCO_2eq$ | 764.43 | 157.29 |
| Scope 3 greenhouse gas emissions (Category 1- Upstream Purchased Goods & Services): | $tCO_2eq$ | - | 4,303.32 |
| Scope 3 greenhouse gas emissions (Category 2- Capital Goods): | $tCO_2eq$ | - | 1,721.39 |
| Scope 3 greenhouse gas emissions (Category 3- fuel- & energy-related activities not in Scope 1 & 2): | $tCO_2eq$ | - | 147.64 |
| Scope 3 greenhouse gas emissions (Category 4- upstream Transportation &Distribution): | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 5- waste generated in operations): | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 6- Business travel): | $tCO_2eq$ | - | 58.24 |

| | | | |
|---|---|---|---|
| Scope 3 greenhouse gas emissions (Category 7 – Employee Commuting): | $tCO_2eq$ | - | 219.70 |
| Scope 3 greenhouse gas emissions (Category 8 – upstream leased assets): | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 9 – downstream transportation and distribution): | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 10 – Processing of sold products): | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 11 – use of sold products): | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 12 – End of life treatment of sold products): | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 13– downstream leased assets: | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 14 – Franchises): | $tCO_2eq$ | - | Not relevant |
| Scope 3 greenhouse gas emissions (Category 15 - investments) | $tCO_2eq$ | - | 1,918,612 |
| **Total (Scope 1-2-3) greenhouse gas emissions (market-based)** | $tCO_2eq$ | - | **1,925,219.57** |
| **Total (Scope 1-2-3) greenhouse gas emissions (location-based)** | $tCO_2eq$ | - | **1,925,823.72** |
| Greenhouse gas intensity (based on location) | $tCO_2eq$/ net revenue K € | 0.0039 | 6.47 |
| Greenhouse gas intensity (market-based) | $tCO_2eq$/net revenue K € | 0.003 | 6.47 |
| Net revenue | K € | 254,723 | 297,553 |

As no significant changes have taken place in the methodology or in the way the Group is defined, the comparability of current GHG emissions with those of the previous reporting period remains. The base year has been set to 2024 and, compared with this baseline, changes in greenhouse gas emissions are observed for 2025. No changes in total emissions, including Category 3, are recorded, as 2025 is the base year for Category 3 emissions. Specifically:

**Scope 1 emissions:** decreased from 128.32 $tCO_2eq$ to 115.78 $tCO_2eq$.

**Scope 2 emissions (market-based):** decreased significantly from 636.11 $tCO_2eq$ to 41.51 $tCO_2eq$ as the Group for the reporting year has acquired guarantees of origin, and 95% of its total electricity consumption is from renewable energy resources.

**Total Scope 1 & 2 emissions (market-based):** decreased from 764.43 $tCO_2eq$ to 157.29 $tCO_2eq$.

**Total Scope 1 & 2 emissions (location-based):** decreased from 1,000.33 $tCO_2eq$ to 761.44 $tCO_2eq$

**Emissions intensity:** Scope 3 emissions were included for the first time in 2025, thus an increase in emissions intensity is observed.

These variations are incorporated into the 2025 disclosure and demonstrate the continued monitoring of emissions in full alignment with the regulatory framework and applicable European reporting standards.

The calculation of greenhouse gas (GHG) emissions is carried out in accordance with the methodology provided for in the National Climate Law and the ISO 14064-1:2018 standard. The emission factors are derived from the official guidelines of the Ministry of Environment and Energy and from the National Inventory Document, as well as from the RES and Guarantees of Origin Operator (ROGO), ensuring compliance with the current national framework. Two distinct approaches are used to calculate Scope 2 emissions: the location-based method, which uses the national energy mix, and the market-based method, which is based on the supplier's energy mix, capturing emissions from the electricity purchased by the organisation. Furthermore, for the year 2025, the Group has secured guarantees of origin for the majority of its electricity consumption, which, in accordance with the methodology, have been duly considered in the calculation of market-based emissions.

The choice of the above methodologies aims to ensure accuracy and consistency with national sustainability reporting (statements) requirements, while being fully aligned with the country's climate objectives. The tools and information used to calculate emissions are provided by the Ministry of Environment and Energy.

The net revenues used to calculate the GHG emissions intensity are fully aligned with the Group's official financial statements, as they are based on the annual report (statement) for the year 2025.

The calculation of Optima bank's indirect emissions was carried out in accordance with the GHG Protocol Corporate Value Chain (Scope 3) and the ISO 14064-1:2018 Standard, examining all categories 1–15 and assessing their relevance, materiality, and applicability to the organization.

The categories related to purchased goods and services, capital goods, fuel- and energy-related activities not included in Scopes 1 & 2, business travel, and employee commuting (categories 1, 2, 3, 6 and 7) were deemed material and were quantified based on available activity data and documented emission factors. The categories relating to upstream or downstream transportation and distribution of physical products (Categories 4 and 9) were documented as not applicable, as Optima Bank does not produce, handle, or distribute physical products and, therefore, no relevant freight logistics flows exist.

Additionally, the categories relating to processing of sold products, use of sold products, end-of-life treatment, franchising and leasing (Categories 8 & 10–14) were assessed as not applicable because the nature of the Group's activities is purely service-based, without production or distribution of physical goods, a physical product portfolio, or downstream value-chain impacts.

Consequently, only the material and applicable Scope 3 categories are reported and quantified, while the non-relevant categories are justifiably designated as N/A.

**Category 1 – Upstream Purchased Goods & Services:** This category covers emissions from the goods and services purchased by the Bank to operate. To calculate emissions for Category 1, purchase invoices were collected for the costs of physical goods (e.g., printed materials, consumables) as well as services (e.g., consulting services). Purchases were then categorized by type. Appropriate cost-based emission factors from Climatiq were selected depending on the item category. Due to unavailability of more recent data, emission factors in $kgCO_2e/\$$ from 2022 or 2019 (depending on the category) were used and converted into $kgCO_2e/€$ based on published exchange rates from the Bank of Greece. Inflation between the emission-factor reference year and 2025 was also taken into account. For water consumption, total volumes were collected from invoices and an appropriate DEFRA emission factor for 2025 was applied.

**Category 2 – Capital Goods:** This includes emissions from the production and supply of capital goods. Capital goods include material purchases classified as fixed equipment assets, whose costs are booked as depreciations over time. Because a spend-based method is applied—using cost-based emission factors—the inflation rate between the emission-factor reference year and 2025 (2019 vs. 2025) is also applied.

- Cost based calculation: Purchase Cost (€) × Emission Factor (kg$CO_2$e/€) / 1000

**Category 3 – Fuel and Energy-Related Activities (not included in Scope 1 or Scope 2):** This category covers emissions from fuel and electricity production, as well as electricity transmission losses, which are not accounted for under Scopes 1 & 2. Total fuel and electricity consumption were collected, and the appropriate 2025 DEFRA emission factors were applied.

**Category 4 – Upstream Transportation and Distribution of Raw Materials (N/A):** Not applicable to Optima Bank, as the Bank does not procure "raw materials" nor maintain a logistics chain for physical goods as defined by the GHG Protocol. Purchases of goods and services (e.g., IT equipment, consumables) are already covered under Categories 1 and 2. Therefore, no freight logistics flows exist to justify inclusion.

**Category 5 – Waste Generated in Operations (N/A):** Due to the Bank's operations and scale, it does not generate significant volumes of industrial solid or liquid waste. Consequently, this category is deemed not material.

**Category 6 – Business Travel:** This category covers emissions from business-related travel. Emissions were calculated using invoices and data from the two travel agencies organizing business trips, as well as the direct booking records of the Bank. The Distance-Based Method was applied, using DEFRA 2025 emission factors (or the most recent applicable factor when 2025 data was unavailable).

**Category 7 – Employee Commuting:** This category covers emissions from employees' daily travel to and from work. A questionnaire was provided to all employees to collect information on home and work locations, transportation mode, and weekly commuting frequency. The Distance-Based Method was used, applying DEFRA 2025 emission factors.

- *Emissions (t$CO_2$e) = Distance (km) × 2 × Working Days (days/year) × Emission Factor (kg$CO_2$e/km)*

**Category 8 – Upstream Leased Assets (N/A):** Not applicable, as the company does not own or manage physical leased assets that generate indirect emissions. Financial assets are out of scope.

**Category 9 – Downstream Transportation & Distribution (N/A):** Not applicable, as the Group does not produce or distribute physical products. As a financial services provider, no downstream logistics or product flows exist.

**Category 10 – Processing of Sold Products (N/A):** Not applicable, as the Group offers financial services that are not subject to processing.

**Category 11 – Use of Sold Products (N/A):** Not applicable, as the Group provides only services that do not generate use-phase emissions.

**Category 12 – End-of-Life Treatment of Sold Products (N/A):** Not applicable, as the Group does not sell physical products with an end-of-life stage. Financial services do not have a physical end-of-life phase.

**Category 13 – Downstream Leased Assets (N/A):** Optima Bank does not lease assets to third parties for use outside the organization. Therefore, no downstream leased-asset emissions exist.

**Category 14 – Franchises (N/A):** Not applicable, as the Group does not operate any franchises.

**Category 15 – Investments:** refers to the emissions associated with the Group's lending and investment portfolio. In 2025, the Group conducted its first measurement of financed emissions in order to map its emissions and develop a comprehensive transition plan. For the measurement of financed emissions, the Group followed the Global Greenhouse Gas Accounting and Reporting Standard, 2nd edition, December 2022, developed by the Partnership for Carbon Accounting Financials (PCAF). Under this methodology, financial institutions are allocated a proportionate share of the emissions generated by counterparties in the real economy, based on their share of financing and investing.

All assets within the asset classes covered by the PCAF Standard are included in the calculation, except for "Motor vehicle loans," as the Group does not provide financing in this asset class.

The calculation of the Group's financed emissions follows a two-step process:

1. Assessing the Scope 1, 2, and 3 emissions of counterparties.
2. Attributing these emissions to the Group's financial activities.

The calculation methodology varies by asset class according to the PCAF Standard and depends on the granularity of available financial and emissions data. The primary formula used is:

**Financed Emissions = Attribution Factor × Emissions**

The Group applied the following methodologies for each asset class:

- **Listed equities, corporate bonds and business loans**

The attribution factor was calculated as the ratio of the outstanding amount or market value to the counterparty's total assets. The Enterprise Value Including Cash ("EVIC") was not used due to data limitations; however, the Group intends to improve data availability to incorporate EVIC in future calculations. Emissions were based on published emissions data from counterparties. Where such data was unavailable, emissions were estimated using the economic activity of each entity and the country of operation, applying emission factors derived from environmentally extended input-output (EEIO) tables.

- **Commercial real estate and mortgage loans**

The attribution factor was calculated as the ratio of the outstanding amount to the property value at origination. Emissions were estimated using emission factors from the PCAF European Emission Factors Building Database, based on building type and location-specific statistical data.

- **Sovereign debt**

The attribution factor was calculated as the ratio of the exposure to sovereign debt to the Purchase Power Parity (PPP)-adjusted GDP, with PPP-adjusted GDP data sourced from the World Bank.
Emissions were derived from the EDGAR GHG Emissions Database (2025 Report) and the OECD Carbon Dioxide Emissions Embodied in International Trade Database.

- **Project finance**

This asset class includes loans for renewable power generation projects. The attribution factor was calculated as the ratio of the utstanding amount to the total equity and debt of each project. Where total equity and debt data were unavailable, estimates were made using capital expenditure (CAPEX) per installed megawatt (MW) and project type (e.g., photovoltaic, wind), based on data from the International Renewable Energy Agency (IRENA) – Renewable Power Generation Costs, 2024.
Emissions were calculated based on the installed capacity of each project, load factors provided by Operator of RES and Guarantees of Origin S.A., and emission factors from the National Renewable Energy Laboratory (NREL) – Life Cycle Greenhouse Gas Emissions from Electricity Generation.

The above categories reflect the main sources of indirect emissions associated with a financial activity, while the remaining Scope 3 categories are excluded with documented justification due to lack of relevance or material impact.

# ESRS E5 Resource Use and Circular Economy

## Impacts, risks and opportunities management

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

Among the objectives set within the framework of the Group's sustainability strategy are the efficient use of resources, the reduction of waste and the promotion of the circular economy. The Group places particular emphasis on reducing the use of virgin resources, recycling and implementing appropriate disposal protocols, both in its operations and in the wider value chain.

Within the organisation, awareness-raising activities are implemented to reinforce responsible practices, while sustainable sourcing and the use of renewable and recycled materials is encouraged. Priority is given to waste prevention and reuse of materials, rather than disposal or treatment.

As part of its operations, the Group has adopted electronic documents, uses recycled materials for forms, has eliminated paper advertising and has introduced recyclable debit cards. In addition, a recycling and reuse system has been installed at the headquarters, in cooperation with external agencies, reinforcing waste management and circular economy initiatives.

The above actions are important steps towards environmental sustainability and the adoption of the principles of circular economy. In addition, as part of the Group's commitment to environmental protection, during 2025, the Group developed an environmental management system and created an independent Environmental Policy to further align its operations and value chain with sustainable and responsible environmental practices.

More information on the Minimum Disclosure Requirements for both the Sustainable Development Policy and the Environmental Policy can be found in the ESRS E1 Climate Change chapter.

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

**Key actions**

The Group has implemented a number of initiatives aimed at minimising waste generation, both within its internal operations and throughout its value chain, from procurement to final disposal. Specifically, actions that either started in 2025, or continue from previous years in the context of the Bank's environmental strategy, include:

- **Adopting a 'paperless' policy** in various activities and interactions with customers, by:
  - exclusive use of digital signatures,
  - promoting electronic copies for accounts and contracts where possible,
  - use of recycled materials in printed matter.
- **Replace all debit cards** with cards that are fully recyclable.
- **Reduction of promotional materials,** printed brochures and leaflets, while promoting alternative digital forms of communication.
- **Supporting waste management** through internal initiatives such as:
  - battery recycling in cooperation with AFIS.
- **Collaboration with the circular economy movement 'Just Go Zero'** by Polygreen, for:
  - The recycling and reuse system installed at headquarters, managing materials such as paper, plastic, aluminium, glass, coffee capsules, coffee grounds, cigarette butts, food and organic waste.
- **Cooperation with the company GreenFence - MetalLogic Single-member S.A.** for:
  - recycling of old electronic equipment (servers, computers); and
  - return on investment from recyclable equipment.
- **Financing circular economy and waste management projects** in municipalities and regions, supporting actions beyond the Group's operations. **Collaboration with Verinso and Lexis/Consect** for the recycling of UPS batteries that need replacement due to their age in the Group's stores and offices.

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

The Group incorporates waste prevention measures in all its operations and value chain, focusing on minimising waste generation at every stage. A key element of these efforts is the implementation of a paperless policy, which reduces the reliance on physical documents in many activities and interactions with customers. The Group has adopted digital signatures and promotes the use of electronic copies for invoices and contracts wherever possible, thereby significantly reducing paper usage.

The Group contributes to circular economy through targeted partnerships and structured initiatives that emphasise resource recovery and waste reuse. At the Group's headquarters, the collaboration with 'Just Go Zero' from Polygreen has led to significant results, including the following:

- Diversion of thousands of kilos of waste from landfills.
- Conversion of organic waste into soil fertiliser.
- Thousands of litres of water saved by the paper and textile processing industry.

In addition, responsible recycling of electronic equipment through GreenFence - MetalLogic ensures that valuable materials are recovered and reintegrated into production cycles instead of being discarded. These actions reflect the Group's commitment to circularity, focusing on measurable environmental benefits and sustainable use of resources in all its operations and partnerships.

The above actions do not require significant monetary amounts of Capital Expenditures (CapEx) and Operational Expenditures (OpEx).

Although the Group has not yet participated in collective actions that focus specifically on circular economy and resource use, the Bank's participation in the Hellenic Bank Association (HBA) and the UN Global Compact, in which it has been participating since May 2025, provide a means to participate in industry-level discussions and explore future opportunities for cooperation that are aligned with the principles of the circular economy. Through this participation, the Group stays abreast of developments in the sector and emerging best practices, laying the groundwork for possible collaborative initiatives in the future.

## Metrics and targets

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

The Group recognises the importance of setting clear environmental targets and tracking progress to achieve meaningful changes. The environmental strategy and the targets set for the proper management of environmental aspects and the reduction of the environmental footprint are clearly reflected in the Group's Environmental Policy, which was drawn up within 2025. This emphasises resource efficiency, waste reduction and the integration of circular economy principles into all business activities and the value chain. Currently, there is no mechanism to monitor the effectiveness of environmental initiatives through specific targets, but the Group intends to develop an organised methodology with clear monitoring procedures.

## E5-5 – Resource outflows

| **WASTE OVERVIEW** | **unit** | **2024** | **2025** |
|---|---|---|---|
| Total waste generated | kg | 2,240.94 | 1,696.80 |
| Non-recycled waste | kg | 470.36 | 511.70 |
| Percentage of non-recycled waste | % | 21 | 30 |
| **WASTE DIVERTED FROM DISPOSAL (non-hazardous waste)** | | | |
| **Types of recovery operations** | **unit** | **2024** | **2025** |
| Preparation for reuse | kg | - | - |
| Recycling | kg | 1,770.58 | 1,185.10 |
| <Other recovery operations> | kg | 470.36 | 511.70 |
| Total waste diverted from disposal | kg | 2,240.94 | 1,696.80 |
| **WASTES DIRECTED TO DISPOSAL (non-hazardous waste)** | | | |

| Types of waste treatment | unit | 2024 | 2025 |
|---|---|---|---|
| Incineration | kg | - | - |
| Landfill | kg | - | - |
| <Other disposal operations > | kg | - | - |
| Total waste directed to disposal | kg | - | - |

*Due to the nature of its activities, 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 measured, as its amount is not considered material due to the nature of the Group's activities.

All of the above metrics have not been validated by an external body.

The composition of waste mainly includes recurring flows resulting from the Group's daily operations. This waste is harmless and comes from typical office operations such as administrative procedures, customer transactions and day-to-day operation of the premises. The main categories of waste are paper from archiving, cardboard, plastic and aluminium from packaging and consumables, and organic waste from employees' premises. These flows are systematically managed through recycling and reuse, in collaboration with Polygreen's "Just Go Zero" initiative. The Group has implemented initiatives such as the elimination of printed promotional material and the replacement of debit cards with recyclable materials, in order to reduce waste production.

The materials contained in the recurring waste streams are paper, plastic, aluminium, organic matter and small electronic components such as batteries.

As the Group does not manufacture products, no criteria or assumptions are applied for the identification and classification of products that are aligned with the principles of the circular economy. In terms of the methodologies used, all waste presented in the resource outflows is collected by an external management partner and weighed in kilograms. In relation to the assumptions for the total amount of waste, organic residues, coffee capsules paper/cardboard, plastic and cigarette butts from the total amount of waste are recovered for reuse by the partner. Organics, capsules and coffee are sent for composting or biogas production, while cigarette butts are used for energy recovery. Finally, paper/cardboard, plastic and aluminium are sent for 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 EU 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.

On 8 January 2026, Delegated Regulation (EU) 2026/73 of 4 July 2025 was published in the Official Journal of the European Union. The latter amends the Disclosures Delegated Act as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives.

Although Delegated Regulation (EU) 2026/73 is applicable from 1 January 2026, paragraph 23 permits undertakings to apply the Disclosures Delegated Act and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as applicable on 31 December 2025 for the financial year 2025, to avoid undue costs of compliance with the amendments laid down in the Regulation. Accordingly, the Group has chosen to apply the Disclosures Delegated Act, Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486, as in force on 31 December 2025, for the financial year 2025.

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 2025, the disclosed information is based on the 2024 annual reports of the counterparties.

For specific-purpose funding, which is defined as exposures allocated to 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 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 GAR summary presents the Green Asset Ratio (GAR) stock indicator, which is based on alignment data published by counterparties, including their turnover and capital expenditures. It also provides additional ratios related to the scope of the GAR.

| | | **Total environmentally sustainable assets****** | **Total environmentally sustainable assets******* | **KPI****** | **KPI******* | **% coverage (of total assets)***** | **% of assets excluded from the GAR numerator (Article 7(2) and (3) and Section 1.1.2 of Annex V)** | **% of assets excluded from the GAR denominator (Article 7 par. 1 and section 1.2.4 of Annex V)** |
|---|---|---|---|---|---|---|---|---|
| **Key Performance Indicator (KPI)** | **Green Asset Ratio (GAR)** | **75** | **158** | **1.26%** | **2.66%** | **78.65%** | **62.84%** | **21.35%** |

| | | **Total environmentally sustainable assets****** | **Total environmentally sustainable assets******* | **KPI****** | **KPI******* | **% coverage (of total assets)** | **% of assets excluded from the GAR numerator (Article 7(2) and (3) and Section 1.1.2 of the Annex V)** | **% of assets excluded from the denominator of the GAR (Article 7 and Section 1.2.4(1) of the Annex V)** |
|---|---|---|---|---|---|---|---|---|
| ***Additionally*** | *GAR (flow)* | 29 | 94 | 9.05% | 29.30% | 4.25% | - | - |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| ***KPIs*** | *Transaction portfolio** | N/A | N/A | N/A | N/A | | | |
| | *Financial guarantees* | 18 | 82 | 5.82% | 26.78% | | | |
| | *Assets under management* | 11 | 103 | 4.85% | 44.07% | | | |
| | *Revenue from fees and commissions*** | N/A | N/A | N/A | N/A | | | |

* For credit institutions that do not meet the conditions set out in Article 94(1) of the CRR or the conditions set out in Article 325[a] par. 1 of the CRR.

** Income from fees and commissions from services other than lending and banking assets.

Institutions shall disclose forward-looking information on specific KPIs, including information on targets, together with relevant explanations on the methodology applied.

*** % of assets covered by the KPI of banks' total assets

**** based on the KPI of the counterparty's turnover

***** based on the counterparty's capital expenditure KPI, with the exception of lending activities where for general lending the Turnover KPI

The Group's overall GAR based on turnover amounted to 1.26% of total assets, while the overall GAR based on capital expenditure amounted to 2.66%. The Group intends to gradually align its targets with the EU taxonomy.

In accordance with the Delegated Act on Disclosures and the Supplementary Delegated Act on Climate, Annex C contains the disclosures of the templates referred to in 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

All individuals in the Group's own workforce who may be materially impacted are included in the scope of disclosure in accordance with ESRS 2. The Double Materiality Assessment focuses on both the positive and negative impacts arising from the Group's relationships with its own workforce, while also examining the strategies and policies implemented to support the workforce and improve working conditions. The results of this assessment are reflected in the Group's sustainability strategy, which aims to mitigate the negative impacts, enhance the positive ones and optimally manage the risks and opportunities that arise.

Material impacts include those related to the Group's own activities and related to its own workforce. The Group employs a diversified workforce that includes both employees and non- employees, depending on the nature of their cooperation with the Group. Employees are employed on contracts of indefinite or fixed-term contracts, depending on the Group's needs 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 benefits such as healthcare, insurance and professional development programmes. The Group's non-employees are provided by third parties and cover specialised needs or participate in the implementation of specific projects. They are mainly involved in projects that require technical or specialised knowledge, such as customer service, digital infrastructure development, maintenance of technical systems or other support services. Although they are not part of the Group's employees, their contribution is important for the completion of projects that serve the Group's strategic and operational needs. The Group's activities have a significant impact on both employees and non-employees. For the former, the Group ensures professional stability and opportunities for long-term professional development. For the latter, the Group offers opportunities to participate in challenging projects, helping them to broaden their professional experience in a demanding banking organisation. The workforce management strategy focuses on creating a supportive environment for the Group's staff, ensuring that they contribute effectively to the achievement of the Group's objectives.

The most material negative impact identified under the DMA concerns the **gender pay gap**. This negative impact is neither linked to widespread/systemic issues nor to isolated incidents. Instead, it reflects the difference between the average pay of men and women, as observed in specific positions. In particular, the high number of young women recruited in entry-level positions has a significant impact on the pay gap.

**Positive impacts include on the one hand job creation** (direct, indirect and induced) **throughout the value chain as well as the well-being of employees**, the **work-life balance,** the provision of competitive pay based on performance recognition, ensuring employees' right to free trade union action and the implementation of policies for inclusion and equal opportunities for all, impacts resulting from the Group's commitment to creating **a healthy working** environment that enhances employee engagement and retention in the Group. The Group also supports **professional development** via training programmes, performance appraisals and mentoring opportunities, with the aim of empowering women and under-represented groups in particular. It should be noted, however, that the continued specialisation of employees, although excellent for their development, can lead to increased costs for the Group, which need to be managed.

Opportunities for the Group arise through **work-life balance** initiatives such as telecommuting, health benefits, additional leave and parental support policies that increase productivity, enhance the Group's reputation as an employer and attract young talented employees. In addition, a sustained commitment to **equality and diversity** offers the opportunity to improve the quality of the workforce and enhance the company culture, making it more attractive to different groups. Employees also participate in corporate events, sports activities and cultural initiatives, such as free tickets to shows and museums.

None of the Group's material impacts on employees arise from the transition plans to reduce negative impacts on the environment or to achieve greener and climate neutral operations. Furthermore, due to the nature and the country where the Group operates, there is no risk of incidents of forced labour, compulsory labour or child labour. It is worth noting that there are no people with particular characteristics, working in particular environments or undertaking particular activities, who may be at greater risk of harm. The Group ensures a safe and inclusive working environment for all employees. Therefore, there are no material risks or opportunities arising from impacts related 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 and equal treatment for all its employees. In this context, the Group has adopted the following policies that reflect its values and commitments. It is noted that when appropriate, the policy makers will ensure that the policy is updated as appropriate. In addition, the Compliance Division informs the relevant Divisions if there are changes in the regulatory framework so that they can make relevant adjustments to the procedures, document systems, etc. of each site.

- **Policy on the Prevention and Combating of Incidents of Workplace Violence and Harassment – Management of Complaints:** The Policy on the Prevention and Combating of Incidents of Workplace Violence and Harassment - Complaints Management aims to prevent incidents of violence and harassment in the workplace, promoting and taking into account the welfare and safety of all employees. The objective of the Policy on the Prevention and Combating of Incidents of Workplace Violence and Harassment - Complaints Management is to prevent and combat all forms of violence and harassment that take place in the workplace, whether it is the designated workplace or any other place. 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 complaint channel is available for all employees to report incidents, with an emphasis on protecting personal data and ensuring equal treatment for all. At the same time, this practice provides a clear procedure for managing and investigating complaints, measures to prevent, control and mitigate risks, and protection against retaliation to ensure fair treatment. The Group is committed to evaluating this policy in a manner that complies with the requirements of applicable laws and regulations, ensuring that it is continuously updated on relevant developments. The Policy on the Prevention and Combating of Incidents of Workplace Violence and Harassment - Complaints Management applies to all Group employees, regardless of their contract, including those employed under an employment contract, through third party service providers, as well as those attending training programmes, including trainees and apprentices. For any information, clarification or question regarding the policy, interested parties may contact the responsible person, who is the Head of Human Resources and is responsible for the implementation of the policy. The Policy on the Prevention and Combating of Incidents of Workplace Violence and Harassment - Complaints Management is available on the intranet and on Optima bank's corporate website.
- **Board of Directors Remuneration Policy:** It defines the principles and procedures for determining the remuneration of the members of the Board of Directors, ensuring compliance with regulatory requirements and transparency principles. The Board of Directors Remuneration Policy aims to create a comprehensive remuneration framework for the members of the Board of Directors of Optima

bank, including both executive and non-executive members. Its purpose is to ensure compliance with regulatory standards. The Board of Directors Remuneration Policy is aligned with the company's strategy to promote sustainable and long-term prosperity. To ensure compatibility with the latest regulations and market dynamics, the Board of Directors Remuneration Policy is reviewed and evaluated by the Remuneration and Nominations Committee and approved by the General Assembly of Shareholders. The Remuneration and Nominations Committee is responsible for implementing this policy. In addition, the Remuneration Policy for the members of the Board of Directors supports the establishment of fair and competitive remuneration, enhancing employee motivation and retention. The Board of Directors Remuneration Policy is available on Optima bank's corporate website. The Policy is approved at Group level and in this context, it is applied by and bounds the subsidiaries appearing in the consolidated financial statements of the Bank, taking into account the size, internal organisation, scale and complexity of their operation, to the extend it is applied and provided that it is not contrary to special provisions of the applicable law in force.

- **Staff Remuneration Policy**: The objective of the Staff Remuneration Policy is to ensure fair, competitive and transparent remuneration for staff, based on the principles of equality and meritocracy. The Staff Remuneration Policy aims to create a comprehensive remuneration framework for senior and executive management and employees. The Staff Remuneration Policy supports the establishment of fair and competitive remuneration, enhancing employee motivation and retention, and creates direct, indirect and induced employment opportunities throughout the value chain by offering competitive remuneration. The Staff Remuneration Policy is updated when necessary to comply with laws and regulations. The Staff Remuneration Policy covers all employees of the Bank and is approved by the Board of Directors, following the recommendation of the Remuneration and Nominations Committee, underlining the importance of continuous compliance with the regulatory framework and market dynamics. The Staff Remuneration Policy is available on the intranet. The Policy is approved at Group level and in this context, it is applied by and bounds the subsidiaries appearing in the consolidated financial statements of the Bank, taking into account the size, internal organisation, scale and complexity of their operation, to the extend it is applied and provided that it is not contrary to special provisions of the applicable law in force. There is also a Remuneration Policy for the Group's subsidiary OPTIMA ASSET MANAGEMENT A.E.D.A.K., which is aligned with Optima bank's Staff Remuneration Policy.
- **Code of Ethical Conduct and Ethics:** It defines the values, principles and ethical standards that guide the conduct of the Bank's employees and 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 protecting the Bank's reputation. It applies to all employees, and every employee is obliged to comply with it. In addition, a statement of acceptance and commitment to comply with the principles outlined in the Code of Ethical Conduct and Ethics is obtained from all employees when the Code of Ethical Conduct and Ethics is adopted or any amendment is made. The Code of Ethical Conduct and Ethics defines the relationship between the Group and its employees, customers, shareholders, partners and competitors. It is approved by the Board of Directors, and its implementation is supervised by the Human Resources Division. The Code of Ethical Conduct and Ethics is available on the intranet, accessible to all employees, and forms part of the induction material for new employees.
- **Whistleblowing Policy:** It 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 way, the Group ensures the well-being of all its employees by providing high quality working conditions, including a suitable workplace and respect for their privacy. The Whistleblowing Policy is updated when necessary to comply with relevant laws and regulations. The Whistleblowing Policy applies to all stakeholders of the Group. The Whistleblowing Policy is based on the provisions of Law 4990/2022 and is approved and supervised by the Executive Committee of Optima bank. It sets a safe environment in which employees can confidentially report unethical practices. However, it does not include cases of rumours, disagreements about Group policies and decisions, personal disputes between employees or customer complaints about the quality of service. The Whistleblowing Policy is available on the intranet.

- **Absenteeism Policy**: It informs Group employees about the most common types of leaves and the conditions for granting it. The Absenteeism Policy applies to all Group employees. The Heads of Divisions are responsible for the implementation of this Absenteeism Policy and for the timely scheduled granting of annual leave to staff members in their Divisions. The Absenteeism Policy is available on the intranet.
- **Recruitment and Staffing Policy:** The purpose of the Recruitment and Staffing Policy is to cover the Group's available vacancies by selecting the appropriate candidates, aiming at the optimal utilisation of the existing potential and its reinforcement with talents from the labor market, based on the basic principles of transparency, objectivity, meritocracy and efficiency. This policy applies to all units of the Bank and its subsidiaries and covers every stage of the staffing process, from the needs analysis and position approval to the final selection of the candidate. The process involves publishing advertisements in appropriate media, assessing CVs, interviews based on skills and conducts, and using specialised tools and methods such as panel interviews and executive search for senior positions. Responsibility for the implementation of the policy lies with the Human Resources Division and, in particular, with the Talent Acquisition & People Development Department, while the approval of the positions is provided by the Executive Committee. The Recruitment and Staffing Policy promotes equal treatment and equal opportunities for all candidates, incorporating the Group's values and best staffing practices. At the same time, the use of modern digital tools and platforms, such as LinkedIn, is foreseen for the attraction of talent and the continuous revision of the process to respond to market developments and the Group's needs. The Recruitment and Staffing Policy is available to all employees through the Bank's internal portal.
- **Performance Evaluation Policy:** Optima bank's Performance Evaluation Policy promotes objectivity, transparency and informed judgement, with the aim of fostering a sense of fairness and meritocracy. Through it, the continuous improvement and development of employees, the exploration of training needs and motivation for high performance is achieved, while it contributes to the formation and strengthening of the corporate culture, aligning the goals and development of partners with the Group's strategy and vision. This policy applies to all employees with permanent contracts hired by 30 June of the reporting year, excluding external collaborators and staff with fixed-term contracts, and covers all units of the Bank and its subsidiaries in Greece. Responsibility for the implementation of the policy lies with the Human Resources Division and approval is given by the Executive Committee. The Performance Evaluation Policy is not bound by external standards but is aligned with best practices in HR management and the Group's strategic priorities. In formulating the Performance Evaluation Policy, the development needs of employees through annual feedback meetings, the linking of objectives with the Group's strategy and two-way communication to identify training needs are taken into account. The Performance Evaluation Policy is available to all employees through internal communication channels, and the evaluation process is communicated with specific timelines and forms.
- **Employee Training and Development Policy:** The Employee Training and Development Policy sets the framework for continuous learning and professional development, linking training to performance management. It includes categories such as regulatory compliance, technical knowledge, soft skills, professional certifications and postgraduate grants, and provides a process for approving training needs based on relevance, cost and performance impact. The Group, through the Employee Training and Development Policy aims to create a learning environment that promotes teamwork, leadership skills and continuous improvement. The Employee Training & Development Policy covers all employees of the Bank and its subsidiaries and relates to issues of non-compliance, human resource development and performance improvement. The results of the annual performance appraisal and the individual employee development plans in relation to the Group's strategic priorities are taken into account when formulating this policy. The Employee Training and Development Policy is approved by the Executive Committee and the Human Resources Division monitors its implementation and updates it whenever appropriate. The Employee Training and Development Policy complies with the regulatory requirements regarding Health and Safety in the workplace and any certifications specified by the Bank of Greece and the Hellenic Capital Market Commission. This policy is available to all employees through the Bank's internal network.

- **Grants Policy for Postgraduate Education and Certifications**: Considering the training needs of employees, special care is given to the continuous development of knowledge and skills, among other educational activities and through Postgraduate Programmes and Vocational Training Certifications tailored to the individual professional profile of each employee and the requirements of his/her role. The aim of the Grants Policy for Postgraduate Education & Certifications is to enhance the personal development of employees in combination with the sustainable growth of the Group, through the cultivation of a culture of continuous training and professional development. This policy applies to the Bank and all Group subsidiaries and describes the general terms and conditions governing the subsidy of Postgraduate Programmes and Professional Training Certificates, which are provided by recognised educational institutions and certification bodies and are directly related to the Group's activities. The amount of funds available for subsidy is determined on an annual basis in accordance with the approved training budget. The subsidy is available to employees with an open-ended contract who have completed at least one year of service and have been accepted to programmes of more than one year's duration, relevant to their role in the Group. The approval of applications is based on criteria such as professional experience, annual performance evaluation and the relevance of the programme to the Group's needs, while the subsidy rate varies according to the performance evaluation scale. This policy is developed and updated by the HR Division and comes into force after approval by the Executive Committee, which is responsible for monitoring its implementation. The Grants Policy for Postgraduate Education and Certifications is available to all employees through the Bank's internal network (portal).
- **Employee Pricing Policy:** Through the Employee Pricing Policy, the Group offers favourable terms on deposit, investment and sponsorship products and services to employees as part of its general employee practices under the Group's welfare programs. The terms of this Policy have emerged following communication from the Human Resources Division, which is responsible for its implementation. These favourable terms are available to all employees through the Bank's internal portal. The terms of this policy apply to all employees of the Bank and Group companies.
- **Sustainable Development Policy:** The Sustainable Development Policy prioritises fair working conditions and equal opportunities for all. The Group demonstrates its commitment to employee well-being by promoting better working conditions and supporting work-life balance. More information on the Minimum Disclosure Requirements of the Sustainable Development Policy is provided in the ESRS E1 Climate Change chapter.

These policies reinforce the Group's commitment to provide a supportive and non-discriminatory working environment that promotes equality, fairness and transparency.

The Group promotes equal opportunities, fair treatment and respect for freedom of expression among its employees. There is no specific human rights policy that is in line with internationally recognised instruments, such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises, including procedures and mechanisms for monitoring compliance with relevant internationally recognized instruments, however specific references to the Bank's commitment to human rights protection are included in the Sustainable Development Policy. This policy states, inter alia, that the Bank promotes respect for human rights and provides a non-discriminatory working environment by ensuring that each employee is valued, supported and empowered to perform to his or her full potential. In addition, according to the Whistleblowing Policy, employees can report any human rights violations and incidents of discrimination. Finally, the Group, with the adoption of the Hellenic Corporate Governance Code and corporate governance practices that promote transparency, accountability and sustainable operation, has the foundations and the momentum to fully integrate standards such as the UN Guiding Principles, further deepening its commitment to social responsibility.

The Group opposes all forms of discrimination, including harassment and unprofessional conduct. Communicates with its workforce through all available communication channels, ensuring that all employees are fully informed. This integrated interaction includes regular updates, discussions, feedback mechanisms and secure communication channels. By maintaining open lines of communication, it can identify and effectively address potential risks of human rights violations, should they arise. There are also strong measures in place to provide and/or facilitate redress for the effects of human rights violations, such as the Whistleblowing Policy mentioned above. All employees are fully aware of their rights and the procedures available to them for reporting concerns. Each time a report is submitted through the aforementioned channels, it is thoroughly reviewed by Optima bank's Internal Audit Division to ensure that appropriate action is taken. This systematic approach not only helps to immediately address any human rights violations, should they occur, but also reinforces the commitment to maintaining a safe and respectful working environment for all employees.

With regard to human trafficking, forced or compulsory labour and child labour, the Group has not so far adopted autonomous policies addressing these issues, due to the nature and location of its activities. However, as mentioned above, the Bank, as a member of the UN Global Compact, is committed to the protection and respect of internationally recognised human rights. It is also worth noting that the Code of Ethical Conduct and Ethics emphasises respect for human dignity and human rights and opposes child labour.

The Group's business activities do not require a specific occupational accident prevention policy or management system. However, all the conditions required by the Greek legislation on safety and protection in the workplace are met. Evacuation plans have been drawn up and communicated to employees in advance so that they are aware of the emergency procedures. Evacuation drills are regularly conducted to train staff and ensure emergency preparedness. Visits by an occupational physician and safety technician are carried out in accordance with the law, ensuring that health and safety issues are monitored and prevented.

The Group plans to develop a specific policy to address issues related to diversity and inclusion, as well as the elimination of discrimination. However, explicit reference to issues of discrimination, such as racial and ethnic origin, colour, sexual orientation, gender identity, disability, age, religion, political opinion, national origin or social origin, or other forms of discrimination, is explicitly mentioned in the Sustainable Development Policy. The prevention of gender discrimination is also reflected in the Policy on the Prevention and Combating of Incidents of Workplace Violence and Harassment - Complaints Management, which explicitly prohibits any repeated, inappropriate conduct directed at an employee or group of employees, or third parties (e.g. partners, suppliers, etc.) that endangers their health and safety. Although there are no specific policies related to inclusion or affirmative action for people from groups at particular risk due to their vulnerability who are in its own workforce, the Group treats all employees equally. The forthcoming policy on diversity, inclusion and the elimination of discrimination will include specific procedures to ensure that discrimination is prevented, mitigated and resolved when identified, and to promote diversity and inclusion in a broader perspective.

## S1-2 – Processes for engaging with own workers and workers' representatives about impacts

The Group engages directly with its employees through various methods of communication, including visits by general management to the branches, access to the internal portal for daily communication, regular meetings with the Human Resources Division and training sessions. This direct communication ensures that all employees' needs and requirements are taken into account in the relevant decision-making processes. The Group actively monitors and evaluates its workforce initiatives through structured feedback mechanisms and ongoing collaboration. Key evaluation methods include formal annual performance reviews with HR discussions and reports, as well as monthly meetings to provide real-time feedback and issue resolution. Direct communication with HR is facilitated through direct phone calls and an open email channel for concerns and requests. Information on the workplace is also collected through visits to the network branches, where senior executives - heads of Network Affluent Banking, Network Support and Network Business Banking departments visit the branches on a regular basis. Staff members of the Human Resources Division also visit the branches and central services units on a regular basis in order to collect direct information from employees regarding how they experience their daily life, their educational needs and their professional development, thus ensuring open communication and the cultivation of a climate of inclusion. The HR Division ensures that employees participate in these meetings, with the Head of HR having operational responsibility. In particular, it ensures that the results of this participation are taken into account in the wider context of the management of work-related issues. The Group has entered into collective labour agreements with employee representatives on labour rights and issues. These agreements allow the Group to obtain valuable information about the views of its employees. The dialogue takes place 1-2 times a year where feedback and comments are provided by employee representatives. The effectiveness of participation is evaluated through regular feedback surveys, performance reviews and follow-up meetings when necessary, as mentioned above. The results of these assessments are also used to manage employee concerns and significant impacts. Agreements or outcomes resulting from these engagements are used to ensure continuous improvement in addressing work issues and enhancing overall employee satisfaction.

The Group remains committed to creating a supportive working environment for all employees. The above communication channels are also used to address any potential vulnerability of employees to impacts.

## S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns

Reducing the gender pay gap, which has been identified as a material negative impact, is essential, not only to promote fairness and equality, but also to maintain a motivated, engaged and productive workforce. By implementing measures to eliminate the gender pay gap, the Group enhances employee satisfaction, increases motivation and fosters a positive working environment. Employee salaries are aligned with the Staff Remuneration Policy and take into account multiple criteria, including the level of the position, job specialisation, opportunities for personal growth and advancement, performance appraisal, value in the labour market, fixed salaries paid by competition for identical positions, duties and skills, collective and company labour agreements (where applicable) and labour laws. There is no gender discrimination in the Staff Remuneration Policy. The main reason for the gender pay gap is that low-paid jobs, especially in branches, are mainly held by women and therefore the relative ratio is affected. To identify cases of gender pay gaps, there is a monitoring procedure to record such cases. Once a difference is observed, its magnitude and underlying causes are assessed and the case is recorded for future strategic planning and policy adjustments. Recruitment practices, promotion rates, performance appraisals, the opportunity to participate in multiple training programs and other relevant factors are some of the practices the Group is considering to reduce the pay gap in similar roles. This may also include wage adjustments and the strengthening of training and development opportunities. Salary adjustments will be communicated transparently to affected employees, accompanied by the justification for the changes.

Employees may use any of the methods of communication listed in section "SBM-2 - Interests and views of stakeholders" with the Human Resources Division they prefer to discuss wage disputes or raise issues they want addressed.

Complaints relating to employee issues are handled by the Human Resources Division. Specifically, they are reported via email, telephone or through personal meetings with a representative of the Human Resources Division.

At this point, it should be noted that the Group has established communication channels for reporting and raising any concerns. Reports can be submitted either anonymously or by mail or email to a specific email address. Reports include the following cases: violation of Group policies, violations or conduct that harms the Group's reputation, violation of legal and regulatory framework, fraud, corruption, bribery, abuse of power, other unethical conduct, etc. These communication channels are always available and any issues are addressed to the Head of Internal Audit of Optima bank and then submitted to the Audit Committee.

All employees are informed about the content of the Whistleblowing Policy. Information is provided through the distribution of relevant material. In addition, information about this policy is published in a prominent place on Optima bank's website and internal network.

Complaints are investigated promptly, ensuring that steps are taken to hold the responsible party accountable and protect the person raising the concern or report, in accordance with legal requirements and the Group's Whistleblowing Policy. The Complaints Handling Procedure is described in the Whistleblowing Policy. More information is provided in the ESRS G1 - Business Conduct chapter. The Head of Internal Audit is responsible for receiving, investigating, recording and maintaining a record of reports at all levels and for all Group companies. In the case of a personalised report, the confidentiality of the identity of the reporter and any third party appearing in the report shall be ensured. Access to the report is restricted to authorised members only. The Group enhances internal communication through meetings with employees, monitors issues reported and addressed and ensures the effectiveness of communication channels.

Through regular meetings and internal communication with employees, the Group can effectively monitor and control any issues reported and deal with them accordingly. These internal meetings help employees to voice their concerns, share feedback and discuss any challenges they may be facing. This proactive approach not only facilitates the immediate identification and resolution of relevant issues but also ensures that communication channels remain effective and responsive to employees' needs.

In addition, the Group is committed to ensuring the anonymity of the complainant and other parties involved and to avoid any actions that could reveal their identity. However, disclosure of the identity of the complainant may be required by judicial or legal proceedings during the investigation. All reports are examined under due diligence, impartial judgment and objectivity procedures. If the complaints are confirmed, the Group will implement all necessary corrective actions. Anonymous reports are assessed on the basis of the quality of their documentation and the possibility of identifying the reported irregularity. Individuals who report in good faith are protected from any form of retaliation, discrimination or unfair treatment, regardless of the outcome of the investigation. Reports are submitted without any commitment of monetary compensation or reward. If the complainant was involved in the reported event, this does not relieve him/her of responsibility; however, his/her role in the disclosure and investigation of the irregularity is taken into account. The Group respects the fundamental rights of the people involved in a report and ensures that the actions and procedures provided for are in accordance with the applicable legislation. In addition, the legal rights and protections afforded by the legal framework cannot be waived or limited by any individual agreement, policy, form or term of employment. This protection also extends to third parties connected to the complainants who may face retaliation in a workplace context, such as colleagues or family members of those involved. Premature termination or cancellation of contracts for goods or services is not allowed, also in case the complainant is an external partner.

## S1-4 – Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches

The Group implements proactive policies to prevent or mitigate material negative impacts on its own workforce, with particular emphasis on addressing the gender pay gap. Through the Staff Remuneration Policy applied to all subsidiaries, equal pay for equal work, regardless of gender, is ensured, contributing to the elimination of discrimination. At the same time, it fosters a working environment that promotes equality, acceptance and respect.
In order to enhance employee well-being and seize growth opportunities, the Group implements actions covering the entire value chain, directly and indirectly supporting employment, offering competitive salaries and benefits, and enhancing staff retention and satisfaction.

**Main actions of 2025:**

**Work-life balance:**

- Enriched Absenteeism Policy with extra days for parents, single parent families, nursing relatives and young fathers.
- “Family Day” initiative to strengthen the family bond.
- Ability to telework according to the needs of each Division.

**Employee well-being and benefits:**

- Private health insurance for employees and dependants.
- Financial support for marriage or the birth of a child (€1,000/month for 12 months), and a special allowance for working parents of disabled children.
- Paid leave for employees with an active donor card or in the event of an emergency blood donation.

**Strengthening employee participation and corporate culture:**

- Annual Group event with the CEO, providing strategic updates, Q&A.
- Strengthening of sports activity through the organisation and participation of the Optima running team in important events such as the Authentic Marathon of Athens, the international charity race "No Finish Line" in support of the NGO "Together for the Child", the race-institution against breast cancer in Greece 'Race for the Cure' by Alma Zois, the Athens Half Marathon, the 'Sykari Road' race in honor of Antonis Sykaris.
- Cultural initiatives, such as free tickets for theatre performances (visit to the Veakeio Theatre).
- Organisation of group tours with an experienced guide-partner, aiming at promoting teamwork and cultural education, in archaeological sites such as the Museum of Cycladic Art, the Ancient Agora of Athens, the Basil and Elise Goulandris Foundation.
- Participation in the awareness-raising action of the Panhellenic Association of Women with Breast Cancer "Alma Zois" by taking part in "The Pink Ribbon Campaign".
- Organising an online talk on the importance of prevention and health on the occasion of World Heart Day.
- Organisation of professional orientation activities for the children of employees in cooperation with external partners.
  Sponsorships to athletes for their participation in national and international competitions.

**Career development and internal mobility:**

- Structured performance reviews through the Human Resources Division, such as annual reviews with documented discussions with the supervisor and goal setting, and monthly meetings for continuous feedback.
- Career development opportunities through internal mobility, as all jobs are published internally via the intranet and all internal mobility requests are tracked in the HR database.
- Specialised training programmes in cooperation with external providers.

**Diversity, inclusion and empowerment of women:**

- Participation in the online meeting on "Resilience and adaptability... women's issue" in cooperation with Women On Top.
- Awareness-raising and empowerment action for women through personal online messages on International Women's Day.

The above initiatives do not require significant operational or capital expenditure. They are targeted at all employees, providing direct benefits in different geographical areas and units, and are extended to other stakeholder groups such as employees' families and the wider community through events and cultural activities. Key actions are usually annual in nature, while some initiatives, such as performance reviews and professional mobility opportunities, are ongoing and constantly evolving.

The Group monitors its actions regarding its own workforce through organised feedback and continuous engagement mechanisms. This includes annual performance reviews, monthly review meetings, direct communication with the Human Resources Division, and store visits by senior managers and the Head of HR Division. Employees also have the possibility to communicate via a dedicated email address for talent attraction and HR related queries.

These initiatives, combined with the ongoing dialogue that is encouraged, have contributed, during 2025, to the increased participation of employees in the social, cultural or sporting activities organised.

The Group has dedicated resources to manage its material impact, including specialized personnel, such as the Talent Acquisition & People Development department of the Human Resources Division, which focuses on addressing related actions and initiatives. In addition, a specific annual budget is allocated for this purpose, ensuring that resources are directed towards the effective management of material impacts. A significant portion of these resources are directed to LinkedIn, giving employees access to a wide range of training opportunities based on their individual needs and preferences.

The Group ensures that its practices do not have a negative impact on its staff, investing in their well-being, professional development and work-life balance. Through actions such as integrated health programmes, parental support, development opportunities and participation in community activities, a positive and supportive working environment is fostered.

## Metrics and targets

## S1-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities

Based on the results of the DMA and following internal consultations with the HR Division and Strategy, IR and Sustainable Development Division, the Group has set specific targets with a clear timeline and results orientation.

In order to strengthen women's representation, an initial assessment of the current situation at all hierarchical levels (e.g. top management, managers, entry level) was carried out to identify potential barriers. A comparative analysis with the competition and standards of the banking industry was then carried out. The targets were set based on internal data, external reports and international standards such as the Sustainable Development Goals (SDGs) and EU directives.

The choice of targets was based on an understanding of how different levels of representation affect the performance and culture of the organisation, subject to the leadership's commitment to an inclusive working environment and the availability of sufficient qualified candidates. Targets are reviewed regularly to ensure progress and alignment with the Group's strategy.

**Table of Women's Representation Targets at Group Level**

| Target description | Time frame | Base year | Base value | Performance 2025 |
|---|---|---|---|---|
| >50% of women employees | 2026 | 2024 | 49% | 50% |
| >40% women in senior management positions* | 2026 | 2024 | 34% | 36% |

* Senior Management positions include: CEO, Management Consultant, CISO, Head of Divisions, Head of Branches, Investment Banking Managers, Team Leaders, DPO, Legal Counsel. Please note that the wording in the corresponding table of the 2024 Sustainability Statement has been corrected to clarify that the target refers to women in senior management positions (N-3) rather than top management positions (N-2).

Currently, the Group's objectives are focused on promoting equality and diversity. No additional measurable targets have been set for other impacts, risks or opportunities, and therefore no monitoring of the effectiveness of the respective actions and policies is required.

## S1-6 – Characteristics of employees

**Table 1:** Employee headcount by Gender

| Gender | Number of Employees (2024) | Number of Employees (2025) |
|---|---|---|
| Male | 295 | 316 |
| Female | 280 | 310 |
| Total | 575 | 626 |

Number 626 refers to the Group's employees (headcount) as of 31.12.2025. The Group has significant employment in Greece. The total number of Group employees is also disclosed in Note 11 "Staff Costs" in the Financial Statements.

**Table 2:** Employee headcount by contract type, broken down by gender (total number of employees)

| Employees by type of contract | Female (2024) | Male (2024) | Total (2024) | Female (2025) | Male (2025) | Total (2025) |
|---|---|---|---|---|---|---|
| Number of Employees | 280 | 295 | 575 | 310 | 316 | 626 |
| Number of Permanent Employees | 253 | 277 | 530 | 291 | 305 | 596 |
| Number of Temporary Employees | 27 | 18 | 45 | 19 | 11 | 30 |
| Number of non-guaranteed hours employees | 0 | 0 | 0 | 0 | 0 | 0 |

During the reporting period, 52 employees left due to resignation, retirement, or death in service (31 respectively in 2024), representing 9% of the workforce (6% in 2024). To calculate the turnover rate, the numerator used was the total number of employees who left during the reporting year for any reason or cause, while the denominator was the average number of employees in 2025. No significant fluctuations were observed in the total number of employees.

## S1-7 – Characteristics of non-employees in the own workforce

In order to meet the specialised needs of the Group's companies, technical, administrative, financial and IT services are provided through external partners and contractors. The employees of these third-party companies are not under the direct control of the Group. At the end of FY 2025, the number of non-employees was 27 (headcount), representing an increase of one compared to FY 2024.

## S1-8 – Collective bargaining coverage and social dialogue

The Group applies two collective agreements covering all employees (100%) - as in 2024 - enhancing equality and productivity. Contracts include arrangements for wages, benefits (e.g. family allowances), additional pay, loans, job protection, working hours, holidays, health and safety.

Social dialogue is a key mechanism for communication and negotiation between employees and management, ensuring that issues are addressed in a timely manner and enhancing participation and inclusion. 100% of the Group's employees are covered by representatives, as was the case in 2024.

**Table 3:** Information on collective bargaining agreement coverage and social dialogue

| | **COLLECTIVE BARGAINING COVERAGE** | | **SOCIAL DIALOGUE** |
|---|---|---|---|
| **Coverage Rate** | **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 and percentage at top management level*

| **Gender** | **Number (2024)** | **Percentage (2024)** | **Number (2025)** | **Percentage (2025)** |
|---|---|---|---|---|
| Female | 25 | 29% | 30 | 31% |
| Male | 62 | 71% | 66 | 69% |

***** Top management level includes executives up to two levels below the administrative and supervisory bodies (N-2). It should be noted that the 2024 figures (47 female – 34% and 91 male – 66%) have been recalculated to include the corresponding personnel for both years, in order to ensure comparability.

**Table 5:** Distribution of employees by age group

| **Age** | **Number (2024)** | **Percentage (2024)** | **Number (2025)** | **Percentage (2025)** |
|---|---|---|---|---|
| <30 years old | 96 | 17% | 101 | 16% |

| Age | Number (2024) | Percentage (2024) | Number (2025) | Percentage (2025) |
|---|---|---|---|---|
| 30-50 years old | 354 | 62% | 380 | 61% |
| >50 years old | 125 | 22% | 145 | 23% |

## S1-10 – Adequate wages

All Group employees receive fair and competitive remuneration, reflecting the Group's commitment to fair pay practices. The remuneration provided is consistently above the thresholds set by Greek legislation, ensuring that all employees are compensated fairly and in accordance with legal standards. In particular, the remuneration packages offered to Group employees exceed the standards set by national collective and professional labour agreements. This means that employees receive more than the minimum requirements negotiated through these agreements, underlining the Group's commitment to providing superior pay and high-quality working conditions. The Group's concern is focused on setting remuneration at levels above the average, in order to ensure a decent living for its employees.

## S1-11 – Social protection

All employees are covered by public social insurance for sickness, unemployment, employment injury and acquired disability, parental leave and retirement, in accordance with Greek legislation.
In addition, the Group offers a group insurance plan that provides financial support in cases of loss of income due to illness or employment injury. The programme also covers the recovery period, offering support to employees and their families. Also, during parental leave, employees continue to receive their full income, enhancing family well-being and work commitment. This policy goes beyond compliance with legislative requirements and underlines the Group's commitment to supporting its employees by enhancing family wellbeing and their commitment to the organisation. In this way, the Group promotes work-life balance and actively contributes to the creation of an environment that supports the development and satisfaction of its employees.
In addition, the Group, with the primary objective of ensuring the safety of all employees, has installed a defibrillator in each of the 3 main facilities, while at the same time it organizes training sessions for employees on first aid issues.

## S1-15 – Work-life balance metrics

All Group employees (100%), regardless of gender, are entitled to family and parental leave, based on social policy and collective bargaining agreements.

**Table 6:** Entitled employees (%) who took family and parental leave, and breakdown by gender

| Gender | Percentage of entitled employees who took family/parental leave* | |
|---|---|---|
| | **2024** | **2025** |
| Male | 1% | 2% |
| Female | 3% | 3% |
| Total | 2% | 2% |

*Leave includes maternity and paternity leave.

## S1-16 – Remuneration and pay gap metrics

The Group applies a policy of equal pay, without gender discrimination. The gender pay gap in 2025 amounted to **37%** (remaining at a similar level to 2024- 38%), which is attributed to the different gender distribution in positions with different pay levels, rather than unequal pay for the same positions.
The Group's annual total remuneration ratio is **18 (comparable to 2024- 19)**. The remuneration framework is based on performance, competencies and market standards, and includes gross salary plus additional benefits in cash or in kind. The calculation of the remuneration metrics includes the gross salary and additional benefits in cash, in kind, etc. The level of remuneration was calculated by dividing the total annual remuneration by the annual hours worked, as derived from the working hours specified in the employees' contracts.

## S1-17 – Incidents, complaints and severe human rights impacts

The Group has strict policies in place to ensure compliance with labour legislation and internal codes of conduct. During the reporting period:

- **No incidents of human rights violations were recorded**
- **No complaints or grievances from employees were reported**
- **No fines, penalties or compensation were imposed**

The Group's commitment to ethical conduct includes a well-defined grievance mechanism for reporting violations and a monitoring system to ensure a safe and respectful working environment. As a result of these precautionary measures, the Group has avoided situations that could lead to serious human rights violations, thus ensuring that no relevant financial obligations appear in its financial statements. Specifically, the Group reported zero (0) incidents of discrimination, including harassment, during the reporting period. There have been zero (0) complaints from the Group's workforce and zero (0) reported concerns (including grievance mechanisms) as at year 2024.
The absence of incidents of human rights violations and related fines, penalties and compensation reflects the Group's proactive approach and commitment to a fair, safe and inclusive working environment.
Note: 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 Group's business model incorporates the implications related to the management of customer information, with an emphasis on protecting personal data and enhancing customer satisfaction. Data is managed responsibly and securely, and customer concerns are addressed through transparent and reliable processes.
The Group's strategy focuses on the responsible use of data and the provision of a customer-oriented experience, with the aim of continuously improving satisfaction and trust. The business model is designed to mitigate risks, such as technical glitches or data breaches, and to take advantage of the opportunities that arise from strengthening the relationship with customers.
In accordance with ESRS 2, all customers that are likely to be significantly affected by the Group's activities, including those affected through its value chain, its products and services, and its business relationships, have been captured in the business model. The Group mainly serves:

- **Corporate customers**, to whom it offers products and services to support their business activities and financing needs.

- **High-income retail banking clients** who manage significant funds under the Group's supervision.

The impact assessment found that some customers may be affected in relation to their rights to privacy and data protection. However:

- The Group **does not offer services or products** that pose risk to the health or safety of consumers or end users.
- No customers are negatively affected in terms of freedom of **expression, non-discrimination, or access to critical information of products.**
- Marketing strategies that could negatively impact **vulnerable groups**, such as children or financial vulnerable individuals, are not applied.

The DMA did not identify any material negative impacts in relation to customers and therefore there are no customers with particular characteristics that could be negatively affected. Instead, positive impacts related to:

- The provision of high-quality services

The protection of privacy and the strengthening of cybersecurity The Group's systems and processes help maintain a secure environment for all stakeholders, with minimal incidents of data breaches. Continuous improvement of services enhances customer satisfaction and loyalty.
The DMA highlighted an opportunity and a risk arising from the material impacts that are relevant to all the Group’s customers. More specifically, the DMA highlighted:

- **An opportunity:** Continuous satisfied customers lead to higher customer loyalty, trust and market share growth..
- **A risk:** System failures that could lead to service disruption, unauthorized access and data breaches, could cause reputational damage and affect 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 customer privacy and ensuring customer satisfaction by offering high quality services. In this context, specific policies have been adopted that reflect the Group's values and commitments. There have been no material changes to policies relating to new requirements for business customers or additional due diligence and remediation procedures.

**Information Security Policy**

This policy is designed to effectively manage critical performance indicators and mitigate risks affecting end users and other customer groups. It is an expression of the Group's firm commitment to protecting sensitive data, maintaining trust and ensuring the integrity, confidentiality and availability of services.
The main pillars of this policy are:

- **Confidentiality:** Access to information only by authorised persons.
- **Integrity:** Protection of information from tampering and controlled modification by authorised users only.
- **Availability:** Access to information and systems when and where required by authorised users.

This policy proactively addresses risks such as cyber threats by implementing modern security measures, regular system updates and stress testing. Ensure full compliance with GDPR and other data protection legislation, while protecting services from malfunctions.

The implementation of the Information Security Policy is monitored through internal controls, quarterly assessments and reports to the Executive Committee. The scope of application covers all employees, units, subsidiaries, offices, affiliated companies, external suppliers and partners. It includes information management at every stage - from creation to storage and disposal - and applies to both internal operations and external partnerships This policy applies to all systems, applications and networks, regardless of format or location, and covers the entire value chain. The Executive Committee and the CISO are responsible for implementation and supervision. This policy is aligned with European standards (GDPR, PSD2, Basel II) and international standards (ISO/IEC 27001:2012, PCI DSS). The views of stakeholders are taken into account, while the policy is communicated to employees upon their recruitment with mandatory electronic acceptance and is supported by training programmes and support services. It is noted that the Information Security Policy is available on the intranet and its key provisions are communicated to external stakeholders through secure portals and documented procedures.

- **Personal Data Management Policy**

Optima bank applies the Personal Data Management Policy, which ensures compliance with the GDPR, the protection of individuals and the responsible processing of all categories of personal data. This policy covers the general principles of necessity, transparency, legality, quality and security, and includes procedures for informing subjects, managing requests, dealing with breaches, and maintaining and destroying records. It is directly linked to substantial risks - such as security breaches, regulatory sanctions and loss of reputation - but also to opportunities to enhance corporate governance and stakeholder trust. Monitoring is ensured through the DPO, data breach management procedures, systematic servicing of subject requests and record review and retention cycles.

**• Information Security Incident Management Policy**

This policy outlines the procedures for recording and managing of security incidents in accordance with the Group's contractual, social and legal obligations. It applies to all activities, employees and partners, excluding systems outside the Group.

A procedure has been established to communicate directly with affected customers and to deal effectively with security incidents. The CISO is responsible for the implementation of this policy, which is aligned with ISO 27001:2013. Stakeholder interests are taken into account and this policy is communicated through internal communications and training programmes.

**• Communications Security Policy**

This policy sets out the framework for the design and management of the web infrastructure, with a focus on security and business continuity. Strict measures are implemented to protect the architecture, use and controls of the network, ensuring the security of information in transit.

It covers all communication networks connecting information systems within and outside the Group, as well as applications and network infrastructure. All users and administrators - employees, partners and suppliers - must comply with this policy. The CISO is responsible for its implementation, which is aligned with ISO 27001 and industry best practices.

The Communications Security Policy includes detailed security provisions for network infrastructures and requires them to be incorporated into third party contracts. Priority is given to the use of secure transmission channels and the clear separation of network systems. Compliance is monitored through automated tools, assessments and controls, and supported by IT teams, technical documentation and training programmes.

**• Logical Access Management Policy**

This policy sets out a comprehensive framework for the protection of information resources through strong security measures. It applies to all systems, networks and applications, covering both local and remote access, across the entire value chain.

The CISO is responsible for implementing this policy, which is aligned with ISO 27001 and industry best practices. Emphasis is placed on the safety of employees, suppliers and customers. This policy is communicated through the intranet and training programmes, while the key provisions are communicated externally through contracts and documentation.

**• Acceptable Use Policy**

This policy sets out the principles for the responsible use of the Group's information systems, with the aim of protecting data, reducing the risks of human error and strengthening the security culture.

It applies to all users - employees and external partners - in all activities and regions. The CISO is responsible for implementing this policy, which is aligned with ISO 27001. Emphasis is placed on user awareness and responsibility.

The Acceptable Use Policy is made available to employees at the time of their recruitment through a special platform, with mandatory electronic acceptance. It is supported by training programmes, assistance services and comprehensive guidance materials.

**Sustainable Development Policy**

The Group's Sustainable Development Policy promotes the enhancement of customer satisfaction, incorporating innovation and digital technology as key elements of the strategy to improve operations. By providing banking solutions that are accessible, efficient and tailored to the needs of customers, the Group seeks to provide an exceptional service experience. Information on the Minimum Disclosure Requirements of this policy is set out in ESRS E1 Climate Change chapter.

The Group, through the implementation of the above policies, strengthens trust and confirms its commitment to its customers and employees. It promotes their rights and creates a modern and responsible operating environment. It should be noted, however, that the above policies are not aligned with internationally recognized customer-related instruments, including the United Nations Guiding Principles on Business and Human Rights. Although there are no explicit commitments to customers' human rights - such as mechanisms to comply with the UN Guiding Principles, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises - the Group remains committed to sustainable development, integrating human rights principles into its strategy. This demonstrates its commitment to creating a framework where security, transparency and respect are core values.

The Group follows an organized and customer-centric approach, utilizing various means to ensure open communication and effective problem solving. These include:

- customer satisfaction surveys,
- daily interactions in the Bank's branches,
- the dedicated Call Centre,
- the "Send us your message" online platform,
- and the complaint form on the Optima bank website.

The complaints handling procedure is organised and described in detail in the Complaints Management Policy and Procedure. It is supervised by the top management, with the CEO of Optima bank being informed about the complaints and supervising their management by the relevant Divisions. The relevant Divisions undertake direct communication with the customer to resolve issues, confirming the Group's commitment to excellent service and enhancing trust through transparent practices.

Finally, it is not considered necessary to take measures to remedy human rights impacts as no such impacts have been identified. This conclusion has been confirmed through the DMA process.

## S4-2 – Processes for engaging with consumers and end-users about impacts

The Products and Marketing Division is responsible for enhancing customer experience and loyalty through the strategic planning of products, services, marketing initiatives and communication strategies. Focuses on designing and delivering an optimal customer experience across all sales and communication channels. The Products and Marketing Division actively integrates customer views into its decisions and activities, interacting directly with consumers through surveys and feedback mechanisms. The measurement of customer satisfaction is systematically managed by dedicated teams, using structured surveys and key performance indicators such as the Net Promoter Score (NPS). These tools allow the Group to capture customer views, identify priorities and then improve services. Communication and engagement take place regularly, including during the product and service evaluation period, ensuring that customer needs are identified and effectively addressed. The Products and Marketing Division organizes and coordinates events for both employees and customers, enhancing engagement and relationships. In addition, to better understand customers' needs and improve their overall experience, it develops innovative methods and creates models to automate the information analysis process, providing deeper insights into customer preferences. Information on customer opinions is collected daily and taken into account in order to improve the customer experience. The results of the engagement are communicated internally to the relevant teams on a regular basis and, when necessary, ensuring alignment with the customer-focused approach.

Operational responsibility for ensuring meaningful engagement with customers and the use of its results, as well as their integration into the Group's strategic approach, is implemented through a combined top-down and bottom-up framework across all divisions, and is overseen by the highest level of leadership, ensuring that the information gathered from the feedback process is incorporated into strategic decisions. All departments and divisions within the organisation are responsible for ensuring and enhancing the customer experience, ensuring a holistic approach. The HR Division is responsible for training employees and enhancing their loyalty by equipping them with the skills necessary to deliver an exceptional customer experience. The Products and Marketing Division has various responsibilities to engage effectively with customers. The Digital Networks & Cards Division ensures excellent customer service through the call centre and digital channels, and the Customer Segments Department is responsible for measuring customer satisfaction through specific indicators and surveys. In addition, the Retail Networks Division is responsible for customer service within the stores. These results are regularly discussed with the members of the Executive Committee, ensuring their alignment with strategic priorities. In addition, an annual presentation is made at the Executive Committee meeting, providing a comprehensive review of customer satisfaction metrics and highlighting areas for improvement. The CEO's office handles customer complaints, ensuring prompt resolution and strategic oversight. All these teams work in close cooperation, with top management acting as the main manager of this process. Top management provides strategic direction and facilitates cooperation between the relevant divisions to achieve effective interaction.

Evaluation of the effectiveness of customer engagement processes is achieved by analysing the impact of each initiative on customer satisfaction and loyalty. The Group follows a continuous cycle of listening, analysis and development with a commitment to providing an exceptional customer experience. Feedback from customers is actively collected at every available point of contact, serving as a basis for enhancing, developing and improving the services provided. Customer engagement is systematically evaluated to ensure that their feedback leads to meaningful improvements in products and services. The effectiveness of this interaction is measured through structured mechanisms, as mentioned above. The increase in NPS on digital channels and the absence of negative/relevant comments underline the positive impact of the ongoing improvements. The results from these interactions are used to improve internal processes, enhance communication strategies and continuously improve the overall customer experience across all interaction points, including stores and online channels. An illustrative example relates to mobile apps, where the feedback the organisation received from customers led to a significant reduction in connection times, ensuring a smoother and faster user experience. Similarly, customer demand for greater convenience has led to improved capabilities for bill payments and IRIS payments. Each initiative highlights the ability to transform customer inputs into practices that improve their overall experience. These improvements are regularly reviewed to ensure their continued relevance and effectiveness, reflecting an ongoing commitment to meeting and exceeding customer expectations. The proactive, feedback-based approach enhances trust and loyalty, underlining the Group's position as a flexible and progressive financial institution.
It is noted that no material negative impacts in relation to customers have been identified through the DMA. No customers have been identified who are particularly vulnerable to impacts and/or marginalized

from the Group's activities (for example, people with disabilities, children, etc.). Therefore, no specific steps were taken or deemed necessary to obtain and/or further understand their views.

## S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

As mentioned above, the Group has not identified any material negative impact on customers through the DMA. However, there are specific channels through which customers can express their concerns or needs in a direct way. The Complaints Form, which is available on Optima bank's website, describes the ways in which customers can submit complaints, including by email, telephone or mail. In addition, the website provides detailed information about the complaints procedure, including the respective procedure to follow after a complaint is made, how the customer receives a response and any available method of contact.
Customers can submit a complaint through one of the following channels:
- Visit the nearest Optima bank branch and fill in the Complaints Form.
- Contact the Optima bank department responsible for complaints management either by calling +30 210-8173199 or via email (wearelistening@optimabank.gr).
- Send a letter to the Optima bank Complaints Department, Aigialia 32 & Paradisos, 15125 Amarousion, to the attention of the Complaints Department.

Furthermore, Optima bank, in compliance with Law 4994/2022 regarding the accessibility requirements of products and services and committed to a banking experience that is truly equal, ensures that every customer has access to all services and through all service points. The Bank offers the possibility of providing guidance, through the call center or through a connection with a representative, adapted to the needs of persons with disabilities. It also gives priority service and provides an escort by a service manager throughout the customer's stay in the store. A special contact form is available on the Bank's website in order to continuously improve the service to persons with disabilities.

The complaint handler, after receiving the complaint, contacts the customer within two working days to verify the customer's identity, confirm receipt of the complaint and give an estimated time for its examination. After collecting any relevant information and documentation, the complaint is investigated in cooperation with other Group departments involved or, if necessary, with the competent authorities (e.g. the Ombudsman). The officials responsible for management shall 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 Group policies. Through the above procedure, the Group monitors and controls complaints and any issues that may arise and takes appropriate action to improve procedures, if necessary. So far, there has been no need to develop a specific process to evaluate the effectiveness of the channels or the information and confidence of customers in these processes as a means of expressing their concerns or addressing their needs.

Information on whistle-blower protection and the Whistleblowing Policy is provided in ESRS G1 Business Conduct and ESRS S1 Own Workforce.

In addition, customers are fully informed about the protection of their personal data and the General Data Protection Regulation (GDPR), through Optima bank's corporate website, specifically through the following:
- 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 concerning personal data recorded by the closed-circuit television (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 is committed to high standards of data protection and cybersecurity, continuously investing in advanced technologies, policies and training to protect sensitive information and enhance trust among all stakeholder groups. Implement actions to strengthen data security, ensuring the protection of sensitive information and reducing the risk of unauthorised access or data breaches in all areas of operation. These actions include strong internal management systems and established cybersecurity procedures that effectively protect and ensure the data privacy of stakeholders. Specialised systems ensure business continuity, enabling consistent service delivery to customers and business functions. Through these actions, the Group has reduced the incidents of breach, data leakage including personal data or exposure of confidential information, while operational efficiency has improved.

**The Group is committed to a banking experience that is truly equal.** In compliance with the legislation (N. 4994/2022 and EU Directive 2019/882), we ensure that every customer has equal access to our services, whether they are served digitally or in a physical store.

**People with disabilities** are served with respect, care and practical solutions:

- Through digital channels (e-banking, mobile app, Optima bank trader, website, chat box), they can be easily served without having to visit a branch.
- The process of opening an account, issuing a debit card and obtaining e-banking codes is entirely online, via mobile phone, with the possibility of subtitling for greater accessibility.

**In Physical stores:**

- The majority of branches ensure easy access for people with mobility difficulties.
- Most branches have WCs suitable for wheelchair use and comfortable indoor movement.
- Most ATMs are wheelchair accessible.
- The meeting rooms offer quiet and privacy.
- There is Braille signage at the entrance of the shops to inform about the priority of service.

**In addition, the following are offered:**

- Automatic document to speech tool.
- Ability to issue basic banking documents in Braille, upon request.
- E-meeting service for online appointments with the branch, without physical presence.

Finally, special emphasis is placed on training our staff by specialised bodies to understand and implement solutions that ensure equal access for all.

In 2025, the Group implemented the following actions:

**Threat Intelligence Solution (Threat Intelligence)**

It includes tools that help the organisation have a full picture of potential cyber threats before they become actual attacks. It includes mechanisms to collect and analyse information from various sources, such as open web, deep and dark web, as well as from the company's digital footprint. Through these, it detects signs of malicious activity, phishing, data leaks and vulnerabilities in systems or partners. The goal is prevention, protection of corporate image and risk reduction, with automated processes and easy integration into existing security solutions.

**Cyber Security Assessment Platform**

It allows the organisation to measure and monitor the level of security of the organisation and its partners through an objective metric (security rating). This metric is based on data from public sources, networks and systems, and allows comparisons with organisations in the same industry as well as with suppliers and partners. At the same time, the platform supports Third-Party Risk Management, helping businesses identify supply chain weaknesses and reduce risk from external partners. Through reports and suggestions for improvement in an understandable format, it facilitates decision-making and enhances trust in business relationships, while contributing to compliance with regulatory frameworks and overall risk reduction.

**File Integrity Monitoring (FIM) on critical systems**

It includes continuous monitoring of key system files to detect unauthorized changes, potential security breaches or unexpected modifications, ensuring the integrity of key banking systems and protecting sensitive information. The scope of coverage includes the monitoring and protection of critical system files from unauthorized modifications, with a primary focus on the internal system integrity of the respective subordinate functions. This initiative is being implemented in the Bank, covering all functional areas. Affected stakeholders, consisting of internal staff such as IT employees and system administrators, as well as customers, benefit indirectly through enhanced data protection.

**Network and Application Layer DDoS protection**

It includes advanced mechanisms to detect, mitigate and prevent denial of service attacks (DDoS), ensuring the continued availability of digital banking services and protection against cyber threats. The scope of coverage includes cybersecurity defense measures targeting DDoS attacks, positioned from the mid- to low-level to protect both network infrastructure and customer-facing applications. This protection extends completely to all digital contact points of the Bank. Affected stakeholders, consisting of internal teams such as IT security employees and network administrators, and external stakeholders, including customers, online banking users and consumers of digital services, benefit from uninterrupted and secure access to banking services.

**Vulnerability Assessment Platform**

This action refers to an advanced platform to continuously scan, identify and assess potential security vulnerabilities across the entire digital ecosystem, enabling proactive risk mitigation. The scope of coverage includes integrated security vulnerability identification and management, positioned at the top and middle levels to detect and address potential security risks before they affect operations. This initiative is being implemented across the Bank, covering all functional areas. Affected stakeholders, which include internal teams such as IT security employees and risk management departments, and external stakeholders, which include customers and suppliers, benefit from enhanced security and reduced risk exposure.

**Privileged Access Management (PAM) Platform**

The action concerns an advanced platform to manage, monitor and control access to critical systems by highly privileged users, reducing the risk of internal security breaches and unauthorised system modifications. The scope of coverage includes rigorous access control and monitoring measures, positioned at the top and middle levels to enhance internal security and prevent unauthorised access. This platform is implemented in an integrated manner across all of the Bank's critical systems. Affected stakeholders, consisting of internal staff, such as employees with increased access to systems and IT administrators, and external stakeholders, including customers, benefit indirectly through enhanced protection of their sensitive data.

The implementation of the above actions does not require significant operational or capital expenditure.

The Group has strong security procedures in place to protect customer data and maintain operational resilience. The Information Systems Monitoring Procedure aims to ensure the smooth operation and reliability of 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 processed information, including personal data. In addition, it ensures the implementation of the security measures decided to maintain the business continuity of the Group. The Security Incident Response Process ensures that information security incidents are effectively managed, where any incidents are reported, investigated and resolved immediately to minimise potential harm to consumers and end users. The purpose of the Security Incident Response Process is to describe the necessary actions to be taken in the event of a security incident for a prompt and effective response. The Logical Access Policy Implementation Control Procedure further enhances security by regulating access to sensitive data. By granting rights only to authorised persons and conducting regular access controls, the possibility of unauthorised access is significantly reduced. This process helps reduce risks and ensures that consumer data is always protected. In addition, the Group's Information Systems Support Process provides excellent service continuity and reliability, addressing technical issues immediately. This proactive strategic approach directly benefits consumers by ensuring that all services remain operational and efficient, with a focus on improving system reliability and customer service. Analysis of recurring technical issues informs ongoing improvements and upgrades to systems.

In addition, the Group has undertaken additional actions and initiatives aimed at further strengthening cybersecurity protection. The Group's current security approach is designed to ensure a safe and reliable environment for customers, leveraging advanced technologies and services, and to contribute positively to improving social outcomes for consumers and end-users. These measures mitigate the risk of cybersecurity threats, protect personal data and maintain trust in digital services. The framework includes the development of a Security Operations Center (SOC) and Security Information and Event Management (SIEM) systems that operate 24/7, which monitor and respond to security threats in real time, ensuring uninterrupted service and user safety. Endpoint Detection and Response (EDR) and Antivirus (AV) are applied to all workstations and servers, along with Managed Detection and Response (MDR) services that proactively identify and mitigate potential risks. Perimeter security is enhanced through Firewalls and Web Application Firewalls (WAFs), complemented by advanced email filtering and sandboxing techniques to combat email threats and phishing attempts. In addition, there is a dedicated service to block fake URLs, ads and social media pages to protect consumers from malicious online activities. The Group also conducts regular security awareness training and exercises for employees to ensure that everyone is equipped with the knowledge to recognise and respond to potential threats. It also provides "Work From Anywhere" laptops based on security best practices, ensuring that employees can securely access systems and services from any location.

The Group implements further actions to promote customer education and awareness. This approach also enhances interaction with stakeholders by providing accessible and transparent information. Digital presence supports this effort by providing critical resources and guidance on the corporate website, including:

- Online anti-fraud guidelines to help customers recognise and avoid online fraud.
- Safety guidelines for online banking and online transactions, promoting safe digital conduct.
- Guidance on the General Data Protection Regulation (GDPR), ensuring transparent information on the processing of personal data and the relevant customers rights.

The Group also uses the LinkedIn platform to enhance communication with customers. The posts cover key topics such as data protection, with information from the Data Protection Officer, and awareness campaigns on online fraud that align with broader educational efforts. These postings serve to reinforce the initiatives implemented and foster trust among its clients.

In 2025, newsletters were another important point of contact, with the Group distributing targeted publications to a large number of e-banking users (individuals and legal entities). These communications have played a key role in addressing widespread online fraud scenarios, offering practical advice on preventing online fraud and promoting safe online shopping practices. In addition, the newsletters presented the digital tools and features available to customers, enabling them to navigate banking services safely and confidently.

To monitor and evaluate the effectiveness of these actions and initiatives in achieving the intended outcomes for customers through the provision of a secure digital environment, the Group implements a framework for continuous monitoring through real-time analysis and automated reporting of security incidents. This approach helps to measure the effectiveness of systems and identify areas for improvement. In addition, the Group has established a comprehensive Full Disaster Recovery site to ensure business continuity in case of critical incidents. Regular penetration and vulnerability assessments are conducted, along with periodic Red Teaming exercises simulating real cyber-attacks. These activities enhance preparedness against evolving threats and provide valuable insights for evaluating the success of security initiatives.

The Group offers a range of customised solutions, ensuring that they remain flexible and aligned with customer needs in order to continue to provide efficient service, security and customer satisfaction. Specifically:

- **Call Centre Operations**: Daily reporting ensures that 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 collect and analyse feedback from stores, digital services and business banking. This allows the Group to proactively improve customer experiences.
- **Campaigns:** The Group uses a dedicated platform to plan and execute campaigns that are aligned with customer needs and strategic objectives, ensuring effective communication.
- **Contact form monitoring**: The GA4 system monitors customer interactions through the contact forms, ensuring that queries are dealt with efficiently and any issues are resolved promptly.

To further mitigate the material risk associated with system failures-such as service interruptions, unauthorized access and data breaches-that could cause reputational damage and affect the organisation's financial performance, the Group implemented the following actions during 2025:

- **Data Loss Prevention (DLP) and Azzure Information Protection (AIP) implementation:** Data Classification has been completed and the Group is in the process of selecting a partner to implement advanced DLP solutions to prevent unauthorized data extraction.
- **ISO 27001 certification:** The organisation was certified according to ISO 27001:2022 by LRQA.
- **Compliance with the DORA regulation:** The project is at an advanced stage of implementing corrective actions, with most of the requirements already covered, aiming at full compliance and comprehensive coverage of DORA requirements and enhancing operational resilience.
- **Firewall Management and Network Security Policy Platform**: The Group evaluates candidate platforms to determine their suitability for firewall management and network security policy requirements.

Customer feedback mechanisms are continuously strengthened by proactively improving services, personalising customer experiences and investing in technology and innovation to ensure continued customer satisfaction leading to higher loyalty, trust and market share growth. It is noted that no serious human rights issues or incidents related to clients have ever been identified.

The Group has the necessary resources to effectively manage its material impacts, ensuring that users clearly understand how these impacts are managed. One of the key resources is a dedicated platform that measures customer satisfaction across all channels. This platform plays a central role in impact management, providing comprehensive information on customer experiences and satisfaction levels. Through its use, the Group ensures the continuous monitoring, evaluation and improvement of its services, contributing to the effective management of customer-related impacts. In addition, the Group has assigned specialized personnel from the Products and Marketing Division, the DPO and the Information Security Department to oversee critical processes and services. They also have responsible employees 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 has an appropriate budget for the implementation of individual measures, actions and initiatives. This budget is tailored to the needs of the Group and ensures that there are sufficient resources to deal effectively with material impacts.

**Metrics and targets**

## S4-5 – Targets related to advancing material positive impacts and managing material risks and opportunities

The Group uses the Net Promoter Score as a tool to measure customer loyalty and satisfaction in the banking experience. NPS measurement is event-driven, capturing the customer experience across all service channels. In addition, it is conducted at regular intervals to assess the overall satisfaction of the Bank. NPS is a simple, easy-to-understand metric that assesses customer loyalty, through likelihood of recommendation, and overall satisfaction on an international scale, the NPS scale (0-10). Customers are categorized based on their responses into detractors (0-6), passives (7-8) and promoters (9-10). NPS is calculated as the percentage of promoters minus the percentage of detractors. The NPS ranges from -100 to +100. NPS above zero indicates that the entity has more promoters than detractors, reflecting general customer loyalty. Conversely, NPS below zero indicates that there are more detractors than promoters, suggesting possible customer dissatisfaction. NPS equal to zero indicates a balance between promoters and detractors.

For 2025, the Bank's branch NPS was 87.6, by up to around 5 points from 2024. The loyalty of customers who visit an Optima bank branch was measured during the following services: loan disbursement, opening an investment account, issuing a credit card, opening an account or issuing a debit card.
Based on an ongoing commitment to deliver a better customer experience in line with the outcome of the DMA, and a series of internal communications with representatives from the Product and Marketing Division and the Strategy, IR and Sustainable Development Division, a specific target has been set to achieve the intended outcome and continuous monitoring. Optima bank aims to continue to provide optimal customer service as outlined in its Sustainable Development Policy. To establish this target, a benchmarking analysis against competitors and banking industry standards was conducted. Customer feedback mechanisms help improve services, personalise interactions with customers and invest in technology and innovation. These efforts ensure continued customer satisfaction, leading to higher loyalty, trust and increased market share. Top management regularly assesses this target (monthly, quarterly and annually) to ensure that it is progressing and that it is 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** | **PERFORMANCE in 2025** |
|---|---|---|---|---|
| Maintaining branch NPS >80 | Ongoing | 2024 | 82.5 | 87.6 |

The Group has not set measurable targets oriented to data protection and privacy issues but continuously monitors the effectiveness of its policies and actions by measuring data breach incidents and following the Information Security Incident Management Policy and the Security Incident Response Procedure. All employees and external partners with access to the Group's resources must immediately report any incident or weakness that affects the security of information. To ensure this, employees receive training to detect and respond to security threats. Incidents are reported through defined channels available to all employees. The Information Security Officer assigns them to the Security Incident Response Team, which consists of specialised staff based on the criticality of the incident. Any medium or high-risk incident is treated as a top priority. In confirmed cases, Root Cause Analysis is conducted to identify root causes and implement preventive measures such as policy updates, enhanced security controls and awareness initiatives.

For the reporting period, the Group had one incident of leakage, theft or loss of customer data, in accordance with the GRI 418-1 b disclosure, an increase of one (1) compared to 2024. It is noted that the incident was small in scale, involved an individual and was identified through existing control mechanisms. The Bank dealt with it promptly and effectively, without any impact on customers or the Group's operations.

The above metrics have not been validated by an external body.

# Entity Specific ("ES")

## Innovation and Digitalization

### Strategy

ES.SBM-3 – Material impacts, risks and their interaction with strategy and business model

The Group recognizes the key role of digital transformation in its business model and strategy. Continuous developments and upgrades in the digital realm aim to enhance operational efficiency while addressing critical challenges such as anti-corruption, prevention of bribery and effective risk management. The Group integrates advanced technologies into its operations, seeking to provide high quality services, optimise processes and create a framework based on transparency and resilience. According to the DMA, Innovation and Digitalization is identified as a material topic with material impact and risk. This topic relates mainly to banking activity, and therefore the disclosures are focused on the Bank. Material IROs are linked to the Group's business model, operations and value chain.

The Group uses digital tools and services to develop innovative solutions, reaping multiple benefits. Investing in secure digital banking platforms and AI-based customer service systems, ensuring seamless and efficient service delivery across all digital channels. These technological upgrades allow the Group to respond promptly and efficiently to customer needs, while maintaining high standards of security and reliability.

In the field of risk management, the Group has adopted cutting-edge technologies such as artificial intelligence, machine learning and blockchain to enhance risk monitoring, assessment and management. Through this proactive approach, the Group's transparency and resilience is enhanced, protecting both operations and relationships with its partners, throughout the value chain - upstream and downstream.

At the same time, the Group places particular emphasis on accessibility, developing user-friendly digital services that respond to the changing needs of customers. By prioritising digital channels, the Group ensures broad accessibility of services, while maintaining a competitive advantage in the dynamically evolving banking sector. The Group also recognises the risks that accompany the implementation of innovation and digitalization. Cyber-attacks can cause disruptions to operations, compromise sensitive data and negatively affect its reputation. To address these risks, strong cybersecurity measures such as sophisticated threat detection systems have been adopted. Furthermore, the reliance on third-party providers, which can create vulnerabilities in case of malfunctions or failures in the supply chain. To address

this risk, the Group applies advanced third-party risk management practices, as mentioned above. As reliance on digital systems is inevitable for a modern organisation that seeks to remain technologically up-to-date, business continuity is a priority. The Group has developed a detailed business continuity plan, which ensures the smooth operation of critical services even in emergency situations.
Material IROs are actively considered in the Group's business model, value chain, strategy and decision-making processes. Further improvements in service quality and customer satisfaction are expected as the use of digital solutions increases. To respond to these positive developments, the Group is strengthening its digital transformation to improve operational efficiency.
At the same time, to address these risks, the Group invests in new technologies that enhance third-party risk management processes, as well as monitoring and evaluation frameworks. As part of strategic changes, it plans to increase customer digital engagement within a specific timeframe, with the aim of boosting the use of digital services and increasing customer satisfaction and loyalty. To achieve this goal, a specific metric has been set to increase the use of digital services.
As stated in ESRS 2, there are currently no financial effects, and the anticipated effects are under the phased-in provision.
The adoption and delivery of innovative services through digital tools have a positive effect on both people and the environment. Digital banking services enable customers to access financial products and manage their finances remotely, making the banking experience more flexible and accessible. At the same time, innovative tools offer personalised, seamless and efficient services, meeting the different needs of customers and enhancing their satisfaction.
At the environmental level, the shift to digital services reduces paper use, helping to reduce deforestation and waste generation. In addition, digital banking requires less energy than traditional processes, particularly due to the elimination of energy-intensive, form-based procedures.
These impacts are fully aligned with the Group's strategy, which focuses on innovation and digital transformation. The goal is to enhance customer satisfaction, improve operational efficiency and promote sustainable growth through the integration of digital tools and services such as:

- digital recording,
- mobile banking applications,
- 24-hour customer support via live chat or video call,
- and automated service platforms.

These digital initiatives are a key element of the Group's business model, which prioritises the use of technology to provide innovative financial solutions. The adoption of digital services is clearly embedded in the Group's strategy, aiming to meet the changing needs of customers and maintain competitiveness in the market.
This strategy not only strengthens the Group's operations but also supports the long-term sustainability goals by reducing operating costs and increasing the accessibility of services. Therefore, Optima bank’s overall strategy and business model are closely linked to the implications of implementing and delivering advanced services through digital tools.
The Group actively participates in this impact through its core activities, as the development and provision of digital services is a central element of its operations. At the same time, it works with technology partners to ensure the smooth delivery of these innovative solutions, creating a network that fosters innovation and sustainability.
The Group is adapting its strategy and business model to effectively manage the material impact and risk associated with innovation and digitalization. As already mentioned, adopting and offering innovative services - such as digital enrolment, mobile banking apps and automated support platforms - boosts customer satisfaction and promotes sustainable growth.
However, digitalization also brings new risks, such as cyber-attacks and increased reliance on third-party providers, which may cause disruptions in operations during crises and affect performance. To enhance

resilience, the Group has developed documented processes and has operational resources for business continuity. These include:

- detailed procedures for the management and mitigation of risks,
- adequate resources to maintain critical functions,
- and regular reviews to address potential disruptions.

## ES – Policies related to the entity-specific topic

Optima bank 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 strong safety measures. By providing accessible, efficient and personalised banking solutions, the Group enables customers to have seamless access to services, whether they are managing accounts, conducting transactions or receiving personalised financial information and assistance. With a strong focus on customer needs, the Group offers a smooth and satisfying experience at every touch point. Committed to innovation and digitalization, Optima bank invests in advanced technologies to ensure efficiency and reliability. In addition, 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, related to innovation and digitalization and their material impacts and risks. More information on the Minimum Disclosure Requirements of the Sustainable Development Policy is provided in the ESRS E1 Climate Change chapter.

## ES – Taking action on material impacts and approaches to mitigate the material risks in relation to the entity-specific topic and effectiveness of those actions

Digital transformation and innovation are the Group's top priorities. The Group is taking actions to manage the material impacts and risks associated with innovation and digitalization. Several key actions undertaken include the development and enhancement of digital solutions that prioritise the customer experience, with the aim of simplifying everyday banking through advanced technologies. These actions are expected to lead to the achievement of the goals and objectives of the above policy. The Group offers a seamless and innovative banking experience, prioritising environmental sustainability, social impact and strong governance. The main actions taken by the Group to achieve these are:

- The available card products were enriched with two new corporate products, the Business Debit & Business Credit cards, adapted to the evolving needs of corporate customers.
- Smart payment solutions: Customers can enjoy fast and secure payment options such as contactless transactions, digital wallets (Apple Pay/Google Wallet) and standing orders for personal and organisational needs. Recurring payments are simplified with subscription management tools.
- Preventive security measures (2025): Financial protection is enhanced with new security and fraud prevention mechanisms, such as the Verification of Payee feature which, combined with existing mechanisms such as Kill Switch, customizable daily or per transaction limits and the ability to block transfers abroad, offer a comprehensive security umbrella to customers. Security is further enhanced through notifications sent via push notifications, email, Viber or SMS.
- Innovative business solutions: Enterprises can leverage advanced features such as complex access rights and single sign-on for multiple users, simplifying workflows. Bulk transactions, including payroll, payments and transfers, were redesigned with the main objective of fully automating the processes of the partner companies with complete flexibility and control by the company itself. Along with IRIS Payments

for professionals, the customers of freelancers - sole proprietorships are given the opportunity to make their payments easily and quickly through the Optima mobile app.

• Seamless account management (in progress): Account holders can effortlessly monitor their finances, perform secure money transfers and track payments, including IRIS payments, through an intuitive and user-friendly interface. Personalised real-time financial information further enhances account management.

• Sustainability and impact (ongoing): Paper consumption is reduced and resource use is optimised through digital processes, contributing to environmental sustainability. Financial inclusion and accessibility are improved, supporting underserved communities.

• Advanced cybersecurity (in progress): Customer data is protected with state-of-the-art measures such as encryption, multi-factor authentication and real-time fraud detection, ensuring that financial information remains secure.

In addition, the collection - payment services are enriched with the possibility for businesses to participate in DIAS with Optima bank as an Organization Bank (RF). These activities cover various activities, including customer service, account management, transaction processing and cybersecurity.

Currently, the actions are focused on the intermediate position of the value chain, namely the Group's operations and customer interactions. These actions are also implemented in all regions where the Group operates. The main stakeholder groups affected include customers and employees. The digital banking platform and improvements in the account opening process were implemented in the reporting year and will continue to be improved in the coming years. The above actions did not require significant operational or capital expenditure.

## Metrics and targets

### ES – Targets related to advancing material positive impacts and managing material risks

At present, no time-bound and result-oriented targets have been set for Innovation and Digitalization. However, the effectiveness of actions and progress is monitored using relevant metrics, such as the percentage of financial transactions carried out through digital services, with the financial year 2024 serving as the base year for this metric. This approach underlines the clear level of ambition in delivering and adopting innovative and digital services and solutions, while allowing for effective monitoring and transparent reporting of results. The metric is calculated by dividing the number of financial transactions carried out through digital networks (web and mobile banking) by the total number of financial transactions carried out both through digital networks and the Bank's branches without the use of cash. Financial transactions include money transfers and bill payments. In 2025, the 89% of financial transactions were conducted through digital networks, roughly the same as in 2024 (90.9%).
The metric has not been validated by an external body.

# Governance Information

## ESRS G1- Business conduct

## Impacts, risks and opportunities management

### G1-1 – Business conduct policies and corporate culture

The Group's primary goal is to protect the interests of its shareholders and all stakeholders associated to the Bank and its subsidiaries - such as customers, employees and partners. Recognizing the importance of corporate governance principles and the benefits derived from their application, the Group has adopted

regulations, policies and practices that comply with the applicable regulatory framework and are embedded in its corporate culture.
The evaluation process of the Corporate Governance System enhances the Group's credibility towards shareholders and stakeholders, promotes transparency in management and decision-making processes, and ensures the effective application of rules, principles and internal mechanisms to both management and shareholders. At the same time, it contributes to the development and maintenance of a functional organisational structure and a business model that supports the Group's strategic objectives and enhances sustainable growth. This process focuses on the early identification of weaknesses or operational problems, allowing for immediate corrective action, as well as the effective monitoring and management of critical risks related to business activities and operations.
Optima bank has adopted the Hellenic Corporate Governance Code for listed companies, which was issued by the Hellenic Corporate Governance Council (HCCC) in June 2021. The Hellenic Corporate Governance Code is based on the principle of "comply or explain", guiding companies to adopt best practices and develop corporate governance policies and procedures that are appropriate to their particular circumstances. According to the Corporate Governance Principles of the Organization for Economic Co-operation and Development (OECD) – a global reference which has influenced the Hellenic Code of Corporate Governance - corporate governance is defined as the system of relationships between management, shareholders, employees and other stakeholders, with the aim of creating, maintaining and developing strong and competitive businesses.
In addition, Optima bank has adopted a detailed Rules of Procedure, which defines the organisational structure, the roles of the units and committees, as well as the responsibilities of their 201 supervisors and reporting lines. The Rules of Procedure define the key features of the internal control system including the functioning of the Internal Audit Division, the Risk Management Division and the Compliance Division, as well as all the policies and procedures referred to in par. 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 active dialogue with them, as well as the procedure for evaluating the Bank's corporate governance system. Already by virtue of the decision of the Board of Directors of the Bank dated 16.01.2025, the Sustainable Development Policy has been adopted, which is included in the Rules of Procedure. Rules of Procedure complements the existing regulations and ensures the integrity, functionality and effectiveness of the Bank's corporate governance and internal control systems. The Group promotes trust, transparency and flexibility through its values and policies, both in the Bank and its subsidiaries. The daily communication between the HR Division and employees constantly reinforces the corporate culture, which is also promoted by the CEO at every corporate event. This culture is also reflected in the benefits offered to employees.
The principles of ethical conduct are embedded in every operation of the Bank and its subsidiaries, affecting both decision-making processes and relations with customers, employees, partners and the wider society. In order to foster a strong corporate culture and promote ethical business conduct, the Group has adopted the following policies:

- **Code of Ethical Conduct and Ethics:**

It includes detailed information on the Minimum Disclosure Requirements, which are presented in ESRS S1 Own Workforce.

- **Whistleblowing Policy:**

The Minimum Disclosure Requirements of this policy are also described in ESRS S1 Own Workforce.

- **Policy on the Prevention and Management of Fraud Risk**

This policy establishes a comprehensive framework for preventing, detecting and dealing with fraud, with zero tolerance for all forms of fraudulent conduct. This policy is directly linked to material risks for the Group - such as financial loss, loss of reputation, data breach and regulatory risks - and helps to reduce the impact through strong corporate governance. The framework includes internal controls, AML/anti-fraud systems, whistleblowing procedures, IT & physical security controls, as well as a full system of monitoring by the BoD Committees. The implementation of the Policy on the Prevention and Management of Fraud Risk is the responsibility of the Executive Committee, which oversees the framework and approves revisions,

while its implementation and monitoring is ensured by the Operational Risk section of the Risk Management Division the Internal Audit Division and the heads of all business units.
The implementation of this policy enhances corporate integrity, protects customers and contributes to a robust and transparent business model, fully aligned with ESRS requirements. The policy is available on the bank's website and its intranet.

**• Anti-Bribery and Anti-corruption Policy**

This policy includes:

- its purpose and scope,
- the governance structure,
- key concepts and definitions,
- fundamental principles and implementing rules,
- procedures for reporting violations and illegal actions.

It is in line with existing legislation on anti-bribery and corruption and aims to:

- setting standards of conduct on corruption issues,
- encouraging confidential reporting of incidents through dedicated channels,
- raising awareness among employees and partners,
- identifying and dealing with corruption and bribery,
- the protection of employees and the preservation of the Group's reputation.

Responsibility for implementing this policy rests with the heads of the business units, who oversee compliance in their respective areas. In addition to legal requirements, this policy is aligned with international and national standards, such as the definition of a public official under the United Nations Convention. It includes references to corruption issues at international level and takes into account the needs and expectations of stakeholders. Ongoing communication with stakeholders ensures that their concerns are understood and enhances compliance with legal and ethical standards, while maintaining transparency.
This policy applies to all Bank employees and any individual providing services to or on behalf of the Bank. It covers all activities and functions, including customer relations, third-party partnerships and outsourcing. It is available on the intranet and on the Bank's website.

- **Policy on the Prevention and Suppression of Money Laundering (AML Policy)**

The AML Policy includes:

- definitions and basic concepts,
- measures to prevent and suppress money laundering and terrorist financing,
- application of due diligence by third parties,
- monitoring and detecting suspicious transactions,
- reporting procedures,
- controls and protection of interests,
- staff training and record keeping.

The aim of this policy is to prevent the imposition of sanctions for unintentional involvement in illegal activities. It is a comprehensive guide to the Bank's procedures for managing money laundering risks and protecting the Group's reputation and interests. This policy includes detailed documentation of corporate practices and controls and is revised as needed to remain in compliance with legal requirements.
It incorporates best practices, such as the Wolfsberg Group principles and FATF guidelines, applying a risk-based approach. The member of the Board of Directors who has been designated in accordance with the relevant legislation as responsible for the implementation of the provisions related to anti-money laundering is the CEO. This policy applies to all employees in order to avoid omissions that could jeopardise the Group's reputation. Training programmes inform employees and partners about legislation, obligations and procedures such as customer identification, record keeping and internal reporting. Stakeholder guidance and expectations have been incorporated through the risk-based approach applied in the design and implementation of AML procedures. This policy is available on the intranet for all employees.

- **Suitability Policy for the Members of the Board of Directors**

The Suitability Policy for the Members of the Board of Directors includes:

- objectives,
- selection principles,
- the procedures for submitting applications,
- suitability assessments
- succession planning,
- promoting diversity and gender equality,
- corrective measures.

Its purpose is to ensure high standards of suitability, to enhance the effective functioning of the Board of Directors in line with the Bank's strategic objectives and to ensure compliance with applicable legal and regulatory requirements.
The Suitability Policy for the Members of the Board of Directors applies to all members of the Board of Directors. Its implementation is monitored by the Board of Directors itself, while the Internal Audit Division is responsible for evaluating its suitability and effectiveness. It is available both on the intranet and on the corporate website. In formulating this policy, which was updated by the Annual General Meeting of Shareholders on 29.04.2025, the expectations of stakeholders and those affected by it are taken into account.

**Policies:**

- **Policy on the Prevention and Combating of Incidents of Workplace Violence and Harassment - Management of Complaints**
  The Minimum Disclosure Requirements of this policy are described in ESRS S1 Own Workforce chapter.

- **Board of Directors Remuneration Policy**
  The Minimum Disclosure Requirements of this policy are described in ESRS S1 Own Workforce chapter.

- **Staff Remuneration Policy**
  The Minimum Disclosure Requirements of this policy are described in ESRS S1 Own Workforce chapter.

**Sustainable Development Policy**
This policy outlines the Group's approach to assessing the impacts related to sustainable development on services, products and decision-making processes. It lays the foundation for integrating sustainability into

all Group operations, with the aim of creating value through environmental protection, social well-being and strengthening governance practices.
The Group is committed to maintaining a sound governance model, fostering a strong corporate culture of ethics and integrity, with zero tolerance for corruption and bribery. The Minimum Disclosure Requirements of the Sustainable Development Policy are included in ESRS E1 Climate Change.

**Complaints Management**

The mechanisms for identifying, reporting and addressing concerns about misconduct or violations of the Code of Ethical Conduct and Ethics are described in the **Complaints Handling Procedure**, which is part of the **Whistleblowing Policy**.
The Head of Internal Audit is responsible for the receipt, review, recording and filing of reports at all levels and for all Group companies. In the case of an individual report, the confidentiality of the identity of the complainant and any third person mentioned shall be ensured. Access to the reports is restricted to authorised persons.
The Head of Internal Audit conducts an initial investigation into the issues concerned and, in collaboration with the Reporting Management Committee, evaluates the reports; if these involve irregularities, omissions, or criminal acts, they proceed with further investigation. In the course of the investigation, the Committee may request assistance from the complainant's head of unit, other divisions or external partners. Depending on the subject matter, additional professional support may be requested from Group executives or external experts.
The Reporting Management Committee submits the results of the initial and final investigation to the **Audit Committee of the Board of Directors,** which is also responsible for examining reports of retaliation.
The Group encourages the submission of anonymous or anonymous complaints about serious irregularities, omissions or criminal acts perceived by any employee, regardless of position. Reports can be submitted through all available communication channels by any interested party.
Reports concerning irregularities, omissions or criminal acts may include, but are not limited to:

- cases of theft, embezzlement, fraud, corruption and bribery,
- misappropriation of assets, breach of banking secrecy and misrepresentation of data,
- abuse of authority, violations of Group policies or conduct that damages the reputation or purpose of the Group,
- breaches of the legal and regulatory framework, human rights violations or incidents of discrimination,
- other unethical conduct or deliberate concealment of information relating to the above.

Reports shall be examined with care, impartiality and objectivity. When complaints are confirmed, the Group must take appropriate corrective action. Anonymous reports are assessed on the basis of the quality of the information they contain and the possibility of detecting the reported illegality.
The Group has established specific communication channels, available 24/7, for the submission of anonymous or anonymous reports:

- **By post**, at P.O. Box No. 61371 at ELTA Maroussi.
- **Electronically**, by email to whistleblowing@optimabank.gr

If an employee receives a report through another channel, he or she must forward it immediately to the Head of Internal Audit.
Corruption and bribery are serious issues of concern. The Global Programme against Corruption promotes international transparency and accountability through monitoring mechanisms, the UN Convention Against Corruption (31.10.2003), and cooperation between states. Greece ratified the Convention with Law

3666/2008 and signed it on 10 December 2003. International treaties ratified by law form part of domestic law and take precedence over any contrary provision.
The **Anti-bribery and Anti-corruption Policy** is based on international banking practices and applicable legal obligations and complies with the applicable principles and provisions of Greek and European legislation, as well as with the principles of the United Nations Convention against Corruption, for the prevention and combating of bribery and corruption. The Anti-bribery and Anti-corruption Policy includes prohibitions, preventive measures, reporting mechanisms and investigation and enforcement procedures, with the aim of enhancing transparency, accountability and ethical conduct.
Reporting channels ensure confidentiality and anonymity. All employees are informed of these via the intranet. Reporting officers are trained to handle reports with discretion and to conduct thorough investigations. The HR Division is responsible for communicating this policy.
The Group has established protection measures for those who submit good faith reports, in accordance with Directive (EU) 2019/1937. These measures include protecting the job position and prohibiting any negative action in retaliation. Actions such as:

- demotion or deprivation of promotion,
- a negative evaluation or recommendation,
- non-renewal or early termination of the contract,
- bullying, threats, harassment or marginalisation.

The same protection applies to third parties linked to the complainant, such as colleagues or family members, as well as external contractors whose contracts cannot be terminated prematurely because of the report.
The Group has established procedures for the timely, independent and objective investigation of incidents of business conduct. Employees who become aware of violations must report them to their supervisor, who informs the HR Division and the Compliance Division. In cases of fraud, the Internal Audit Division is informed. If it is a violation of the Anti-bribery and Anti-corruption Policy, the report must be made immediately, with the possibility of anonymity.
The Group has also established a policy and reporting procedures for customers and external parties, outlining the necessary steps to manage and resolve disputes.
The Group's activities are governed by integrity, transparency and responsibility, enhancing stakeholder confidence and supporting sustainable development. Employees are informed about business conduct issues and participate in training activities where appropriate.
Finally, the functions with an increased risk of corruption and bribery are those directly related to customers, suppliers, service providers, contractors and partners.

## G1-3 – Prevention and detection of corruption and bribery

The Group has developed a comprehensive system of policies, procedures and controls to address the risks related to corruption and bribery. This framework aims to prevent, detect and effectively manage relevant complaints, while transparency in business decision-making and corporate governance is a key priority.
The Group applies best practices that comply with national and international legislation, promoting a culture of zero tolerance towards corruption and bribery. All employees, contractors and business partners are required to comply with the principles contained in the **Anti-bribery and Anti-corruption Policy** which is communicated to all levels of the organisation. Any infringements are dealt with immediately and firmly. This policy is communicated through internal channels, training activities and regular updates to employees, contractors and partners. The **Internal Audit Division** is responsible for overseeing the complaints procedures - either named or anonymous - through specific reporting mechanisms. Complaints may relate

to breaches in the procedures for collecting, processing and disclosing financial information, accounting issues, control issues, internal financial controls or serious cases of misconduct.

In addition, internal controls are in place to monitor financial transactions and detect suspicious or unusual activities. Regular preventive and corrective controls, as well as compliance checks are carried out to ensure compliance with this policy and related procedures. This approach enhances the integrity of financial information and confirms the Group's commitment to fighting corruption and bribery.

Through the implementation of these measures, the Group reaffirms its commitment to maintaining high standards of integrity and compliance, helping to protect the financial system and customers from financial crime.

In order to strengthen its actions against money laundering and financial crime, **Optima bank** has established the **AML Policy**, accompanied by specialised control and reporting systems. Compliance with procedures, effective oversight through systems and controls, clear separation of responsibilities and appropriate training of staff are the key pillars for addressing the risks related to money laundering and terrorist financing.

In cases of violations related to incidents of corruption or bribery, **disciplinary measures** may be imposed, depending on the seriousness of the incident. Non-compliance can lead to actions such as:

- written warnings,
- termination of the employment relationship,
- or, if necessary, legal action.

The Group applies strict **due diligence** standards for customers, suppliers, external partners and third parties to ensure compliance with anti-corruption and anti-bribery principles. **Anti-corruption clauses** are incorporated into contracts and agreements with business partners, with the aim of reducing the risk involved and ensuring that all business relationships are governed by high standards of integrity.

The procedures for the prevention, detection and management of allegations or incidents of corruption and bribery include the **Anti-bribery and Anti-corruption Policy**, which ensures compliance with applicable legislation. This policy sets out clear guidelines for appropriate conduct in line with the Group's values and principles, and raises awareness of the various forms of corruption and bribery.

In addition, it promotes confidential reporting of suspicious or confirmed incidents, encourages compliance and vigilance among employees and partners, and protects both employees and the Group's reputation.

The Group also applies the **RCSA methodology**, which describes the process of identifying and assessing risks and performing internal self-assessments. At the same time, the **Operational Risk Management Policy** and the **Risk Management Policy** are in place, which serve as control mechanisms for detecting and addressing incidents of corruption and bribery.

The **Human Resources Division** is responsible for disseminating, updating and training all employees on the **Anti-bribery and Anti-corruption Policy**. The Group is organising a web seminar through the platform of the **Hellenic Banking Institute (HBI)**, pertaining to the **Suppression of Money Laundering and terrorist financing and the Prevention and Combatting of Corruption**.

The seminar is fully aligned with the Group's policy and is **mandatory** for employees in high-risk positions, while for other employees participation is **voluntary but encouraged.** It includes modules related to:

- the prevention and suppression of money laundering,
- the financing of terrorism,
- and the fight against corruption.

In addition to theoretical training, the seminar offers **practical advice and case studies**, helping participants to enhance their knowledge and skills to effectively meet the challenges of everyday work. The section on corruption aims to raise **awareness** by providing a historical review of the national and international dimensions of the phenomenon, as well as a presentation of the main points of the Group's policy on corruption.

The course is designed to equip employees with the necessary knowledge and practical skills to **identify and mitigate the risks** associated with corruption and bribery. It includes advice, case studies and evaluations, ensuring an in-depth understanding of the issues.
The programme is monitored by Group employees at all levels, including those in high-risk positions. In particular, **100% of functions at-risk,** which are considered vulnerable due to their responsibilities and accountabilities, are covered. This ensures that employees in these positions receive the necessary training to effectively manage the risks involved.
The seminar also includes references to the **members of the administrative, management and supervisory bodies**, highlighting their role in supervision and their responsibility to prevent and deal with corruption and bribery.
**During the financial year 2025**, additional seminars on "**Prevention of money laundering and terrorist financing**" were held throughout the **Optima bank Network**, as well as in the Bank's units. The training material has also been posted on the **Bank's training platform**, while it is also **assigned to new employees** through the same platform and the **Hellenic Banking Institute.**
The Internal Audit Division is responsible for investigating cases of bribery and corruption, as defined in the third line of defence. To ensure the integrity of the Internal Control System, the Group has delegated responsibilities to independent units and Board Committees and applies the "Three Lines of Defence" model. It operates separately from the first and second lines of defence, ensuring impartiality and objectivity. This independence guarantees that investigations are carried out without influence from the management chain involved in preventing and detecting corruption or bribery. The Internal Audit Division thoroughly investigates allegations of corruption and bribery, ensuring that all findings are based on factual evidence and that appropriate action is taken in line with the results of the investigation. In addition, it assesses the effectiveness of the measures and controls applied by the first and second lines of defence to prevent and detect corruption and bribery. In addition, it is responsible for reporting the results of investigations in accordance with its manuals and procedures, ensuring that findings and recommendations are communicated to the relevant administrative, management and supervisory bodies, appropriate action is taken based on the findings of the investigation, while ensuring compliance with applicable laws and regulations.

Finally, the Internal Audit Division submits monthly reports to the Audit Committee, which then informs the Bank's Management. The Internal Audit Division is also responsible for reporting the results 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 following the established reporting protocols, the Internal Audit Division ensures that the results of investigations are communicated in a transparent and effective manner. This process ensures that appropriate action is taken based on the findings of the investigation, while ensuring compliance with applicable laws and regulations

In order to be available and easily accessible to all interested parties, from July 2025, a relevant version of the Anti-bribery and Anti-corruption Policy is posted on the Bank's website.  Employees are informed of this policy through the intranet, internal emails and training programmes.

The governance of this policy highlights its importance and includes the Board of Directors, the Audit Committee, the Risk Management Committee, the CEO, the relevant divisions and departments, as well as the business units. In particular, the Board of Directors is fully responsible for defining, approving and supervising the implementation of this policy through the Bank's Audit Committee, while ensuring that it is in line with the Group's principles and values. The Risk Management Committee takes note of the risks of corruption and bribery that have been identified as high, as part of the Risk & Control Self-Assessment conducted by the Risk Management Division through the Operational Risk Department in the Group's units. The Compliance Division is responsible for reviewing and amending this policy when necessary and, in cooperation with the Human Resources Division, develops training and awareness programmes for staff.

The Internal Audit Division investigates reports of policy violations at all levels, assesses the adequacy of controls and ensures compliance with this policy through independent preventive and corrective Controls. The Risk Management Division assesses the risks of corruption and bribery as part of conducting RCSA in the relevant units. It also coordinates the self-assessment process of the risk of corruption and bribery in cooperation with the Compliance and Internal Audit Divisions.

## Metrics and targets

### G1-4 – Confirmed incidents of corruption or bribery

During 2025, as in the previous year (2024), the Group recorded zero convictions for violations of anti-corruption and anti-bribery laws and no fines were imposed for such violations. Therefore, no action was required to address breaches of procedures and standards related to the fight against corruption and bribery. Therefore, there was no need for further action or preventive measures. The Group will continue to monitor the situation, implement and modify its policies whenever necessary. While the Group has adopted a zero-tolerance approach to corruption and bribery, it has not set measurable, outcome-oriented targets on this issue. Ensure full compliance with the principles outlined in the Anti-bribery and Anti-corruption Policy and applies to all the Group's activities and operations, including customer relationships, collaborations with third parties -suppliers and partners- and the outsourcing of activities by all employees, while actively monitor compliance with this policy. The Group continuously evaluates its practices and its commitment to integrity and transparency, fostering a culture of ethical conduct throughout the organisation. The above metric has not been validated by an external body.

# APPENDIX
## ANNEX VI - Disclosures Delegated Act – 31.12.2025
## 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)** |
|---|---|---|---|---|---|---|---|---|
| **Main Indicator (KPI)** | **Green Asset Stock Ratio (GAR)** | 75 | 158 | **1.26%** | **2.66%** | 78.65% | 62.84% | 21.35% |

| | | Total environmentally sustainable assets**** | Total environmentally sustainable assets***** | KPI**** | KPI***** | % coverage (of total assets) | % of assets that are excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) | % of assets that are excluded from the denominator of the GAR (Article 7 paragraph 1 and section 1.2.4 of Annex V) |
|---|---|---|---|---|---|---|---|---|
| *Additional KPIs* | *GAR (flow)* | 29 | 94 | 9.05% | 29.30% | 4.25% | - | - |
| | *Transaction portfolio** | N/A | N/A | N/A | N/A | | | |
| | *Financial guarantees* | 18 | 82 | 5.82% | 26.78% | | | |
| | *Assets under management* | 11 | 103 | 4.85% | 44.07% | | | |
| | *Revenue from fees and commissions*** | N/A | N/A | N/A | N/A | | | |

* For credit institutions that do not meet the conditions set out in Article 94(1) of the CRR or the conditions set out in Article 325ª par. 1 of the CRR.

** Fee and commission income from services other than lending and banking assets. Institutions shall disclose forward-looking information on specific KPIs, including information on targets, together with relevant explanations on the methodology applied.

*** % of assets covered by the KPI of banks' total assets

**** Based on the KPI of the counterparty's turnover.

***** Based on the counterparty's capital expenditure KPI, with the exception of lending activities where for general lending the turnover KPI is used.

## Template 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] carrying amount | 31 December 2025 | | | | | | | | |
| | | | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instrument no HfT eligible for GAR calculation | 1,195 | 431 | 75 | 1 | 0 | 13 | 15 | 0 | 0 | 0 |
| 2 | **Financial undertakings** | **347** | **78** | **7** | **0** | **0** | **2** | **1** | **0** | **0** | **0** |
| 3 | **Credit institutions** | 338 | 71 | 7 | 0 | 0 | 2 | 1 | 0 | 0 | 0 |
| 4 | Loans and advances | 185 | 28 | 4 | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| 5 | Debt securities, including UoP | 152 | 42 | 3 | 0 | 0 | 2 | 0 | 0 | 0 | 0 |
| 6 | Equity instruments | 0 | 0 | 0 | | 0 | 0 | 0 | 0 | | 0 |
| 7 | **Other financial corporations** | **10** | **7** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *10* | *7* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *0* |
| 9 | Loans and advances | 3 | 1 | 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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **573** | **175** | **68** | **1** | **0** | **11** | **14** | **0** | **0** | **0** |
| 21 | Loans and advances | 478 | 135 | 61 | 1 | 0 | 10 | 14 | 0 | 0 | 0 |
| 22 | Debt securities, including UoP | 95 | 40 | 7 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| 23 | Equity instruments | 0 | 0 | 0 | | 0 | 0 | 0 | 0 | | 0 |
| 24 | **Households** | **274** | **178** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 25 | of which loans collateralized by residential immovable property | 178 | 178 | 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 29 | Housing financing | 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 |
| 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)** | **4,750** | | | | | | | | | |

| 1. Assets for the calculation of GAR based on Turnover | | a | b | c | d | e | f | g | h | i | j |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Million EUR | | Total [gross] carrying amount | 31 December 2025 | | | | | | | | |
| | | | 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 |
| 33 | **Financial and Non-financial undertakings** | **4,528** | | | | | | | | | |
| 34 | *SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations* | *4,254* | | | | | | | | | |
| 35 | Loans and advances | 4,195 | | | | | | | | | |
| 36 | of which loans collateralized by commercial immovable property | 0 | | | | | | | | | |
| 37 | of which building renovation loans | 0 | | | | | | | | | |
| 38 | Debt securities | 59 | | | | | | | | | |
| 39 | Equity instruments | 0 | | | | | | | | | |
| 40 | *Non-EU country counterparties not subject to NFRD disclosure obligations* | *275* | | | | | | | | | |
| 41 | Loans and advances | 196 | | | | | | | | | |
| 42 | Debt securities | 78 | | | | | | | | | |
| 43 | Equity instruments | 0 | | | | | | | | | |
| 44 | **Derivatives** | **0** | | | | | | | | | |
| 45 | **On demand interbank loans** | **126** | | | | | | | | | |
| 46 | **Cash and cash-related assets** | **16** | | | | | | | | | |
| 47 | **Other categories of assets (e.g. goodwill, commodities etc.)** | **79** | | | | | | | | | |
| 48 | **Total GAR assets** | **5,944** | **431** | **75** | **1** | **0** | **13** | **15** | **0** | **0** | **0** |
| 49 | **Assets not covered for GAR calculation** | **1,614** | | | | | | | | | |
| 50 | **Central governments and Supranational issuers** | **691** | | | | | | | | | |
| 51 | **Central banks exposure** | **668** | | | | | | | | | |
| 52 | **Trading book** | **255** | | | | | | | | | |
| 53 | **Total assets** | **7,558** | **431** | **75** | **1** | **0** | **13** | **15** | **0** | **0** | **0** |
| **Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations** | | | | | | | | | | | |
| 54 | Financial guarantees | 305 | 56 | 18 | 0 | 1 | 0 | 16 | 0 | 0 | 0 |
| 55 | Assets under management | 233 | 13 | 11 | 0 | 0 | 7 | 2 | 0 | 0 | 0 |
| 56 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 233 | 13 | 11 | 0 | 0 | 7 | 2 | 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 2025 | | | | | | | | | | | |
| | | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instrument no HfT eligible for GAR calculation | 0 | 0 | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2 | **Financial undertakings** | **0** | **0** | **0** | **0** | **1** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 3 | **Credit institutions** | 0 | 0 | 0 | 0 | 1 | 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 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 6 | Equity instruments | 0 | 0 | | 0 | 0 | 0 | | 0 | 0 | 0 | | 0 |
| 7 | **Other financial corporations** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *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 Up | 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 | *of which management companies* | *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 Up | 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 | *of which insurance undertakings* | *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 Up | 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 | **Non-financial undertakings** | **0** | **0** | **0** | **0** | **6** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 21 | Loans and advances | 0 | 0 | 0 | 0 | 5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 22 | Debt securities, including UoP | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 23 | Equity instruments | 0 | 0 | | 0 | 0 | 0 | | 0 | 0 | 0 | | 0 |
| 24 | **Households** | | | | | **0** | **0** | **0** | **0** | | | | |
| 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 2025 | | | | | | | | | | | |
| | | 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 | **Assets excluded from the numerator for GAR calculation (covered in the denominator)** | | | | | | | | | | | | |
| 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** | **7** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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** | **7** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| | **Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations** | | | | | | | | | | | | |
| 54 | Financial guarantees | 0 | 0 | 0 | 0 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 55 | Assets under management | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 56 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 0 | 0 | 0 | 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 2025 | | | | | | | | |
| | | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instrument no HfT eligible for GAR calculation | 0 | 0 | 0 | 0 | 453 | 75 | 1 | 0 | 13 |
| 2 | **Financial undertakings** | **0** | **0** | **0** | **0** | **80** | **7** | **0** | **0** | **2** |
| 3 | **Credit institutions** | 0 | 0 | 0 | 0 | 73 | 7 | 0 | 0 | 2 |
| 4 | Loans and advances | 0 | 0 | 0 | 0 | 29 | 4 | 0 | 0 | 0 |
| 5 | Debt securities, including UoP | 0 | 0 | 0 | 0 | 44 | 3 | 0 | 0 | 2 |
| 6 | Equity instruments | 0 | 0 | | 0 | 0 | 0 | | 0 | 0 |
| 7 | **Other financial corporations** | **0** | **0** | **0** | **0** | **7** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *0* | *0* | *0* | *0* | *7* | *0* | *0* | *0* | *0* |
| 9 | Loans and advances | 0 | 0 | 0 | 0 | 1 | 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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **0** | **0** | **0** | **0** | **195** | **68** | **1** | **0** | **11** |
| 21 | Loans and advances | 0 | 0 | 0 | 0 | 154 | 61 | 1 | 0 | 10 |
| 22 | Debt securities, including UoP | 0 | 0 | 0 | 0 | 41 | 7 | 0 | 0 | 1 |
| 23 | Equity instruments | 0 | 0 | | 0 | 0 | 0 | | 0 | 0 |
| 24 | **Households** | | | | | **178** | **0** | **0** | **0** | **0** |
| 25 | of which loans collateralized by residential immovable property | | | | | 178 | 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 2025 | | | | | | | | |
| | | 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)** | | | | | | | | | |
| 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** | **453** | **75** | **1** | **0** | **13** |
| 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** | **453** | **75** | **1** | **0** | **13** |
| **Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations** | | | | | | | | | | |
| 54 | Financial guarantees | 0 | 0 | 0 | 0 | 75 | 18 | 0 | 1 | 1 |
| 55 | Assets under management | 0 | 0 | 0 | 0 | 16 | 11 | 0 | 0 | 7 |
| 56 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 0 | 0 | 0 | 0 | 16 | 11 | 0 | 0 | 7 |

# Template 1 - Capex

| 1. Assets for the calculation of GAR based on CapEx | | a | b | c | d | e | f | g | h | i | j |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | 31 December 2025 | | | | | | | | |
| | | | Climate change mitigation (CCM) | | | | | Climate change adaptation (CCA) | | | |
| Million EUR | | Total [gross] carrying amount | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instrument no HfT eligible for GAR calculation | 1,195 | 529 | 157 | 1 | 1 | 97 | 3 | 0 | 0 | 0 |
| 2 | **Financial undertakings** | **347** | **96** | **11** | **0** | **0** | **0** | **1** | **0** | **0** | **0** |
| 3 | **Credit institutions** | 338 | 89 | 11 | 0 | 1 | 2 | 1 | 0 | 0 | 0 |
| 4 | Loans and advances | 185 | 42 | 6 | 0 | 1 | 1 | 1 | 0 | 0 | 0 |
| 5 | Debt securities, including UoP | 152 | 47 | 4 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| 6 | Equity instruments | 0 | 0 | 0 | | 0 | 0 | 0 | 0 | | 0 |
| 7 | **Other financial corporations** | **10** | **7** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *10* | *7* | *0* | *0* | *0* | *0* | *0* | *0* | *0* | *0* |
| 9 | Loans and advances | 3 | 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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **573** | **255** | **147** | **1** | **0** | **79** | **2** | **0** | **0** | **0** |
| 21 | Loans and advances | 478 | 199 | 123 | 1 | 0 | 72 | 1 | 0 | 0 | 0 |
| 22 | Debt securities, including UoP | 95 | 57 | 24 | 0 | 0 | 7 | 0 | 0 | 0 | 0 |
| 23 | Equity instruments | 0 | 0 | 0 | | 0 | 0 | 0 | 0 | | 0 |
| 24 | **Households** | **274** | **178** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 25 | of which loans collateralized by residential immovable property | 178 | 178 | 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 29 | Housing financing | 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 |
| 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)** | **4,750** | | | | | | | | | |

| 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 2025 | | | | | | | | |
| | | | 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 |
| 33 | **Financial and Non-financial undertakings** | **4,528** | | | | | | | | | |
| 34 | *SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations* | *4,254* | | | | | | | | | |
| 35 | Loans and advances | 4,195 | | | | | | | | | |
| 36 | of which loans collateralized by commercial immovable property | 0 | | | | | | | | | |
| 37 | of which building renovation loans | 0 | | | | | | | | | |
| 38 | Debt securities | 59 | | | | | | | | | |
| 39 | Equity instruments | 0 | | | | | | | | | |
| 40 | *Non-EU country counterparties not subject to NFRD disclosure obligations* | *275* | | | | | | | | | |
| 41 | Loans and advances | 196 | | | | | | | | | |
| 42 | Debt securities | 78 | | | | | | | | | |
| 43 | Equity instruments | 0 | | | | | | | | | |
| 44 | **Derivatives** | **0** | | | | | | | | | |
| 45 | **On demand interbank loans** | **126** | | | | | | | | | |
| 46 | **Cash and cash-related assets** | **16** | | | | | | | | | |
| 47 | **Other categories of assets (e.g. goodwill, commodities etc.)** | **79** | | | | | | | | | |
| 48 | **Total GAR assets** | **5,944** | **529** | **157** | **1** | **0** | **79** | **3** | **0** | **0** | **0** |
| 49 | **Assets not covered for GAR calculation** | **1,614** | | | | | | | | | |
| 50 | **Central governments and Supranational issuers** | **691** | | | | | | | | | |
| 51 | **Central banks exposure** | **668** | | | | | | | | | |
| 52 | **Trading book** | **225** | | | | | | | | | |
| 53 | **Total assets** | **7,558** | **529** | **157** | **1** | **0** | **79** | **3** | **0** | **0** | **0** |
| **Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations** | | | | | | | | | | | |
| 54 | Financial guarantees | 305 | 117 | 81 | 0 | 1 | 9 | 2 | 0 | 0 | 0 |
| 55 | Assets under management | 233 | 111 | 100 | 0 | 0 | 26 | 2 | 1 | 0 | 0 |
| 56 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 233 | 111 | 100 | 0 | 0 | 26 | 2 | 1 | 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 2025 | | | | | | | | | | | |
| | | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instrument no HfT eligible for GAR calculation | 0 | 0 | 0 | 0 | 139 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2 | **Financial undertakings** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Other financial corporations** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **0** | **0** | **0** | **0** | **139** | **0** | **0** | **0** | **1** | **1** | **0** | **0** |
| 21 | Loans and advances | 0 | 0 | 0 | 0 | 127 | 0 | 0 | 0 | 1 | 1 | 0 | 0 |
| 22 | Debt securities, including UoP | 0 | 0 | 0 | 0 | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 23 | Equity instruments | 0 | 0 | | 0 | 0 | 0 | | 0 | 0 | 0 | | 0 |
| 24 | **Households** | | | | | **0** | **0** | **0** | **0** | | | | |
| 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 2025 | | | | | | | | | | | |
| | | 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 | **Assets excluded from the numerator for GAR calculation (covered in the denominator)** | | | | | | | | | | | | |
| 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** | **139** | **0** | **0** | **0** | **1** | **1** | **0** | **0** |
| 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** | **139** | **0** | **0** | **0** | **1** | **1** | **0** | **0** |
| **Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations** | | | | | | | | | | | | | |
| 54 | Financial guarantees | 0 | 0 | 0 | 0 | 29 | 0 | 0 | 0 | 1 | 1 | 0 | 0 |
| 55 | Assets under management | 0 | 0 | 0 | 0 | 3 | 0 | 0 | 0 | 18 | 2 | 0 | 0 |
| 56 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 0 | 0 | 0 | 0 | 3 | 0 | 0 | 0 | 18 | 2 | 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 2025 | | | | | | | | |
| | | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instrument no HfT eligible for GAR calculation | 0 | 0 | 0 | 0 | 672 | 158 | 1 | 0 | 80 |
| 2 | **Financial undertakings** | **0** | **0** | **0** | **0** | **97** | **11** | **0** | **0** | **0** |
| 3 | **Credit institutions** | 0 | 0 | 0 | 0 | 90 | 11 | 0 | 1 | 2 |
| 4 | Loans and advances | 0 | 0 | 0 | 0 | 43 | 6 | 0 | 1 | 1 |
| 5 | Debt securities, including UoP | 0 | 0 | 0 | 0 | 47 | 4 | 0 | 0 | 1 |
| 6 | Equity instruments | 0 | 0 | | 0 | 0 | 0 | | 0 | 0 |
| 7 | **Other financial corporations** | **0** | **0** | **0** | **0** | **7** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *0* | *0* | *0* | *0* | *7* | *0* | *0* | *0* | *0* |
| 9 | Loans and advances | 0 | 0 | 0 | 0 | 1 | 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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **0** | **0** | **0** | **0** | **397** | **147** | **1** | **0** | **80** |
| 21 | Loans and advances | 0 | 0 | 0 | 0 | 328 | 124 | 1 | 0 | 72 |
| 22 | Debt securities, including UoP | 0 | 0 | 0 | 0 | 69 | 24 | 0 | 0 | 7 |
| 23 | Equity instruments | 0 | 0 | | 0 | 0 | 0 | | 0 | 0 |
| 24 | **Households** | | | | | **178** | **0** | **0** | **0** | **0** |
| 25 | of which loans collateralized by residential immovable property | | | | | 178 | 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 2025 | | | | | | | | |
| | | 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)** | | | | | | | | | |
| 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** | **672** | **158** | **1** | **0** | **80** |
| 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** | **672** | **158** | **1** | **0** | **80** |
| **Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations** | | | | | | | | | | |
| 54 | Financial guarantees | 0 | 0 | 0 | 0 | 149 | 82 | 0 | 1 | 9 |
| 55 | Assets under management | 0 | 0 | 0 | 0 | 134 | 103 | 0 | 0 | 26 |
| 56 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 0 | 0 | 0 | 0 | 134 | 103 | 0 | 0 | 26 |

# Template 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (CCM) | Million EUR | Of which environmentally sustainable (CCM) |
| 1 | C13.93 - Manufacture of carpets and rugs | 1 | 1 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 2 | 2 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 15 | 13 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 4 | 4 | | |
| 5 | D35.11 - Production of electricity | 13 | 4 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 8 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 9 | 2 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 10 | 0 | | |
| 11 | H52.21 - Service activities incidental to land transportation | 42 | 19 | | |
| 12 | I55.10 - Hotels and similar accommodation | 32 | 16 | | |
| 13 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 14 | J62.01 - Computer programming activities | 0 | 0 | | |
| 15 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 16 | K64.20 - Activities of holding companies | 6 | 2 | | |
| 17 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 18 | N81.21 - General cleaning of buildings | 1 | 0 | | |
| 19 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 20 | H50.10 - Sea and coastal passenger water transport | 6 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 1 | 0 | | |
| 22 | C24.42 - Aluminium production | 19 | 4 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 4 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (CCA) | Million EUR | Of which environmentally sustainable (CCA) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 7 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 4 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H52.21 - Service activities incidental to land transportation | 3 | 0 | | |
| 12 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 13 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 14 | J62.01 - Computer programming activities | 0 | 0 | | |
| 15 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 16 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 17 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 18 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 19 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 20 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (WTR) | Million EUR | Of which environmentally sustainable (WTR) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 0 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H52.21 - Service activities incidental to land transportation | 0 | 0 | | |
| 12 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 13 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 14 | J62.01 - Computer programming activities | 0 | 0 | | |
| 15 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 16 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 17 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 18 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 19 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 20 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (CE) | Million EUR | Of which environmentally sustainable (CE) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 1 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H52.21 - Service activities incidental to land transportation | 4 | 0 | | |
| 12 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 13 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 14 | J62.01 - Computer programming activities | 0 | 0 | | |
| 15 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 16 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 17 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 18 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 19 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 20 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (PPC) | Million EUR | Of which environmentally sustainable (PPC) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 0 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H52.21 - Service activities incidental to land transportation | 0 | 0 | | |
| 12 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 13 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 14 | J62.01 - Computer programming activities | 0 | 0 | | |
| 15 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 16 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 17 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 18 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 19 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 20 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (BIO) | Million EUR | Of which environmentally sustainable (BIO) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 0 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H52.21 - Service activities incidental to land transportation | 0 | 0 | | |
| 12 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 13 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 14 | J62.01 - Computer programming activities | 0 | 0 | | |
| 15 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 16 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 17 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 18 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 19 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 20 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) | Million EUR | Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) |
| 1 | C13.93 - Manufacture of carpets and rugs | 1 | 1 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 2 | 2 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 15 | 13 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 4 | 4 | | |
| 5 | D35.11 - Production of electricity | 13 | 4 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 1 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 15 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 13 | 2 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 10 | 0 | | |
| 11 | H52.21 - Service activities incidental to land transportation | 49 | 19 | | |
| 12 | I55.10 - Hotels and similar accommodation | 32 | 16 | | |
| 13 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 14 | J62.01 - Computer programming activities | 0 | 0 | | |
| 15 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 16 | K64.20 - Activities of holding companies | 7 | 2 | | |
| 17 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 18 | N81.21 - General cleaning of buildings | 1 | 0 | | |
| 19 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 20 | H50.10 - Sea and coastal passenger water transport | 6 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 1 | 0 | | |
| 22 | C24.42 - Aluminium production | 19 | 4 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 4 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 1 | 0 | | |

## Template 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (CCM) | Million EUR | Of which environmentally sustainable (CCM) |
| 1 | C13.93 - Manufacture of carpets and rugs | 1 | 1 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 3 | 3 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 48 | 37 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 5 | 5 | | |
| 5 | D35.11 - Production of electricity | 50 | 32 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 1 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 15 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 7 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 6 | 4 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 10 | 1 | | |
| 11 | H50.10 - Sea and coastal passenger water transport | 6 | 0 | | |
| 12 | H52.21 - Service activities incidental to land transportation | 1 | 1 | | |
| 13 | I55.10 - Hotels and similar accommodation | 63 | 40 | | |
| 14 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 15 | J62.01 - Computer programming activities | 0 | 0 | | |
| 16 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 17 | K64.20 - Activities of holding companies | 2 | 1 | | |
| 18 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 19 | N81.21 - General cleaning of buildings | 1 | 1 | | |
| 20 | R92.00 - Gambling and betting activities | 1 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 9 | 7 | | |
| 22 | C24.42 - Aluminium production | 24 | 11 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 1 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 4 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 1 | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (CCA) | Million EUR | Of which environmentally sustainable (CCA) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 0 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 12 | H52.21 - Service activities incidental to land transportation | 0 | 0 | | |
| 13 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 14 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 15 | J62.01 - Computer programming activities | 0 | 0 | | |
| 16 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 17 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 18 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 19 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 20 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (WTR) | Million EUR | Of which environmentally sustainable (WTR) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 0 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 12 | H52.21 - Service activities incidental to land transportation | 0 | 0 | | |
| 13 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 14 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 15 | J62.01 - Computer programming activities | 0 | 0 | | |
| 16 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 17 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 18 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 19 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 20 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (CE) | Million EUR | Of which environmentally sustainable (CE) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 14 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 12 | H52.21 - Service activities incidental to land transportation | 113 | 0 | | |
| 13 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 14 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 15 | J62.01 - Computer programming activities | 0 | 0 | | |
| 16 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 17 | K64.20 - Activities of holding companies | 11 | 0 | | |
| 18 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 19 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 20 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (PPC) | Million EUR | Of which environmentally sustainable (PPC) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 0 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 12 | H52.21 - Service activities incidental to land transportation | 0 | 0 | | |
| 13 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 14 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 15 | J62.01 - Computer programming activities | 0 | 0 | | |
| 16 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 17 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 18 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 19 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 20 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (BIO) | Million EUR | Of which environmentally sustainable (BIO) |
| 1 | C13.93 - Manufacture of carpets and rugs | 0 | 0 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 0 | 0 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 0 | 0 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 0 | 0 | | |
| 5 | D35.11 - Production of electricity | 0 | 0 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 0 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 0 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 0 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 0 | 0 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 0 | 0 | | |
| 11 | H50.10 - Sea and coastal passenger water transport | 0 | 0 | | |
| 12 | H52.21 - Service activities incidental to land transportation | 0 | 0 | | |
| 13 | I55.10 - Hotels and similar accommodation | 0 | 0 | | |
| 14 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 15 | J62.01 - Computer programming activities | 0 | 0 | | |
| 16 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 17 | K64.20 - Activities of holding companies | 0 | 0 | | |
| 18 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 19 | N81.21 - General cleaning of buildings | 0 | 0 | | |
| 20 | R92.00 - Gambling and betting activities | 0 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 0 | 0 | | |
| 22 | C24.42 - Aluminium production | 0 | 0 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 0 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 0 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 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 (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | [Gross] carrying amount | | [Gross] carrying amount | |
| | | Million EUR | Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) | Million EUR | Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) |
| 1 | C13.93 - Manufacture of carpets and rugs | 1 | 1 | | |
| 2 | C24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel | 3 | 3 | | |
| 3 | C25.50 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy | 48 | 37 | | |
| 4 | C27.32 - Manufacture of other electronic and electric wires and cables | 5 | 5 | | |
| 5 | D35.11 - Production of electricity | 50 | 32 | | |
| 6 | F41.20 - Construction of residential and non-residential buildings | 1 | 0 | | |
| 7 | F42.10 - Construction of roads and railways | 15 | 0 | | |
| 8 | F42.11 - Construction of roads and motorways | 22 | 0 | | |
| 9 | G46.71 - Wholesale of solid, liquid and gaseous fuels and related products | 6 | 4 | | |
| 10 | H50.20 - Sea and coastal freight water transport | 10 | 1 | | |
| 11 | H50.10 - Sea and coastal passenger water transport | 6 | 0 | | |
| 12 | H52.21 - Service activities incidental to land transportation | 114 | 1 | | |
| 13 | I55.10 - Hotels and similar accommodation | 63 | 40 | | |
| 14 | J60.20 - Television programming and broadcasting activities | 0 | 0 | | |
| 15 | J62.01 - Computer programming activities | 0 | 0 | | |
| 16 | J62.09 - Other information technology and computer service activities | 0 | 0 | | |
| 17 | K64.20 - Activities of holding companies | 13 | 1 | | |
| 18 | K64.99 - Other financial service activities, except insurance and pension funding n.e.c. | 0 | 0 | | |
| 19 | N81.21 - General cleaning of buildings | 1 | 1 | | |
| 20 | R92.00 - Gambling and betting activities | 1 | 0 | | |
| 21 | C19.20 - Manufacture of refined petroleum products | 9 | 7 | | |
| 22 | C24.42 - Aluminium production | 24 | 11 | | |
| 23 | F42.12 - Construction of railways and underground railways | 0 | 0 | | |
| 24 | J62.03 - Computer facilities management activities | 1 | 0 | | |
| 25 | K64.19 - Other monetary intermediation | 0 | 0 | | |
| 26 | N77.11 - Renting and leasing of cars and light motor vehicles | 4 | 0 | | |
| 27 | N82.99 - Other business support service activities n.e.c. | 1 | 0 | | |

# Template 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 2025 | | | | | | | | | | | | | | | | |
| | | 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 | 36.04% | 6.28% | 0.05% | 0.02% | 1.09% | 1.27% | 0.00% | 0.00% | 0.00% | 0.01% | 0.00% | 0.00% | 0.00% | 0.57% | 0.00% | 0.00% | 0.00% |
| 2 | **Financial undertakings** | **22.48%** | **2.02%** | **0.00%** | **0.08%** | **0.62%** | **0.31%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.27%** | **0.00%** | **0.00%** | **0.00%** |
| 3 | Credit institutions | 20.97% | 2.06% | 0.00% | 0.08% | 0.63% | 0.32% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.28% | 0.00% | 0.00% | 0.00% |
| 4 | Loans and advances | 15.38% | 2.21% | 0.00% | 0.07% | 0.08% | 0.42% | 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 | 27.75% | 1.88% | 0.00% | 0.08% | 1.30% | 0.18% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.61% | 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** | **73.99%** | **0.60%** | **0.00%** | **0.22%** | **0.07%** | **0.09%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.04%** | **0.00%** | **0.00%** | **0.00%** |
| 8 | of which investment firms | 73.99% | 0.60% | 0.00% | 0.22% | 0.07% | 0.09% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.04% | 0.00% | 0.00% | 0.00% |
| 9 | Loans and advances | 21.24% | 1.82% | 0.00% | 0.67% | 0.22% | 0.28% | 0.00% | 0.00% | 0.00% | 0.01% | 0.00% | 0.00% | 0.00% | 0.13% | 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% |
| 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% |

| | 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 2025 | | | | | | | | | | | | | | | | |
| | | 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 |
| 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** | **30.49%** | **11.87%** | **0.10%** | **0.00%** | **1.90%** | **2.46%** | **0.00%** | **0.00%** | **0.00%** | **0.01%** | **0.00%** | **0.00%** | **0.00%** | **1.03%** | **0.01%** | **0.00%** | **0.00%** |
| 21 | Loans and advances | 28.26% | 12.74% | 0.12% | 0.00% | 2.08% | 2.88% | 0.00% | 0.00% | 0.00% | 0.02% | 0.00% | 0.00% | 0.00% | 1.07% | 0.01% | 0.00% | 0.00% |
| 22 | Debt securities. including UoP | 41.68% | 7.51% | 0.00% | 0.00% | 1.01% | 0.31% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.85% | 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** | **64.79%** | **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% |
| 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** | **7.24%** | **1.26%** | **0.01%** | **0.00%** | **0.22%** | **0.25%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.12%** | **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 2025 | | | | | | | | | | | | | |
| | | 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% | 0.01% | 0.00% | 0.00% | 0.00% | 37.90% | 6.29% | 0.05% | 0.02% | 1.09% | 15.81% |
| 2 | **Financial undertakings** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.01%** | **0.00%** | **0.00%** | **0.00%** | **23.07%** | **2.02%** | **0.00%** | **0.08%** | **0.62%** | **4.60%** |
| 3 | Credit institutions | 0.00% | 0.00% | 0.00% | 0.00% | 0.01% | 0.00% | 0.00% | 0.00% | 21.57% | 2.06% | 0.00% | 0.08% | 0.63% | 4.47% |
| 4 | Loans and advances | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 18.81% | 2.21% | 0.00% | 0.07% | 0.08% | 2.45% |
| 5 | Debt securities. including UoP | 0.00% | 0.00% | 0.00% | 0.00% | 0.02% | 0.00% | 0.00% | 0.00% | 28.57% | 1.88% | 0.00% | 0.08% | 1.30% | 2.02% |
| 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** | **0.10%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **74.23%** | **0.60%** | **0.00%** | **0.22%** | **0.07%** | **0.13%** |
| 8 | of which investment firms | 0.10% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 74.23% | 0.60% | 0.00% | 0.22% | 0.07% | 0.13% |
| 9 | Loans and advances | 0.30% | 0.00% | 0.00% | 0.00% | 0.01% | 0.00% | 0.00% | 0.00% | 21.97% | 1.82% | 0.00% | 0.67% | 0.22% | 0.04% |
| 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% | 0.09% |
| 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%** | **0.01%** | **0.00%** | **0.00%** | **0.00%** | **34.00%** | **11.89%** | **0.10%** | **0.00%** | **1.90%** | **7.58%** |
| 21 | Loans and advances | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 32.24% | 12.76% | 0.12% | 0.00% | 2.08% | 6.32% |
| 22 | Debt securities. including UoP | 0.00% | 0.00% | 0.00% | 0.00% | 0.05% | 0.00% | 0.00% | 0.00% | 42.89% | 7.51% | 0.00% | 0.00% | 1.01% | 1.26% |
| 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** | | | | | | | | | **64.79%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **3.63%** |
| 25 | of which loans collateralized by residential immovable property | | | | | | | | | 100.00% | 0.00% | 0.00% | 0.00% | 0.00% | 2.35% |
| 26 | of which building renovation loans | | | | | | | | | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 27 | of which motor vehicle loans | | | | | | | | | | | | | | |

| 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 2025 | | | | | | | | | | | | | |
| | | 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 | |
| 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%** |
| 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% | 0.00% |
| 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%** |
| 32 | **Total GAR assets** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **7.62%** | **1.26%** | **0.01%** | **0.00%** | **0.22%** | **78.65%** |

## Template 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 2025 | | | | | | | | | | | | | | | | |
| | | 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 | 44.30% | 13.17% | 0.05% | 0.00% | 6.65% | 0.22% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 11.64% | 0.01% | 0.00% | 0.01% |
| 2 | **Financial undertakings** | **27.65%** | **3.04%** | **0.00%** | **0.00%** | **0.00%** | **0.30%** | **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 | 26.26% | 3.11% | 0.00% | 0.24% | 0.48% | 0.31% | 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 | 22.55% | 3.39% | 0.00% | 0.29% | 0.52% | 0.42% | 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 | 30.77% | 2.77% | 0.00% | 0.18% | 0.43% | 0.16% | 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** | **75.04%** | **0.54%** | **0.00%** | **0.28%** | **0.13%** | **0.04%** | **0.01%** | **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 | 75.04% | 0.54% | 0.00% | 0.28% | 0.13% | 0.04% | 0.01% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 9 | Loans and advances | 24.42% | 1.63% | 0.00% | 0.85% | 0.38% | 0.11% | 0.03% | 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% |
| 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% |

| 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 2025 | | | | | | | | | | | | | | | | |
| | | 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 |
| 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** | **44.58%** | **25.63%** | **0.10%** | **0.00%** | **13.87%** | **0.29%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **24.27%** | **0.01%** | **0.00%** | **0.01%** |
| 21 | Loans and advances | 41.58% | 25.80% | 0.12% | 0.00% | 15.13% | 0.31% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 26.66% | 0.00% | 0.00% | 0.00% |
| 22 | Debt securities. including UoP | 59.70% | 24.77% | 0.00% | 0.00% | 7.57% | 0.16% | 0.01% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 12.26% | 0.27% | 0.00% | 0.07% |
| 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** | **64.79%** | **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% |
| 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** | **8.90%** | **2.65%** | **0.01%** | **0.00%** | **1.34%** | **0.05%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **2.34%** | **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 2025 | | | | | | | | | | | | | |
| | | 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 | 0.05% | 0.05% | 0.00% | 0.00% | 0.01% | 0.00% | 0.00% | 0.00% | 56.22% | 13.23% | 0.05% | 0.00% | 6.66% | 15.81% |
| 2 | **Financial undertakings** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.02%** | **0.00%** | **0.00%** | **0.00%** | **27.98%** | **3.04%** | **0.00%** | **0.00%** | **0.00%** | **4.60%** |
| 3 | Credit institutions | 0.00% | 0.00% | 0.00% | 0.00% | 0.02% | 0.00% | 0.00% | 0.00% | 26.60% | 3.11% | 0.00% | 0.24% | 0.48% | 4.47% |
| 4 | Loans and advances | 0.00% | 0.00% | 0.00% | 0.00% | 0.01% | 0.00% | 0.00% | 0.00% | 22.99% | 3.39% | 0.00% | 0.29% | 0.52% | 2.45% |
| 5 | Debt securities. including UoP | 0.00% | 0.00% | 0.00% | 0.00% | 0.03% | 0.00% | 0.00% | 0.00% | 30.97% | 2.78% | 0.00% | 0.18% | 0.43% | 2.02% |
| 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%** | **75.08%** | **0.55%** | **0.00%** | **0.28%** | **0.13%** | **0.13%** |
| 8 | of which investment firms | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 75.08% | 0.55% | 0.00% | 0.28% | 0.13% | 0.13% |
| 9 | Loans and advances | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 24.53% | 1.66% | 0.00% | 0.85% | 0.38% | 0.04% |
| 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% | 0.09% |
| 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** | **0.10%** | **0.10%** | **0.00%** | **0.00%** | **0.01%** | **0.00%** | **0.00%** | **0.00%** | **69.25%** | **25.74%** | **0.10%** | **0.00%** | **13.89%** | **7.58%** |
| 21 | Loans and advances | 0.12% | 0.12% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 68.67% | 25.92% | 0.12% | 0.00% | 15.13% | 6.32% |
| 22 | Debt securities. including UoP | 0.00% | 0.00% | 0.00% | 0.00% | 0.05% | 0.00% | 0.00% | 0.00% | 72.17% | 24.85% | 0.00% | 0.00% | 7.64% | 1.26% |
| 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** | | | | | | | | | 64.79% | 0.00% | 0.00% | 0.00% | 0.00% | 3.63% |
| 25 | of which loans collateralized by residential immovable property | | | | | | | | | 100.00% | 0.00% | 0.00% | 0.00% | 0.00% | 2.35% |
| 26 | of which building renovation loans | | | | | | | | | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 27 | of which motor vehicle loans | | | | | | | | | | | | | | |

| 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 2025 | | | | | | | | | | | | | |
| | | 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 | |
| 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%** |
| 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% | 0.00% |
| 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%** |
| 32 | **Total GAR assets** | **0.01%** | **0.01%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **11.30%** | **2.66%** | **0.01%** | **0.00%** | **1.34%** | **78.65%** |

## Template 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 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | % (compared to flow of total eligible assets) | 31 December 2025 | | | | | | | | | | | | | | | | |
| | | 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 | 44.94% | 9.05% | 0.18% | 0.01% | 1.48% | 2.19% | 0.00% | 0.00% | 0.00% | 0.02% | 0.00% | 0.00% | 0.00% | 0.29% | 0.00% | 0.00% | 0.00% |
| 2 | **Financial undertakings** | **56.32%** | **0.88%** | **0.00%** | **0.05%** | **0.07%** | **0.28%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.06%** | **0.00%** | **0.00%** | **0.00%** |
| 3 | Credit institutions | 56.32% | 0.88% | 0.00% | 0.05% | 0.07% | 0.28% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.06% | 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 | 56.32% | 0.88% | 0.00% | 0.05% | 0.07% | 0.28% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.06% | 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** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **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% | 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% |
| 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** | **31.91%** | **13.43%** | **0.27%** | **0.00%** | **2.21%** | **3.25%** | **0.00%** | **0.00%** | **0.00%** | **0.03%** | **0.00%** | **0.00%** | **0.00%** | **0.42%** | **0.01%** | **0.00%** | **0.00%** |
| 21 | Loans and advances | 27.40% | 13.46% | 0.32% | 0.00% | 2.52% | 3.76% | 0.00% | 0.00% | 0.00% | 0.04% | 0.00% | 0.00% | 0.00% | 0.27% | 0.01% | 0.00% | 0.00% |
| 22 | Debt securities. including UoP | 58.96% | 13.24% | 0.00% | 0.00% | 0.32% | 0.18% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 1.37% | 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** | **77.05%** | **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 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| % (compared to flow of total eligible assets) | | 31 December 2025 | | | | | | | | | | | | | | | | |
| | | 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 |
| 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% |
| 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** | **44.94%** | **9.05%** | **0.18%** | **0.01%** | **1.48%** | **2.19%** | **0.00%** | **0.00%** | **0.00%** | **0.02%** | **0.00%** | **0.00%** | **0.00%** | **0.29%** | **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 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| % (compared to flow of total eligible assets) | | 31 December 2025 | | | | | | | | | | | | | |
| | | 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% | 0.01% | 0.00% | 0.00% | 0.00% | 47.46% | 9.05% | 0.18% | 0.01% | 1.48% | 100.00% |
| 2 | **Financial undertakings** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **56.66%** | **0.88%** | **0.00%** | **0.05%** | **0.07%** | **9.61%** |
| 3 | Credit institutions | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 56.66% | 0.88% | 0.00% | 0.05% | 0.07% | 9.61% |
| 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% | 56.66% | 0.88% | 0.00% | 0.05% | 0.07% | 9.61% |
| 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%** | **0.02%** | **0.00%** | **0.00%** | **0.00%** | **35.64%** | **13.44%** | **0.27%** | **0.00%** | **2.21%** | **66.72%** |
| 21 | Loans and advances | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 31.46% | 13.48% | 0.32% | 0.00% | 2.52% | 57.18% |
| 22 | Debt securities. including UoP | 0.00% | 0.00% | 0.00% | 0.00% | 0.15% | 0.00% | 0.00% | 0.00% | 60.66% | 13.24% | 0.00% | 0.01% | 0.32% | 9.55% |
| 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** | | | | | | | | | **77.05%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **23.67%** |
| 25 | of which loans collateralized by residential immovable property | | | | | | | | | 100.00% | 0.00% | 0.00% | 0.00% | 0.00% | 18.23% |
| 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 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| % (compared to flow of total eligible assets) | | 31 December 2025 | | | | | | | | | | | | | |
| | | 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 | |
| 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%** | **0.00%** |
| 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% |
| 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** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.01%** | **0.00%** | **0.00%** | **0.00%** | **47.46%** | **9.05%** | **0.18%** | **0.01%** | **1.48%** | **100.00%** |

## Template 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 2025 | | | | | | | | | | | | | | | | |
| | | 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 | 67.68% | 29.25% | 0.18% | 0.00% | 5.19% | 0.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.66% | 0.00% | 0.00% | 0.00% |
| 2 | **Financial undertakings** | **74.73%** | **38.83%** | **0.00%** | **0.00%** | **3.31%** | **0.28%** | **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 | 74.73% | 38.83% | 0.00% | 0.00% | 3.31% | 0.28% | 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 | 74.73% | 38.83% | 0.00% | 0.00% | 0.31% | 0.28% | 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** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **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% | 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% |
| 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** | **63.34%** | **38.25%** | **0.27%** | **0.00%** | **7.31%** | **0.52%** | **0.01%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.98%** | **0.00%** | **0.00%** | **0.00%** |
| 21 | Loans and advances | 61.35% | 38.11% | 0.32% | 0.00% | 7.97% | 0.54% | 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 | 75.22% | 39.08% | 0.00% | 0.00% | 3.33% | 0.42% | 0.04% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 6.87% | 0.01% | 0.00% | 0.01% |
| 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** | **77.05%** | **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% | 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% |

| 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 2025 | | | | | | | | | | | | | | | | |
| | | 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 |
| 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% |
| 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** | **67.68%** | **29.25%** | **0.18%** | **0.00%** | **5.19%** | **0.38%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.66%** | **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 2025 | | | | | | | | | | | | | |
| | | 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 | 0.04% | 0.04% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 68.75% | 29.30% | 0.18% | 0.00% | 5.19% | 100.00% |
| 2 | **Financial undertakings** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **75.02%** | **38.83%** | **0.00%** | **0.00%** | **3.31%** | **9.61%** |
| 3 | Credit institutions | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 75.02% | 38.83% | 0.00% | 0.00% | 3.31% | 9.61% |
| 4 | Loans and advances | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.002% | 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% | 75.02% | 38.83% | 0.00% | 0.10% | 3.31% | 9.61% |
| 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** | **0.07%** | **0.07%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **64.91%** | **38.32%** | **0.27%** | **0.00%** | **7.31%** | **66.72%** |
| 21 | Loans and advances | 0.08% | 0.08% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 61.97% | 38.19% | 0.32% | 0.00% | 7.97% | 57.18% |
| 22 | Debt securities. including UoP | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 82.51% | 39.14% | 0.00% | 0.00% | 3.34% | 9.55% |
| 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** | | | | | | | | | 77.05% | 0.00% | 0.00% | 0.00% | 0.00% | 23.67% |
| 25 | of which loans collateralized by residential immovable property | | | | | | | | | 100.00% | 0.00% | 0.00% | 0.00% | 0.00% | 18.23% |
| 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 2025 | | | | | | | | | | | | | |
| | | 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 | |
| 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%** | **0.00%** |
| 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% |
| 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% |
| 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** | **0.04%** | **0.04%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **0.00%** | **68.75%** | **29.30%** | **0.18%** | **0.00%** | **5.19%** | **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 2025 | | | | | | | | | | | | | | | | |
| | | 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) | 18.33% | 5.77% | 0.00% | 0.31% | 0.00% | 5.15% | 0.00% | 0.00% | 0.00% | 0.01% | 0.01% | 0.00% | 0.00% | 1.03% | 0.04% | 0.00% | 0.00% |
| 2 | Assets under management (AuM KPI) | 5.78% | 4.65% | 0.00% | 0.00% | 3.21% | 1.01% | 0.05% | 0.00% | 0.00% | 0.02% | 0.02% | 0.00% | 0.00% | 0.15% | 0.08% | 0.00% | 0.00% |

## Template 5 – Turnover - Stock

| 5. KPI off-balance sheet exposures based on Turnover | | r | s | t | u | v | w | x | z | aa | ab | ac | ad | ae |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 31 December 2025 | | | | | | | | | | | | |
| | | 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) | | | | |
| % (compared to total eligible off-balance sheet 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) | | | |
| | | | | 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) | 0.01% | 0.01% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 24.54% | 5.82% | 0.00% | 0.31% | 0.00% |
| 2 | Assets under management (AuM KPI) | 0.08% | 0.05% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 7.03% | 4.85% | 0.00% | 0.00% | 3.21% |

| | 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 2025 | | | | | | | | | | | | | | | | |
| | | 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) | 38.42% | 26.40% | 0.00% | 0.31% | 3.11% | 0.68% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 9.46% | 0.00% | 0.00% | 0.00% |
| 2 | Assets under management (AuM KPI) | 47.54% | 42.84% | 0.00% | 0.00% | 11.11% | 0.99% | 0.43% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 1.41% | 0.02% | 0.00% | 0.00% |

**Template 5 – Capex - Stock**

| 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 2025 | | | | | | | | | | | | |
| | | 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) | 0.38% | 0.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 48.94% | 26.78% | 0.00% | 0.31% | 3.11% |
| 2 | Assets under management (AuM KPI) | 7.77% | 0.78% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 57.71% | 44.07% | 0.00% | 0.00% | 11.11% |

| 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 2025 | | | | | | | | | | | | | | | | |
| | 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) | 3.94% | 2.27% | 0.00% | 0.00% | 0.00% | 0.72% | 0.00% | 0.00% | 0.00% | 0.04% | 0.04% | 0.00% | 0.00% | 0.24% | 0.14% | 0.00% | 0.00% |
| 2 Assets under management (AuM KPI) | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |

## Template 5 – Turnover - Flow

| 5. KPI off-balance sheet exposures based on Turnover | | r | s | t | u | v | w | x | z | aa | ab | ac | ad | ae |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 31 December 2025 | | | | | | | | | | | | |
| | | Pollution prevention and control (PPC) | | | | Biodiversity and ecosystems (BIO) | | | | TOTAL (CCM + CCA + WTR + CE + PPC + BIO) | | | | |
| % (compared to total eligible off-balance sheet assets) | | 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) | 0.05% | 0.05% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 4.99% | 2.49% | 0.00% | 0.00% | 0.00% |
| 2 | Assets under management (AuM KPI) | 0.00% | 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. 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 2025 | | | | | | | | | | | | | | | | |
| | | 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) | 42.94% | 60.85% | 0.00% | 0.00% | 0.03% | 0.10% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.02% | 0.00% | 0.00% | 0.00% |
| 2 | Assets under management (AuM KPI) | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |

**Template 5 – Capex - Flow**

| 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 2025 | | | | | | | | | | | | |
| | | 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) | 1.50% | 1.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 44.56% | 62.35% | 0.00% | 0.00% | 0.03% |
| 2 | Assets under management (AuM KPI) | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |

Optima bank

# ANNEX VI - Disclosures Delegated Act – 31.12.2024

## Template 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] 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | |
| 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 | **Financial undertakings** | **171** | **48** | **3** | **0** | **0** | **0** | **1** | **0** | **0** | **0** |
| 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 | **Other financial corporations** | **7** | **7** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **548** | **159** | **52** | **0** | **0** | **9** | **1** | **0** | **0** | **0** |
| 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 | **Households** | **221** | **130** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Local governments financing** | **27** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Collateral obtained by taking possession: residential and commercial immovable properties** | **0** | **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] 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** | **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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | | | |
| 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 | **Financial undertakings** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Other financial corporations** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Households** | | | | | **0** | **0** | **0** | **0** | | | | |
| 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Assets excluded from the numerator for GAR calculation (covered in the denominator)** | | | | | | | | | | | | |
| 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** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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** | **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 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | |
| 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 | **Financial undertakings** | **0** | **0** | **0** | **0** | **49** | **3** | **0** | **0** | **0** |
| 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 | **Other financial corporations** | **0** | **0** | **0** | **0** | **7** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **0** | **0** | **0** | **0** | **159** | **52** | **0** | **0** | **9** |
| 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 | **Households** | | | | | **130** | **0** | **0** | **0** | **0** |
| 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Assets excluded from the numerator for GAR calculation (covered in the denominator)** | | | | | | | | | |
| 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** | **338** | **55** | **0** | **0** | **9** |
| 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** | **338** | **55** | **0** | **0** | **9** |
| **Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations** | | | | | | | | | | |
| 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 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 0 | 0 | 0 | 0 | 19 | 6 | 0 | 0 | 0 |

## Template 1 - Capex

| | 1. Assets for the calculation of GAR based on CapEx | a | b | c | d | e | f | g | h | i | j |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | 31 December 2024 | | | | | | | | |
| | | | Climate change mitigation (CCM) | | | | | Climate change adaptation (CCA) | | | |
| | Million EUR | Total [gross] carrying amount | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | |
| 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 | **Financial undertakings** | **171** | **64** | **11** | **0** | **0** | **0** | **1** | **0** | **0** | **0** |
| 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 | **Other financial corporations** | **7** | **7** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **548** | **208** | **97** | **0** | **2** | **31** | **0** | **0** | **0** | **0** |
| 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 | **Households** | **221** | **130** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Local governments financing** | **27** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **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** | | | | | | | | | |

| 1. Assets for the calculation of GAR based on CapEx | | a | b | c | d | e | f | g | h | i | j |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | 31 December 2024 | | | | | | | | |
| | | | Climate change mitigation (CCM) | | | | | Climate change adaptation (CCA) | | | |
| Million EUR | | Total [gross] carrying amount | 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 |
| 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | | | |
| 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 | **Financial undertakings** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Other financial corporations** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Households** | | | | | **0** | **0** | **0** | **0** | | | | |
| 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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 | **Assets excluded from the numerator for GAR calculation (covered in the denominator)** | | | | | | | | | | | | |
| 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** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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** | **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 | *Of which debt securities* | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 57 | *Of which equity instruments* | 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 |
|---|---|---|---|---|---|---|---|---|---|---|
| | | 31 December 2024 | | | | | | | | |
| | | Biodiversity and ecosystems (BIO) | | | | TOTAL (CCM + CCA + WTR + CE + PPC + BIO) | | | | |
| | Million EUR | 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 |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | |
| 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 | **Financial undertakings** | **0** | **0** | **0** | **0** | **65** | **11** | **0** | **0** | **0** |
| 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 | **Other financial corporations** | **0** | **0** | **0** | **0** | **7** | **0** | **0** | **0** | **0** |
| 8 | *of which investment firms* | *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 | *of which management companies* | *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 | *of which insurance undertakings* | *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 | **Non-financial undertakings** | **0** | **0** | **0** | **0** | **208** | **97** | **0** | **2** | **31** |
| 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 | **Households** | | | | | **130** | **0** | **0** | **0** | **0** |
| 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 | **Local governments financing** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** | **0** |
| 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)** | | | | | | | | | |
| 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 |

# Template 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 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 | 34.82% | 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% |
| 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% |

| | 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 |
| 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% |
| 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% |

| 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 |
| 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 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 31 December 2024 | | | | | | | | | | | | | |
| | | Pollution prevention and control (PPC) | | | | Biodiversity and ecosystems (BIO) | | | | TOTAL (CCM + CCA + WTR + CE + PPC + BIO) | | | | | |
| | % (compared to total covered assets in the denominator) | 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% |
| 26 | of which building renovation loans | | | | | | | | | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 27 | of which motor vehicle loans | | | | | | | | | | | | | | |

| | 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 | |
| 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%** |

## Template 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% |
| 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% |

Optima bank

| 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 |
| 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% |
| 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% | | | | | | | | | | | | |

| 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 |
| 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% |
| 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** | **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%** |

| | 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% |
| 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% |

| 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 | |
| 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%** |

## ANNEX XII - Complementary Climate Delegated Act – 31.12.2025

### 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 | 0 | 0.00% | 0 | 0.00% | 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. | **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** | **75** | **1.26%** | **75** | **1.26%** | **0** | **0.00%** |
| 8. | **Total applicable KPI** | **75** | **1.26%** | **75** | **1.26%** | **0** | **0.00%** |

*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 | 0 | 0.00% | 0 | 0.00% | 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. | **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** | **157** | **2.65%** | **157** | **2.65%** | **0** | **0.00%** |
| 8. | **Total applicable KPI** | **157** | **2.65%** | **157** | **2.65%** | **0** | **0.00%** |

## 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 | 0 | 0.00% | 0 | 0.00% | 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 numerator 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 numerator of the applicable KPI | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| 7. | **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** | **75** | **99.88%** | **75** | **99.88%** | **0** | **0.00%** |
| 8. | **Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI** | **75** | **99.88%** | **75** | **99.88%** | **0** | **0.00%** |

*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 | 0 | 0.00% | 0 | 0.00% | 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 numerator 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 numerator of the applicable KPI | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| 7. | **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** | **157** | **99.59%** | **157** | **99.57%** | **0** | **0.01%** |
| 8. | **Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI** | **157** | **99.59%** | **157** | **99.57%** | **0** | **0.01%** |

## 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 Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 61 | 1.02% | 61 | 1.02% | 0 | 0.00% |
| 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. | **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** | **310** | **5.21%** | **295** | **4.96%** | **15** | **0.25%** |
| 8. | **Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI** | **371** | **6.24%** | **356** | **5.98%** | **15** | **0.25%** |

*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 Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 30 | 0.50% | 30 | 0.50% | 0 | 0.00% |
| 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. | **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** | **345** | **5.80%** | **342** | **5.76%** | **3** | **0.04%** |
| 8. | **Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI** | **375** | **6.30%** | **372** | **6.26%** | **3** | **0.04%** |

## 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. | **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** | **5.492** | **92.38%** |
| 8. | **Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI** | **5.492** | **92.38%** |

*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. | **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** | **5.273** | **88,70%** |
| 8. | **Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI** | **5.273** | **88,70%** |

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

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**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 "Bank") and its subsidiaries (collectively the "Group"), included in section "Sustainability Statement of Optima bank Group" of the consolidated Board of Directors' Annual Report (the "Sustainability Statement"), for the period from 01/01/2025 to 31/12/2025.

**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 by Law 5164/2024 and currently in force, 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 – 31.12.2025" and "ANNEX XII - Complementary Climate Delegated Act – 31.12.2025" of the Sustainability Statement, do not comply with Article 8 of EU Regulation 2020/852.

**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.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

**Professional Ethics and Quality Management**

We are independent of the Bank and the Group, 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.

**Management's responsibilities regarding the Sustainability Statement**

Management of the Bank 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 Bank'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 Bank'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, and

- Making assumptions that are reasonable in the circumstances.

Management of the Bank is further responsible for the preparation of the Sustainability Statement, in accordance with Article 154 of Law 4548/2018, as amended by Law 5164/2024 and currently in force, 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 – 31.12.2025" and "ANNEX XII - Complementary Climate Delegated Act – 31.12.2025" 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.

Deloitte.

The Audit Committee of the Bank 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 Bank is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Bank 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 Bank'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 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 Board of Directors of 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, 3 March 2026

The Certified Public Accountant

Konstantinos Kakoliris
Reg. No SOEL: 42931
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# IV.Independent Auditor's Report

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**TRUE TRANSLATION FROM THE ORIGINAL IN GREEK**

## Independent Auditor's Report

To the Shareholders of société anonyme "Optima bank S.A."

**<u>Audit Report of the Separate and Consolidated Financial Statements</u>**

### Opinion

We have audited the separate and consolidated financial statements of the société anonyme "Optima bank S.A." (the Bank), which comprise the separate and consolidated statement of financial position as at 31 December 2025, the separate and consolidated statements of income, statements of comprehensive income, changes in equity and cash flows for the year then ended, as well as the notes to the separate and consolidated financial statements including material accounting policy information.

In our opinion, the accompanying separate and consolidated financial statements present fairly, in all material respects, the financial position of the société anonyme "Optima bank S.A." and its subsidiaries (the Group) as at 31 December 2025, its financial performance and the consolidated cash flows for the year then ended in accordance with the International Financial Reporting Standards (IFRSs), as endorsed by the European Union.

### Basis for Opinion

We conducted our audit in accordance with the International Standards on Auditing (ISAs) as these 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 its consolidated subsidiaries, 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) relevant to the audit of the financial statements of public interest entities and the ethical requirements relevant in Greece to the audit of the separate and consolidated financial statements, and we have fulfilled our ethical requirements in accordance with the applicable legislation and the above-mentioned 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 judgment, 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.

<table>
<tr><th>Key Audit Matter</th><th>How our audit addressed the Key audit matters</th></tr>
<tr><th colspan="2">Allowance for Expected credit losses (ECL) for corporate loans and advances to customers at amortized cost</th></tr>
<tr><td>
Corporate loans and advances to customers at amortized cost of the Bank and the Group amounted to €4,866,731 th. και €4,903,650 th., respectively as at 31 December 2025 (€3,473,331 th. and €3,489,845 th. respectively as at 31 December 2024) and the allowance for expected credit loss (“ECL”) amounted to €67,058 th. for the Bank and €67,638 th. for the Group as at 31 December 2025 (€43,865 th. and €44,381 th. respectively as at 31 December 2024).
Measurement of Allowance for Expected credit losses on corporate loans and advances to customers at amortised cost is considered a key audit matter as the identification of assumptions used involves critical Management judgments and accounting estimates with inherent risk, high level of subjectivity, and complexity.
The most significant Management judgements and accounting estimates, relate to:
<ul>
<li>The determination of credit risk parameters such as Loss Given Default - LGD, Probability of Default-PD and Exposure at Default-EAD which used in the credit risk models for the estimation of expected credit losses.</li>
<li>The criteria used for the classification of loans at amortized cost to stages (Significant Increase in Credit Risk – SICR Unlikeness to Pay – UTP)</li>
<li>The estimation of the significant forward-looking information used by Management in credit risk models and the probability weightings used to estimate the impact of multiple macro-economic scenarios.</li>
<li>The identification and valuation of the adjustments (Management Overlays) made by Management in the outcome of the credit risk models for the estimation of expected credit losses. These adjustments include inherent uncertainty and significant degree of Management judgement.</li>
<li>The assumptions for the determination of expected future cash flows of individually assessed credit impaired loans, including assessment approach, valuation of collaterals, and the time to liquidate the collaterals.</li>
</ul>
</td><td>
Based on our risk assessment and following a risk-based approach, we have evaluated the impairment methodologies applied and the assumptions made by Management, in relation to this key audit matter, and we performed, inter alia, the following audit procedures:
<ul>
<li>With the support of our credit risk modelling specialists, we assessed the design and the implementation of the relevant internal controls over expected credit losses estimate, including the controls around:
<ul>
<li>The significant assumptions used in the ECL models.</li>
<li>Model monitoring and model validation.</li>
<li>The governance framework and approval of management overlays.</li>
<li>Stage allocation of loans and advances to customers.</li>
<li>The selection of macro-economic scenarios and probability weightings.</li>
</ul></li>
<li>With the support of our credit risk modelling specialists, we:
<ul>
<li>assessed the compliance of impairment methodologies of the Bank and the Group with the requirements of IFRS 9.</li>
<li>assessed the appropriateness of the criteria used to allocate loans to stages in accordance with IFRS 9. Our audit procedures included the assessment of the criteria set by Management for the identification of significant increase in credit risk or Unlikeness to Pay. On a sample basis we tested the correct allocation of loans with UTP triggers in stages.</li>
<li>evaluated the appropriateness of the significant credit risk parameters (Loss Given Default - LGD, Probability of Default- PD and Exposure at Default-EAD) used in credit risk models to estimate the expected credit losses and 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>
</ul></li>
</ul>
</td></tr>
</table>

| Key Audit Matter | How our audit addressed the Key audit matters |
|---|---|
| **Allowance for Expected credit losses (ECL) for corporate loans and advances to customers at amortized cost** | |
| 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, 2.12, 3.A, 4.1 and 20 to the separate and consolidated financial statements. | ○ 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.<br>○ assessed the reasonableness and appropriateness of the significant forward-looking information used in the credit risk models by comparing them to those included in external sources.<br>○ 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.<br>○ assessed the design and implementation of the relevant controls over the ECL measurement of credit impaired loans assessed on an individual basis which included the determination of the appropriate approach and the estimation of expected cash flows.<br>○ on a sample basis we assessed whether the approach used in the measurement of impairment for the credit impaired loans assessed on individual basis is appropriate , and tested the reasonableness of the significant assumptions used including the valuation of the collaterals (where we also made use of our real estate specialists), time to liquidate collaterals and the estimation of discounted future cash flows.<br><br>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. |

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| Key Audit Matter | How our audit addressed the Key audit matters |
|---|---|
| **Information Technology General Controls and controls over financial reporting** | |
| 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.<br><br>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. | 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.<br><br>In summary, our key audit activities included, among others, testing of:<br>• User access provisioning and de-provisioning process.<br>• Privileged access to applications, operating systems and databases.<br>• Periodic review of user access rights.<br>• Change management process over applications, operating systems and databases (i.e. user request, user acceptance testing and final approval for promotion to production).<br>• Management of IT daily operations. |

**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.

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**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.

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**Auditor's Responsibilities for the Audit of the Separate and Consolidated Financial Statements (continued)**

- 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 154C 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 3 March 2026, 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 the same article, and its content is consistent with the accompanying separate and consolidated financial statements for the year ended 31 December 2025.

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 2025 are disclosed in note 41 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 2025 is the fifth consecutive year that we serve as statutory auditors, based on the relevant Annual General Assembly.

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**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 Optima bank S.A. (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 2025, in XHTML format, as well as the envisaged iXBRL file (2138008NSD1X1XFUK750-2025-12-31-1-el.xbri.) with the appropriate tagging on the above consolidated financial statements, including the notes to the financial statements(hereinafter "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 2025, 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 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 2025, in XHTML format as well as the envisaged iXBRL file (2138008NSD1X1XFUK750-2025-12-31-1-el.xbri.) with the appropriate tagging on these consolidated financial statements, including the notes of these financial statements, are prepared in all material respects in accordance with the Applicable Criteria.

Athens, 3 March 2026

The Certified Public Accountant

**Apostolos Kokkinellis**
**Reg.No. SOEL 44621**
Deloitte Certified Public Accountants S.A.
3a Fragoklissias & Granikou Str.
151 25 Maroussi
Reg. No. SOEL: E120

Optima bank

# V. Financial statements for the year ended December 31, 2025

**Financial Statements**

**for the year**

**January 1 - December 31, 2025**

**In accordance with the International Financial Reporting Standards (IFRS)**

## Group

### Consolidated statement of profit or loss and other comprehensive income

| Amounts in Eur '000 | Note | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|---|
| Interest and similar income | 6 | 279,817 | 253,647 |
| Interest expense and similar charges | 6 | (69,780) | (63,790) |
| **Net interest income** | | **210,037** | **189,857** |
| | | | |
| Fee and commission income | 7 | 71,474 | 47,743 |
| Fee and commission expense | 7 | (9,724) | (6,411) |
| **Net fee and commission income** | | **61,750** | **41,332** |
| | | | |
| Dividend income | | 824 | 512 |
| Gains/(losses) from financial transactions | 8 | 17,875 | 19,795 |
| Gains/(losses) from derecognition of financial assets measured at amortised cost | 9 | 5,395 | 2,648 |
| Other operating income | 10 | 1,672 | 579 |
| | | **25,766** | **23,534** |
| | | | |
| **Total operating income** | | **297,553** | **254,723** |
| | | | |
| Staff costs | 11 | (36,322) | (32,638) |
| Other operating expenses | 12 | (20,901) | (16,912) |
| Depreciation & amortisation | | (9,285) | (8,329) |
| **Total operating expenses** | | **(66,508)** | **(57,879)** |
| | | | |
| **Profit before provisions and taxes** | | **231,045** | **196,844** |
| Provisions for expected credit losses | 13 | (24,523) | (20,553) |
| **Total provisions** | | **(24,523)** | **(20,553)** |
| Share of profit/(loss) of associates | | (598) | 349 |
| | | | |
| **Profit before tax** | | **205,924** | **176,640** |
| Income tax | 14 | (35,864) | (36,414) |
| **Profit after tax (a)** | | **170,060** | **140,226** |
| | | | |
| **Profits attributable to:** | | | |
| Shareholders of the parent company | | 170,048 | 140,224 |
| Non-controlling interests | | 12 | 2 |
| | | **170,060** | **140,226** |
| **Other comprenhesive income** | | | |
| **Items that may be reclassified subsequently to the income statement** | | | |
| Reserve of debt instruments measured at fair value through other comprehensive income ("FVTOCI") | | 256 | 1,910 |
| Deferred tax on reserve from valuation of debt instruments measured at fair value through other comprehensive income ("FVTOCI") | | (57) | (420) |
| Provision for expected credit losses for instruments measured at fair value through other comprehensive income ("FVTOCI") | | 26 | (19) |
| **Total items that may be reclassified subsequently to the income statement** | | **225** | **1,471** |
| | | | |
| **Items that will not be reclassified to the income statement** | | | |
| Actuarial losses of defined benefit obligations | 31 | 178 | (152) |
| Deferred tax on actuarial losses | | (39) | 34 |
| **Total items that will not be reclassified to the income statement** | | **139** | **(118)** |
| | | | |
| **Other comprehensive income after tax (b)** | | **364** | **1,353** |
| | | | |
| **Total comprehensive income after tax (a)+(b)** | | **170,424** | **141,579** |
| | | | |
| **Total comprehensive income attributable to:** | | | |
| Shareholders of the parent company | | 170,412 | 141,577 |
| Non-controlling interests | | 12 | 2 |
| | | **170,424** | **141,579** |
| | | | |
| Earnings after tax per share - basic (in Eur) | 15 | 0.77 | 0.63 |
| Earnings after tax per share - adjusted (in Eur) | 15 | 0.77 | 0.63 |

The notes on pages 317 to 449 form an integral part of these annual financial statements.

## Bank

### Statement of profit or loss and other comprehensive income

| Amounts in Eur '000 | Note | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|---|
| Interest and similar income | 6 | 275,483 | 250,793 |
| Interest expense and similar charges | 6 | (69,814) | (63,783) |
| **Net interest income** | | **205,669** | **187,010** |
| | | | |
| Fee and commission income | 7 | 64,228 | 43,004 |
| Fee and commission expense | 7 | (9,612) | (6,312) |
| **Net fee and commission income** | | **54,616** | **36,692** |
| | | | |
| Dividend income | | 793 | 500 |
| Gains/(losses) from financial transactions | 8 | 17,830 | 19,669 |
| Gains/(losses) from the derecognition of financial assets measured at amortised cost | 9 | 5,487 | 2,648 |
| Other operating income | 10 | 1,705 | 695 |
| | | **25,815** | **23,512** |
| | | | |
| **Total operating income** | | **286,100** | **247,214** |
| | | | |
| Staff costs | 11 | (34,534) | (31,281) |
| Other operating expenses | 12 | (19,888) | (15,779) |
| Depreciation & amortisation | | (8,832) | (7,852) |
| **Total operating expenses** | | **(63,254)** | **(54,912)** |
| | | | |
| **Profit before provisions and taxes** | | **222,846** | **192,302** |
| Provisions for expected credit losses | 13 | (24,455) | (20,172) |
| **Total provisions** | | **(24,455)** | **(20,172)** |
| | | | |
| **Profit before tax** | | **198,391** | **172,130** |
| Income tax | 14 | (34,108) | (35,418) |
| **Profit after tax (a)** | | **164,283** | **136,712** |
| | | | |
| **Other comprenhesive income** | | | |
| **Items that may be reclassified subsequently to the income statement** | | | |
| Reserve of debt instruments measured at fair value through other comprehensive income ("FVTOCI") | | 256 | 1,910 |
| Deferred tax on reserve from valuation of debt instruments measured at fair value through other comprehensive income ("FVTOCI") | | (57) | (420) |
| Provision for expected credit losses for instruments measured at fair value through other comprehensive income ("FVTOCI") | | 26 | (19) |
| **Total items that may be reclassified subsequently to the income statement** | | **225** | **1,471** |
| | | | |
| **Items that will not be reclassified to the income statement** | | | |
| Actuarial losses of defined benefit obligations | 31 | 167 | (141) |
| Deferred tax on actuarial losses | | (37) | 31 |
| **Total items will not be reclassified to the income statement** | | **130** | **(110)** |
| | | | |
| **Other comprehensive income after tax (b)** | | **355** | **1,361** |
| | | | |
| **Total comprehensive income after tax (a)+(b)** | | **164,638** | **138,073** |
| | | | |
| Earnings after tax per share - basic (in Eur) | 15 | 0.74 | 0.62 |
| Earnings after tax per share - adjusted (in Eur) | 15 | 0.74 | 0.62 |

The notes on pages 317 to 449 form an integral part of these annual financial statements.

Optima bank

**Group**

## Consolidated statement of financial position

| Amounts in Eur '000 | Note | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| **ASSETS** | | | |
| Cash and balances with central bank | 16 | 683,840 | 797,646 |
| Due from banks | 17 | 321,025 | 171,309 |
| Financial assets measured at fair value through profit or loss | 18 | 304,577 | 264,442 |
| Derivative financial instruments | 19 | 1,137 | 2,210 |
| Loans and advances to customers | 20 | 5,049,761 | 3,612,598 |
| Financial assets measured at fair value through other comprehensive income | 21 | 53,842 | 47,390 |
| Debt securities at amortised cost | 22 | 974,990 | 413,844 |
| Investments in associates | 23 | 11 | 609 |
| Property, plant and equipment | 24 | 10,487 | 10,717 |
| Intangible assets | 25 | 11,034 | 11,396 |
| Right of use assets | 26 | 18,008 | 19,595 |
| Deferred tax assets | 27 | 14,830 | 9,685 |
| Other assets | 28 | 114,892 | 179,506 |
| **Total assets** | | **7,558,434** | **5,540,947** |
| | | | |
| **EQUITY AND LIABILITIES** | | | |
| Due to banks | 29 | 281,341 | 115,563 |
| Due to customers | 30 | 6,298,580 | 4,643,412 |
| Derivative financial instruments | 19 | 5,622 | 5,318 |
| Debt securities in issue and other borrowed funds | 32 | 150,776 | 0 |
| Lease liabilities | 26 | 19,959 | 21,220 |
| Retirement benefit obligations | 31 | 1,092 | 1,027 |
| Income tax liabilities | | 3,634 | 5,573 |
| Other liabilities | 33 | 45,581 | 124,368 |
| Provisions | 34 | 4,693 | 4,167 |
| **Total liabilities** | | **6,811,278** | **4,920,648** |
| | | | |
| **Shareholders equity** | | | |
| Share capital | 35 | 254,521 | 254,521 |
| Share premium | | 84,114 | 84,114 |
| Fair value through other comprehensive income reserve | | (1,239) | (1,464) |
| Less: Treasury shares | | (1,736) | (112) |
| Other reserves | 36 | 41,015 | 31,620 |
| Retained earnings | | 370,447 | 251,598 |
| **Total equity attributable to the Company's shareholders** | | **747,122** | **620,277** |
| Non-controlling interests | | 34 | 22 |
| **Total equity** | | **747,156** | **620,299** |
| | | | |
| **Total liabilities and equity** | | **7,558,434** | **5,540,947** |

The notes on pages 317 to 449 form an integral part of these annual financial statements.

## Bank

### Statement of financial position

| Amounts in Eur '000 | Note | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| **ASSETS** | | | |
| Cash and balances with central bank | 16 | 683,840 | 797,645 |
| Due from banks | 17 | 317,601 | 160,157 |
| Financial assets measured at fair value through profit or loss | 18 | 302,671 | 261,626 |
| Derivative financial instruments | 19 | 1,137 | 2,210 |
| Loans and advances to customers | 20 | 5,013,422 | 3,596,600 |
| Financial assets measured at fair value through other comprehensive income | 21 | 53,842 | 47,390 |
| Debt securities at amortised cost | 22 | 974,990 | 413,844 |
| Investment in subsidiaries and associates | 23 | 22,988 | 23,972 |
| Property, plant and equipment | 24 | 10,423 | 10,588 |
| Intangible assets | 25 | 8,134 | 8,193 |
| Right of use assets | 26 | 17,981 | 19,561 |
| Deferred tax assets | 27 | 16,043 | 10,603 |
| Other assets | 28 | 113,692 | 179,804 |
| **Total assets** | | **7,536,764** | **5,532,193** |
| | | | |
| **EQUITY AND LIABILITIES** | | | |
| Due to banks | 29 | 281,341 | 115,563 |
| Due to customers | 30 | 6,302,434 | 4,654,064 |
| Derivative financial instruments | 19 | 5,622 | 5,318 |
| Debt securities in issue and other borrowed funds | 32 | 150,776 | 0 |
| Lease liabilities | 26 | 19,933 | 21,188 |
| Retirement benefit obligations | 31 | 1,023 | 964 |
| Income tax liabilities | | 2,647 | 4,961 |
| Other liabilities | 33 | 43,205 | 122,933 |
| Provisions | 34 | 4,683 | 4,157 |
| **Total liabilities** | | **6,811,664** | **4,929,148** |
| | | | |
| **Shareholders equity** | | | |
| Share capital | 35 | 254,521 | 254,521 |
| Share premium | | 84,114 | 84,114 |
| Fair value through other comprehensive income reserve | | (1,239) | (1,464) |
| Less: Treasury shares | | (1,736) | (112) |
| Other reserves | 36 | 39,710 | 30,551 |
| Retained earnings | | 349,730 | 235,435 |
| **Total equity** | | **725,100** | **603,045** |
| | | | |
| **Total liabilities and equity** | | **7,536,764** | **5,532,193** |

The notes on pages 317 to 449 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 | Total | Non-controlling interest | Total |
|---|---|---|---|---|---|---|---|---|---|---|
| **Balance as at 1 January 2024** | | **254,245** | **84,114** | **(2,935)** | **(164)** | **30,146** | **144,651** | **510,057** | **20** | **510,077** |
| Profit for the year, after income tax | | 0 | 0 | 0 | 0 | 0 | 140,224 | 140,224 | 2 | 140,226 |
| **Other comprehensive income** | | | | | | | | | | |
| 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 | 1,910 | 0 | 1,910 |
| Loss transferred directly to equity | | 0 | 0 | (19) | 0 | 0 | 0 | (19) | 0 | (19) |
| Minus: related income tax | | 0 | 0 | (420) | 0 | 34 | 0 | (386) | 0 | (386) |
| Net actuarial loss recognised directly in equity | 31 | 0 | 0 | 0 | 0 | (152) | 0 | (152) | 0 | (152) |
| **Total comprehensive income (after taxes)** | | **0** | **0** | **1,471** | **0** | **(118)** | **140,224** | **141,577** | **2** | **141,579** |
| Retained earnings capitalization | | 276 | 0 | 0 | 0 | 0 | (276) | 0 | 0 | 0 |
| Transfer to statutory reserve | | 0 | 0 | 0 | 0 | 6,918 | (6,918) | 0 | 0 | 0 |
| Dividend distribution | | 0 | 0 | 0 | 0 | 0 | (32,461) | (32,461) | 0 | (32,461) |
| Transfers | | 0 | 0 | 0 | (84) | (5,827) | 5,911 | 0 | 0 | 0 |
| (Purchases)/sales treasury shares | | 0 | 0 | 0 | 136 | 0 | 0 | 136 | 0 | 136 |
| Stock awards to personnel | | 0 | 0 | 0 | 0 | 501 | 467 | 968 | 0 | 968 |
| **Total transactions with equity shareholders** | | **276** | **0** | **0** | **52** | **1,592** | **(33,277)** | **(31,357)** | **0** | **(31,357)** |
| **Balance as at 31 December 2024** | | **254,521** | **84,114** | **(1,464)** | **(112)** | **31,620** | **251,598** | **620,277** | **22** | **620,299** |
| | | | | | | | | | | |
| **Balance as at 1 January 2025** | | **254,521** | **84,114** | **(1,464)** | **(112)** | **31,620** | **251,598** | **620,277** | **22** | **620,299** |
| Profit for the year, after income tax | | 0 | 0 | 0 | 0 | 0 | 170,048 | 170,048 | 12 | 170,060 |
| **Other comprehensive income** | | | | | | | | | | |
| Gain from valuation of financial assets measured at fair value through other comprehensive income recognised directly in equity | | 0 | 0 | 256 | 0 | 0 | 0 | 256 | 0 | 256 |
| Gain transferred directly to equity | | 0 | 0 | 26 | 0 | 0 | 0 | 26 | 0 | 26 |
| Minus: related income tax | | 0 | 0 | (57) | 0 | (39) | 0 | (96) | 0 | (96) |
| Net actuarial gain recognised directly in equity | 31 | 0 | 0 | 0 | 0 | 178 | 0 | 178 | 0 | 178 |
| **Total comprehensive income (after taxes)** | | **0** | **0** | **225** | **0** | **139** | **170,048** | **170,412** | **12** | **170,424** |
| Divestment from a subsidiary | | 0 | 0 | 0 | 0 | 0 | (984) | (984) | 0 | (984) |
| Dividend distribution | | 0 | 0 | 0 | 0 | 0 | (42,051) | (42,051) | 0 | (42,051) |
| (Purchases)/sales treasury shares | | 0 | 0 | 0 | (1,624) | 0 | 0 | (1,624) | 0 | (1,624) |
| Stock awards to personnel | | 0 | 0 | 0 | 0 | 1,092 | 0 | 1,092 | 0 | 1,092 |
| Transfer to statutory reserve | | 0 | 0 | 0 | 0 | 8,164 | (8,164) | 0 | 0 | 0 |
| **Total transactions with equity shareholders** | | **0** | **0** | **0** | **(1,624)** | **9,256** | **(51,199)** | **(43,567)** | **0** | **(43,567)** |
| **Balance as at 31 December 2025** | | **254,521** | **84,114** | **(1,239)** | **(1,736)** | **41,015** | **370,447** | **747,122** | **34** | **747,156** |

The notes on pages 317 to 449 form an integral part of these annual financial statements.

## Bank

## 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 | Total |
|---|---|---|---|---|---|---|---|---|
| **Balance as at 1 January 2024** | | **254,245** | **84,114** | **(2,935)** | **(164)** | **29,249** | **131,821** | **496,330** |
| Profit for the year, after income tax | | 0 | 0 | 0 | 0 | 0 | 136,712 | 136,712 |
| **Other comprehensive income** | | | | | | | | |
| 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 | 1,910 |
| Loss transferred directly to equity | | 0 | 0 | (19) | 0 | 0 | 0 | (19) |
| Minus: related income tax | | 0 | 0 | (420) | 0 | 31 | 0 | (389) |
| Net actuarial loss recognised directly in equity | 31 | 0 | 0 | 0 | 0 | (141) | 0 | (141) |
| **Total comprehensive income (after taxes)** | | **0** | **0** | **1,471** | **0** | **(110)** | **136,712** | **138,073** |
| Retained earnings capitalization | | 276 | 0 | 0 | 0 | 0 | (276) | 0 |
| Transfer to statutory reserve | | 0 | 0 | 0 | 0 | 6,739 | (6,739) | 0 |
| Dividend distribution | | 0 | 0 | 0 | 0 | 0 | (32,461) | (32,461) |
| Transfers | | 0 | 0 | 0 | (83) | (5,828) | 5,911 | 0 |
| (Purchases)/sales treasury shares | | 0 | 0 | 0 | 135 | 0 | 0 | 135 |
| Stock awards to personnel | | 0 | 0 | 0 | 0 | 501 | 467 | 968 |
| **Total transactions with equity shareholders** | | **276** | **0** | **0** | **52** | **1,412** | **(33,098)** | **(31,358)** |
| **Balance as at 31 December 2024** | | **254,521** | **84,114** | **(1,464)** | **(112)** | **30,551** | **235,435** | **603,045** |
| | | | | | | | | |
| **Balance as at 1 January 2025** | | **254,521** | **84,114** | **(1,464)** | **(112)** | **30,551** | **235,435** | **603,045** |
| Profit for the year, after income tax | | 0 | 0 | 0 | 0 | 0 | 164,283 | 164,283 |
| **Other comprehensive income** | | | | | | | | |
| Gain from valuation of financial assets measured at fair value through other comprehensive income recognised directly in equity | | 0 | 0 | 256 | 0 | 0 | 0 | 256 |
| Gain transferred directly to equity | | 0 | 0 | 26 | 0 | 0 | 0 | 26 |
| Minus: related income tax | | 0 | 0 | (57) | 0 | (37) | 0 | (94) |
| Net actuarial gain recognised directly in equity | 31 | 0 | 0 | 0 | 0 | 167 | 0 | 167 |
| **Total comprehensive income (after taxes)** | | **0** | **0** | **225** | | **130** | **164,283** | **164,638** |
| Dividend distribution | | 0 | 0 | 0 | 0 | 0 | (42,051) | (42,051) |
| Transfer to statutory reserve | | 0 | 0 | 0 | 0 | 7,937 | (7,937) | 0 |
| (Purchases)/sales treasury shares | | 0 | 0 | 0 | (1,624) | 0 | 0 | (1,624) |
| Stock awards to personnel | | 0 | 0 | 0 | 0 | 1,092 | 0 | 1,092 |
| **Total transactions with equity shareholders** | | **0** | **0** | **0** | **(1,624)** | **9,029** | **(49,988)** | **(42,583)** |
| **Balance as at 31 December 2025** | | **254,521** | **84,114** | **(1,239)** | **(1,736)** | **39,710** | **349,730** | **725,100** |

The notes on pages 317 to 449 form an integral part of these annual financial statements

## Group

## Consolidated cash flow statement

| Amounts in Eur '000 | Note | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|---|
| **Cash flows from operating activities** | | | |
| **Profit before tax** | | **205,924** | **176,640** |
| Adjustments for: | | | |
| Depreciation & amortisation | | 9,285 | 8,329 |
| Fair value losses from financial assets measured at fair value | | (14,810) | (9,001) |
| Interest and non-cash expenses | | 785 | 728 |
| Dividend income | | (824) | (512) |
| (Gain)/ loss from derivatives valuation | | 1,760 | (4,424) |
| Share of profit/(loss) of equity method associates | | 598 | (349) |
| Provision for retirement benefit obligations | 31 | 282 | 184 |
| Employee benefits & other staff provisions | | 1,092 | 968 |
| Provision for expected credit losses | 13 | 24,523 | 20,553 |
| (Gain)/ loss from sale of assets | | 7 | 184 |
| (Gain)/loss from carbon emission inventory at fair value | | 4,326 | 1,023 |
| Accrued interest from financing activities | | 4,349 | 0 |
| Foreign exchange differences | | 138 | (61) |
| (Gains)/losses from sale of financial assets at fair value | | (42) | (33) |
| | | **237,393** | **194,229** |
| **Changes in operating assets and liabilities** | | | |
| Financial assets measured at fair value through profit or loss | | (26,244) | 84,287 |
| Loans and advances to customers | | (1,461,394) | (1,199,941) |
| Due from banks | | 5,020 | (41) |
| Other assets | | 45,349 | (87,379) |
| Due to banks | | 165,777 | 36,508 |
| Due to customers | | 1,652,940 | 1,451,608 |
| Other liabilities | | (77,620) | 60,176 |
| Paid staff compensation | 31 | (40) | 0 |
| Interest paid | | (1) | (2) |
| **Net cash flows from operating activities before income tax** | | **541,180** | **539,445** |
| Income tax paid | | (28,763) | (8,918) |
| **Net cash flows from operating activities** | | **512,417** | **530,527** |
| **Investing activities** | | | |
| Acquisition of associates, relatives, joint ventures and other investments | | 0 | 2 |
| Disposal of participation percentage in subsidiaries and associates | | 984 | 0 |
| Purchases of investment portfolio securities | | (782,972) | (392,930) |
| Disposal/maturity of investment portfolio securities | | 198,204 | 252,584 |
| Interest received from investment portfolio securities | | 17,988 | 16,407 |
| Dividends received | | 824 | 512 |
| Proceeds from PPE sales | | 17 | 1 |
| Purchase of PPE | 24 | (1,853) | (1,766) |
| Purchase of intangible assets | 25 | (3,125) | (3,723) |
| **Net cash flow from investing activities** | | **(569,933)** | **(128,913)** |
| **Financing activities** | | | |
| Share capital decrease | | 0 | (162) |
| Purchase of treasury shares | | (3,531) | (2,757) |
| Proceeds from disposal of treasury shares | | 1,907 | 2,893 |
| Dividends paid | | (42,051) | (32,461) |
| Proceeds from the issuance of debt securities and other borrowed funds | | 148,506 | 0 |
| Payment of interest from the issuance of credit securities and other borrowed funds | | (2,079) | 0 |
| Proceed/(repayments) from loans issued/undertaken | | 0 | (2,024) |
| Repayments of lease liabilities (capital and interest) | | (4,197) | (3,703) |
| **Net cash flow from financing activities** | | **98,555** | **(38,214)** |
| Effect of exchange rate changes on cash and cash equivalents | | (138) | 57 |
| **Net increase/(decrease) in cash and cash equivalents** | | **40,901** | **363,457** |
| Cash and cash equivalents at beginning of the year | 16 | 941,070 | 577,613 |
| **Cash and cash equivalents at the end of the year** | | **981,972** | **941,070** |

The notes on pages 317 to 449 form an integral part of these annual financial statements.

## Bank

## Cash flow statement

| Amounts in Eur '000 | Note | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|---|
| **Cash flows from operating activities** | | | |
| **Profit before tax** | | **198,391** | **172,130** |
| Adjustments for: | | | |
| Depreciation & amortisation | | 8,832 | 7,852 |
| Fair value losses from financial assets measured at fair value | | (14,801) | (8,919) |
| Interest and non-cash expenses | | 783 | 730 |
| Dividend income | | (793) | (500) |
| (Gain)/ loss from derivatives valuation | | 1,760 | (4,424) |
| Provision for retirement benefit obligations | 31 | 266 | 173 |
| Employee benefits & other staff provisions | | 1,092 | 968 |
| Provision for expected credit losses | 13 | 24,455 | 20,172 |
| (Gain)/ loss from sale of assets | | 7 | 184 |
| (Gain)/loss from carbon emission inventory at fair value | | 4,326 | 1,023 |
| Interest income from loans | | 4,349 | 0 |
| Foreign exchange differences | | 132 | (57) |
| | | **228,799** | **189,332** |
| **Changes in operating assets and liabilities** | | | |
| Financial assets measured at fair value through profit or loss | | (26,244) | 84,287 |
| Loans and advances to customers | | (1,440,984) | (1,198,404) |
| Due from banks | | 5,020 | (41) |
| Other assets | | 46,588 | (88,670) |
| Due to banks | | 165,777 | 36,508 |
| Due to customers | | 1,648,370 | 1,457,152 |
| Other liabilities | | (78,561) | 60,273 |
| Paid staff compensation | 31 | (40) | 0 |
| **Net cash flows from operating activities before income tax** | | **548,725** | **540,437** |
| Income tax paid | | (27,677) | (8,094) |
| **Net cash flows from operating activities** | | **521,048** | **532,343** |
| | | | |
| **Investing activities** | | | |
| Acquisition of subsidiaries, associates, joint ventures and other investments | 23 | 0 | (15,000) |
| Disposal of participation percentage in subsidiaries and associates | | 0 | 2 |
| Divestment from subsidiary | | 984 | 0 |
| Purchases of investment portfolio securities | | (781,772) | (389,730) |
| Disposal/maturity of investment portfolio securities | | 196,043 | 251,451 |
| Interest received from investment portfolio securities | | 17,988 | 16,407 |
| Dividends received | | 793 | 500 |
| Proceeds from PPE sales | | 17 | 1 |
| Purchase of PPE | 24 | (1,896) | (1,739) |
| Purchase of intangible assets | 25 | (3,019) | (3,508) |
| **Net cash flow from investing activities** | | **(570,862)** | **(141,616)** |
| | | | |
| **Financing activities** | | | |
| Purchase of treasury shares | | (3,531) | (2,757) |
| Proceeds from disposal of treasury shares | | 1,907 | 2,893 |
| Dividend distribution | | (42,051) | (32,461) |
| Proceeds from the issuance of debt securities and other borrowed funds | | 148,506 | 0 |
| Payment of interest from the issuance of credit securities and other borrowed funds | | (2,079) | 0 |
| Repayments of lease liabilities (capital and interest) | | (4,175) | (3,689) |
| **Net cash flow from financing activities** | | **98,577** | **(36,014)** |
| Effect of exchange rate changes on cash and cash equivalents | | (132) | 57 |
| **Net increase/(decrease) in cash and cash equivalents** | | **48,631** | **354,770** |
| Cash and cash equivalents at beginning of the year | 16 | 929,917 | 575,147 |
| **Cash and cash equivalents at the end of the year** | | **978,548** | **929,917** |

The notes on pages 317 to 449 form an integral part of these annual financial statements.

**Notes to the financial statements as of 31 December 2025**

## 1. General information

**Optima Bank S.A.** resulted 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 31/12/2025 it employed 591 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 Eur 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.

In June 2025, the Bank proceeded with the issuance of a Eur 150m subordinated bond (Tier II) under the Euro-Medium Term Note program on the Luxembourg Stock Exchange.

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 | PALAIO 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 |
| 30 | KOMOTINI | Orfeos Ave. 1 – 691 32 |

The consolidated and standalone financial statements as of 31/12/2025 were approved by the BoD on 2/3/2026 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).

## 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. Areas involving complex transactions with a high degree of subjectivity, or assumptions and estimates that are significant to the financial statements, are disclosed in note 3.

#### 2.1.1. Going concern

The financial statements of 31/12/2025 have been 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 growth of the Greek economy, which continues to follow a positive trajectory at rates exceeding the euro area averages, a trend expected to persist in 2026, as evidenced by the Bank of Greece's Interim Monetary Policy Report 2025 and the Foundation for Economic and Industrial Research (IOBE) quarterly report (Q4 2025) on the Greek economy.

- The strong fundamentals demonstrated by Greek banks, reflecting improved profitability, continued credit expansion, access to international capital markets, and the containment of non-performing loans.
- The ongoing upgrades of the country's creditworthiness, which were further supported by the upgrades of the credit ratings of Greek banks—developments that enhanced access to international markets and enabled the issuance of capital instruments under more favorable terms.
- The maintenance of a high-quality balance sheet structure, as reflected in the Non-Performing Loans (NPL) ratio, which stands at 1.31%, as well as the 21.28% increase in after-tax profits.
- The effective management of operating costs, as reflected in the Cost / Core Income ratio, which stands at 24.5%.
- The commitment to the business plan that ensures strong profitability—despite the decline in interest rates—safeguards asset quality, and maintains the Group's liquidity and capital adequacy at levels well above the established regulatory thresholds.
- The initially significant uncertainty caused by the imposition of high tariffs by the United States, which subsided as a result of the trade agreements reached with the European Union.
- The risks arising from the ongoing Russia–Ukraine war, despite the progress in negotiations, along with the identification of alternative solutions that mitigate the impact and create new investment opportunities, resulting in these risks not posing a threat to stability of the Group.
- The Group's active participation in the Recovery and Resilience Facility, with substantial absorption of funds.

Based on the above, the Board of Directors considers that there are no doubts regarding the Group's ability to continue its operations for a period of 12 months from the approval date of the annual financial statements. Therefore, the conditions for applying the going concern principle in the preparation of the financial statements are met.

Greek economy

The Greek economy continues to record a positive trajectory, with growth rates exceeding the euro area averages. Growth was driven by strengthened private consumption, the revival of investments, and the partial easing of inflation. Unemployment declined, and fixed investments increased at a pace surpassing that of most European economies. Inflation stood at 2.5% for 2025 and remains higher than the euro area average, mainly due to services (housing, clothing, accommodation, and food services). The central assessment of IOBE, according to its quarterly report, is that this trend is expected to continue in the coming year. Domestic demand is projected to remain strong, and fixed investments are expected to accelerate, supported by the implementation of the Recovery and Resilience Plan, the robust Public Investment Programme, and relatively low financing costs.

Key risks include geopolitical tensions, which, according to the Bank of Greece, relate to the fragile negotiations aimed at ending the Russia–Ukraine war, as well as potential damages associated with the impacts of the climate crisis, along with the high external deficit driven by increased imports.

In the financial system, the European Central Bank maintained its key interest rates unchanged during the second half of 2025, and these are expected to remain stable in 2026. Greek banks expanded their access to international capital markets in 2025 at lower financing costs; credit expansion—mainly towards businesses—remained strong; non-performing loans in Q3 2025 stood at 3.6% of total loans; profitability improved; and capital adequacy and liquidity ratios remained elevated. All of the above are reflected in the continuous upgrades by credit rating agencies.

According to the Bank of Greece's Interim Monetary Policy Report 2025, the key challenges concern the full and effective utilization of European financing instruments—the loan component of the RRF, the Multiannual Financial Frameworks, and the EU funds related to the Social Climate Fund, the Modernisation Fund, and the Islands' Decarbonisation Fund. The next NSRF (Partnership Agreement) will also play a decisive role.

In conclusion, 2025 was a year of significant resilience for the Greek economy, despite the volatile global environment. The outlook for 2026 remains strong, despite geopolitical tensions and trade frictions, with growth expected to continue alongside positive trends in employment and investment.

#### 2.1.2. Restatement and reclassification 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 restatement or reclassification arose.

#### 2.1.3. New standards, amendments to standards and interpretations

The amendments to the applicable standards as of 1/1/2025 are listed below:

‣ **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 Group and Bank's financial statements.

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 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 Group and Bank's financial statements.

‣ **Amendment to International Financial Reporting Standard 9 and International Financial Reporting Standard 7 "Contracts Referring to 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 Group will assess whether the above amendment 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 the Financial Statements.

Effective for annual periods beginning on or after 1/1/2027.

The Group is assessing the impact it will have on the presentation of the financial statements of the Group and the Bank.

‣ **New International Financial Reporting Standard 19 "Non-Publicly Accountable Subsidiaries"**: Disclosures by 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 Group and Bank's financial statements.

## 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
- Debt securities in issue and other borrowed funds
- 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, minus principal repayments, plus or minus the accumulated depreciation using the effective interest rate method for, any differences between the initial amount and the amount at maturity, 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

The Group records a financial asset or liability on its statement of financial position only when it becomes a party to the contractual terms of the financial instrument. 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 quoted price in an active market for an identical asset or liability (i.e. a 1st level input) or is based on a valuation technique that uses only observable market data, the difference is recognized as a gain or loss in profit or loss.

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: Financial assets are measured at 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: 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 initial recognition, these assets 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. Accumulated gains 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

Equity investments refer to instruments that meet the definition of an equity instrument from the issuer's perspective, meaning they do not contain a contractual obligation to deliver cash and represent a residual interest in the issuer's net assets after deducting all 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 recognized in profit or loss under other income when the Group's right to receive payment is established.

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 reliable information that is available at the reporting date without unreasonable cost or effort and concerns past events, current conditions and forecasts of 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 may modify loan contracts and, consequently, the related contractual cash flows either as a refinancing or restructuring of a loan granted to a customer facing, or expected to face, financial difficulties, or due to various other factors such as changes in market conditions or commercial negotiations.

In the above cases, the Group and the Bank initially assess whether the new terms are substantially different from the original contractual terms. 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 substantially 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 revised gross carrying amount of the financial asset is determined as the present value of the renegotiated or modified contractual cash flows, discounted using the initial effective interest rate (or the credit-adjusted effective interest rate, in the case of purchased or originated credit-impaired financial assets). Any costs or fees incurred adjust the carrying amount of the modified financial asset and are amortized over the remaining term of the modified instrument.

### (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) the financial asset is transferred and the 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**

Financial liability is derecognised when it is settled, canceled or expires.

## 2.5. Repurchase agreements and securities lending

The Group enters into purchases (sales) of securities and resell (repurchase) them at a future date and at a predetermined 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 charges" 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 depreciation and any impairments. The acquisition cost includes all expenses directly attributable to the acquisition of the assets.

The depreciation 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 carrying amount of an asset is written-down to its recoverable amount when its carrying amount exceeds its estimated recoverable amount (note 2.9).

Profits and losses on disposals are defined by comparing the proceeds with the book value and are recognised in the profit or loss.

### 2.7. Intangible assets

**Software**

Intangible assets include software and are recognised at acquisition cost less the accumulated amortisation 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 has been determined to be 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.

At the end of each semester, the Group assesses the carrying amounts of other intangible assets for indications of impairment. When the recoverable amount is lower than the carrying amount, the intangible asset is written down to its recoverable amount.

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 arising from company acquisitions is recorded in the statement of financial position account "Goodwill", when it concerns the acquisition of a company that constitutes a subsidiary, and is examined for any impairment of its value at each date of preparation of the financial statements. When it comes to investment in associates or joint ventures, goodwill is recognised in the statement of financial position account "Investments in associates".

Negative goodwill is recognised as income in the profit or loss.

### 2.9. Impairment of non-financial assets

Fixed assets that are depreciated are assessed for impairment when events or changes in conditions indicate that their carrying amount may not be recoverable. Where the carrying amount of an asset exceeds its recoverable amount, its corresponding impairment loss is recognised in profit or loss. Recoverable amount is determined as the higher of the fair value less costs to sell and 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 on non-financial assets are reviewed 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 income statement 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" 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 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 over the entire 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.
- For financial instruments with low credit risk, such as deposits with central banks, the Bank applies the low credit-risk exemption and recognises only 12-month expected credit losses. Based on the risk assessment performed, the related losses are considered immaterial.

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 into a stage 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 is to recognise lifetime expected credit losses for financial assets that have experienced a significant increase in credit risk since initial recognition. This assessment is performed regardless of whether the evaluation is on an individual or collective basis, always taking into account all available and supportable information, including forward-looking macroeconomic data.

The determination of the SICR is based on qualitative and quantitative criteria depending on the availability and quality of information.

To classify financial exposures into stages, the Group assesses the increase in credit risk (SICR) as indicated by changes in the probability of default of the exposures and the deterioration in their credit rating at the reporting date compared with the date of initial recognition.

Cases that indicate the existence of SICR for the Group are the following:

- Financial exposures with past-due amounts exceeding 30 days.
- Exposures classified as forborne when concessions are granted to a borrower who is facing, or is expected to face, financial difficulties in meeting their contractual obligations. Such concessions are considered an indication of a significant increase in credit risk, and when the financial exposure is classified as a 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 who are current (pre delinquency stage, 0–30 days past due, with no indication of forbearance), and whose total exposure (on- and off balance sheet) exceeds €1 million, the Bank may review and reassess their Stage classification on an individual basis, taking into consideration their transactional behavior and the latest available financial information. If the latest available financial data show significant deviation, specifically:
    - Sales variation of +/- 15%
    - EBITDA variation of +/- 20%
    - Total assets variation of +/- 20%

  compared to the financial data used in their most recent credit rating assessment through the Bank's rating systems (e.g., IRP, Moody's), the Bank performs an evaluation to determine the existence of Significant Increase in Credit Risk (SICR). The borrower's rating resulting from the rating system is not modified unless the system itself can incorporate the new information; only the Stage classification may be adjusted. The decision, following a recommendation by the responsible business unit and verification by the corresponding Credit unit, is approved by the appropriate Credit Approval Authority of the Bank, in accordance with the Credit Policy Manual. The decision is then communicated to the Credit Risk Department of the Risk Management Division for further action.

**Securities**

A key factor 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. The Group evaluates whether the credit risk of a debt security has increased significantly since initial recognition at the reporting date, taking into account reasonable and supportable information available relating to past events, current conditions, and forecasts of future economic circumstances.

For the assessment of the credit risk of debt securities, the Group relies on the credit rating scales of external credit rating agencies or on the internal credit rating of the issuer/counterparty when it concerns corporate debt securities of entities to which the Group has granted lending products. Additionally, to ensure that debt securities are assessed in each reporting period using the same criteria applied at initial recognition, the Group uses the same External Credit Assessment Institutions (ECAIs).

The credit rating scales of the External Credit Assessment Institutions (ECAIs) namely Fitch, Moody's, S&P, and ICAP, used by the Group are presented in the table below.

| Moody's | S&P Global | Fitch | ICAP | Investment type |
|---|---|---|---|---|
| **Aaa – Baa3** | AAA – BBB- | AAA – BBB- | AAA – BBB | Investment Grade |
| **Ba1 – Caa3** | BB+ – CCC- | BB+ – CCC- | BB-CC | Non - Investment Grade |
| **Ca, C** | CC – D | CC – D | C-D | Default |

Table: Investment grade rating of the securities according to External Credit Assessment Institutions

It is noted that there are cases of debt securities that have not been assigned a credit rating (unrated instruments) by any ECAI. In the absence of a credit rating for a corporate debt security, the Group assigns to it the credit rating of the issuing entity, or the rating of the industry sector in which the issuer operates, or the sovereign rating of the country where the issuer is based and conducts its activities (if such information is available). For sovereign debt securities, the country's rating is assigned to the security.

The Group uses these assessments in the following order of priority:

- the credit rating of the debt security (if available),
- the credit rating of the issuer (if available), and
- the credit rating of the industry sector or the sovereign rating of the issuer's country of domicile.

If the corporate debt security is not rated by an ECAI but the issuer is a borrower of the Group, then the security is classified in the same stage as the issuer's loan exposures.

If none of the above conditions is met, and the debt security is therefore considered unrated, the Group relies on its internal assessment of the security. Specifically, the Group compares the characteristics of the unrated debt security (e.g., coupon rate, yield-to-maturity) with similar rated securities in its portfolio in order 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 identifies a Significant Increase in Credit Risk (SICR) and classifies the debt security into Stage 2 (Lifetime ECL) when the following conditions are met:

- Debt securities for which their rating on the reporting date has been downgraded by two notches (or more) compared 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 in the table above) or their probability of default remains low (lower 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% compared 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 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 is met:

- 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 account 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 sheet default balance of the debtor 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**

Reclassification between stages 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". Transfers from "Stage 3" to "Stage 2" are less frequent and more difficult to substantiate, 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" for credit exposures classified as Forborne Performing Exposures (FPEs), successful completion of a 24-month probation period is required.
- For the transition from "Stage 3" to "Stage 2" for credit exposures classified as Non-Performing Exposures (NPEs), successful completion of a 3-month probation period, during which the exposure remains fully performing, is required.
- For the transition from "Stage 3" to "Stage 2" for credit exposures classified as Forborne Non-Performing Exposures (FNPEs), successful completion of a 12-month probation period, during which the exposure remains fully performing, is required.

**Securities**

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" less frequent.

**D) Measurement of the expected credit losses**

Expected credit losses are measured either based on the probability default events occurring within the next 12 months, or throughout the lifetime of the financial asset, depending on whether a significant increase in credit risk has occurred and on whether the items are considered as credit-impaired. Expected credit losses are defined as the discounted product of the probability of default (PD), the exposure at default (EAD) and the loss as a percentage of the financial exposure 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, over 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 reporting 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. On balance sheet exposure corresponds to the total amount committed and payable, which includes the principal due, accrued interest and overdue amounts. Off balance sheet exposure represents credit available for drawdown in addition to on balance sheet exposure.
- Loss given default ("LGD") reflects 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 typically 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, assesses 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 weighting factors 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.

| | **Base scenario** | **Favorable scenario** | **Unfavorable scenario** |
|---|---|---|---|
| | **% annual change** | | |
| 2025 | 2.14% | 2.14% | 2.14%* |
| 2026 | 2.10% | 4.50% | -3.56% |
| 2027 | 1.69% | 1.40% | 2.24% |
| 2028 | 1.57% | 1.42% | 3.29% |

* 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 2026, 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 allowance for loans and advances to customers measured at amortised cost, against reasonably possible changes in the growth rate of Greece's GDP, compared with the forward-looking scenarios used in the measurement of expected credit losses at 31 December 2025. 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 2025, 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 | +2.0% | -20.68% | -10.37% | -0.60% |
| B)Alternative Unfavorable scenario as base | -2.0% | 24.87% | 9.62% | 0.39% |

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 3,164.8 thousand and for (B) increase EUR 2,741.7 thousand.

Additionally, the impact of various scenarios developed by the Network for Greening the Financial System (NGFS) on the expected credit losses was assessed. The impact per scenario is as follows:

Amounts in Eur '000

| Scenario Title | Impact on ECL |
|---|---|
| Disorderly Delayed Transition | (2,657) |
| Fragmented World | (2,182) |
| Hothouse Current Policies | 664 |
| Hothouse NDC | (3,477) |
| Orderly Below 2oC | (3,139) |
| Orderly Low Demand | (314) |
| Orderly NetZero 2050 | (2,484) |

**Effect of changing LGD on the calculation of expected credit loss**

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 | +18.44% | +107 | 687 | -13.55% | -79 | 501 |
| Corporate banking | +8.71% | +6,286 | 78,493 | -7.55% | -5,451 | 66,756 |

**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 so that the loans included in each sub-portfolio have the highest possible homogeneity and uniformity in terms of their characteristics. The main parameters used in the portfolio segmentation process and allocation in the individual sub-portfolios are the following:

- loan product (retail banking)

- the loan's performance status and
- loan classification as forborne.

In determining the impairment allowance of each sub-portfolio, both the specific characteristics of the portfolio and the impact of key macroeconomic variables on the final measurement are quantified. The recognised impairment loss or reversal of loss is recorded in the Income Statement.

**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 2025 included qualitative and quantitative adjustments to the result produced by the credit risk models. The Group applies an internal governance and control framework the timely recognition of any required adjustments as well as supporting the implementation of these adjustments and the related calculation. The Group's governance framework requires such adjustments to be adequately documented and approved by the Provisions Committee.

### 2.13. Financial guarantees

Financial guarantees are contracts under which the issuer commits to compensate the holder of the contract for any loss they incur, in the event that a specific debtor fails to meet their obligations in accordance with the terms of a debt financial instrument.

Financial guarantees are recognised as financial liabilities initially at fair value. After the initial recognition, the financial guarantees are measured at the higher of:

(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 cumulative amount of the commission recognised as income according to IFRS 15, where applicable.

Liabilities arising from financial guarantee contracts are presented under "Other liabilities".

### 2.14. Staff benefits

#### (i) Short-term staff benefits

Liabilities for wages and salaries that are to expected be fully settled within 12 months from the end of the period during which 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 on settlement of the liabilities. These liabilities are presented in the Statement of Financial Position under Other liabilities.

**(ii) Post-employment benefit obligation**

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 outflows using, as discount rate, interest rates of high ranking corporate bonds in the currency in which the liabilities will be settled and with terms similar to the terms of the related 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. These are included in the other reserves of the statement of changes in equity and the statement of financial position.

Changes in the present value of the defined benefit liability resulting from plan amendments or reductions, are recognised 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 refund or offset against 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 at the earlier of the following dates: a) when the Group can no longer recall the offer of these benefits, and b) when the Group recognises a restructuring cost within the scope of IAS 37 that includes the payment of the employment termination benefits. In the event of an offer made to encourage voluntary termination of service, the termination benefits are calculated based on number of employees expected to accept the 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's employees may receive compensation in the form of share-based payments through the grant of free shares or share option rights. 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 respective rights with a corresponding 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, it is probable that an outflow of resources will be required to settle the obligation, and the amount can be reliably estimated.

## 2.16. Offsetting financial instruments

Offsetting financial assets with financial liabilities and presenting the net amount in the statement of financial position is permitted only if there is a legal right to offset the recorded amounts and there is an intention either to settle the resulting net amount from the offset or to simultaneously settle the total amount of the financial asset and the liability.

## 2.17. Leases

The Group as lessee

The Group's agreements pertain to building and offices rentals, as well as to long-term leases 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 lease payments (including the "essentially" fixed payments);
- variable lease payments that depend on an index or interest rate, which are initially measured using the index or the interest rate on the commencement date of the lease term;
- amounts expected to be paid on the basis of guaranteed residual values;
- the exercise price of a purchase option, if it is reasonably certain that the Group will exercise that option, and
- the penalty payments in the event of lease termination, only when the termination option is considered in determining the lease term.

The measurement of the lease liability also includes the lease payments during the lease extension period, if it is reasonably certain that the Group will exercise the extension option.

Lease payments are discounted at the deemed interest rate of the lease payment 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 lease payments which depend on an index or interest rate, which are only included in the lease liability when accrued. When the above changes occur, the lease liability is remeasured and adjusted by relevantly adjusting the right of use asset.

Each lease payment is allocated between the lease liability and the financial cost. Interest on the lease liability for each period of the lease term is equal to the amount resulting from applying a fixed periodic interest rate to the outstanding balance of the lease liability.

After initial measurement, lease liabilities are increased by the financial cost and decreased by the lease payments. The lease liability is remeasured to reflect any reassessments or modifications of the lease.

The cost of the right of use asset consists of:

- The amount of the initial measurement of the lease liability
- Any lease payments 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 of use assets are measured at cost and depreciated by the straight-line method over the shorter period between the useful life of the asset and the lease term.

The Group chose to apply the recognition exceptions of the standard for the short-term leases that is, leases with a duration of less than 12 months that do not include a purchase option, as well as leases in which the underlying asset has low value. For the above leases, the Group recognises the lease payments as expenses in the profit or loss statement on a straight-line basis .

**2.18. Interest income and expense**

Interest income and expenses mainly concerns 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 on an accrual basis using the effective interest method or the corresponding 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 exactly discounts the estimated future payments or receipts throughout the expected life of the financial instrument, or over a shorter period, when necessary, so that the discounted value would equal its carrying amount, at the initial recognition including any transaction costs.

In particular, with regard to 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) from 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 for the period is the tax calculated on the taxable income of the current period based on the tax rate applicable in each country, adjusted for any changes in the deferred tax assets and liabilities due to provisional differences and unutilized tax losses. Current income 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 current income taxation is calculated based on 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 differenced and it is likely that the temporary differences will not be reversed in the foreseeable future.

Deferred tax assets and liabilities are offset when there is an applicable legal right to offset the current tax assets and liabilities and when the deferred income taxes involve the same tax authority. The current tax assets 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 those 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 lower 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 (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

To apply the accounting principles of the Group and the Bank, the Management makes estimates and assumptions that may significantly affect the amounts of the assets and liabilities presented on the consolidated and standalone financial statements. 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 areas involving estimates and assumptions in the application of accounting policies primarily relate to the following:

### A. Impairment provisions for credit risks from loans and advances to customers

At each reporting date the Group and the Bank recognise impairment allowances for loans and advances to customers.

In assessing impairment of loans and receivables, the Group makes estimates regarding the amount and timing of future cash flows. Considering that these estimates are influenced by various factors such as the financial condition of the borrower, the net realisable 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 measurement 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 securitised loan bond as well as of the Additional Tier 1 (AT1) capital instruments depends on key assumptions, which include future revenues and cash flows, operating expenses, and discount rates. These bonds are classified within Level 3 of the fair value hierarchy.

Additional information about the fair value of financial assets is included in notes 5, 18, 19 and 21.

**D. Subsidiaries impairment**

The Bank assesses for impairment the value of its investments in subsidiaries by comparing the recoverable amount of each investment (the higher value between the value for use and the fair value less the disposal cost) 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 Appetite Framework is reviewed on an annual basis, and ad hoc whenever required due to specific circumstances related 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 Division 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 Executive Committee Act 243/2025 and its subsequent 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: primarily responsible for proposing, implementing and maintaining the policy and procedural framework for managing the Bank's credit risk arising from the lending process, as well as for measuring and monitoring risk appetite and limits.

(ii) Market Risks & Liquidity Department: 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: mainly responsible 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 set risk appetite and limits

(iv) The Capital Adequacy Management Department: primarily responsible for 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) Modeling Department: responsible for coordinating and monitoring 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.

Credit risk management methodologies are adjusted to reflect the prevailing economic environment. 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. To minimise credit risk, and taking into account the borrower's creditworthiness, the collateral and guarantees offered, the type and duration of the credit facility, the Group sets credit limits for each borrower. The credit assessment of each borrower considers country risk, the economic sector in which the borrower operates, as well as the borrower's 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;
- pledges over cash, cheques, 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".

For the retail portfolio, creditworthiness is assessed based on information obtained from the TIRESSIAS credit bureau, which reflects the customer's transactional behaviour history, as well as income-related 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 corporate portfolio, and for the assessment of large corporates and SMEs, 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.

| IRP Debtor Score | Mapping to Moody's Impairment Studio© | Risk Classification |
|---|---|---|
| 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 condition, 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 on a systematic basis, with a frequency determined by the type of collateral, in accordance with the Credit Policy Manual. Specialised external valuers are engaged where required, such as for real estate assets. In valuing collateral, factors relating to realisation time and liquidation costs are taken into consideration.

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.

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**

| | Maximum exposure | |
|---|---|---|
| Amounts in Eur ΄000 | **31/12/2025** | **31/12/2024** |
| **Exposure to credit risk from items on the SOFP:** | | |
| Deposits with central bank | 683,840 | 797,646 |
| Due from banks | 321,025 | 171,309 |
| Financial assets measured at fair value through profit or loss | 304,577 | 264,442 |
| Derivative financial instruments | 1,137 | 2,210 |
| Loans and advances to customers | 5,049,761 | 3,612,598 |
| Financial assets measured at fair value through other comprehensive income | 53,842 | 47,390 |
| Debt securities at amortised cost | 974,990 | 413,844 |
| Other financial assets | 54,487 | 33,665 |
| **Total on balance sheet credit exposures** | **7,443,659** | **5,343,104** |
| | | |
| **Total off balance sheet credit exposures:** | | |
| Letter of guarantee and unutilised credit limits | 1,287,771 | 862,056 |
| **Total** | **8,731,430** | **6,205,160** |

**Bank**

| Amounts in Eur ΄000 | Maximum exposure 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Exposure to credit risk from items on the SOFP:** | | |
| Deposits with central bank | 683,840 | 797,645 |
| Due from banks | 317,601 | 160,157 |
| Financial assets measured at fair value through profit or loss | 302,671 | 261,626 |
| Derivative financial instruments | 1,137 | 2,210 |
| Loans and advances to customers | 5,013,422 | 3,596,600 |
| Financial assets measured at fair value through other comprehensive income | 53,842 | 47,390 |
| Debt securities at amortised cost | 974,990 | 413,844 |
| Other financial assets | 54,546 | 34,236 |
| **Total on balance sheet credit exposures** | **7,402,049** | **5,313,708** |
| | | |
| **Total off balance sheet credit exposures:** | | |
| Letter of guarantee and unutilised credit limits | 1,287,771 | 862,056 |
| **Total** | **8,689,820** | **6,175,764** |

**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** |
| **31/12/2025** | 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 | |
| **Individuals** | | | | | | | | | | | |
| Consumer, personal & other | 36,482 | 228 | 19 | 0 | 36 | 37 | 0 | 0 | 36,537 | 265 | 36,272 |
| Mortgages | 177,388 | 337 | 442 | 16 | 0 | 0 | 0 | 0 | 177,830 | 353 | 177,477 |
| **Corporate** | | | | | | | | | | | |
| Large Corporate | 2,384,859 | 16,149 | 84,753 | 1,684 | 27,596 | 11,227 | 3,107 | 178 | 2,500,315 | 29,238 | 2,471,077 |
| SMEs | 2,138,833 | 12,559 | 226,363 | 5,699 | 35,554 | 19,112 | 2,585 | 1,030 | 2,403,335 | 38,400 | 2,364,935 |
| **Total** | **4,737,562** | **29,273** | **311,577** | **7,399** | **63,186** | **30,376** | **5,692** | **1,208** | **5,118,017** | **68,256** | **5,049,761** |
| **Commitments relevant to credit risk** | | | | | | | | | | | |
| Letters of guarantee | 1,211,699 | 3,302 | 66,577 | 382 | 160 | 32 | 1,242 | 210 | 1,279,678 | 3,926 | 1,275,752 |
| Loan commitments | 11,991 | 0 | 26 | 0 | 2 | 0 | 0 | 0 | 12,019 | 0 | 12,019 |
| **Total** | **1,223,690** | **3,302** | **66,603** | **382** | **162** | **32** | **1,242** | **210** | **1,291,697** | **3,926** | **1,287,771** |

| 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 | |
| **Individuals** | | | | | | | | | | | |
| 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 |
| **Corporate** | | | | | | | | | | | |
| 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 |
| **Total** | **3,387,638** | **21,911** | **231,564** | **7,664** | **31,165** | **14,949** | **7,132** | **377** | **3,657,499** | **44,901** | **3,612,598** |
| **Commitments relevant to credit risk** | | | | | | | | | | | |
| 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 |
| **Total** | **775,887** | **2,952** | **89,817** | **696** | **0** | **0** | **0** | **0** | **865,704** | **3,648** | **862,056** |

## 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** |
| **31/12/2025** | 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 | |
| **Individuals** | | | | | | | | | | | |
| Consumer, personal & other | 36,482 | 228 | 19 | 0 | 36 | 37 | 0 | 0 | 36,537 | 265 | 36,272 |
| Mortgages | 177,388 | 337 | 442 | 16 | 0 | 0 | 0 | 0 | 177,830 | 353 | 177,477 |
| **Corporate** | | | | | | | | | | | |
| Large Corporate | 2,438,751 | 15,962 | 77,816 | 1,639 | 27,596 | 11,227 | 3,107 | 178 | 2,547,270 | 29,006 | 2,518,264 |
| SMEs | 2,079,065 | 12,457 | 203,763 | 5,655 | 34,048 | 18,910 | 2,585 | 1,030 | 2,319,461 | 38,052 | 2,281,409 |
| **Total** | **4,731,686** | **28,984** | **282,040** | **7,310** | **61,680** | **30,174** | **5,692** | **1,208** | **5,081,098** | **67,676** | **5,013,422** |
| **Commitments relevant to credit risk** | | | | | | | | | | | |
| Letters of guarantee | 1,211,699 | 3,302 | 66,577 | 382 | 160 | 32 | 1,242 | 210 | 1,279,678 | 3,926 | 1,275,752 |
| Loan commitments | 11,991 | 0 | 26 | 0 | 2 | 0 | 0 | 0 | 12,019 | 0 | 12,019 |
| **Total** | **1,223,690** | **3,302** | **66,603** | **382** | **162** | **32** | **1,242** | **210** | **1,291,697** | **3,926** | **1,287,771** |

| 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 | |
| **Individuals** | | | | | | | | | | | |
| 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 |
| **Corporate** | | | | | | | | | | | |
| 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 |
| **Total** | **3,384,055** | **21,606** | **218,809** | **7,629** | **30,989** | **14,773** | **7,132** | **377** | **3,640,985** | **44,385** | **3,596,600** |
| **Commitments relevant to credit risk** | | | | | | | | | | | |
| 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 |
| **Total** | **775,887** | **2,952** | **89,817** | **696** | **0** | **0** | **0** | **0** | **865,704** | **3,648** | **862,056** |

**Group**

| Loans and advances to customers based on their quality (impairments under IFRS 9) | | | | | | | |
|---|---|---|---|---|---|---|---|
| Amounts in Eur '000<br>**31/12/2025** | **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 | | |
| **Individuals** | | | | | | | |
| Consumer, personal & other | 0 | 36,537 | 36,537 | 0 | 265 | 36,272 | 120,960 |
| Mortgages | 0 | 177,830 | 177,830 | 0 | 353 | 177,477 | 226,012 |
| **Corporate** | | | | | | | |
| Large Corporate | 28,130 | 2,472,185 | 2,500,315 | 10,124 | 19,114 | 2,471,077 | 1,530,936 |
| SMEs | 25,099 | 2,378,236 | 2,403,335 | 11,694 | 26,706 | 2,364,935 | 2,409,336 |
| **Total** | **53,229** | **5,064,788** | **5,118,017** | **21,818** | **46,438** | **5,049,761** | **4,287,244** |
| **Commitments relevant to credit risk** | | | | | | | |
| Letters of guarantee | 1,402 | 1,278,276 | 1,279,678 | 242 | 3,684 | 1,275,752 | 134,418 |
| Loan commitments | 0 | 12,019 | 12,019 | 0 | 0 | 12,019 | 0 |
| **Total** | **1,402** | **1,290,295** | **1,291,697** | **242** | **3,684** | **1,287,771** | **134,418** |

| Loans and advances to customers based on their quality (impairments under IFRS 9) | | | | | | | |
|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | **Gross loans and advances to customers** | | **Total value before impairment** | **Accumulated impairment provisions** | | **Total net value after impairment** | **Value of collaterals** |
| **31/12/2024** | Individual assesment | Collective assesment | | Individual assesment | Collective assesment | | |
| **Individuals** | | | | | | | |
| 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 |
| **Corporate** | | | | | | | |
| 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 |
| **Total** | **0** | **3,657,499** | **3,657,499** | **0** | **44,901** | **3,612,598** | **3,104,185** |
| **Commitments relevant to credit risk** | | | | | | | |
| 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 |
| **Total** | **0** | **865,704** | **865,704** | **0** | **3,648** | **862,056** | **85,576** |

## Bank

| Loans and advances to customers based on their quality (impairments under IFRS 9) | | | | | | | |
|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | **Gross loans and advances to customers** | | **Total value before impairment** | **Accumulated impairment provisions** | | **Total net value after impairment** | **Value of collaterals** |
| **31/12/2025** | Individual assesment | Collective assesment | | Individual assesment | Collective assesment | | |
| **Individuals** | | | | | | | |
| Consumer, personal & other | 0 | 36,537 | 36,537 | 0 | 265 | 36,272 | 120,960 |
| Mortgages | 0 | 177,830 | 177,830 | 0 | 353 | 177,477 | 226,012 |
| **Corporate** | | | | | | | |
| Large Corporate | 28,130 | 2,519,140 | 2,547,270 | 10,124 | 18,882 | 2,518,264 | 1,327,323 |
| SMEs | 25,099 | 2,294,362 | 2,319,461 | 11,694 | 26,358 | 2,281,409 | 2,196,374 |
| **Total** | **53,229** | **5,027,869** | **5,081,098** | **21,818** | **45,858** | **5,013,422** | **3,870,669** |
| **Commitments relevant to credit risk** | | | | | | | |
| Letters of guarantee | 1,402 | 1,278,276 | 1,279,678 | 242 | 3,684 | 1,275,752 | 134,418 |
| Loan commitments | 0 | 12,019 | 12,019 | 0 | 0 | 12,019 | 0 |
| **Total** | **1,402** | **1,290,295** | **1,291,697** | **242** | **3,684** | **1,287,771** | **134,418** |

| Loans and advances to customers based on their quality (impairments under IFRS 9) | | | | | | | |
|---|---|---|---|---|---|---|---|
| Amounts in Eur '000<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 | | |
| **Individuals** | | | | | | | |
| 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 |
| **Corporate** | | | | | | | |
| 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 |
| **Total** | **0** | **3,640,985** | **3,640,985** | **0** | **44,385** | **3,596,600** | **2,877,274** |
| **Commitments relevant to credit risk** | | | | | | | |
| 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 |
| **Total** | **0** | **865,704** | **865,704** | **0** | **3,648** | **862,056** | **85,576** |

## Group

| Loans and advances to customers and impairment provisions per IFRS 9 Stage (per industry and geographical region) | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | Greece | | | | | | | Other countries | | | | | | |
| **31/12/2025** | 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** |
| **Individuals** | **196,107** | **461** | **36** | **0** | **196,604** | **568** | **196,036** | **17,763** | **0** | **0** | **0** | **17,763** | **50** | **17,713** |
| Consumer, personal & other | 36,100 | 19 | 36 | 0 | 36,155 | 263 | 35,892 | 382 | 0 | 0 | 0 | 382 | 2 | 380 |
| Mortgages | 160,007 | 442 | 0 | 0 | 160,449 | 305 | 160,144 | 17,381 | 0 | 0 | 0 | 17,381 | 48 | 17,333 |
| **Corporate** | **3,772,815** | **308,884** | **62,562** | **5,692** | **4,149,953** | **64,751** | **4,085,202** | **722,559** | **2,232** | **588** | **0** | **725,379** | **2,785** | **722,594** |
| Financial institutions and other financial services | 163,400 | 825 | 0 | 0 | 164,225 | 405 | 163,820 | 337,642 | 0 | 0 | 0 | 337,642 | 553 | 337,089 |
| Manufacturing | 456,260 | 39,314 | 10,985 | 979 | 507,538 | 10,855 | 496,683 | 48,944 | 0 | 0 | 0 | 48,944 | 186 | 48,758 |
| Construction | 386,345 | 15,355 | 3,230 | 0 | 404,930 | 6,074 | 398,856 | 5,035 | 0 | 0 | 0 | 5,035 | 3 | 5,032 |
| Wholesale and retail trade | 511,361 | 53,509 | 27,718 | 3,000 | 595,588 | 18,723 | 576,865 | 12,837 | 0 | 0 | 0 | 12,837 | 46 | 12,791 |
| Accommodation and food service activities | 481,624 | 45,601 | 2,590 | 901 | 530,716 | 4,989 | 525,727 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Information and communication | 159,636 | 46,859 | 3,498 | 0 | 209,993 | 3,840 | 206,153 | 3,420 | 0 | 0 | 0 | 3,420 | 1 | 3,419 |
| Energy | 533,126 | 40,296 | 3,625 | 0 | 577,047 | 4,933 | 572,114 | 29,807 | 0 | 0 | 0 | 29,807 | 1,124 | 28,683 |
| Real estate activities | 493,383 | 42,020 | 3,809 | 0 | 539,212 | 5,565 | 533,647 | 40,185 | 0 | 588 | 0 | 40,773 | 338 | 40,435 |
| Services and other industries | 587,680 | 25,105 | 7,107 | 812 | 620,704 | 9,367 | 611,337 | 244,689 | 2,232 | 0 | 0 | 246,921 | 534 | 246,387 |
| **Public sector** | 28,318 | 0 | 0 | 0 | 28,318 | 102 | 28,216 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | **3,997,240** | **309,345** | **62,598** | **5,692** | **4,374,875** | **65,421** | **4,309,454** | **740,322** | **2,232** | **588** | **0** | **743,142** | **2,835** | **740,307** |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage (per industry and geographical region) | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | Greece | | | | | | | Other countries | | | | | | |
| 31/12/2024 | 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 |
| **Individuals** | **156,045** | **28** | **19** | **0** | **156,092** | **499** | **155,593** | **11,561** | **1** | **0** | **0** | **11,562** | **21** | **11,541** |
| Consumer, personal & other | 34,550 | 28 | 19 | 0 | 34,597 | 148 | 34,449 | 415 | 1 | 0 | 0 | 416 | 1 | 415 |
| Mortgages | 121,495 | 0 | 0 | 0 | 121,495 | 351 | 121,144 | 11,146 | 0 | 0 | 0 | 11,146 | 20 | 11,126 |
| **Corporate** | **2,829,451** | **229,171** | **29,430** | **7,132** | **3,095,184** | **41,586** | **3,053,598** | **363,230** | **2,364** | **1,716** | **0** | **367,310** | **2,686** | **364,624** |
| Financial institutions and other financial services | 141,702 | 0 | 0 | 0 | 141,702 | 491 | 141,211 | 36,956 | 0 | 0 | 0 | 36,956 | 69 | 36,887 |
| Manufacturing | 320,478 | 33,986 | 3,054 | 0 | 357,518 | 6,517 | 351,001 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Construction | 249,219 | 26,516 | 4,529 | 0 | 280,264 | 5,290 | 274,974 | 1,340 | 0 | 0 | 0 | 1,340 | 5 | 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 | 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 | 0 |
| Information and communication | 142,064 | 41,037 | 81 | 0 | 183,182 | 4,197 | 178,985 | 3,993 | 0 | 0 | 0 | 3,993 | 1 | 3,992 |
| 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 | 446,739 | 25,837 | 8,769 | 886 | 482,231 | 8,574 | 473,657 | 288,691 | 2,364 | 1,716 | 0 | 292,771 | 2,540 | 290,231 |
| **Public sector** | 27,351 | 0 | 0 | 0 | 27,351 | 109 | 27,242 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | **3,012,847** | **229,199** | **29,449** | **7,132** | **3,278,627** | **42,194** | **3,236,433** | **374,791** | **2,365** | **1,716** | **0** | **378,872** | **2,707** | **376,165** |

## Bank

| Loans and advances to customers and impairment provisions per IFRS 9 Stage (per industry and geographical region) | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | Greece | | | | | | | Other countries | | | | | | |
| **31/12/2025** | 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** |
| **Individuals** | **196,107** | **461** | **36** | **0** | **196,604** | **568** | **196,036** | **17,763** | **0** | **0** | **0** | **17,763** | **50** | **17,713** |
| Consumer, personal & other | 36,100 | 19 | 36 | 0 | 36,155 | 263 | 35,892 | 382 | 0 | 0 | 0 | 382 | 2 | 380 |
| Mortgages | 160,007 | 442 | 0 | 0 | 160,449 | 305 | 160,144 | 17,381 | 0 | 0 | 0 | 17,381 | 48 | 17,333 |
| **Corporate** | **3,770,746** | **279,348** | **61,056** | **5,692** | **4,116,842** | **64,172** | **4,052,670** | **718,752** | **2,231** | **588** | **0** | **721,571** | **2,784** | **718,787** |
| Financial institutions and other financial services | 455,994 | 825 | 0 | 0 | 456,819 | 482 | 456,337 | 337,643 | 0 | 0 | 0 | 337,643 | 553 | 337,090 |
| Manufacturing | 412,111 | 32,604 | 10,985 | 979 | 456,679 | 10,802 | 445,877 | 48,944 | 0 | 0 | 0 | 48,944 | 186 | 48,758 |
| Construction | 337,256 | 14,424 | 3,230 | 0 | 354,910 | 6,042 | 348,868 | 5,035 | 0 | 0 | 0 | 5,035 | 3 | 5,032 |
| Wholesale and retail trade | 460,505 | 48,989 | 27,541 | 3,000 | 540,035 | 18,499 | 521,536 | 12,837 | 0 | 0 | 0 | 12,837 | 46 | 12,791 |
| Accommodation and food service activities | 451,860 | 45,603 | 2,590 | 901 | 500,954 | 4,978 | 495,976 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Information and communication | 96,178 | 29,532 | 2,169 | 0 | 127,879 | 3,673 | 124,206 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Energy | 533,126 | 40,296 | 3,625 | 0 | 577,047 | 4,933 | 572,114 | 29,807 | 0 | 0 | 0 | 29,807 | 1,124 | 28,683 |
| Real estate activities | 490,779 | 42,020 | 3,809 | 0 | 536,608 | 5,558 | 531,050 | 40,185 | 0 | 588 | 0 | 40,773 | 338 | 40,435 |
| Services and other industries | 532,937 | 25,055 | 7,107 | 812 | 565,911 | 9,205 | 556,706 | 244,301 | 2,231 | 0 | 0 | 246,532 | 534 | 245,998 |
| **Public sector** | 28,318 | 0 | 0 | 0 | 28,318 | 102 | 28,216 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | **3,995,171** | **279,809** | **61,092** | **5,692** | **4,341,764** | **64,842** | **4,276,922** | **736,515** | **2,231** | **588** | **0** | **739,334** | **2,834** | **736,500** |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage (per industry and geographical region) | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | **Greece** | | | | | | | **Other countries** | | | | | | |
| **31/12/2024** | 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** |
| **Individuals** | **156,045** | **28** | **19** | **0** | **156,092** | **498** | **155,594** | **11,561** | **1** | **0** | **0** | **11,562** | **22** | **11,540** |
| 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 |
| **Corporate** | **2,832,337** | **216,416** | **29,254** | **7,132** | **3,085,139** | **41,080** | **3,044,059** | **356,761** | **2,364** | **1,716** | **0** | **360,841** | **2,676** | **358,165** |
| 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 |
| **Public sector** | 27,351 | 0 | 0 | 0 | 27,351 | 109 | 27,242 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | **3,015,733** | **216,444** | **29,273** | **7,132** | **3,268,582** | **41,687** | **3,226,895** | **368,322** | **2,365** | **1,716** | **0** | **372,403** | **2,698** | **369,705** |

## Group

| Movement of Gross loans and advances to customers | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | **Individuals** | | | | | **Corporate** | | | | | **Total** | | | | |
| **31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **Gross carrying amount 1/1/2025** | **167,606** | **29** | **19** | **0** | **167,654** | **3,220,032** | **231,535** | **31,146** | **7,132** | **3,489,845** | **3,387,638** | **231,564** | **31,165** | **7,132** | **3,657,499** |
| Transferred from stage 1 to stage 2 or stage 3 | (1,348) | 909 | 439 | 0 | 0 | (429,580) | 401,712 | 27,868 | 0 | 0 | (430,928) | 402,621 | 28,307 | 0 | 0 |
| Transferred from stage 2 to stage 1 or stage 3 | 465 | (475) | 10 | 0 | 0 | 229,268 | (258,751) | 29,483 | 0 | 0 | 229,733 | (259,226) | 29,493 | 0 | 0 |
| Transferred from stage 3 to stage 1 or stage 2 | 4 | 0 | (4) | 0 | 0 | 5,037 | 10,375 | (15,412) | 0 | 0 | 5,041 | 10,375 | (15,416) | 0 | 0 |
| New financial assets originated or purchased | 65,164 | 0 | 0 | 0 | 65,164 | 3,902,095 | 190,977 | 13,240 | 4,267 | 4,110,579 | 3,967,259 | 190,977 | 13,240 | 4,267 | 4,175,743 |
| Changes due to modifications of loans contractual terms | 14 | 0 | 0 | 0 | 14 | (172) | (230) | (121) | 0 | (523) | (158) | (230) | (121) | 0 | (509) |
| Repayments and other changes | (18,035) | (2) | (428) | 0 | (18,465) | (2,402,988) | (264,502) | (23,054) | (5,707) | (2,696,251) | (2,421,023) | (264,504) | (23,482) | (5,707) | (2,714,716) |
| **Gross carrying amount 31/12/2025** | **213,870** | **461** | **36** | **0** | **214,367** | **4,523,692** | **311,116** | **63,150** | **5,692** | **4,903,650** | **4,737,562** | **311,577** | **63,186** | **5,692** | **5,118,017** |
| ECL allowance | (565) | (16) | (37) | 0 | (618) | (28,708) | (7,383) | (30,339) | (1,208) | (67,638) | (29,273) | (7,399) | (30,376) | (1,208) | (68,256) |
| **Net carrying amount** | **213,305** | **445** | **(1)** | **0** | **213,749** | **4,494,984** | **303,733** | **32,811** | **4,484** | **4,836,012** | **4,708,289** | **304,178** | **32,810** | **4,484** | **5,049,761** |

| Movement of Gross loans and advances to customers | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | Individuals | | | | | Corporate | | | | | Total | | | | |
| **31/12/2024** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **Gross carrying amount 1/1/2024** | **129,123** | **19** | **1,810** | **0** | **130,952** | **2,187,708** | **124,594** | **9,318** | **5,938** | **2,327,558** | **2,316,831** | **124,613** | **11,128** | **5,938** | **2,458,510** |
| Transferred from stage 1 to stage 2 or stage 3 | (35) | 32 | 3 | 0 | 0 | (277,812) | 240,986 | 36,826 | 0 | 0 | (277,847) | 241,018 | 36,829 | 0 | 0 |
| Transferred from stage 2 to stage 1 or stage 3 | 12 | (20) | 8 | 0 | 0 | 89,121 | (102,775) | 13,654 | 0 | 0 | 89,133 | (102,795) | 13,662 | 0 | 0 |
| Transferred from stage 3 to stage 1 or stage 2 | 8 | 1 | (9) | 0 | 0 | 13,875 | 3,809 | (17,684) | 0 | 0 | 13,883 | 3,810 | (17,693) | 0 | 0 |
| New financial assets originated or purchased | 49,183 | 0 | 0 | 0 | 49,183 | 3,080,292 | 115,140 | 318 | 2,091 | 3,197,841 | 3,129,475 | 115,140 | 318 | 2,091 | 3,247,024 |
| Changes due to modifications of loans contractual terms | 0 | 0 | (47) | 0 | (47) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | (47) | 0 | (47) |
| Repayments and other changes | (3) | 0 | 0 | 0 | (3) | (731) | (231) | (7) | 0 | (969) | (734) | (231) | (7) | 0 | (972) |
| Transferred from stage 1 to stage 2 or stage 3 | (10,682) | (3) | (1,746) | 0 | (12,431) | (1,872,421) | (149,988) | (11,279) | (897) | (2,034,585) | (1,883,103) | (149,991) | (13,025) | (897) | (2,047,016) |
| **Gross carrying amount 31/12/2024** | **167,606** | **29** | **19** | **0** | **167,654** | **3,220,032** | **231,535** | **31,146** | **7,132** | **3,489,845** | **3,387,638** | **231,564** | **31,165** | **7,132** | **3,657,499** |
| ECL allowance | (498) | (3) | (19) | 0 | (520) | (21,413) | (7,661) | (14,930) | (377) | (44,381) | (21,911) | (7,664) | (14,949) | (377) | (44,901) |
| **Net carrying amount** | **167,108** | **26** | **0** | **0** | **167,134** | **3,198,619** | **223,874** | **16,216** | **6,755** | **3,445,464** | **3,365,727** | **223,900** | **16,216** | **6,755** | **3,612,598** |

## Bank

| Movement of Gross loans and advances to customers | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | **Individuals** | | | | | **Corporate** | | | | | **Total** | | | | |
| **31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **Gross carrying amount 1/1/2025** | **167,606** | **29** | **19** | **0** | **167,654** | **3,216,449** | **218,780** | **30,970** | **7,132** | **3,473,331** | **3,384,055** | **218,809** | **30,989** | **7,132** | **3,640,985** |
| Transferred from stage 1 to stage 2 or stage 3 | (1,349) | 909 | 440 | 0 | 0 | (401,285) | 376,227 | 25,058 | 0 | 0 | (402,634) | 377,136 | 25,498 | 0 | 0 |
| Transferred from stage 2 to stage 1 or stage 3 | 465 | (475) | 10 | 0 | 0 | 220,543 | (250,026) | 29,483 | 0 | 0 | 221,008 | (250,501) | 29,493 | 0 | 0 |
| Transferred from stage 3 to stage 1 or stage 2 | 4 | 0 | (4) | 0 | 0 | 5,037 | 10,375 | (15,412) | 0 | 0 | 5,041 | 10,375 | (15,416) | 0 | 0 |
| New financial assets originated or purchased | 65,164 | 0 | 0 | 0 | 65,164 | 3,505,353 | 121,428 | 12,716 | 4,267 | 3,643,764 | 3,570,517 | 121,428 | 12,716 | 4,267 | 3,708,928 |
| Changes due to modifications of loans contractual terms | 14 | 0 | 0 | 0 | 14 | (171) | (231) | (123) | 0 | (525) | (157) | (231) | (123) | 0 | (511) |
| Repayments and other changes | (18,034) | (2) | (429) | 0 | (18,465) | (2,028,110) | (194,974) | (21,048) | (5,707) | (2,249,839) | (2,046,144) | (194,976) | (21,477) | (5,707) | (2,268,304) |
| **Gross carrying amount 31/12/2025** | **213,870** | **461** | **36** | **0** | **214,367** | **4,517,816** | **281,579** | **61,644** | **5,692** | **4,866,731** | **4,731,686** | **282,040** | **61,680** | **5,692** | **5,081,098** |
| ECL allowance | (565) | (16) | (37) | 0 | (618) | (28,419) | (7,294) | (30,137) | (1,208) | (67,058) | (28,984) | (7,310) | (30,174) | (1,208) | (67,676) |
| **Net carrying amount** | **213,305** | **445** | **(1)** | **0** | **213,749** | **4,489,397** | **274,285** | **31,507** | **4,484** | **4,799,673** | **4,702,702** | **274,730** | **31,506** | **4,484** | **5,013,422** |

| Movement of Gross loans and advances to customers | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | Individuals | | | | | Corporate | | | | | Total | | | | |
| **31/12/2024** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **Gross carrying amount 1/1/2024 (Before ECL)** | **129,123** | **19** | **1,810** | **0** | **130,952** | **2,172,731** | **124,594** | **9,318** | **5,938** | **2,312,581** | **2,301,854** | **124,613** | **11,128** | **5,938** | **2,443,533** |
| Transferred from stage 1 to stage 2 or stage 3 | (35) | 32 | 3 | 0 | 0 | (267,452) | 230,626 | 36,826 | 0 | 0 | (267,487) | 230,658 | 36,829 | 0 | 0 |
| Transferred from stage 2 to stage 1 or stage 3 | 12 | (20) | 8 | 0 | 0 | 89,121 | (102,775) | 13,654 | 0 | 0 | 89,133 | (102,795) | 13,662 | 0 | 0 |
| Transferred from stage 3 to stage 1 or stage 2 | 8 | 1 | (9) | 0 | 0 | 13,875 | 3,809 | (17,684) | 0 | 0 | 13,883 | 3,810 | (17,693) | 0 | 0 |
| New financial assets originated or purchased | 49,183 | 0 | 0 | 0 | 49,183 | 2,671,458 | 85,950 | 318 | 2,091 | 2,759,817 | 2,720,641 | 85,950 | 318 | 2,091 | 2,809,000 |
| Write-offs | 0 | 0 | (47) | 0 | (47) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | (47) | 0 | (47) |
| Changes due to modifications of loans contractual terms | (3) | 0 | 0 | 0 | (3) | (731) | (231) | (7) | 0 | (969) | (734) | (231) | (7) | 0 | (972) |
| Repayments and other changes | (10,682) | (3) | (1,746) | 0 | (12,431) | (1,462,553) | (123,193) | (11,455) | (897) | (1,598,098) | (1,473,235) | (123,196) | (13,201) | (897) | (1,610,529) |
| **Gross carrying amount 31/12/2024** | **167,606** | **29** | **19** | **0** | **167,654** | **3,216,449** | **218,780** | **30,970** | **7,132** | **3,473,331** | **3,384,055** | **218,809** | **30,989** | **7,132** | **3,640,985** |
| ECL allowance | (498) | (3) | (19) | 0 | (520) | (21,108) | (7,626) | (14,754) | (377) | (43,865) | (21,606) | (7,629) | (14,773) | (377) | (44,385) |
| **Net carrying amount** | **167,108** | **26** | **0** | **0** | **167,134** | **3,195,341** | **211,154** | **16,216** | **6,755** | **3,429,466** | **3,362,449** | **211,180** | **16,216** | **6,755** | **3,596,600** |

## Group

| Movement in ECL allowance of loans and advances to customers measured at amortised cost | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | **Individuals** | | | | | **Corporate** | | | | | **Total** | | | | |
| **31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **ECL allowance as at 1/1/2025** | **498** | **3** | **19** | **0** | **520** | **21,413** | **7,661** | **14,930** | **377** | **44,381** | **21,911** | **7,664** | **14,949** | **377** | **44,901** |
| Transferred from stage 1 to stage 2 or stage 3 | (21) | 21 | 0 | 0 | 0 | (2,869) | 2,601 | 268 | 0 | 0 | (2,890) | 2,622 | 268 | 0 | 0 |
| Transferred from stage 2 to stage 1 or stage 3 | 255 | (255) | 0 | 0 | 0 | 7,905 | (9,414) | 1,509 | 0 | 0 | 8,160 | (9,669) | 1,509 | 0 | 0 |
| Transferred from stage 3 to stage 1 or stage 2 | 4 | 0 | (4) | 0 | 0 | 2,063 | 2,752 | (4,815) | 0 | 0 | 2,067 | 2,752 | (4,819) | 0 | 0 |
| **Allowances:** | **(171)** | **247** | **22** | **0** | **98** | **196** | **3,783** | **18,447** | **831** | **23,257** | **25** | **4,030** | **18,469** | **831** | **23,355** |
| ECL impairment charge/(release) for the year (P&L) | (548) | 247 | 22 | 0 | (279) | (17,056) | 3,747 | 18,447 | (114) | 5,024 | (17,604) | 3,994 | 18,469 | (114) | 4,745 |
| ECL impairment charge for new financial assets originated or purchased (P&L) | 377 | 0 | 0 | 0 | 377 | 17,252 | 36 | 0 | 945 | 18,233 | 17,629 | 36 | 0 | 945 | 18,610 |
| **ECL allowance as at 31/12/2025** | **565** | **16** | **37** | **0** | **618** | **28,708** | **7,383** | **30,339** | **1,208** | **67,638** | **29,273** | **7,399** | **30,376** | **1,208** | **68,256** |

| Movement in ECL allowance of loans and advances to customers measured at amortised cost | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 31/12/2024 | | | | | | | | | | | | | | | |
| Amounts in Eur ΄000 | Individuals | | | | | Corporate | | | | | Total | | | | |
| **31/12/2024** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **ECL allowance as at 1/1/2024** | **602** | **9** | **1,809** | **0** | **2,420** | **13,114** | **4,494** | **7,545** | **22** | **25,175** | **13,716** | **4,503** | **9,354** | **22** | **27,595** |
| 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 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 |
| **Allowances:** | **(117)** | **3** | **(1,739)** | **0** | **(1,853)** | **6,615** | **955** | **11,281** | **355** | **19,206** | **6,498** | **958** | **9,542** | **355** | **17,353** |
| 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) |
| **ECL allowance as at 31/12/2024** | **498** | **3** | **19** | **0** | **520** | **21,413** | **7,661** | **14,930** | **377** | **44,381** | **21,911** | **7,664** | **14,949** | **377** | **44,901** |

## Bank

| Movement in ECL allowance of loans and advances to customers measured at amortised cost | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | **Individuals** | | | | | **Corporate** | | | | | **Total** | | | | |
| **31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **ECL allowance as at 1/1/2025** | **498** | **3** | **19** | **0** | **520** | **21,108** | **7,626** | **14,754** | **377** | **43,865** | **21,606** | **7,629** | **14,773** | **377** | **44,385** |
| Transferred from stage 1 to stage 2 or stage 3 | (21) | 21 | 0 | 0 | 0 | (2,821) | 2,555 | 266 | 0 | 0 | (2,842) | 2,576 | 266 | 0 | 0 |
| Transferred from stage 2 to stage 1 or stage 3 | 255 | (255) | 0 | 0 | 0 | 7,848 | (9,357) | 1,509 | 0 | 0 | 8,103 | (9,612) | 1,509 | 0 | 0 |
| Transferred from stage 3 to stage 1 or stage 2 | 4 | 0 | (4) | 0 | 0 | 2,063 | 2,752 | (4,815) | 0 | 0 | 2,067 | 2,752 | (4,819) | 0 | 0 |
| **Allowances:** | **(171)** | **247** | **22** | **0** | **98** | **221** | **3,718** | **18,423** | **831** | **23,193** | **50** | **3,965** | **18,445** | **831** | **23,292** |
| ECL impairment charge/(release) for the year (P&L) | (548) | 247 | 22 | 0 | (279) | (17,299) | 3,693 | 18,423 | (113) | 4,704 | (17,847) | 3,940 | 18,445 | (113) | 4,425 |
| ECL impairment charge for new financial assets originated or purchased (P&L) | 377 | 0 | 0 | 0 | 377 | 17,520 | 25 | 0 | 944 | 18,489 | 17,897 | 25 | 0 | 944 | 18,866 |
| **ECL allowance as at 31/12/2025** | **565** | **16** | **37** | **0** | **618** | **28,419** | **7,294** | **30,137** | **1,208** | **67,058** | **28,984** | **7,310** | **30,174** | **1,208** | **67,676** |

| Movement in ECL allowance of loans and advances to customers measured at amortised cost | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | Individuals | | | | | Corporate | | | | | Total | | | | |
| **31/12/2024** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **ECL allowance as at 1/1/2024** | **602** | **9** | **1,809** | **0** | **2,420** | **12,979** | **4,494** | **7,545** | **22** | **25,040** | **13,581** | **4,503** | **9,354** | **22** | **27,460** |
| 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 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 |
| **Allowances:** | **(117)** | **3** | **(1,739)** | **0** | **(1,853)** | **6,422** | **944** | **11,104** | **355** | **18,825** | **6,305** | **947** | **9,365** | **355** | **16,972** |
| 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) |
| **ECL allowance as at 31/12/24** | **498** | **3** | **19** | **0** | **520** | **21,108** | **7,626** | **14,754** | **377** | **43,865** | **21,606** | **7,629** | **14,773** | **377** | **44,385** |

## Group

| Movement in ECL allowance of commitments relevant to credit risk | | | | | |
|---|---|---|---|---|---|
| Amounts in Eur ΄000<br>**31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **ECL allowance as at 1/1/2025** | **2,952** | **696** | **0** | **0** | **3,648** |
| Transferred from stage 1 to stage 2 or stage 3 | (332) | 330 | 2 | 0 | 0 |
| Transferred from stage 2 to stage 1 or stage 3 | 1,662 | (1,662) | 0 | 0 | 0 |
| Transferred from stage 3 to stage 1 or stage 2 | 0 | 0 | 0 | 0 | 0 |
| **Allowances** | **(980)** | **1,018** | **30** | **210** | **278** |
| ECL impairment charge/(release) for the year (P&L) | (2,229) | 1,018 | 30 | 0 | (1,181) |
| ECL impairment charge for new financial assets originated or purchased (P&L) | 1,249 | 0 | 0 | 210 | 1,459 |
| **ECL allowance as at 31/12/2025** | **3,302** | **382** | **32** | **210** | **3,926** |

| Movement in ECL allowance of commitments relevant to credit risk | | | | | |
|---|---|---|---|---|---|
| Amounts in Eur ΄000<br>**31/12/2024** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **ECL allowance as at 1/1/2024** | **1,753** | **25** | **0** | **0** | **1,779** |
| 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 to stage 1 or stage 2 | 0 | 0 | 0 | 0 | 0 |
| **Allowances** | **1,375** | **494** | **0** | **0** | **1,869** |
| 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 |
| **ECL allowance as at 31/12/2024** | **2,951** | **696** | **0** | **0** | **3,648** |

**Bank**

| Movement in ECL allowance of commitments relevant to credit risk | | | | | |
|---|---|---|---|---|---|
| Amounts in Eur ΄000<br>**31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **ECL allowance as at 1/1/2025** | **2,952** | **696** | **0** | **0** | **3,648** |
| Transferred from stage 1 to stage 2 or stage 3 | (332) | 330 | 2 | 0 | 0 |
| Transferred from stage 2 to stage 1 or stage 3 | 1,662 | (1,662) | 0 | 0 | 0 |
| Transferred from stage 3 to stage 1 or stage 2 | 0 | 0 | 0 | 0 | 0 |
| **Allowances** | **(980)** | **1,018** | **30** | **210** | **278** |
| ECL impairment charge/(release) for the year (P&L) | (2,229) | 1,018 | 30 | 0 | (1,181) |
| ECL impairment charge for new financial assets originated or purchased (P&L) | 1,249 | 0 | 0 | 210 | 1,459 |
| **ECL allowance as at 31/12/2025** | **3,302** | **382** | **32** | **210** | **3,926** |

| Movement in ECL allowance of commitments relevant to credit risk | | | | | |
|---|---|---|---|---|---|
| Amounts in Eur ΄000<br>**31/12/2024** | Stage 1 | Stage 2 | Stage 3 | POCI | **Total** |
| **ECL allowance as at 1/1/2024** | **1,753** | **26** | **0** | **0** | **1,779** |
| 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 to stage 1 or stage 2 | 0 | 0 | 0 | 0 | 0 |
| **Allowances** | **1,375** | **494** | **0** | **0** | **1,869** |
| 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 |
| **ECL allowance as at 31/12/24** | **2,951** | **697** | **0** | **0** | **3,648** |

## Group

| Credit quality of Loans and advances to customers and value of collaterals | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | **Strong credit quality** | | | **Satisfactory credit quality** | | | **Watch list** | | | **Default** | | | **Not rated** | | | POCI | **Value of collaterals** |
| **31/12/2025** | 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 | | |
| **Individuals** | | | | | | | | | | | | | | | | | |
| Consumer, personal & other | 6,321 | 0 | 0 | 0 | 0 | 0 | 0 | 19 | 0 | 0 | 0 | 36 | 30,161 | 0 | 0 | 0 | 120,960 |
| Mortgages | 0 | 0 | 0 | 177,388 | 0 | 0 | 0 | 442 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 226,012 |
| **Corporate** | | | | | | | | | | | | | | | | | |
| Large Corporate | 1,268,862 | 0 | 0 | 341,087 | 0 | 0 | 774,910 | 84,753 | 0 | 0 | 0 | 27,596 | 0 | 0 | 0 | 3,107 | 1,530,936 |
| SMEs | 1,068,570 | 0 | 0 | 684,547 | 0 | 0 | 375,032 | 226,363 | 0 | 0 | 0 | 35,554 | 10,684 | 0 | 0 | 2,585 | 2,409,336 |
| **Total** | **2,343,753** | **0** | **0** | **1,203,022** | **0** | **0** | **1,149,942** | **311,577** | **0** | **0** | **0** | **63,186** | **40,845** | **0** | **0** | **5,692** | **4,287,244** |

| Credit quality of Loans and advances to customers and value of collaterals | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | **Strong credit quality** | | | **Satisfactory credit quality** | | | **Watch list** | | | **Default** | | | **Not rated** | | | POCI | **Value of collaterals** |
| **31/12/2024** | 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 | | |
| **Individuals** | | | | | | | | | | | | | | | | | |
| 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 |
| **Corporate** | | | | | | | | | | | | | | | | | |
| 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 |
| **Total** | **1,733,428** | **0** | **0** | **1,516,365** | **0** | **0** | **100,424** | **231,564** | **0** | **0** | **0** | **31,165** | **37,421** | **0** | **0** | **7,132** | **3,104,185** |

## Bank

| Credit quality of Loans and advances to customers and value of collaterals | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | **Strong credit quality** | | | **Satisfactory credit quality** | | | **Watch list** | | | **Default** | | | **Not rated** | | | POCI | **Value of collaterals** |
| **31/12/2025** | 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 | | |
| **Individuals** | | | | | | | | | | | | | | | | | |
| Consumer, personal & other | 6,321 | 0 | 0 | 0 | 0 | 0 | 0 | 19 | 0 | 0 | 0 | 36 | 30,161 | 0 | 0 | 0 | 120,960 |
| Mortgages | 0 | 0 | 0 | 177388 | 0 | 0 | 0 | 442 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 226,012 |
| **Corporate** | | | | | | | | | | | | | | | | | |
| Large Corporate | 1,406,686 | 0 | 0 | 269978 | 0 | 0 | 762087 | 77816 | 0 | 0 | 0 | 27,596 | 0 | 0 | 0 | 3107 | 1,327,323 |
| SMEs | 1,087,800 | 0 | 0 | 611,551 | 0 | 0 | 369,030 | 203,763 | 0 | 0 | 0 | 34,048 | 10,684 | 0 | 0 | 2,585 | 2,196,374 |
| **Total** | **2,500,807** | **0** | **0** | **1,058,917** | **0** | **0** | **1,131,117** | **282,040** | **0** | **0** | **0** | **61,680** | **40,845** | **0** | **0** | **5,692** | **3,870,669** |

| Credit quality of Loans and advances to customers and value of collaterals | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | **Strong credit quality** | | | **Satisfactory credit quality** | | | **Watch list** | | | **Default** | | | **Not rated** | | | POCI | **Value of collaterals** |
| **31/12/2024** | 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 | | |
| **Individuals** | | | | | | | | | | | | | | | | | |
| 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 |
| **Corporate** | | | | | | | | | | | | | | | | | |
| 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 |
| **Total** | **1,821,632** | **0** | **0** | **1,442,783** | **0** | **0** | **82,219** | **218,809** | **0** | **0** | **0** | **30,989** | **37,421** | **0** | **0** | **7,132** | **2,877,274** |

## Group

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Individuals | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | **Large corporates** | | | | **SMEs** | | | |
| **31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | Stage 1 | Stage 2 | Stage 3 | POCI |
| Performing | 36,139 | 0 | 0 | 0 | 167,197 | 0 | 0 | 0 |
| From 1 to 30 days | 343 | 0 | 0 | 0 | 10,191 | 0 | 0 | 0 |
| From 31 to 60 days | 0 | 17 | 3 | 0 | 0 | 244 | 0 | 0 |
| From 61 to 90 days | 0 | 2 | 0 | 0 | 0 | 198 | 0 | 0 |
| From 91 to 180 days | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 |
| From 181 to 365 days | 0 | 0 | 9 | 0 | 0 | 0 | 0 | 0 |
| More than 365 days | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Denounced | 0 | 0 | 17 | 0 | 0 | 0 | 0 | 0 |
| **Total** | **36,482** | **19** | **36** | **0** | **177,388** | **442** | **0** | **0** |
| Impairments | 228 | 0 | 37 | 0 | 337 | 16 | 0 | 0 |
| **Net value** | **36,254** | **19** | **(1)** | **0** | **177,051** | **426** | **0** | **0** |
| Collaterals | 120,960 | 0 | 0 | 0 | 225,472 | 540 | 0 | 0 |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Corporate | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Amounts in Eur ΄000 | **Large corporates** | | | | **SMEs** | | | |
| **31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | Stage 1 | Stage 2 | Stage 3 | POCI |
| Performing | 1,954,387 | 67,395 | 2,489 | 0 | 2,050,881 | 186,783 | 8,004 | 1,713 |
| From 1 to 30 days | 430,472 | 3,490 | 24,092 | 3,000 | 87,952 | 15,900 | 752 | 0 |
| From 31 to 60 days | 0 | 13,868 | 0 | 0 | 0 | 17,284 | 1,580 | 0 |
| From 61 to 90 days | 0 | 0 | 0 | 0 | 0 | 6,396 | 781 | 0 |
| From 91 to 180 days | 0 | 0 | 761 | 107 | 0 | 0 | 7,770 | 872 |
| From 181 to 365 days | 0 | 0 | 0 | 0 | 0 | 0 | 3,036 | 0 |
| More than 365 days | 0 | 0 | 0 | 0 | 0 | 0 | 176 | 0 |
| Denounced | 0 | 0 | 254 | 0 | 0 | 0 | 13,455 | 0 |
| **Total** | **2,384,859** | **84,753** | **27,596** | **3,107** | **2,138,833** | **226,363** | **35,554** | **2,585** |
| Impairments | 16,149 | 1,684 | 11,227 | 178 | 12,559 | 5,699 | 19,112 | 1,030 |
| **Net value** | **2,368,710** | **83,069** | **16,369** | **2,929** | **2,126,274** | **220,664** | **16,442** | **1,555** |
| Collaterals | 1,432,901 | 79,572 | 16,989 | 1,474 | 2,143,774 | 217,446 | 46,207 | 1,909 |

| 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 |
| **Total** | **34,965** | **29** | **19** | **0** | **132,641** | **0** | **0** | **0** |
| Impairments | 127 | 3 | 19 | 0 | 371 | 0 | 0 | 0 |
| **Net value** | **34,838** | **26** | **0** | **0** | **132,270** | **0** | **0** | **0** |
| 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 |
| **Total** | **1,606,696** | **99,297** | **11,720** | **0** | **1,613,336** | **132,238** | **19,426** | **7,132** |
| Impairments | 10,559 | 4,072 | 4,096 | 0 | 10,854 | 3,589 | 10,834 | 377 |
| **Net value** | **1,596,137** | **95,225** | **7,624** | **0** | **1,602,482** | **128,649** | **8,592** | **6,755** |
| Collaterals | 1,087,832 | 68,682 | 16,660 | 0 | 1,521,063 | 98,923 | 29,658 | 9,666 |

**Bank**

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Individuals | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | **Large corporates** | | | | **SMEs** | | | |
| **31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | Stage 1 | Stage 2 | Stage 3 | POCI |
| Performing | 36,139 | 0 | 0 | 0 | 167,197 | 0 | 0 | 0 |
| From 1 to 30 days | 343 | 0 | 0 | 0 | 10,191 | 0 | 0 | 0 |
| From 31 to 60 days | 0 | 17 | 3 | 0 | 0 | 244 | 0 | 0 |
| From 61 to 90 days | 0 | 2 | 0 | 0 | 0 | 198 | 0 | 0 |
| From 91 to 180 days | 0 | 0 | 7 | 0 | 0 | 0 | 0 | 0 |
| From 181 to 365 days | 0 | 0 | 9 | 0 | 0 | 0 | 0 | 0 |
| More than 365 days | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Denounced | 0 | 0 | 17 | 0 | 0 | 0 | 0 | 0 |
| **Total** | **36,482** | **19** | **36** | **0** | **177,388** | **442** | **0** | **0** |
| Impairments | 228 | 0 | 37 | 0 | 337 | 16 | 0 | 0 |
| **Net value** | **36,254** | **19** | **(1)** | **0** | **177,051** | **426** | **0** | **0** |
| Collaterals | 120,960 | 0 | 0 | 0 | 225,472 | 540 | 0 | 0 |

| Loans and advances to customers and impairment provisions per IFRS 9 Stage - Corporate | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Amounts in Eur '000 | **Large corporates** | | | | **SMEs** | | | |
| **31/12/2025** | Stage 1 | Stage 2 | Stage 3 | POCI | Stage 1 | Stage 2 | Stage 3 | POCI |
| Performing | 2,035,459 | 60,458 | 2,489 | 0 | 1,995,965 | 167,520 | 7,626 | 1,713 |
| From 1 to 30 days | 403,292 | 3,490 | 24,092 | 3,000 | 83,100 | 15,900 | 752 | 0 |
| From 31 to 60 days | 0 | 13,868 | 0 | 0 | 0 | 14,918 | 1,580 | 0 |
| From 61 to 90 days | 0 | 0 | 0 | 0 | 0 | 5,425 | 781 | 0 |
| From 91 to 180 days | 0 | 0 | 761 | 107 | 0 | 0 | 7,770 | 872 |
| From 181 to 365 days | 0 | 0 | 0 | 0 | 0 | 0 | 2,084 | 0 |
| More than 365 days | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Denounced | 0 | 0 | 254 | 0 | 0 | 0 | 13,455 | 0 |
| **Total** | **2,438,751** | **77,816** | **27,596** | **3,107** | **2,079,065** | **203,763** | **34,048** | **2,585** |
| Impairments | 15,962 | 1,639 | 11,227 | 178 | 12,457 | 5,655 | 18,910 | 1,030 |
| **Net value** | **2,422,789** | **76,177** | **16,369** | **2,929** | **2,066,608** | **198,108** | **15,138** | **1,555** |
| Collaterals | 1,244,774 | 64,086 | 16,989 | 1,474 | 1,963,315 | 186,704 | 44,446 | 1,909 |

| 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 |
| **Total** | **34,965** | **29** | **19** | **0** | **132,641** | **0** | **0** | **0** |
| Impairments | 127 | 3 | 19 | 0 | 371 | 0 | 0 | 0 |
| **Net value** | **34,838** | **26** | **0** | **0** | **132,270** | **0** | **0** | **0** |
| 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 | 1,544,961 | 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 |
| **Total** | **1,685,176** | **92,428** | **11,720** | **0** | **1,531,273** | **126,352** | **19,250** | **7,132** |
| Impairments | 10,492 | 4,064 | 4,096 | 0 | 10,616 | 3,562 | 10,658 | 377 |
| **Net value** | **1,674,684** | **88,364** | **7,624** | **0** | **1,520,657** | **122,790** | **8,592** | **6,755** |
| Collaterals | 998,304 | 58,590 | 16,660 | 0 | 1,401,726 | 90,969 | 29,658 | 9,666 |

**Group**

| Loan-to-value ratio (LTV) | | |
|---|---|---|
| Amounts in Eur ΄000 | 31/12/2025 | |
| **Mortgages** | **Total loans** | **Impairments** |
| < 50% | 7,596 | 2 |
| 51% - 70% | 21,274 | 5 |
| 71% -90% | 131,951 | 265 |
| 91% - 100% | 4,858 | 8 |
| > 100% | 12,151 | 73 |
| **Total** | **177,830** | **353** |
| **Simple average of LTV (%)** | **76%** | |

| 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 |
| **Total** | **132,641** | **371** |
| **Simple average of LTV (%)** | **77%** | |

**Bank**

| Loan-to-value ratio (LTV) | | |
|---|---|---|
| Amounts in Eur ΄000 | **31/12/2025** | |
| **Mortgages** | **Total loans** | **Impairments** |
| < 50% | 7,596 | 2 |
| 51% - 70% | 21,274 | 5 |
| 71% -90% | 131,951 | 265 |
| 91% - 100% | 4,858 | 8 |
| > 100% | 12,151 | 73 |
| **Total** | **177,830** | **353** |
| **Simple average of LTV (%)** | **76%** | |

| 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 |
| **Total** | **132,641** | **372** |
| **Simple average of LTV (%)** | **77%** | |

**Group**

| Analysis of collateral and guarantees received | | | | | |
|---|---|---|---|---|---|
| Amounts in Eur ΄000 **31/12/2025** | Real estate collaterals | Financial collaterals | Government guarantees | Other collaterals | **Total collaterals** |
| Individuals | 208,438 | 128,344 | 0 | 13,758 | **350,540** |
| Corporate | 1,841,815 | 353,369 | 62,795 | 1,813,143 | **4,071,122** |
| **Total** | **2,050,253** | **481,713** | **62,795** | **1,826,901** | **4,421,662** |

| Analysis of collateral and guarantees received | | | | | |
|---|---|---|---|---|---|
| Amounts in Eur ΄000 **31/12/2024** | Real estate collaterals | Financial collaterals | Government guarantees | Other collaterals | **Total collaterals** |
| Individuals | 162,202 | 100,610 | 0 | 10,266 | **273,078** |
| Corporate | 1,239,830 | 226,543 | 42,443 | 1,407,867 | **2,916,683** |
| **Total** | **1,402,032** | **327,153** | **42,443** | **1,418,133** | **3,189,761** |

Collaterals received include letters of guarantee of EUR 99,637 thousand. (31/12/24 EUR 85,576 thousand).

**Bank**

| Analysis of collateral and guarantees received | | | | | |
|---|---|---|---|---|---|
| Amounts in Eur ΄000 **31/12/2025** | Real estate collaterals | Financial collaterals | Government guarantees | Other collaterals | **Total collaterals** |
| Individuals | 208,438 | 128,344 | 0 | 13,758 | **350,540** |
| Corporate | 1,841,815 | 353,369 | 62,795 | 1,396,568 | **3,654,547** |
| **Total** | **2,050,253** | **481,713** | **62,795** | **1,410,326** | **4,005,087** |

| Analysis of collateral and guarantees received | | | | | |
|---|---|---|---|---|---|
| Amounts in Eur ΄000 **31/12/2024** | Real estate collaterals | Financial collaterals | Government guarantees | Other collaterals | **Total collaterals** |
| Individuals | 162,202 | 100,610 | 0 | 10,266 | **273,078** |
| Corporate | 1,239,830 | 226,543 | 42,443 | 1,180,956 | **2,689,772** |
| **Total** | **1,402,032** | **327,153** | **42,443** | **1,191,222** | **2,962,850** |

Collaterals received include letters of guarantee of EUR 99,637 thousand. (31/12/24 EUR 85,576 thousand).

**Bonds**

## Group

| Amounts in Eur '000 **31/12/2025** | 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** |
|---|---|---|---|---|---|---|---|
| | **Debt Securities** | | | | | | |
| A- to AAA | 8,685 | 32,530 | 394,991 | **436,206** | 9 | 84 | **93** |
| B- to BBB+ | 44,903 | 179,042 | 567,243 | **791,188** | 79 | 968 | **1,047** |
| C- to CCC+ | 0 | 0 | 0 | **0** | 0 | 0 | **0** |
| Not rated | 0 | 70,071 | 13,959 | **84,030** | 0 | 150 | **150** |
| **Total** | **53,588** | **281,643** | **976,193** | **1,311,424** | **88** | **1,202** | **1,290** |

| Amounts in Eur '000 **31/12/2024** | 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** |
|---|---|---|---|---|---|---|---|
| | **Debt Securities** | | | | | | |
| A- to AAA | 2,286 | 19,153 | 50,354 | **71,793** | 0 | 28 | **28** |
| B- to BBB+ | 44,839 | 191,199 | 333,685 | **569,723** | 62 | 485 | **547** |
| C- to CCC+ | 0 | 3,900 | 15,346 | **19,246** | 0 | 178 | **178** |
| Not rated | 0 | 38,066 | 15,263 | **53,329** | 0 | 112 | **112** |
| **Total** | **47,125** | **252,318** | **414,648** | **714,091** | **62** | **803** | **865** |

All securities in the portfolio measured through other comprehensive income and of the amortised cost portfolio are classified at "Stage 1".

## Bank

| Amounts in Eur '000 **31/12/2025** | 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** |
|---|---|---|---|---|---|---|---|
| | **Debt Securities** | | | | | | |
| A- to AAA | 8,685 | 32,530 | 394,991 | **436,206** | 9 | 84 | **93** |
| B- to BBB+ | 44,903 | 179,042 | 567,243 | **791,188** | 79 | 968 | **1,047** |
| C- to CCC+ | 0 | 0 | 0 | **0** | 0 | 0 | **0** |
| Not rated | 0 | 70,071 | 13,959 | **84,030** | 0 | 150 | **150** |
| **Total** | **53,588** | **281,643** | **976,193** | **1,311,424** | **88** | **1,202** | **1,290** |

| Amounts in Eur '000 **31/12/2024** | 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** |
|---|---|---|---|---|---|---|---|
| | **Debt Securities** | | | | | | |
| A- to AAA | 2,286 | 19,153 | 50,354 | **71,793** | 0 | 28 | **28** |
| B- to BBB+ | 44,839 | 191,199 | 333,685 | **569,723** | 62 | 485 | **547** |
| C- to CCC+ | 0 | 3,900 | 15,346 | **19,246** | 0 | 178 | **178** |
| Not rated | 0 | 38,066 | 15,263 | **53,329** | 0 | 112 | **112** |
| **Total** | **47,125** | **252,318** | **414,648** | **714,091** | **62** | **803** | **865** |

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 arising from the potential delayed repayment of existing or contingent obligations by 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. Open positions are monitored daily against the approved limits

**Country risk**

The Group is exposed to the risk of capital losses 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 prospectives of the country, as well as its credit rating by international credit rating institutions (Moody’s). Actual exposures per country are monitored daily against the respective limits. 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, 2025, amounted to EUR 423 thousand and EUR 412 thousand respectively as analysed in the following table

**Group**

| Amounts in Eur ΄000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Foreign exchange risk | 19 | 6 |
| Bond portfolio interest rate risk | 413 | 200 |
| Stock market portfolio market risk | 29 | 7 |
| Commodities | 28 | 91 |
| Decrease due to correlation | (77) | (50) |
| Subsidiaries price risk (Optima asset Management) | 11 | 39 |
| **Total (Net Market Risk)** | **423** | **293** |

**Bank**

| Amounts in Eur ΄000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Foreign exchange risk | 19 | 6 |
| Bond portfolio interest rate risk | 413 | 200 |
| Stock market portfolio market risk | 29 | 7 |
| Commodities | 28 | 91 |
| Decrease due to correlation | (77) | (50) |
| **Total (Net Market Risk)** | **412** | **254** |

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 1 month | 1-3 months | 3-12 months | 1-2 years | 2-5 years | Over 5 years | Non-interest bearing | Total |
|---|---|---|---|---|---|---|---|---|
| **As at 31st December 2025** | | | | | | | | |
| **Assets** | | | | | | | | |
| Cash and balances with central bank | 668,225 | 0 | 0 | 0 | 0 | 0 | 15,615 | **683,840** |
| Due from banks | 312,052 | 8,973 | 0 | 0 | 0 | 0 | 0 | **321,025** |
| Financial assets at fair value through profit and loss | 259,624 | 0 | 23,926 | 0 | 0 | 0 | 21,027 | **304,577** |
| Loans and advances to customers | 147,905 | 4,014,156 | 753,552 | 79 | 1,038 | 133,031 | 0 | **5,049,761** |
| Financial assets at fair value through other comprehensive income | 0 | 738 | 115 | 4,089 | 8,996 | 39,649 | 255 | **53,842** |
| Debt instruments at amortised cost | 221,154 | 81,992 | 31,919 | 48,896 | 170,129 | 420,900 | 0 | **974,990** |
| Derivative financial instruments | 279 | 0 | 0 | 0 | 0 | 0 | 858 | **1,137** |
| Other assets | 0 | 47,630 | 0 | 0 | 0 | 0 | 0 | **47,630** |
| **Total assets** | **1,609,239** | **4,153,489** | **809,512** | **53,064** | **180,163** | **593,580** | **37,755** | **7,436,802** |
| **Liabilities** | | | | | | | | |
| Due to banks | 281,341 | 0 | 0 | 0 | 0 | 0 | 0 | **281,341** |
| Due to customers | 3,967,490 | 1,326,896 | 772,085 | 413 | 0 | 0 | 231,696 | **6,298,580** |
| Derivative financial instruments | 147 | 0 | 0 | 0 | 0 | 0 | 5,475 | **5,622** |
| Debt securities in issue and other borrowed funds | 0 | 0 | 0 | 0 | 0 | 150,776 | 0 | **150,776** |
| Other liabilities | 0 | 0 | 0 | 0 | 0 | 0 | 45,581 | **45,581** |
| **Total liabilities** | **4,248,978** | **1,326,896** | **772,085** | **413** | **0** | **150,776** | **282,752** | **6,781,900** |
| **Total interest rate gap** | **(2,639,739)** | **2,826,593** | **37,427** | **52,651** | **180,163** | **442,804** | **(244,997)** | **654,902** |

| Amounts in Eur '000 | Up to 1 month | 1-3 months | 3-12 months | 1-2 years | 2-5 years | Over 5 years | Non-interest bearing | Total |
|---|---|---|---|---|---|---|---|---|
| **As at 31st December 2024** | | | | | | | | |
| **Assets** | | | | | | | | |
| Cash and balances with central bank | 781,378 | 0 | 0 | 0 | 0 | 0 | 16,268 | **797,646** |
| Due from banks | 162,286 | 9,023 | 0 | 0 | 0 | 0 | 0 | **171,309** |
| Financial assets at fair value through profit and loss | 229,054 | 0 | 26,080 | 0 | 0 | 0 | 9,308 | **264,442** |
| Loans and advances to customers | 49,072 | 2,612,312 | 610,539 | 23,393 | 28,319 | 288,963 | 0 | **3,612,598** |
| Financial assets at fair value through other comprehensive income | 0 | 3,703 | 0 | 3,729 | 22,210 | 17,482 | 266 | **47,390** |
| Debt instruments at amortised cost | 0 | 39,845 | 30 | 16,754 | 207,211 | 150,004 | 0 | **413,844** |
| Derivative financial instruments | 583 | 0 | 0 | 0 | 0 | 0 | 1,627 | **2,210** |
| Other assets | 0 | 31,279 | 0 | 0 | 0 | 0 | 0 | **31,279** |
| **Total assets** | **1,222,373** | **2,696,162** | **636,649** | **43,876** | **257,740** | **456,449** | **27,469** | **5,340,718** |
| **Liabilities** | | | | | | | | |
| Due to banks | 115,563 | 0 | 0 | 0 | 0 | 0 | 0 | **115,563** |
| Due to customers | 2,811,903 | 1,184,856 | 642,847 | 3,806 | 0 | 0 | 0 | **4,643,412** |
| Derivative financial instruments | 123 | 0 | 0 | 0 | 0 | 0 | 5,195 | **5,318** |
| Other liabilities | 0 | 0 | 0 | 0 | 0 | 0 | 124,368 | **124,368** |
| **Total liabilities** | **2,927,589** | **1,184,856** | **642,847** | **3,806** | **0** | **0** | **129,563** | **4,888,661** |
| **Total interest rate gap** | **(1,705,216)** | **1,511,306** | **(6,198)** | **40,070** | **257.740** | **456.449** | **(102,094)** | **452,057** |

## Bank

| Amounts in Eur '000 | Up to 1 month | 1-3 months | 3-12 months | 1-2 years | 2-5 years | Over 5 years | Non-interest bearing | Total |
|---|---|---|---|---|---|---|---|---|
| **As at 31st December 2025** | | | | | | | | |
| **Assets** | | | | | | | | |
| Cash and balances with central bank | 668,225 | 0 | 0 | 0 | 0 | 0 | 15,615 | **683,840** |
| Due from banks | 308,628 | 8,973 | 0 | 0 | 0 | 0 | 0 | **317,601** |
| Financial assets at fair value through profit and loss | 257,718 | 0 | 23,926 | 0 | 0 | 0 | 21,027 | **302,671** |
| Loans and advances to customers | 147,906 | 3,982,069 | 753,552 | 79 | 1,038 | 128,778 | 0 | **5,013,422** |
| Financial assets at fair value through other comprehensive income | 0 | 738 | 115 | 4,089 | 8,996 | 39,649 | 255 | **53,842** |
| Debt instruments at amortised cost | 221,154 | 81,992 | 31,919 | 48,896 | 170,129 | 420,900 | 0 | **974,990** |
| Derivative financial instruments | 279 | 0 | 0 | 0 | 0 | 0 | 858 | **1,137** |
| Other assets | 0 | 47,630 | 0 | 0 | 0 | 0 | 0 | **47,630** |
| **Total assets** | **1,603,910** | **4,121,402** | **809,512** | **53,064** | **180,163** | **589,327** | **37,755** | **7,395,133** |
| **Liabilities** | | | | | | | | |
| Due to banks | 281,341 | 0 | 0 | 0 | 0 | 0 | 0 | **281,341** |
| Due to customers | 3,967,490 | 1,326,896 | 772,084 | 413 | 0 | 0 | 235,551 | **6,302,434** |
| Derivative financial instruments | 147 | 0 | 0 | 0 | 0 | 0 | 5,475 | **5,622** |
| Debt securities in issue and other borrowed funds | 0 | 0 | 0 | 0 | 0 | 150,776 | 0 | **150,776** |
| Other liabilities | 0 | 0 | 0 | 0 | 0 | 0 | 43,205 | **43,205** |
| **Total liabilities** | **4,248,978** | **1,326,896** | **772,084** | **413** | **0** | **150,776** | **284,231** | **6,783,378** |
| **Total interest rate gap** | **(2,645,068)** | **2,794,506** | **37,428** | **52,651** | **180,163** | **438,551** | **(246,476)** | **611,755** |

| Amounts in Eur '000 | Up to 1 month | 1-3 months | 3-12 months | 1-2 years | 2-5 years | Over 5 years | Non-interest bearing | Total |
|---|---|---|---|---|---|---|---|---|
| **As at 31st December 2024** | | | | | | | | |
| **Assets** | | | | | | | | |
| Cash and balances with central bank | 781,378 | 0 | 0 | 0 | 0 | 0 | 16,267 | **797,645** |
| Due from banks | 151,204 | 8,953 | 0 | 0 | 0 | 0 | 0 | **160,157** |
| Financial assets at fair value through profit and loss | 226,238 | 0 | 26,080 | 0 | 0 | 0 | 9,308 | **261,626** |
| Loans and advances to customers | 70,027 | 2,633,687 | 610,539 | 23,393 | 28,319 | 230,635 | 0 | **3,596,600** |
| Financial assets at fair value through other comprehensive income | 0 | 3,703 | 0 | 3,729 | 22,210 | 17,482 | 266 | **47,390** |
| Debt instruments at amortised cost | 0 | 39,845 | 30 | 16,754 | 207,211 | 150,004 | 0 | **413,844** |
| Derivative financial instruments | 583 | 0 | 0 | 0 | 0 | 0 | 1,627 | **2,210** |
| Other assets | 0 | 30,430 | 0 | 0 | 0 | 0 | 0 | **30,430** |
| **Total assets** | **1,229,430** | **2,716,618** | **636,649** | **43,876** | **257,740** | **398,121** | **27,468** | **5,309,902** |
| **Liabilities** | | | | | | | | |
| Due to banks | 115,563 | 0 | 0 | 0 | 0 | 0 | 0 | **115,563** |
| Due to customers | 2,822,555 | 1,184,856 | 642,847 | 3,806 | 0 | 0 | 0 | **4,654,064** |
| Derivative financial instruments | 123 | 0 | 0 | 0 | 0 | 0 | 5,195 | **5,318** |
| Other liabilities | 0 | 0 | 0 | 0 | 0 | 0 | 122,933 | **122,933** |
| **Total liabilities** | **2,938,241** | **1,184,856** | **642,847** | **3,806** | **0** | **0** | **128,128** | **4,897,878** |
| **Total interest rate gap** | **(1,708,811)** | **1,531,762** | **(6,198)** | **40,070** | **257,740** | **398,121** | **(100,660)** | **412,024** |

### *(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 | Other Currencies | Total |
|---|---|---|---|---|---|---|
| **As at 31st December 2025** | | | | | | |
| **Foreign exchange risk - Assets** | | | | | | |
| Cash and balances with central bank | 682,280 | 872 | 213 | 352 | 123 | **683,840** |
| Due from banks | 37,697 | 268,710 | 5,344 | 1,313 | 7,961 | **321,025** |
| Financial assets measured at fair value through profit or loss | 301,172 | 0 | 3,405 | 0 | 0 | **304,577** |
| Derivative financial instruments | 1,123 | 14 | 0 | 0 | 0 | **1,137** |
| Loans and advances to customers | 4,891,028 | 155,633 | 3,100 | 0 | 0 | **5,049,761** |
| Financial assets measured at fair value through other comprehensive income | 53,842 | 0 | 0 | 0 | 0 | **53,842** |
| Debt securities at amortised cost | 696,581 | 278,409 | 0 | 0 | 0 | **974,990** |
| Investment in subsidiaries and associates | 11 | 0 | 0 | 0 | 0 | **11** |
| Property, plant and equipment | 10,487 | 0 | 0 | 0 | 0 | **10,487** |
| Intangible assets | 11,034 | 0 | 0 | 0 | 0 | **11,034** |
| Right of use assets | 18,008 | 0 | 0 | 0 | 0 | **18,008** |
| Deferred tax assets | 14,830 | 0 | 0 | 0 | 0 | **14,830** |
| Other assets | 107,777 | 5,144 | 714 | 651 | 606 | **114,892** |
| **Total assets** | **6,825,870** | **708,782** | **12,776** | **2,316** | **8,690** | **7,558,434** |
| **Foreign exchange risk - Liabilities** | | | | | | |
| Due to banks | 281,136 | 25 | 87 | 92 | 0 | **281,340** |
| Due to customers | 5,574,514 | 701,223 | 12,780 | 2,780 | 7,283 | **6,298,580** |
| Derivative financial instruments | 5,613 | 9 | 0 | 0 | 0 | **5,622** |
| Debt securities in issue and other borrowed funds | 150,776 | 0 | 0 | 0 | 0 | **150,776** |
| Lease liability | 19,959 | 0 | 0 | 0 | 0 | **19,959** |
| Retirement benefit obligations | 1,092 | 0 | 0 | 0 | 0 | **1,092** |
| Income tax liability | 3,634 | 0 | 0 | 0 | 0 | **3,634** |
| Other liabilities | 44,912 | 669 | 1 | 0 | 0 | **45,582** |
| Provisions | 4,693 | 0 | 0 | 0 | 0 | **4,693** |
| **Total liabilities** | **6,086,329** | **701,926** | **12,868** | **2,872** | **7,283** | **6,811,278** |
| **Net on balance sheet position** | **739,541** | **6,856** | **(92)** | **(556)** | **1,407** | **747,156** |

| Amounts to Eur '000 | EUR | USD | GBP | CHF | Other Currencies | Total |
|---|---|---|---|---|---|---|
| **As at 31st December 2024** | | | | | | |
| **Foreign exchange risk - Assets** | | | | | | |
| Cash and balances with central bank | 795,752 | 1,127 | 163 | 515 | 89 | **797,646** |
| Due from banks | 50,716 | 96,276 | 9,821 | 189 | 14,307 | **171,309** |
| Financial assets measured at fair value through profit or loss | 264,442 | 0 | 0 | 0 | 0 | **264,442** |
| Derivative financial instruments | 2,085 | 125 | 0 | 0 | 0 | **2,210** |
| Loans and advances to customers | 3,510,921 | 96,665 | 5,012 | 0 | 0 | **3,612,598** |
| Financial assets measured at fair value through other comprehensive income | 47,390 | 0 | 0 | 0 | 0 | **47,390** |
| Debt securities at amortised cost | 403,831 | 10,013 | 0 | 0 | 0 | **413,844** |
| Investment in subsidiaries and associates | 609 | 0 | 0 | 0 | 0 | **609** |
| Property, plant and equipment | 10,717 | 0 | 0 | 0 | 0 | **10,717** |
| Intangible assets | 11,396 | 0 | 0 | 0 | 0 | **11,396** |
| Right of use assets | 19,595 | 0 | 0 | 0 | 0 | **19,595** |
| Deferred tax assets | 9,685 | 0 | 0 | 0 | 0 | **9,685** |
| Other assets | 172,776 | 5,160 | 734 | 339 | 497 | **179,506** |
| **Total assets** | **5,299,915** | **209,366** | **15,730** | **1,043** | **14,893** | **5,540,947** |
| **Foreign exchange risk - Liabilities** | | | | | | |
| Due to banks | 109,263 | 174 | 6,120 | 6 | 0 | **115,563** |
| Due to customers | 4,149,662 | 469,650 | 9,612 | 950 | 13,538 | **4,643,412** |
| Derivative financial instruments | 5,315 | 3 | 0 | 0 | 0 | **5,318** |
| Lease liability | 21,220 | 0 | 0 | 0 | 0 | **21,220** |
| Retirement benefit obligations | 1,027 | 0 | 0 | 0 | 0 | **1,027** |
| Income tax liability | 5,637 | (64) | 0 | 0 | 0 | **5,573** |
| Other liabilities | 124,180 | 178 | 10 | 0 | 0 | **124,368** |
| Provisions | 4,167 | 0 | 0 | 0 | 0 | **4,167** |
| **Total liabilities** | **4,420,471** | **469,941** | **15,742** | **956** | **13,538** | **4,920,648** |
| **Net on balance sheet position** | **879,444** | **(260,575)** | **(12)** | **87** | **1,355** | **620,299** |

## Bank

| Amounts to Eur '000 | EUR | USD | GBP | CHF | Other Currencies | Total |
|---|---|---|---|---|---|---|
| **As at 31st December 2025** | | | | | | |
| **Foreign exchange risk - Assets** | | | | | | |
| Cash and balances with central bank | 682,280 | 872 | 213 | 352 | 123 | **683,840** |
| Due from banks | 34,276 | 268,707 | 5,344 | 1,313 | 7,961 | **317,601** |
| Financial assets measured at fair value through profit or loss | 299,266 | 0 | 3,405 | 0 | 0 | **302,671** |
| Derivative financial instruments | 1,123 | 14 | 0 | 0 | 0 | **1,137** |
| Loans and advances to customers | 4,854,437 | 155,885 | 3,100 | 0 | 0 | **5,013,422** |
| Financial assets measured at fair value through other comprehensive income | 53,842 | 0 | 0 | 0 | 0 | **53,842** |
| Debt securities at amortised cost | 696,581 | 278,409 | 0 | 0 | 0 | **974,990** |
| Investment in subsidiaries and associates | 22,988 | 0 | 0 | 0 | 0 | **22,988** |
| Property, plant and equipment | 10,423 | 0 | 0 | 0 | 0 | **10,423** |
| Intangible assets | 8,134 | 0 | 0 | 0 | 0 | **8,134** |
| Right of use assets | 17,981 | 0 | 0 | 0 | 0 | **17,981** |
| Deferred tax assets | 16,043 | 0 | 0 | 0 | 0 | **16,043** |
| Other assets | 106,577 | 5,144 | 714 | 651 | 606 | **113,692** |
| **Total assets** | **6,803,951** | **709,031** | **12,776** | **2,316** | **8,690** | **7,536,764** |
| **Foreign exchange risk - Liabilities** | | | | | | |
| Due to banks | 281,137 | 25 | 87 | 92 | 0 | **281,341** |
| Due to customers | 5,578,099 | 701,492 | 12,780 | 2,780 | 7,283 | **6,302,434** |
| Derivative financial instruments | 5,613 | 9 | 0 | 0 | 0 | **5,622** |
| Debt securities in issue and other borrowed funds | 150,776 | 0 | 0 | 0 | 0 | **150,776** |
| Lease liability | 19,933 | 0 | 0 | 0 | 0 | **19,933** |
| Retirement benefit obligations | 1,023 | 0 | 0 | 0 | 0 | **1,023** |
| Income tax liability | 2,647 | 0 | 0 | 0 | 0 | **2,647** |
| Other liabilities | 42,535 | 669 | 1 | 0 | 0 | **43,205** |
| Provisions | 4,683 | 0 | 0 | 0 | 0 | **4,683** |
| **Total liabilities** | **6,086,446** | **702,195** | **12,868** | **2,872** | **7,283** | **6,811,664** |
| **Net on balance sheet position** | **717,505** | **6,836** | **(92)** | **(556)** | **1,407** | **725,100** |

| Amounts to Eur '000 | EUR | USD | GBP | CHF | Other Currencies | Total |
|---|---|---|---|---|---|---|
| **As at 31st December 2024** | | | | | | |
| **Foreign exchange risk - Assets** | | | | | | |
| Cash and balances with central bank | 795,751 | 1,127 | 163 | 515 | 89 | **797,645** |
| Due from banks | 39,572 | 96,268 | 9,821 | 189 | 14,307 | **160,157** |
| Financial assets measured at fair value through profit or loss | 261,626 | 0 | 0 | 0 | 0 | **261,626** |
| Derivative financial instruments | 2,085 | 125 | 0 | 0 | 0 | **2,210** |
| Loans and advances to customers | 3,493,440 | 98,147 | 5,012 | 0 | 0 | **3,596,599** |
| Financial assets measured at fair value through other comprehensive income | 47,390 | 0 | 0 | 0 | 0 | **47,390** |
| Debt securities at amortised cost | 403,832 | 10,013 | 0 | 0 | 0 | **413,845** |
| Investment in subsidiaries and associates | 23,972 | 0 | 0 | 0 | 0 | **23,972** |
| Property, plant and equipment | 10,588 | 0 | 0 | 0 | 0 | **10,588** |
| Intangible assets | 8,193 | 0 | 0 | 0 | 0 | **8,193** |
| Right of use assets | 19,561 | 0 | 0 | 0 | 0 | **19,561** |
| Deferred tax assets | 10,603 | 0 | 0 | 0 | 0 | **10,603** |
| Other assets | 173,074 | 5,160 | 734 | 339 | 497 | **179,804** |
| **Total assets** | **5,289,687** | **210,840** | **15,730** | **1,043** | **14,893** | **5,532,193** |
| **Foreign exchange risk - Liabilities** | | | | | | |
| Due to banks | 109,263 | 174 | 6,120 | 6 | 0 | **115,563** |
| Due to customers | 4,158,797 | 471,167 | 9,612 | 950 | 13,538 | **4,654,064** |
| Derivative financial instruments | 5,315 | 3 | 0 | 0 | 0 | **5,318** |
| Lease liability | 21,188 | 0 | 0 | 0 | 0 | **21,188** |
| Retirement benefit obligations | 964 | 0 | 0 | 0 | 0 | **964** |
| Income tax liability | 5,025 | (64) | 0 | 0 | 0 | **4,961** |
| Other liabilities | 122,745 | 178 | 10 | 0 | 0 | **122,933** |
| Provisions | 4,157 | 0 | 0 | 0 | 0 | **4,157** |
| **Total liabilities** | **4,427,454** | **471,458** | **15,742** | **956** | **13,538** | **4,929,148** |
| **Net on balance sheet position** | **862,233** | **(260,618)** | **(12)** | **87** | **1,355** | **603,045** |

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 31/12/2025, the simulation results in losses of EUR 623,68 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 31/12/2025.
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.

| **Risk factors**<br>Amounts in Eur '000 | **Markets** | **Unfavorable scenario** | **Favorable scenario** |
|---|---|---|---|
| **Shares prices** | ASE movement of FTSE/Stock Exchange Large Cap. | 1,646 | (1,376) |
| | Change in S&P | (741) | 262 |
| | **Total** | **905** | **(1,114)** |

The total bond portfolio held by the Bank on 31/12/2025 amounts to EUR 1,287,498 thousand and is analysed as follows:

| | |
|---|---|
| - Portfolio measured at fair value through profit or loss | 281,643 |
| - Portfolio measured at fair value through other comprehensive income | 53,588 |
| - Portfolio measured at amortised cost | 974,990 |

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 Amounts in Eur '000 | Scenario | Portfolio | +200 Bps | -200 Bps |
|---|---|---|---|---|
| Bond yield curves | Movement of bonds' yield curves | Fair Value through P&L Portfolio (FVTPL) | (4,968) | 5,509 |
| | | Bond Futures | (246) | 288 |
| | | Interest rate Swaps | (13) | 15 |
| | | Fair Value through other comprehensive income Portfolio (FVTOCI) | (4,450) | 5,061 |
| **Totals** | | | **(9,677)** | **10,873** |

In 2025 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 was insignificant.

### 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 1 month | 1-3 months | 3-12 months | 1-2 years | 2-5 years | Over 5 years | Total |
|---|---|---|---|---|---|---|---|
| **As at 31st December 2025** | | | | | | | |
| **LIABILITIES** | | | | | | | |
| Due to banks | 281,341 | 0 | 0 | 0 | 0 | 0 | 281,341 |
| Due to customers | 3,945,709 | 1,326,896 | 772,085 | 413 | 0 | 253,477 | 6,298,580 |
| Derivative financial instruments | 5,622 | 0 | 0 | 0 | 0 | 0 | 5,622 |
| Debt securities in issue and other borrowed funds | 0 | 0 | 0 | 0 | 0 | 150,776 | 150,776 |
| Lease Liability | 366 | 736 | 3,309 | 4,380 | 8,735 | 5,024 | 22,550 |
| Retirement benefit obligations | 0 | 0 | 0 | 0 | 0 | 1,092 | 1,092 |
| Income tax liability | 0 | 0 | 3,634 | 0 | 0 | 0 | 3,634 |
| Other liabilities | 0 | 18,066 | 27,515 | 0 | 0 | 0 | 45,581 |
| Provisions | 0 | 0 | 0 | 0 | 0 | 4,693 | 4,693 |
| **Total liabilities** | **4,233,038** | **1,345,698** | **806,543** | **4,793** | **8,735** | **415,062** | **6,813,869** |

| Amounts in Eur '000 | Up to 1 month | 1-3 months | 3-12 months | 1-2 years | 2-5 years | Over 5 years | Total |
|---|---|---|---|---|---|---|---|
| **As at 31st December 2024** | | | | | | | |
| **LIABILITIES** | | | | | | | |
| 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 |
| **Total liabilities** | **2,933,113** | **1,281,661** | **679,649** | **7,851** | **9,917** | **11,329** | **4,923,520** |

## Bank

| Amounts in Eur '000 | Up to 1 month | 1-3 months | 3-12 months | 1-2 years | 2-5 years | Over 5 years | Total |
|---|---|---|---|---|---|---|---|
| **As at 31st December 2025** | | | | | | | |
| **LIABILITIES** | | | | | | | |
| Due to banks | 281,341 | 0 | 0 | 0 | 0 | 0 | 281,341 |
| Due to customers | 3,967,489 | 1,326,896 | 772,085 | 413 | 0 | 235,551 | 6,302,434 |
| Derivative financial instruments | 5,622 | 0 | 0 | 0 | 0 | 0 | 5,622 |
| Debt securities in issue and other borrowed funds | 0 | 0 | 0 | 0 | 0 | 150,776 | 150,776 |
| Lease Liability | 364 | 731 | 3,300 | 4,367 | 8,734 | 5,025 | 22,521 |
| Retirement benefit obligations | 0 | 0 | 0 | 0 | 0 | 1,023 | 1,023 |
| Income tax liability | 0 | 0 | 2,647 | 0 | 0 | 0 | 2,647 |
| Other liabilities | 0 | 14,680 | 27,517 | 0 | 0 | 1,008 | 43,205 |
| Provisions | 0 | 0 | 0 | 0 | 0 | 4,683 | 4,683 |
| **Total liabilities** | **4,254,816** | **1,342,307** | **805,549** | **4,780** | **8,734** | **398,066** | **6,814,252** |

| Amounts in Eur '000 | Up to 1 month | 1-3 months | 3-12 months | 1-2 years | 2-5 years | Over 5 years | Total |
|---|---|---|---|---|---|---|---|
| **As at 31st December 2024** | | | | | | | |
| **LIABILITIES** | | | | | | | |
| 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 |
| **Total liabilities** | **2,943,763** | **1,281,082** | **678,163** | **7,839** | **9,911** | **11,257** | **4,932,015** |

## 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).

Furthermore, by virtue of Bank of Greece Executive Committee Act No. 235/07.10.2024, the countercyclical capital buffer rate for Greece was set at 0.25%, with an effective date of 1 October 2025.

The total capital requirements on an individual and consolidated basis are detailed in the table below:

| **Total Capital Requirements** | **Total Capital (%)** |
|---|---|
| Minimum Total Capital Ratio | 8.00% |
| Additional Pillar II Own Funds Requirements (P2R) | 3.06% |
| **Total Capital Requirements EDEA (TSCR)** | **11.06%** |
| (Capital Conservation Buffer - CCB) | 2.50% |
| **Overall Capital Requirements (OCR)** | **13.56%** |
| Pillar 2 Guidance – P2G | 0.50% |
| Countercyclical capital buffer | 0.25% |
| **Overall Capital Requirements (OCR) & Pillar 2 Guidance (P2G) – (TRCR)** | **14.31%** |

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 3.06% 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.

• countercyclical capital buffer rate was set at 0.25%.

The Capital Adequacy ratio of the Group and the Bank on 31/12/2025 and 31/12/2024 was structured as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025(1) | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| Share Capital | 254,521 | 254,521 | 254,521 |
| Share premium | 84,114 | 84,114 | 84,114 |
| Less: Treasury Shares | (1,736) | (1,736) | (112) |
| Other Reserves | 39,776 | 39,776 | 30,155 |
| Retained Earnings | 321,152 | 257,916 | 210,582 |
| Less: Intagible assets | (10,481) | (10,481) | (10,775) |
| Other regulatory adjustments | (1,704) | (1,704) | 5,720 |
| **Common Equity Tier 1 Capital ( CET1)** | **685,642** | **622,406** | **574,205** |
| Additional Tier 1 instruments (AT1) | 0 | 0 | 0 |
| **Additional Tier 1 Capital (AT1)** | **0** | **0** | **0** |
| **Tier 2 Capital (TIER2) Supplementary Own Funds** | **685,642** | **622,406** | **574,205** |
| **Tier 1 Capital (TIER1)** | 150,776 | 150,776 | 0 |
| Total regulatory capital | **836,418** | **773,182** | **574,205** |
| **Total risk weighted assets** | **5,624,931** | **5,539,798** | **3,988,249** |
| **CET1 Capital Ratio** | **12.19%** | **11.24%** | **14.40%** |
| **T1 Capital Ratio** | **12.19%** | **11.24%** | **14.40%** |
| **Total Regulatory Capital Ratio (TRCR)** | **14.87%** | **13.96%** | **14.40%** |

**Bank**

| Amounts in Eur '000 | 31/12/2025(1) | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| Share Capital | 254,521 | 254,521 | 254,521 |
| Share premium | 84,114 | 84,114 | 84,114 |
| Less: Treasury Shares | (1,736) | (1,736) | (112) |
| Other Reserves | 38,471 | 38,471 | 29,087 |
| Retained Earnings | 300,445 | 240,444 | 194,422 |
| Less: Intagible assets | (8,134) | (8,134) | (8,193) |
| Other regulatory adjustments | (1,702) | (1,702) | 5,641 |
| **Common Equity Tier 1 Capital ( CET1)** | **665,979** | **605,978** | **559,480** |
| Additional Tier 1 instruments (AT1) | 0 | 0 | 0 |
| **Additional Tier 1 Capital (AT1)** | **0** | **0** | **0** |
| **Tier 2 Capital (TIER2) Supplementary Own Funds** | **665,979** | **605,978** | **559,480** |
| **Tier 1 Capital (TIER1)** | 150,776 | 150,776 | 0 |
| Total regulatory capital | **816,755** | **756,754** | **559,480** |
| **Total risk weighted assets** | **5,367,730** | **5,282,926** | **3,880,675** |
| **CET1 Capital Ratio** | **12.41%** | **11.47%** | **14.42%** |
| **T1 Capital Ratio** | **12.41%** | **11.47%** | **14.42%** |
| **Total Regulatory Capital Ratio (TRCR)** | **15.22%** | **14.32%** | **14.42%** |

(1) Items have been calculated including profits of the year (EUR 170,060 thousand) and incorporating a provision for dividend distribution (EUR 49,285 thousand), which is subject to the approval of the Ordinary General Assembly.

(2) Items have been calculated including profits of the year (EUR 164,283 thousand) and incorporating a provision for dividend distribution (EUR 49,285 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. At fair value are not measured:

**(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) Debt securities at amortised cost**

Debt securities at amortised cost include bonds that are intended to be held to maturity for the purpose of collecting principal and interest.

**(d) 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.

**(e) Debt securities in issue and other borrowed funds**

Liabilities from debt securities in issue and other borrowed funds include the subordinated bond (Tier II) issued by the Bank under the EMTN program, the fair value of which is determined by the stock exchange price.

### 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, 2025:**

**Financial assets measured at fair value**

| Amounts in Eur '000 | | | **31/12/2025** | | |
|---|---|---|---|---|---|
| **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 | 253,914 | 1,906 | 48,757 | **304,577** | **304,577** |
| Derivative financial instruments | 533 | 604 | 0 | **1,137** | **1,137** |
| Financial assets measured at fair value through other comprehensive income | 53,842 | 0 | 0 | **53,842** | **53,842** |
| **Total** | **308,289** | **2,510** | **48,757** | **359,556** | **359,556** |

Level 3 includes a bond from loan securitization 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 securitization held by the Group on 31/12/2025 was EUR 23,926 thousand and on 31/12/2024 EUR 26,080 thousand.

For the valuation of the loan securitization bond, three scenarios have been used, and the discount rate ranges from 3% to 15% under the base case, depending on the characteristics and the quality of the loan portfolio.

If the discount rate increases by 2% for the categories where a 15% discount rate was used in the valuation, and increases by 1% for all other loan categories compared with the discount rate used in the valuation, then the bond's value will be lower by EUR 400 thousand.

If the discount rate decreases by 2% for the categories where a 15% discount rate was used in the valuation, and decreases by 1% for all other loan categories compared with the discount rate used in the valuation, then the bond's value will be higher by EUR 500 thousand.

Additionally, Level 3 includes two further bonds which are measured at fair value using the income approach, applying the discounted cash flow method. These financial instruments relate to Additional Tier 1 (AT1) capital securities, whose fair value estimation is based on unobservable inputs, including future income and discount rates. The fair value of these bonds as at 31/12/2025 was EUR 24,832 thousand.

If the discount rate increases by 1%, the fair value of the bonds will be lower by EUR 986 thousand.

If the discount rate decreases by 1%, the fair value of the bonds will be higher by EUR 1 million.

| Amounts in Eur '000 | | | 31/12/2025 | | |
|---|---|---|---|---|---|
| **Financial liabilities measured at fair value** | **Level 1** | **Level 2** | **Level 3** | **Total fair value** | **Total accounting value** |
| Derivative financial instruments | 236 | 5,386 | 0 | 5,622 | 5,622 |
| Financial liabilities measured at fair value through profit and loss | 85 | 0 | 0 | 85 | 85 |
| **Total** | **321** | **5,386** | **0** | **5,707** | **5,707** |

There was no transfer of financial assets and financial liabilities between Levels 1 and 2 during the periods ended 31 December 2025 and 31 December 2024. During the periods ended December 31, 2025 and December 31, 2024, 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 instruments not measured at fair value

| Amounts in Eur '000 | | | 31/12/2025 | | |
|---|---|---|---|---|---|
| **Financial assets** | **Level 1** | **Level 2** | **Level 3** | **Total fair value** | **Total accounting value** |
| Due from banks | 312,053 | 0 | 9,539 | 321,592 | 321,025 |
| Loans and advances to customers | 0 | 0 | 5,380,412 | 5,380,412 | 5,049,761 |
| Debt securities at amortised cost | 980,647 | 0 | 0 | 980,647 | 974,990 |
| **Total** | **1,292,700** | **0** | **5,389,951** | **6,682,651** | **6,345,776** |

| Amounts in Eur '000 | | | 31/12/2025 | | |
|---|---|---|---|---|---|
| **Financial liabilities** | **Level 1** | **Level 2** | **Level 3** | **Total fair value** | **Total accounting value** |
| Debt securities in issue and other borrowed funds | 154,470 | 0 | 0 | **154,470** | 150,776 |
| **Total** | **154,470** | **0** | **0** | **154,470** | **150,776** |

The following methods and assumptions were used to estimate the fair value of the above financial instruments on December 31, 2025 and 2024.

**Due from banks:** The fair value of due from banks approximates their carrying amount and 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 amortized 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 amortized cost:** Fair value is calculated with prices traded in the market.

**Debt securities in issue and other borrowed funds:** The fair value of the subordinated bond (Tier II) issued by the Bank on June 25, 2025, is determined based on the price on the Luxembourg stock exchange.

**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 | **264,442** | **264,442** |
| 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** |
| **Total** | **285,808** | **2,154** | **26,080** | **314,042** | **314,042** |

| 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** |
| **Total** | **37** | **5,281** | **0** | **5,318** | **5,318** |

**Financial instruments 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** |
| **Total** | **569,185** | **0** | **3,840,059** | **4,409,244** | **4,197,751** |

| **Movement of financial instruments at Level 3** | |
|---|---|
| **Financial instruments measured at fair value through profit or loss** | |
| **Balance as at 1/1/2024** | **30,696** |
| Gain/ (loss) recognised at profit or loss | 2,043 |
| Repayments | (6,659) |
| **Balance as at 31/12/2024** | **26,080** |
| Gain/ (loss) recognised at profit or loss | 2,900 |
| Purchases / initial recognition | 25,000 |
| Repayments | (5,223) |
| **Balance as at 31/12/2025** | **48,757** |

**Bank**

**Fair value hierarchy as of December 31, 2025:**

**Financial assets measured at fair value**

Amounts in Eur '000

| | 31/12/2025 | | | | |
|---|---|---|---|---|---|
| **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 | 253,914 | 0 | 48,757 | 302,671 | 302,671 |
| Derivative financial instruments | 533 | 604 | 0 | 1,137 | 1,137 |
| Financial assets measured at fair value through other comprehensive income | 53,842 | 0 | 0 | 53,842 | 53,842 |
| **Total** | **308,289** | **604** | **48,757** | **357,650** | **357,650** |

Level 3 includes a bond from loan securitization 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 securitization held by the Group on 31/12/2025 was Eur 23,926 thousand (Eur 26,080 thousand on 31/12/2024).

For the valuation of the loan securitization bond, three scenarios have been used, and the discount rate ranges from 3% to 15% under the base case, depending on the characteristics and the quality of the loan portfolio.

If the discount rate increases by 2% for the categories where a 15% discount rate was used in the valuation, and increases by 1% for all other loan categories compared with the discount rate used in the valuation, then the bond's value will be lower by EUR 400 thousand.

If the discount rate decreases by 2% for the categories where a 15% discount rate was used in the valuation, and decreases by 1% for all other loan categories compared with the discount rate used in the valuation, then the bond's value will be higher by EUR 500 thousand.

Additionally, Level 3 includes two further bonds which are measured at fair value using the income approach, applying the discounted cash flow method. These financial instruments relate to Additional Tier 1 (AT1) capital securities, whose fair value estimation is based on unobservable inputs, including future income and discount rates. The fair value of these bonds as at 31/12/2025 was EUR 24,832 thousand.

If the discount rate increases by 1%, the fair value of the bonds will be lower by EUR 986 thousand.

If the discount rate decreases by 1%, the fair value of the bonds will be higher by EUR 1 million.

Amounts in Eur '000

| | 31/12/2025 | | | | |
|---|---|---|---|---|---|
| **Financial liabilities measured at fair value** | **Level 1** | **Level 2** | **Level 3** | **Total fair value** | **Total accounting value** |
| Derivative financial instruments | 236 | 5,386 | 0 | 5,622 | 5,622 |
| Financial liabilities measured at fair value through profit and loss | 85 | 0 | 0 | 85 | 85 |
| **Total** | **321** | **5,386** | **0** | **5,707** | **5,707** |

There was no transfer of financial assets and financial liabilities between Levels 1 and 2 during the periods ended 31 December 2025 and 31 December 2024 for the Bank. During the period ended December 31, 2025 and December 31, 2024, 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 instruments not measured at fair value

| Amounts in Eur '000 | | | 31/12/2025 | | |
|---|---|---|---|---|---|
| **Financial assets** | **Level 1** | **Level 2** | **Level 3** | **Total fair value** | **Total accounting value** |
| Due from banks | 308,628 | 0 | 9,539 | 318,167 | 317,601 |
| Loans and advances to customers | 0 | 0 | 5,343,494 | 5,343,494 | 5,013,422 |
| Debt securities at amortised cost | 980,647 | 0 | 0 | 980,647 | 974,990 |
| **Total** | **1,289,275** | **0** | **5,353,033** | **6,642,308** | **6,306,013** |

| Amounts in Eur '000 | | | 31/12/2025 | | |
|---|---|---|---|---|---|
| **Financial liabilities measured at fair value** | **Level 1** | **Level 2** | **Level 3** | **Total fair value** | **Total accounting value** |
| Debt securities in issue and other borrowed funds | 154,470 | 0 | 0 | 154,470 | 150,776 |
| **Total** | **154,470** | **0** | **0** | **154,470** | **150,776** |

### 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** |
| **Total** | **282,992** | **2,154** | **26,080** | **311,226** | **311,226** |

| 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** |
| **Total** | **37** | **5,281** | **0** | **5,318** | **5,318** |

### Financial instruments 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 | 420,226 | 0 | 0 | **420,226** | **413,844** |
| **Total** | **571,430** | **0** | **3,823,545** | **4,394,975** | **4,170,601** |

| Movement of financial instruments at Level 3 | |
|---|---|
| **Financial instruments measured at fair value through profit or loss** | |
| **Balance as at 1/1/2024** | **30,696** |
| Gain/ (loss) recognised at profit or loss | 2,043 |
| Repayments | (6,659) |
| **Balance as at 31/12/2024** | **26,080** |
| Gain/ (loss) recognised at profit or loss | 2,900 |
| Purchases / initial recognition | 25,000 |
| Repayments | (5,223) |
| **Balance as at 31/12/2025** | **48,757** |

## 6. Net interest income

The breakdown of net interest income is as follows:

**Group**

| Amounts in Eur '000 | 1/1/2025 – 31/12/2025 | 1/1/2024 – 31/12/2024 |
|---|---|---|
| **Interest and similar income** | | |
| Interest on debt securities at amortized cost | 22,563 | 16,614 |
| Interest on loans at amortized cost | 228,407 | 207,230 |
| Interest on due from banks | 19,113 | 18,618 |
| Other interest income | 1,081 | 785 |
| Interest on debt securities measured at fair value through other comprehensive income | 1,533 | 1,221 |
| **Total interest and similar income for financial instrument not measured at FVTPL** | **272,697** | **244,468** |
| Debt securities at fair value through profit and loss | 5,991 | 6,994 |
| Interest on derivatives | 1,129 | 2,185 |
| **Total interest and similar income from financial instruments** | **279,817** | **253,647** |
| | | |
| **Interest expense and similar charges** | | |
| Interest on deposits | (59,547) | (56,577) |
| Interest on due to banks | (2,183) | (3,477) |
| Interest on debt securities and other borrowed funds | (4,349) | 0 |
| Interest on rights of use assets | (785) | (732) |
| Other interest expenses | (1,881) | (649) |
| **Total interest expense and similar charges on financial instruments not measured at FVTPL** | **(68,745)** | **(61,435)** |
| Interest on derivatives | (1,035) | (2,355) |
| **Total interest expense and similar charges** | **(69,780)** | **(63,790)** |
| | | |
| **Net interest income** | **210,037** | **189,857** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 – 31/12/2025 | 1/1/2024 – 31/12/2024 |
|---|---|---|
| **Interest and similar income** | | |
| Interest on debt securities at amortized cost | 22,563 | 16,614 |
| Interest on loans at amortized cost | 224,098 | 204,400 |
| Interest on due from banks | 19,089 | 18,591 |
| Other interest income | 1,080 | 788 |
| Interest on debt securities measured at fair value through other comprehensive income | 1,533 | 1,221 |
| **Total interest and similar income for financial instrument not measured at FVTPL** | **268,363** | **241,614** |
| Debt securities at fair value through profit and loss | 5,991 | 6,994 |
| Interest on derivatives | 1,129 | 2,185 |
| **Total interest and similar income from financial instruments** | **275,483** | **250,793** |
| | | |
| **Interest expense and similar charges** | | |
| Interest on deposits | (59,588) | (56,602) |
| Interest on due to banks | (2,183) | (3,477) |
| Interest on debt securities and other borrowed funds | (4,349) | 0 |
| Interest on rights of use assets | (783) | (730) |
| Other interest expenses | (1,877) | (619) |
| **Total interest expense and similar charges on financial instruments not measured at FVTPL** | **(68,780)** | **(61,428)** |
| Interest on derivatives | (1,035) | (2,355) |
| **Total interest expense and similar charges** | **(69,814)** | **(63,783)** |
| | | |
| **Net interest income** | **205,669** | **187,010** |

## 7. Net fee and commission income

The breakdown of net fee and commission income is as follows:

**Group**

| Amounts in Eur '000 | 1/1/2025 – 31/12/2025 | 1/1/2024 – 31/12/2024 |
|---|---|---|
| **Fee and commission income** | | |
| Commission income from commercial transactions | 6,032 | 4,478 |
| Commission income from loans and letters of guarantee | 27,818 | 20,660 |
| Commission income from investment banking | 12,065 | 6,590 |
| Commission income from brokerage services | 25,559 | 16,015 |
| **Total fee and commission income** | **71,474** | **47,743** |
| | | |
| **Fee and commission expense** | | |
| Commission expense from commercial transactions | (817) | (908) |
| Commission expense from brokerage services | (8,907) | (5,503) |
| **Total fee and commission expense** | **(9,724)** | **(6,411)** |
| | | |
| **Net fee and commission income** | **61,750** | **41,332** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| **Fee and commission income** | | |
| Commission income from commercial transactions | 6,060 | 4,494 |
| Commission income from loans and letters of guarantee | 28,002 | 20,697 |
| Commission income from investment banking | 2,087 | 490 |
| Commission income from brokerage services | 28,079 | 17,323 |
| **Total fee and commission income** | **64,228** | **43,004** |
| | | |
| **Fee and commission expense** | | |
| Commission expense from commercial transactions | (705) | (809) |
| Commission expense from brokerage services | (8,907) | (5,503) |
| **Total fee and commission expense** | **(9,612)** | **(6,312)** |
| | | |
| **Net fee and commission income** | **54,616** | **36,692** |

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 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Gains/(losses) from foreign exchange differences | 10,523 | 5,861 |
| Gains/(losses) from derivatives held for trading | (8,313) | 3,538 |
| Gains/(losses) from carbon emission rights | 1,068 | 1,050 |
| Gains/(losses) from investments in shares and mutual funds | 9,802 | 1,858 |
| Gains/(losses) from debt securities | 4,795 | 7,488 |
| **Total** | **17,875** | **19,795** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Gains/(losses) from foreign exchange differences | 10,530 | 5,857 |
| Gains/(losses) from derivatives held for trading | (8,313) | 3,539 |
| Gains/(losses) from carbon emission rights | 1,068 | 1,050 |
| Gains/(losses) from investments in shares and mutual funds | 9,711 | 1,726 |
| Gains/(losses) from debt securities | 4,835 | 7,497 |
| **Total** | **17,830** | **19,669** |

The gains/(losses) from financial transactions of the Bank have been mainly affected by the following:

- Gain of EUR 10,530 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.
- Loss of EUR 8,313 thousand in the line item "Gains/(losses) from derivatives held for trading" mainly relates to a loss of EUR 9,785 thousand from derivative products on shares and indices of the Athens

Stock Exchange, which are offset by gains from financial transactions on equity investments, as presented in the line item "Gains/(losses) from investments in shares and mutual funds". It also includes a gain of EUR1,604 thousand from the closing of positions in interest rate derivatives (Interest Rate Swaps & Options).

- Gain of EUR 1,068 thousand in the line item "Gains/(losses) from carbon emission rights" includes the result from buying and selling emission allowances as part of promoting this product to the Bank's customers, as well as the valuation of the emissions inventory and derivatives on emission allowances used for hedging purposes.
- Gain of EUR 9,711 thousand in the line item "Gains/(losses) from investments in shares and mutual funds" relates to the management and valuation of equity positions.
- Gain of EUR 4,835 thousand in the line item "Gains/(losses) from debt securities" includes a profit of EUR 1,766 thousand arising both from the liquidation of debt securities and from the valuation of bonds measured at fair value through profit or loss, as well as a profit of EUR 3,068 thousand relating to the valuation of a securitized loan bond.

## 9. Gains/(losses) from derecognition of financial assets measured at amortised cost

**Group**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Gains/(losses) from the derecognition of financial assets measured at amortized cost | 5,395 | 2,648 |
| **Total** | **5,395** | **2,648** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Gains/(losses) from the derecognition of financial assets measured at amortized cost | 5,487 | 2,648 |
| **Total** | **5,487** | **2,648** |

Gains/(losses) from the derecognition of financial assets measured at amortized cost include an amount of EUR 1,829 thousand relating to individual sales from the bond portfolio measured at amortized cost.

## 10. Other operating income

The other operating income is analysed as follows:

**Group**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Rental income | 36 | 5 |
| Other income | 660 | 574 |
| Disinvestment from subsidiary | 976 | 0 |
| **Total** | **1,672** | **579** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Rental income | 96 | 38 |
| Other income | 814 | 657 |
| Disinvestment from subsidiary | 795 | 0 |
| **Total** | **1,705** | **695** |

The gains from the disinvestment of a subsidiary of the Group and the Bank arise from the result of the liquidation of the company IBG INVESTMENTS S.A.

## 11. Staff costs

The total charge on the results of the year for staff benefits is broken down as follows:

**Group**

| Amounts in Eur '000 | Note | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|---|
| Salaries and wages | | (29,165) | (26,164) |
| Social security contributions | | (5,256) | (4,693) |
| Pension costs - employee defined benefit plan | 31 | (282) | (184) |
| Other staff costs | | (1,619) | (1,597) |
| **Total** | | **(36,322)** | **(32,638)** |

**Bank**

| Amounts in Eur '000 | Note | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|---|
| Salaries and wages | | (27,768) | (25,053) |
| Social security contributions | | (4,988) | (4,502) |
| Pension costs - employee defined benefit plan | 31 | (266) | (173) |
| Other staff costs | | (1,512) | (1,553) |
| **Total** | | **(34,534)** | **(31,281)** |

The increase in staff costs mainly results from the increase in the Bank's staff. The total number of Group's staff on 31/12/2025 amounted to 626 people and of Bank's staff to 591 people (31/12/2024: Group 575 people and Bank 550 people).

## 12. Other operating expenses

The breakdown of the "Other operating expenses" is as follows:

**Group**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| BoD, legal, consulting, audit fees etc. | (2,873) | (2,964) |
| Computerization cost | (6,252) | (4,459) |
| Subscription fees | (877) | (734) |
| Building expenses | (1,746) | (1,446) |
| Promotion, advertising expenses ana sponsorships | (979) | (955) |
| Taxes and duties | (3,403) | (2,810) |
| Office supplies | (127) | (114) |
| Other expenses | (4,644) | (3,430) |
| **Total** | **(20,901)** | **(16,912)** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| BoD, legal, consulting, audit fees etc. | (2,622) | (2,778) |
| Computerization cost | (6,102) | (4,370) |
| Subscription fees | (710) | (571) |
| Building expenses | (1,722) | (1,416) |
| Promotion, advertising expenses ana sponsorships | (940) | (924) |
| Taxes and duties | (3,305) | (2,727) |
| Office supplies | (122) | (110) |
| Other expenses | (4,365) | (2,883) |
| **Total** | **(19,888)** | **(15,779)** |

## 13. Provision for expected credit losses

The impairment provisions are broken down as follows:

**Group**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Provisions for loan impairment | (23,355) | (17,353) |
| Provision for impairment of letters of guarantee | (278) | (1,869) |
| Provisions for impairment of debt securities at amortized cost | (399) | (423) |
| Provisions for impairment of other receivables | 28 | 45 |
| Provisions for impairment of financial assets at fair value through the statement of other income | (26) | 19 |
| Recoveries from written-off receivables | 20 | 0 |
| Gain/(loss) from modification of loans contractual terms | (513) | (972) |
| **Total** | **(24,523)** | **(20,553)** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Provisions for loan impairment | (23,292) | (16,972) |
| Provision for impairment of letters of guarantee | (278) | (1,869) |
| Provisions for impairment of debt securities at amortized cost | (399) | (423) |
| Provisions for impairment of other receivables | 28 | 45 |
| Provisions for impairment of financial assets at fair value through the statement of other income | (26) | 19 |
| Recoveries from written-off receivables | 20 | 0 |
| Gain/(loss) from modification of loans contractual terms | (508) | (972) |
| **Total** | **(24,455)** | **(20,172)** |

The increase in provisions derives from the corresponding increase in the loan portfolio and the recognition of additional provisions (management overlays), which were carried out taking into account the internal risk tolerance limits that cannot be fully captured by the provisioning models.
As of 31/12/2025 the additional provisions amount to €14.4 million compared to €6.4 million as of 31/12/2024.

The carrying amount of the Bank's and the Group's loans, before the modification of their contractual terms, which had lifetime expected credit losses, is presented below:

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024* (as restated) |
|---|---|---|
| Net carrying amount before the modification | 22,723 | 53,243 |
| Net gain/(loss) due to the modification | (375) | (281) |
| **Total** | **22,348** | **52,962** |

### 14. Income Tax

The charge for income tax for the year is broken down as follows:

**Group**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Deferred tax | 5,241 | 1,992 |
| Current tax | (41,105) | (38,406) |
| **Total** | **(35,864)** | **(36,414)** |

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| **Profit before tax** | **205,924** | **176,640** |
| Tax calculated based on the current tax rate of 22% (2024: 22%) | (45,303) | (38,861) |
| ***Adjustments to income tax for:*** | | |
| Income not subject to taxation | 927 | 10 |
| Previous year tax | 959 | (1,677) |
| Expenses not deductible for tax purposes | (1,343) | (1,446) |
| Temporary differences income tax | 159 | (921) |
| Tax effect of utilization of deductible temporary differences not previously recognised | 8,878 | 6,412 |
| Other tax adjustments | (143) | 69 |
| Tax effect of utilization of tax losses not previously recognised | 2 | 0 |
| **Income tax expense** | **(35,864)** | **(36,414)** |
| **Effective tax rate** | **17.42%** | **20.61%** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Deferred tax | 5,533 | 2,053 |
| Current tax | (39,641) | (37,471) |
| **Total** | **(34,108)** | **(35,418)** |

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| **Profit before tax** | **198,392** | **172,130** |
| Tax calculated based on the current tax rate of 22% (2024: 22%) | (43,646) | (37,869) |
| ***Adjustments to income tax for:*** | | |
| Income not subject to taxation | 906 | 0 |
| Previous year tax | 959 | (1,677) |
| Expenses not deductible for tax purposes | (1,301) | (1,373) |
| Previous year defered tax recognition | 92 | (911) |
| Tax effect of utilization of deductible temporary differences not previously recognised | 8,882 | 6,412 |
| **Income tax expense** | **(34,108)** | **(35,418)** |
| **Effective tax rate** | **17.19%** | **20.58%** |

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 23 and note 39(b).

For the fiscal year 2025, the tax audit is in progress and the related tax compliance certificate is expected to be issued after the publication of the financial statements for the year 2025. Upon completion of the tax audit, the Group's management does not expect any significant tax liabilities to arise beyond those already recorded 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**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Profits attributable to the shareholders of the parent company | 170,048 | 140,224 |
| Weighted average number of common shares (in thousands) | 221,241 | 221,298 |
| **Earnings after tax per share – basic & adjusted (*in Eur*)** | **0.77** | **0.63** |

**Bank**

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| Profits attributable to the shareholders of the parent company | 164,283 | 136,712 |
| Weighted average number of common shares (in thousands) | 221,241 | 221,298 |
| **Earnings after tax per share - basic & adjusted (*in Eur*)** | **0.74** | **0.62** |

On May 23, 2024, the Bank's Annual General Meeting of Shareholders approved an increase in share capital through the capitalization of part of the undistributed profits of the 2023 financial year, amounting to €276,000. This was effected through the issuance of 80,000 new ordinary registered voting shares.

On April 29, 2025, the Bank's Annual General Meeting resolved to implement a stock split of all existing ordinary shares, without any change to the Bank's share capital. The split was effected at a ratio of three new shares for each existing share, resulting in a reduction in the nominal value per share from €3.45 to €1.15 and an increase in the total number of ordinary shares from 73,774,142 to 221,322,426. On 4 July 2025, the Athens Stock Exchange approved the listing for trading of the Bank's new shares resulting from the aforementioned. The ex-date for the right to participate in the share split was set as 9 July 2025, while the beneficiaries of the corporate action were the Bank's shareholders registered in the Dematerialized Securities System on 10 July 2025.The commencement of trading of the new common shares on the Athens Stock Exchange began on 14 July 2025.

In accordance with paragraph 64 of IAS 33, the weighted average number of ordinary shares has been retrospectively adjusted for all periods presented to reflect the impact of both the share capital increase and the share split.

## 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 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Cash | 15,615 | 16,268 |
| Deposits with central bank | 668,225 | 781,378 |
| **Total** | **683,840** | **797,646** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Cash | 15,615 | 16,267 |
| Deposits with central bank | 668,225 | 781,378 |
| **Total** | **683,840** | **797,645** |

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 | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| Cash and deposits with central bank | | 683,840 | 797,646 |
| Due from banks | 17 | 298,132 | 143,424 |
| **Total** | | **981,972** | **941,070** |

**Bank**

| Amounts in Eur '000 | Note | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| Cash and deposits with central bank | | 683,840 | 797,645 |
| Due from banks | 17 | 294,708 | 132,272 |
| **Total** | | **978,548** | **929,917** |

Deposits with central bank are measured at amortised cost and the impairment allowance is zero due to the low credit risk.

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 58,218 thousand (EUR 39,718 thousand in 2024).

## 17. Due from banks

The claims from deposits and transactions with other financial institutions are analysed as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Due from banks - sight and time deposits | 298,132 | 143,424 |
| Loans to financial institutions | 8,973 | 8,953 |
| Blocked deposits | 6,414 | 3,485 |
| Derivatives margin account | 7,506 | 15,447 |
| **Total** | **321,025** | **171,309** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Due from banks - sight and time deposits | 294,708 | 132,272 |
| Loans to financial institutions | 8,973 | 8,953 |
| Blocked deposits | 6,414 | 3,485 |
| Derivatives margin account | 7,506 | 15,447 |
| **Total** | **317,601** | **160,157** |

Loans to financial institutions include impairment provisions of EUR 90 thousand (EUR 118 thousand as of 31/12/2024).

Due from Banks are measured at amortised cost, and no impairment provisions has been recognised, as the credit risk is assessed to be low.

## 18. Financial assets at fair value through profit and loss

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Shares and other variable yield securities** | | |
| Equity securities listed in Athens Stock Exchange | 21,028 | 9,308 |
| Government bonds | 3,405 | 0 |
| Treasury bills | 162,213 | 186,918 |
| Corporate bonds | 63,381 | 39,320 |
| Bank bonds | 3,887 | 0 |
| **Financial assets mandatorily classified at fair value through profit and loss** | | |
| Mutual funds | 1,906 | 2,816 |
| Other bonds | 48,757 | 26,080 |
| **Total** | **304,577** | **264,442** |

The 'Other bonds' include a bond from a loan securitization, whose proceeds derive from a securitized portfolio of mortgage loans, with profit-participation terms ("Profit Participating Security"), as well as two bonds that relate to Additional Tier 1 (AT1) capital instruments.

The basic valuation assumptions of the financial assets are presented in notes 2.4 and 5.2.

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Shares and other variable yield securities** | | |
| Equity securities listed in Athens Stock Exchange | 21,028 | 9,308 |
| Government bonds | 3,405 | 0 |
| Treasury bills | 162,213 | 186,918 |
| Corporate bonds | 63,381 | 39,320 |
| Bank bonds | 3,887 | 0 |
| **Financial assets mandatorily classified at fair value through profit and loss** | | |
| Other bonds | 48,757 | 26,080 |
| **Total** | **302,671** | **261,626** |

The movement of financial assets measured at fair value through profit and loss is analysed as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance at the beginning of the year** | **264,442** | **337,628** |
| Purchases | 1,845,641 | 3,428,027 |
| Sales / maturities / other movements | (1,810,531) | (3,503,724) |
| Fair value adjustments | 5,025 | 2,511 |
| **Balance at the end of year** | **304,577** | **264,442** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance at the beginning of the year** | **261,626** | **336,994** |
| Purchases | 1,844,441 | 3,424,827 |
| Sales / maturities / other movements | (1,808,412) | (3,502,624) |
| Fair value adjustments | 5,016 | 2,429 |
| **Balance at the end of year** | **302,671** | **261,626** |

## 19. Derivative financial instruments

**Group**

| | 31/12/2025 | | |
|---|---|---|---|
| Amounts in Eur '000 | **Notional amount** | **Estimated fair value** | |
| | | **Assets** | **Liabilities** |
| Bond / Stock /Index futures | 37,213 | 0 | 0 |
| Stock /Index options | 701 | 465 | 235 |
| Foreign exchange derivatives | 10,467 | 33 | 14 |
| Commodity derivatives | 108,159 | 360 | 5,226 |
| Interest rate derivatives (IRS- IRCAP) | 42,650 | 279 | 147 |
| **Total derivative financial instruments** | | **1,137** | **5,622** |

| | 31/12/2024 | | |
|---|---|---|---|
| Amounts in Eur '000 | **Nominal value** | **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 |
| **Total derivative financial instruments** | | **2,210** | **5,318** |

**Bank**

| | 31/12/2025 | | |
|---|---|---|---|
| Amounts in Eur '000 | **Notional amount** | **Estimated fair value** | |
| | | **Assets** | **Liabilities** |
| Bond / Stock /Index futures | 37,213 | 0 | 0 |
| Stock /Index options | 701 | 465 | 235 |
| Foreign exchange derivatives | 10,467 | 33 | 14 |
| Commodity derivatives | 108,159 | 360 | 5,226 |
| Interest rate derivatives (IRS- IRCAP) | 42,650 | 279 | 147 |
| **Total derivative financial instruments** | | **1,137** | **5,622** |

| | 31/12/2024 | | |
|---|---|---|---|
| Amounts in Eur '000 | **Nominal value** | **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 |
| **Total derivative financial instruments** | | **2,210** | **5,318** |

## 20. Loans and advances to customers

Loans portfolio is broken down as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Loans and advances to customers measured at amortised cost** | | |
| Consumer, personal & other | 36,537 | 35,013 |
| Mortgages | 177,830 | 132,641 |
| Large Corporate | 2,462,954 | 1,717,713 |
| SMEs | 2,338,212 | 1,772,132 |
| Leasing | 102,484 | 0 |
| | **5,118,017** | **3,657,499** |
| Less: Provisions for impairment of loans and advances to customers | (68,256) | (44,901) |
| **Book value of loans and advances to customers measured at amortised cost after provisions** | **5,049,761** | **3,612,598** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Loans and advances to customers measured at amortised cost** | | |
| Consumer, personal & other | 36,537 | 35,013 |
| Mortgages | 177,830 | 132,641 |
| Large Corporate | 2,547,270 | 1,789,324 |
| SMEs | 2,319,461 | 1,684,007 |
| | **5,081,098** | **3,640,985** |
| Less: Provisions for impairment of loans and advances to customers | (67,676) | (44,385) |
| **Book value of loans and advances to customers measured at amortised cost after provisions** | **5,013,422** | **3,596,600** |

The Bank and the Group did not hold any loans measured at fair value through profit or loss (FVTPL) as at 31 December 2025 and 31 December 2024.

The movement on expected credit losses are broken down as follows:

**Group**

| Amounts in Eur '000 | Note | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| **Balance at the beginning of the year** | | (44,901) | **(27,595)** |
| Provisions for the year | 13 | (23,355) | (17,353) |
| Loans written-off | | 0 | 47 |
| **Balance at the end of year** | | **(68,256)** | **(44,901)** |

**Bank**

| Amounts in Eur '000 | Note | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| **Balance at the beginning of the year** | | **(44,385)** | **(27,460)** |
| Provisions for the year | 13 | (23,292) | (16,972) |
| Loans written-off | | 0 | 47 |
| **Balance at the end of year** | | **(67,676)** | **(44,385)** |

## 21. Financial assets at fair value through other comprehensive income

The investment portfolio includes shares and bonds.

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Fixed income securities** | | |
| Government bonds | 18,732 | 17,432 |
| Corporate bonds | 15,485 | 10,877 |
| Bank bonds | 19,371 | 18,815 |
| **Total fixed income securities** | **53,588** | **47,124** |
| **Variable yield securities** | | |
| Equity securities listed in Athens Stock Exchange | 248 | 260 |
| Non-listed securities | 6 | 6 |
| **Total equity variable yield securities** | **254** | **266** |
| **Total** | **53,842** | **47,390** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Fixed income securities** | | |
| Government bonds | 18,732 | 17,432 |
| Corporate bonds | 15,485 | 10,877 |
| Bank bonds | 19,371 | 18,815 |
| **Total fixed income securities** | **53,588** | **47,124** |
| **Variable yield securities** | | |
| Equity securities listed in Athens Stock Exchange | 248 | 260 |
| Non-listed securities | 6 | 6 |
| **Total equity variable yield securities** | **254** | **266** |
| **Total** | **53,842** | **47,390** |

All debt securities measured at fair value through other comprehensive income are classified as 'Stage 1'. The Bank has classified as financial assets measured at fair value through other comprehensive income equity instruments that represent strategic and operational investments held on a long-term basis.

The movement in the portfolio of securities measured at fair value through other comprehensive income is as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance at the beginning of the year** | **47,390** | **86,488** |
| Purchases | 128,065 | 189,178 |
| Sales / maturities / other movements | (121,869) | (230,186) |
| Fair value adjustments | 256 | 1,910 |
| **Balance at the end of year** | **53,842** | **47,390** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance at the beginning of the year** | **47,390** | **86,488** |
| Purchases | 128,065 | 189,178 |
| Sales / maturities / other movements | (121,869) | (230,186) |
| Fair value adjustments | 256 | 1,910 |
| **Balance at the end of year** | **53,842** | **47,390** |

The movement in the impairment provision of the securities portfolio measured at fair value through other comprehensive income for the period 1/1/2024 – 31/12/2025 is as follows:

**Group**

| Amounts in Eur '000 | |
|---|---|
| **Balance as at 1st January 2024** | **(81)** |
| Government bonds | 13 |
| Corporate bonds | (15) |
| Bank bonds | 21 |
| **Impairment provisions 1/1/2024 - 31/12/2024** | **19** |
| | |
| **Balance as at 1st January 2025** | **(62)** |
| Government Bonds | (11) |
| Corporate bonds | (19) |
| Bank bonds | 4 |
| **Impairment provisions 1/1/2025 - 31/12/2025** | **(26)** |
| | |
| **Balance as at 31st December 2025** | **(88)** |

**Bank**

| Amounts in Eur '000 | |
|---|---|
| **Balance as at 1st January 2024** | **(81)** |
| Government bonds | 13 |
| Corporate bonds | (15) |
| Bank bonds | 21 |
| **Impairment provisions 1/1/2024 - 31/12/2024** | **19** |
| | |
| **Balance as at 1st January 2025** | **(62)** |
| Government Bonds | (11) |
| Corporate bonds | (19) |
| Bank bonds | 4 |
| **Impairment provisions 1/1/2025 - 31/12/2025** | **(26)** |
| | |
| **Balance as at 31st December 2025** | **(88)** |

## 22. Debt securities at amortised cost

The debt securities at amortised cost are analysed as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Debt securities at amortised cost** | | |
| Government Bonds | 361,597 | 161,834 |
| Treasury bills | 283,042 | 0 |
| Corporate bonds | 144,002 | 102,371 |
| Bank bonds | 187,551 | 150,442 |
| Expected credit losses | (1,202) | (803) |
| **Total** | **974,990** | **413,844** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Debt securities at amortised cost** | | |
| Greek Government Bonds | 361,597 | 161,834 |
| Treasury bills | 283,042 | 0 |
| Corporate bonds | 144,002 | 102,371 |
| Bank bonds | 187,551 | 150,442 |
| Expected credit losses | (1,202) | (803) |
| **Total** | **974,990** | **413,844** |

The increase in the Bank's total assets also led to a further rise in placements in debt securities measured at amortised cost. This increase mainly resulted from placements in treasury bills and government bonds.

All securities measured at amortised cost are classified in "Stage 1".

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 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance at the beginning of the year** | **413,844** | **251,388** |
| Purchases | 653,707 | 200,552 |
| Sales / maturities / other movements | (92,162) | (37,673) |
| Expected credit losses | (399) | (423) |
| **Balance at the end of year** | **974,990** | **413,844** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance at the beginning of the year** | **413,844** | **251,388** |
| Purchases | 653,707 | 200,552 |
| Sales / maturities / other movements | (92,162) | (37,673) |
| Expected credit losses | (399) | (423) |
| **Balance at the end of year** | **974,990** | **413,844** |

The movement of portfolio impairment provisions at amortised cost, for the years 1/1/2024-31/12/2025 is as follows:

**Group**

| Amounts in Eur '000 | |
|---|---|
| **Balance 1st January 2024** | **(380)** |
| Government Bonds | (112) |
| Corporate bonds | (281) |
| Bank bonds | (30) |
| **Expected credit losses 1/1/2024 - 31/12/2024** | **(423)** |
| | |
| **Balance 1st January 2025** | **(803)** |
| Government Bonds | (101) |
| Corporate bonds | (331) |
| Bank bonds | 33 |
| **Expected credit losses 1/1/2025 - 31/12/2025** | **(399)** |
| | |
| **Balance 31st December 2025** | **(1,202)** |

**Bank**

| Amounts in Eur '000 | |
|---|---|
| **Balance 1st January 2024** | **(380)** |
| Government Bonds | (112) |
| Corporate bonds | (281) |
| Bank bonds | (30) |
| **Expected credit losses 1/1/2024 - 31/12/2024** | **(423)** |
| | |
| **Balance 1st January 2025** | **(803)** |
| Government Bonds | (101) |
| Corporate bonds | (331) |
| Bank bonds | 33 |
| **Expected credit losses 1/1/2025 - 31/12/2025** | **(399)** |
| | |
| **Balance 31st December 2025** | **(1,202)** |

## 23. Investments in subsidiaries and associates

| **Subsidiaries** | | | | **31/12/2025** | | **31/12/2024** | |
|---|---|---|---|---|---|---|---|
| **Corporate Name** | **Country** | **Business activity** | **Tax-unaudited years** | **% Direct investment** | **% Indirect investment** | **% Direct investment** | **% Indirect investment** |
| IBG CAPITAL S.A. | Greece | Capital & Holdings Company | 2020-2025 | 100,00% | 0,00% | 100,00% | 0,00% |
| IBG INVESTMENTS S.A. | British Virgin Islands | Investment Company | 2020-2025 | 0,00% | 0,00% | 79,04% | 20,96% |
| OPTIMA FACTORS S.A. | Greece | Factoring Company | 2020-2025 | 100,00% | 0,00% | 100,00% | 0,00% |
| OPTIMA ASSET MANAGEMENT A.E.D.A.K. | Greece | Asset Management Company | 2020-2025 | 99,44% | 0,00% | 99,44% | 0,00% |
| OPTIMA LEASING S.A. | Greece | Leasing Company | 2024-2025 | 100,00% | 0,00% | 100,00% | 0,00% |

| Associates | | | | 31/12/2025 | 31/12/2024 |
|---|---|---|---|---|---|
| **Corporate Name** | **Country** | **Business activity** | **Tax-unaudited years** | **% Investment** | **% Investment** |
| NOTOS COM HOLDINGS S.A. | Greece | Commercial representative, exclusive import and trading of cosmetics, personal care products, clothing, footwear and stationery | 2020-2025 | 25,00% | 25,00% |

**Financial data 31/12/2025**

| Amounts in Eur '000 | Assets | Liabilities | Revenues | Profit / (loss) before tax |
|---|---|---|---|---|
| IBG CAPITAL S.A. | 1,363 | 52 | 206 | 193 |
| OPTIMA FACTORS S.A. | 240,045 | 218,370 | 13,443 | 4,745 |
| OPTIMA ASSET MANAGEMENT A.E.D.A.K. | 6,985 | 2,236 | 6,402 | 2,597 |
| OPTIMA LEASING S.A. | 102,711 | 87,437 | 3,069 | 654 |
| | **351,104** | **308,095** | **23,120** | **8,189** |

**Financial data 31/12/2024**

| Amounts in Eur '000 | Assets | Liabilities | Revenues | Profit / (loss) 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) |
| | **188,876** | **148,121** | **16,438** | **4,466** |

The above tables present the shareholding percentages and the financial data of the subsidiaries held by the Bank. On 27 June 2025, the liquidation process of IBG INVESTMENTS S.A., a subsidiary of the Bank domiciled in the British Virgin Islands, was completed and the company was removed from the relevant companies' register. At Group level, the result from the liquidation amounted to EUR 979 thousand and is included in the line item 'Other operating income'.

The movement in the item "Investments in subsidiaries and associates" of the Group and the Bank is broken down as follows:

**<u>Group - Investments in associates</u>**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance as at 1 January 2025** | **609** | **260** |
| - Share of profit/(loss) of associates | (598) | 349 |
| **Balance as at 31 December 2025** | **11** | **609** |

**<u>Bank- Investments in subsidiaries and associates</u>**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance as at 1 January 2025** | **23,972** | **9,134** |
| - New investments | 0 | 15,000 |
| - Share of profit/(loss) of associates | 0 | (162) |
| Divestment from subsidiary | (984) | 0 |
| **Balance as at 31 December 2025** | **22,988** | **23,972** |

The cost of investment in the Bank's subsidiaries is broken down as follows:

| Amounts in Eur '000<br>**Subsidiaries** | **Investment amount 31/12/2025** | **Investment amount 31/12/2024** |
|---|---|---|
| IBG CAPITAL S.A. | 778 | 778 |
| IBG INVESTMENTS S.A. | 0 | 984 |
| OPTIMA FACTORS | 6,307 | 6,307 |
| OPTIMA ASSET MANAGEMENT AEDAK | 892 | 892 |
| OPTIMA LEASING S.A. | 15,000 | 15,000 |
| **Total investments in subsidiaries** | **22,977** | **23,961** |

| Amounts in Eur '000<br>**Associated Companies** | **Investment amount 31/12/2025** | **Investment amount 31/12/2024** |
|---|---|---|
| NOTOS COM HOLDINGS S.A. | 11 | 11 |
| **Total investments in associates** | **11** | **11** |

## 24. Property, plant and equipment

The changes in tangible fixed assets during the years 2025 and 2024 are as follows:

**Group**

| Amounts in Eur '000 | **Land and buildings** | **Vehicles & machinery** | **Furniture and other equipment** | **Total** |
|---|---|---|---|---|
| Acquisition cost on 1 January 2025 | 13,774 | 3,711 | 4,375 | 21,860 |
| Accumulated depreciation on 1 January 2025 | (6,038) | (2,723) | (2,382) | (11,143) |
| **Carrying amount at 1 January 2025** | **7,736** | **988** | **1,993** | **10,717** |
| Additions | 1,335 | 183 | 357 | 1,875 |
| Disposals/write-offs | (21) | (21) | 0 | (42) |
| Depreciation for the year | (1,408) | (310) | (345) | (2,063) |
| Acquisition cost at 31 December 2025 | 15,088 | 3,873 | 4,732 | 23,693 |
| Accumulated depreciation at 31 December 2025 | (7,446) | (3,033) | (2,727) | (13,206) |
| **Carrying amount at 31 December 2025** | **7,642** | **840** | **2,005** | **10,487** |

| Amounts in Eur '000 | **Land and buildings** | **Vehicles & machinery** | **Furniture and other 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) |
| **Carrying amount at 1 January 2024** | **8,000** | **903** | **2,000** | **10,903** |
| 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) |
| **Carrying amount at 31 December 2024** | **7,736** | **988** | **1,993** | **10,717** |

**Bank**

| Amounts in Eur '000 | Land and buildings | Vehicles & machinery | Furniture and other equipment | Total |
|---|---|---|---|---|
| Acquisition cost on 1 January 2025 | 13,621 | 3,710 | 4,246 | 21,577 |
| Accumulated depreciation on 1 January 2025 | (5,976) | (2,723) | (2,290) | (10,989) |
| **Carrying amount at 1 January 2025** | **7,645** | **987** | **1,956** | **10,588** |
| Additions | 1,384 | 183 | 349 | 1,916 |
| Disposals/write-offs | (21) | (21) | 0 | (42) |
| Depreciation for the year | (1,398) | (310) | (331) | (2,039) |
| Acquisition cost at 31 December 2025 | 14,984 | 3,872 | 4,595 | 23,451 |
| Accumulated depreciation at 31 December 2025 | (7,374) | (3,033) | (2,621) | (13,028) |
| **Carrying amount at 31 December 2025** | **7,610** | **839** | **1,974** | **10,423** |

| 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) |
| **Carrying amount at 1 January 2024** | **7,879** | **903** | **1,956** | **10,738** |
| 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) |
| **Carrying amount at 31 December 2024** | **7,645** | **987** | **1,956** | **10,588** |

## 25. Intangible assets

The movement of the intangible assets the years 2025 and 2024 are as follows:

**Group**

| Amounts in Eur '000 | Software | Other Intangible | Total |
|---|---|---|---|
| Acquisition cost on 1 January 2025 | 18,572 | 4,055 | 22,627 |
| Accumulated depreciation on 1 January 2025 | (9,998) | (1,233) | (11,231) |
| **Carrying amount at 1 January 2025** | **8,574** | **2,822** | **11,396** |
| Additions | 3,124 | 0 | 3,124 |
| Depreciation for the year | (3,178) | (308) | (3,486) |
| Acquisition cost at 31 December 2025 | 21,696 | 4,055 | 25,751 |
| Accumulated depreciation at 31 December 2025 | (13,176) | (1,541) | (14,717) |
| **Carrying amount at 31 December 2025** | **8,520** | **2,514** | **11,034** |

| 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) |
| **Carrying amount at 1 January 2024** | **7,675** | **3,130** | **10,805** |
| 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) |
| **Carrying amount at 31 December 2024** | **8,574** | **2,822** | **11,396** |

The line item 'Intangible Assets' includes intangible assets attributable to customer relationships and trademarks arising from the acquisitions of the subsidiaries Optima Factors and Optima AEDAK in December 2020.

**Bank**

| Amounts in Eur '000 | Software | Total |
|---|---|---|
| Acquisition cost on 1 January 2025 | 17,380 | 17,380 |
| Accumulated depreciation on 1 January 2025 | (9,187) | (9,187) |
| **Carrying amount at 1 January 2025** | **8,193** | **8,193** |
| Additions | 3,018 | 3,018 |
| Depreciation for the year | (3,077) | (3,077) |
| Acquisition cost at 31 December 2025 | 20,398 | 20,398 |
| Accumulated depreciation at 31 December 2025 | (12,264) | (12,264) |
| **Carrying amount at 31 December 2025** | **8,134** | **8,134** |

| 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) |
| **Carrying amount at 1 January 2024** | **7,421** | **7,421** |
| 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) |
| **Carrying amount at 31 December 2024** | **8,193** | **8,193** |

## 26. Right of use assets and Lease liabilities

**Group**

(i) Amounts recognised in statement of financial position

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Rights of use assets** | | |
| Buildings | 16,560 | 18,288 |
| Vehicles | 1,448 | 1,307 |
| **Balance at the end of year** | **18,008** | **19,595** |
| | | |
| **Lease liabilities** | | |
| Short-term liabilities | 3,701 | 3,265 |
| Long-term liabilities | 16,258 | 17,955 |
| **Balance at the end of year** | **19,959** | **21,220** |

(ii) Amounts recognised in statement of profit or loss

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| **Depreciation of rights-of-use on assets** | | |
| Buildings | 3,195 | 2,817 |
| Vehicles | 541 | 431 |
| **Total** | **3,736** | **3,248** |
| | | |
| Interest expense | 785 | 732 |

| Amounts in Eur '000 | Buildings | Vehicles | Total |
|---|---|---|---|
| Acquisition cost on 1 January 2025 | 29,759 | 1,987 | 31,746 |
| Accumulated depreciation on 1 January 2025 | (11,470) | (681) | (12,151) |
| **Carrying amount at 1 January 2025** | **18,289** | **1,306** | **19,595** |
| Additions | 1,729 | 731 | 2,460 |
| Disposals/write-offs | (472) | (350) | (822) |
| Depreciation for the year | (3,195) | (541) | (3,736) |
| Depreciation of disposals/write offs | 209 | 302 | 511 |
| Acquisition cost at 31 December 2025 | 31,016 | 2,368 | 33,384 |
| Accumulated depreciation at 31 December 2025 | (14,456) | (920) | (15,376) |
| **Carrying amount at 31 December 2025** | **16,560** | **1,448** | **18,008** |

| 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) |
| **Carrying amount at 1 January 2024** | **18,546** | **962** | **19,508** |
| 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) |
| **Carrying amount at 31 December 2024** | **18,289** | **1,306** | **19,595** |

## Bank

(i) Amounts recognised in statement of financial position

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Rights of use assets** | | |
| Buildings | 16,560 | 18,289 |
| Vehicles | 1,421 | 1,272 |
| **Balance at the end of year** | **17,981** | **19,561** |
| | | |
| **Lease liabilities** | | |
| Short-term liabilities | 3,693 | 3,258 |
| Long-term liabilities | 16,240 | 17,930 |
| **Balance at the end of year** | **19,933** | **21,188** |

**(ii)** Amounts recognised in statement of profit or loss

| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2024 - 31/12/2024 |
|---|---|---|
| **Depreciation of rights-of-use on assets** | | |
| Buildings | 3,195 | 2,817 |
| Vehicles | 521 | 414 |
| **Total** | **3,716** | **3,231** |
| | | |
| Interest expense | 783 | 730 |

| Amounts in Eur '000 | Buildings | Vehicles | Total |
|---|---|---|---|
| Acquisition cost on 1 January 2025 | 29,759 | 1,922 | 31,681 |
| Accumulated depreciation on 1 January 2025 | (11,470) | (650) | (12,120) |
| **Carrying amount at 1 January 2025** | **18,289** | **1,272** | **19,561** |
| Additions | 1,729 | 718 | 2,447 |
| Disposals/write-offs | (472) | (350) | (822) |
| Depreciation for the year | (3,195) | (521) | (3,716) |
| Depreciation of disposals/write offs | 209 | 302 | 511 |
| Acquisition cost at 31 December 2025 | 31,016 | 2,290 | 33,306 |
| Accumulated depreciation at 31 December 2025 | (14,456) | (869) | (15,325) |
| **Carrying amount at 31 December 2025** | **16,560** | **1,421** | **17,981** |

| 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) |
| **Carrying amount at 1 January 2024** | **18,546** | **932** | **19,478** |
| 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) |
| **Carrying amount at 31 December 2024** | **18,289** | **1,272** | **19,561** |

## 27. Deferred tax assets

The change in the deferred tax assets by category of temporary differences in the year 2025 is analysed as follows:

**Group**

| Amounts in Eur '000 | Balance as at 1 January 2025 | Credit / (debit) to results | Credit / (debit) to other comprehensive income | Balance as at 31 December 2025 |
|---|---|---|---|---|
| Property, plant & equipment and Intangible assets | 55 | 22 | 0 | 77 |
| Intangible assets from the acquisition of subsidiaries | (620) | 68 | 0 | (552) |
| Provisions for impairment on loans and advances to customers | 9,496 | 4,411 | 0 | 13,907 |
| Other provisions | 1,022 | 147 | 0 | 1,169 |
| Retirement benefit obligations | 227 | 53 | (39) | 241 |
| Financial assets measured at fair value through other comprehensive income | 431 | 0 | (57) | 374 |
| Financial assets measured at fair value through profit and loss | (1,503) | (1,100) | 0 | (2,603) |
| Valuation of carbon emissions | (939) | 952 | 0 | 13 |
| Valuation of derivatives | 713 | 272 | 0 | 985 |
| Leases | 381 | 49 | 0 | 430 |
| Other | 422 | 367 | 0 | 789 |
| **Total** | **9,685** | **5,241** | **(96)** | **14,830** |

| Amounts in Eur '000 | **Balance as at 1st January 2024** | **Credit / (debit) to results** | **Credit / (debit) to other comprehensive income** | **Balance as at 31st December 2024** |
|---|---|---|---|---|
| Property, Plant & Equipment and Intangible assets | 54 | 1 | 0 | 55 |
| Intangible assets from the acquisition of subsidiaries at fair value | (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 at fair value through other comprehensive income | 851 | 0 | (420) | 431 |
| Financial assets 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 |
| **Total** | **8,079** | **1,992** | **(386)** | **9,685** |

**Bank**

| Amounts in Eur '000 | **Balance as at 1 January 2025** | **Credit / (debit) to results** | **Credit / (debit) to other comprehensive income** | **Balance as at 31 December 2025** |
|---|---|---|---|---|
| Property, plant & equipment and Intangible assets | 49 | 22 | 0 | 71 |
| Provisions for impairment on loans and advances to customers | 9,792 | 5,118 | 0 | 14,910 |
| Other provisions | 1,021 | 147 | 0 | 1,168 |
| Retirement benefit obligations | 212 | 50 | (37) | 225 |
| Financial assets measured at fair value through other comprehensive income | 429 | 0 | (56) | 373 |
| Financial assets measured at fair value through profit and loss | (1,477) | (1,103) | 0 | (2,580) |
| Valuation of carbon emissions | (939) | 952 | 0 | 13 |
| Valuation of derivatives | 713 | 272 | 0 | 985 |
| Leases | 381 | 49 | 0 | 430 |
| Other | 421 | 26 | 0 | 447 |
| **Total** | **10,603** | **5,533** | **(93)** | **16,043** |

| Amounts in Eur '000 | Balance as at 1 January 2024 | Credit / (debit) to results | Credit / (debit) to other comprehensive income | Balance as at 31 December 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 |
| **Total** | **8,938** | **2,053** | **(389)** | **10,603** |

## 28. Other assets

The other assets are broken down as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Derivatives and securities margin accounts | 51,674 | 31,279 |
| Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges | 7,460 | 66,683 |
| Guarantee fund | 7,914 | 7,404 |
| Auxiliary fund | 7,307 | 3,606 |
| Energy Stock Exchange | 1,250 | 1,250 |
| Debtors | 4,704 | 2,610 |
| Guarantees | 1,701 | 1,796 |
| Carbon emissions inventory | 5,754 | 38,348 |
| Advances and other receivables accounts | 16,397 | 15,395 |
| Prepaid expenses and accrued revenue | 2,324 | 2,006 |
| Other receivables from the Greek State | 55 | 84 |
| Due from brokerage companies | 8,454 | 9,147 |
| | **114,994** | **179,608** |
| Less: Impairment Provisions | (102) | (102) |
| **Total** | **114,892** | **179,506** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Derivatives and securities margin accounts | 51,674 | 31,279 |
| Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges | 7,460 | 66,683 |
| Guarantee fund | 7,664 | 7,154 |
| Auxiliary fund | 7,307 | 3,606 |
| Energy Stock Exchange | 1,250 | 1,250 |
| Debtors | 5,500 | 3,479 |
| Guarantees | 1,701 | 1,796 |
| Carbon emissions inventory | 5,754 | 38,348 |
| Advances and other receivables accounts | 14,703 | 15,137 |
| Prepaid expenses and accrued revenue | 2,282 | 1,948 |
| Other receivables from the Greek State | 45 | 79 |
| Due from brokerage companies | 8,454 | 9,147 |
| | **113,794** | **179,906** |
| Less: Impairment Provisions | (102) | (102) |
| **Total** | **113,692** | **179,804** |

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 and to the reduction in the "Carbon emissions inventory" held by the Bank as at 31 December 2025.

## 29. Due to banks

The due to other credit institutions are broken down as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Due to banks - sight deposits | 551 | 421 |
| Due to banks - time deposits | 80,675 | 71,035 |
| Listed derivatives margin account | 0 | 850 |
| Repos | 200,115 | 43,257 |
| **Total** | **281,341** | **115,563** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Due to banks - sight deposits | 551 | 421 |
| Due to banks - time deposits | 80,675 | 71,035 |
| Listed derivatives margin account | 0 | 850 |
| Repos | 200,115 | 43,257 |
| **Total** | **281,341** | **115,563** |

The line item 'Repos' comprises the balances arising from transactions involving the transfer of government bonds to credit institutions under agreements to repurchase them (repo transactions) for the purpose of liquidity generation.

The fair value of the 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 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Sight deposits | 2,269,855 | 1,617,438 |
| Savings accounts | 2,149 | 1,494 |
| Time deposits | 3,590,223 | 2,701,079 |
| Blocked deposits | 305,625 | 218,071 |
| Other deposits | 113,410 | 83,261 |
| Cheques payable | 17,318 | 22,069 |
| **Total** | **6,298,580** | **4,643,412** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Sight deposits | 2,272,710 | 1,623,090 |
| Savings accounts | 2,149 | 1,494 |
| Time deposits | 3,591,222 | 2,706,079 |
| Blocked deposits | 305,625 | 218,071 |
| Other deposits | 113,410 | 83,261 |
| Cheques payable | 17,318 | 22,069 |
| **Total** | **6,302,434** | **4,654,064** |

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

The amounts recorded in the statement of financial position are the following:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance sheet liabilities for:** | | |
| Lump-sum payments upon retirement | | |
| - Non funded | 1,092 | 1,027 |
| | **1,092** | **1,027** |

The amounts recorded in the income statement are the following:

| Amounts in Eur '000 | Note | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| Current service cost | | 218 | 160 |
| Finance cost | | 28 | 24 |
| Settlement cost | | 36 | 0 |
| **Total included in employee benefits** | **11** | **282** | **184** |

The movement in the liability recognised in the statement of financial position is as follows:

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Net obligation recognised in the balance sheet at the beginning of the year** | **1,027** | **692** |
| Expenditure to be recorded in the income statement | 282 | 184 |
| Employer contributions paid | (39) | 0 |
| Amount recorded in other comprehensive income | (178) | 152 |
| **Net obligation recognised in the balance sheet at the end of the year** | **1,092** | **1,027** |

The amount recorded in other comprehensive income is as follows:

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Amount recognised in other comprehensive income** | **(178)** | **152** |
| **Actuarial (gain) / loss on obligation due to:** | | |
| - financial assumptions | (22) | 43 |
| - demographic assumptions | 0 | 3 |
| - experience | (156) | 106 |

**Bank**

The amounts recorded on the statement of financial position are the following:

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Balance sheet liabilities for:** | | |
| Lump-sum payments upon retirement | | |
| - Non funded | 1,023 | 964 |
| | **1,023** | **964** |

The amounts recorded in the income statement are the following:

| Amounts in Eur '000 | Note | 31/12/2025 | 31/12/2024 |
|---|---|---|---|
| Current service cost | | 203 | 151 |
| Finance cost | | 27 | 22 |
| Settlement cost | | 36 | 0 |
| **Total included in employee benefits** | **11** | **266** | **173** |

The movement in the liability recognised in the statement of financial position is as follows:

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Net obligation recognised in the balance sheet at the beginning of the year** | **964** | **650** |
| Expenditure to be recorded in the income statement | 266 | 173 |
| Employer contributions paid | (40) | 0 |
| Amount recorded in other comprehensive income | (167) | 141 |
| **Net obligation recognised in the balance sheet at the end of the year** | **1,023** | **964** |

The amount recorded in other comprehensive income is as follows:

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| **Amount recognised in other comprehensive income** | **(167)** | **141** |
| Actuarial (gain) / loss on obligation due to: | | |
| - financial assumptions | (21) | 41 |
| - demographic assumptions | 0 | 2 |
| - experience | (146) | 98 |

The main actuarial assumptions used for accounting purposes are as follows:

| | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Discount rate | 3.09% | 2.76% |
| Future salary increases | 2.10% | 2.10% |
| Inflation | 2.00% | 2.00% |

**Sensitivity analysis**

The sensitivity analysis of the defined employee retirement benefit liability is as follows:

| | OPTIMA BANK | | OPTIMA FACTORS | | OPTIMA AEDAK | | OPTIMA LEASING | |
|---|---|---|---|---|---|---|---|---|
| | **Increase** | **Decrease** | **Increase** | **Decrease** | **Increase** | **Decrease** | **Increase** | **Decrease** |
| Discount rate (change in assumption by 0.5%) | -3% | 3% | -5% | 5% | -2% | 2% | -5% | 6% |
| Salary increase (change in assumption by 0.5%) | 3% | -3% | 5% | -5% | 1% | -2% | 6% | -5% |

## 32. Debt securities in issue and other borrowed funds

On 25/6/2025, the Bank issued, within the framework of the European Medium Term Note Programme (Euro Medium Term Note), a Tier II Subordinated Bond with a nominal value of Eur 150 million. Its duration is 10.25 years with a fixed interest rate of 5.50% for the first 5.25 years, which in the event of non-call, is adjusted to a 5-year mid SWAP plus 3.251%.

## 33. Other liabilities

Other liabilities are broken down as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges | 10,209 | 90,971 |
| Taxes and duties payables | 3,207 | 2,924 |
| Accrued interest and other deferred revenue | 2,451 | 1,857 |
| Other payables | 28,453 | 27,419 |
| Social security payable | 1,215 | 1,193 |
| Due to brokerage companies | 46 | 4 |
| **Total** | **45,581** | **124,368** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges | 10,209 | 90,971 |
| Taxes and duties payables | 1,991 | 2,396 |
| Accrued interest and other deferred revenue | 2,451 | 1,857 |
| Other payables | 27,360 | 26,559 |
| Social security payable | 1,148 | 1,146 |
| Due to brokerage companies | 46 | 4 |
| **Total** | **43,205** | **122,933** |

The changes in the balances are mainly attributable to the item 'Clearing accounts for securities transactions in Athens Stock Exchange, Greek derivatives market and foreign stock exchanges' which relates to purchases of the Bank's bonds that have not yet been settled.

## 34. Provisions

The provisions are broken down as follows:

**Group**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Provisions for legal cases | 186 | 189 |
| Provisions for unaudited fiscal years | 582 | 331 |
| Provisions of guarantee letters | 3,925 | 3,647 |
| **Total** | **4,693** | **4,167** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Provisions for legal cases | 186 | 188 |
| Provisions for unaudited fiscal years | 572 | 321 |
| Provisions of guarantee letters | 3,925 | 3,648 |
| **Total** | **4,683** | **4,157** |

## 35. Share capital

Share capital as of 31/12/2025 and 31/12/2024 amounts to EUR 254,521 thousand. As of 31/12/2025, the share capital is divided into 221,322,426 common registered voting shares with a nominal value of EUR 1.15 each (73,774,142 common registered voting shares with a nominal value of EUR 3.45 each as of 31/12/2024). The Bank held 248,366 treasury shares as of 31/12/2025.

The Annual General Meeting of the Bank's shareholders on 29 April 2025 resolved to establish a Share Buy-back Programme for the acquisition of up to 2,608,695 common shares of the Bank, corresponding to 1.18% of the share capital, at a price range per share between EUR 1.15 and EUR 8.00, for a period of 24 months from the date of the General Meeting's resolution, i.e. until 28 April 2027, with a maximum total acquisition cost of up to EUR 3,000,000.

In accordance with the authorisations granted by the above Annual General Meeting and following receipt of the necessary approvals from the competent supervisory authorities (Bank of Greece), the Board of Directors, at its meeting of 18.12.2025, determined the specific terms of the Share Buy-back Programme, for the purpose of allocating shares to employees of the Bank and the Group, in line with the Bank's Remuneration Policy for Board Members and the Staff Remuneration Policy.

During the 4th quarter of 2025, purchases of 220,000 treasury shares were made under the Share Buy-back Programme, which will be granted free of charge to executives and/or employees of the Bank and the Group companies

| | Number of Shares | | |
|---|---|---|---|
| | Bank | | Group |
| | No. of ordinary shares | Own shares | Total no. of ordinary shares |
| **Balance as at 1st January 2024** | **73,694,142** | **(23,298)** | **73,670,844** |
| Capitalization of earnings | 80,000 | | 80,000 |
| Purchases of own shares | | (302,174) | (302,174) |
| Sales of own shares | | 316,279 | 316,279 |
| **Balance as at 31st December 2024** | **73,774,142** | **(9,193)** | **73,764,949** |
| | | | |
| **Balance as at 1st January 2025** | **73,774,142** | **(9,193)** | **73,764,949** |
| Share split (1old to 3 new) | 147,548,284 | (18,386) | 147,529,898 |
| Purchases of own shares | 0 | (1,511,998) | (1,511,998) |
| Sales of own shares | 0 | 1,291,211 | 1,291,211 |
| **Balance as at 31st December 2025** | **221,322,426** | **(248,366)** | **221,074,060** |

## 36. Other reserves

The breakdown of other reserves is as follows:

**Group**

| Amounts in Eur '000 | **31/12/2025** | **31/12/2024** |
|---|---|---|
| Statutory reserve | 32,287 | 24,123 |
| Special reserves | 7,183 | 7,183 |
| Actuarial gain/(loss) reserve | 453 | 314 |
| Reserve for stock awards to personnel | 1,092 | 0 |
| **Total** | **41,015** | **31,620** |

**Bank**

| Amounts in Eur '000 | **31/12/2025** | **31/12/2024** |
|---|---|---|
| Statutory reserve | 31,683 | 23,746 |
| Special reserves | 6,483 | 6,483 |
| Actuarial gain/(loss) reserve | 452 | 322 |
| Reserve for stock awards to personnel | 1,092 | 0 |
| **Total** | **39,710** | **30,551** |

**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.

**Reserve for stock awards to personnel:** The reserve was formed based on the value of the shares that will be granted free of charge to executives and/or employees of the Bank as part of their variable remuneration for the work performed in 2025, and their distribution will take place gradually, applying a deferral period with a minimum duration of five years.

## 37. 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 |
|---|---|---|
| **As at 31st December 2025** | | |
| **ASSETS** | | |
| Cash and balances with central bank | 683,840 | 0 |
| Due from banks | 312,052 | 8,973 |
| Financial assets measured at fair value through profit or loss | 255,820 | 48,757 |
| Derivative financial instruments | 1,137 | 0 |
| Loans and advances to customers | 2,091,559 | 2,958,202 |
| Financial assets measured at fair value through other comprehensive income | 28,841 | 25,001 |
| Debt securities at amortised cost | 335,066 | 639,924 |
| Investment in subsidiaries and associates | 0 | 11 |
| Property, plant and equipment | 0 | 10,487 |
| Intangible assets | 0 | 11,034 |
| Right of use assets | 0 | 18,008 |
| Deferred tax assets | 0 | 14,830 |
| Other assets | 46,947 | 67,945 |
| **Total assets** | **3,755,262** | **3,803,172** |
| | | |
| **LIABILITIES** | | |
| Due to banks | 281,341 | 0 |
| Due to customers | 6,044,690 | 253,890 |
| Derivative financial instruments | 5,622 | 0 |
| Debt securities in issue and other borrowed funds | 2,193 | 148,583 |
| Lease liabilities | 3,701 | 16,258 |
| Retirement benefit obligations | 0 | 1,092 |
| Income tax liability | 3,634 | 0 |
| Other liabilities | 45,581 | 0 |
| Provisions | 0 | 4,693 |
| **Total liabilities** | **6,386,762** | **424,515** |

| Amounts in Eur '000 | Within 1 year | After 1 year |
|---|---|---|
| **As at 31st December 2024** | | |
| **ASSETS** | | |
| 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 |
| **Total assets** | **2,955,178** | **2,585,769** |
| | | |
| **LIABILITIES** | | |
| 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 |
| **Total liabilities** | **4,893,693** | **26,955** |

## Bank

| Amounts in Eur '000 | Within 1 year | After 1 year |
|---|---|---|
| **As at 31st December 2025** | | |
| **ASSETS** | | |
| Cash and balances with central bank | 683,840 | 0 |
| Due from banks | 308,628 | 8,973 |
| Financial assets measured at fair value through profit or loss | 253,914 | 48,757 |
| Derivative financial instruments | 1,137 | 0 |
| Loans and advances to customers | 1,862,730 | 3,150,692 |
| Financial assets measured at fair value through other comprehensive income | 28,841 | 25,001 |
| Debt securities at amortised cost | 335,066 | 639,924 |
| Investment in subsidiaries and associates | 0 | 22,988 |
| Property, plant and equipment | 0 | 10,423 |
| Intangible assets | 0 | 8,134 |
| Right of use assets | 0 | 17,981 |
| Deferred tax assets | 0 | 16,043 |
| Other assets | 45,997 | 67,695 |
| **Total assets** | **3,520,153** | **4,016,611** |
| | | |
| **LIABILITIES** | | |
| Due to banks | 281,341 | 0 |
| Due to customers | 6,066,470 | 235,964 |
| Derivative financial instruments | 5,622 | 0 |
| Debt securities in issue and other borrowed funds | 2,193 | 148,583 |
| Lease liabilities | 3,693 | 16,240 |
| Retirement benefit obligations | 0 | 1,023 |
| Income tax liability | 2,647 | 0 |
| Other liabilities | 43,205 | 0 |
| Provisions | 0 | 4,683 |
| **Total liabilities** | **6,405,171** | **406,493** |

| Amounts in Eur '000 | Within 1 year | After 1 year |
|---|---|---|
| **As at 31st December 2024** | | |
| **ASSETS** | | |
| 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 |
| **Total assets** | **2,807,896** | **2,724,297** |
| **LIABILITIES** | | |
| 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 |
| **Total liabilities** | **4,902,291** | **26,857** |

## 38. Share based payments

During the period ended 31/12/2025, no new shares were alloted. In the 2024 financial year, free shares with a total value of €968 thousand were granted, based on the resolution of the Annual General Meeting of Shareholders dated 23/5/2024.

## 39. 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 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Letters of guarantee issued | 1,279,678 | 855,132 |
| **Total** | **1,279,678** | **855,132** |

**Bank**

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Letters of guarantee issued | 1,279,678 | 855,132 |
| **Total** | **1,279,678** | **855,132** |

In addition to the above, on December 31, 2025 the credit commitments include approved loan agreements and credit limits of EUR 1,560,212 thousand for the Group (December 31, 2024: EUR 1,317,046 thousand) and EUR 1,380,402 thousands for the Bank (December 31, 2024: EUR 1,158,890 thousand)

Approved undisbursed loan agreements and approved lines of credit 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**

For the fiscal years 2011 to 2016, the Greek entities of the Group were subject to mandatory tax audits conducted by statutory auditors, in accordance with Law 4174/2013 (Article 65A, as currently in force, and previously under Article 82 of Law 2238/1994). As of the fiscal year 2016, the issuance of the Tax Certificate became optional. Nevertheless, management has opted to continue this practice for the company and its domestic subsidiaries, aiming to ensure a high level of tax compliance.

The Bank has been audited by independent auditors (Deloitte S.A.) for the fiscal years 2017 through 2024, with the corresponding Tax Certificate issued without qualifications or findings. The tax audit for the fiscal year 2025 is currently in progress and is not expected to have a material impact on the Consolidated Financial Statements.

In accordance with the new Tax Procedure Code (Law 5104/2024), the Tax Administration retains the right to conduct audits within the statutory limitation periods. As of December 31, 2025, the State's right to issue corrective tax assessment acts has lapsed for fiscal years up to and including 2019. For subsequent fiscal years, even in cases where an unqualified Tax Certificate has been issued, the competent authorities retain the right to perform regular tax audits, pursuant to POL.1006/2016.

Information regarding the unaudited tax years of the Bank's subsidiaries is disclosed in Note 23.

**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, 2025, except for the cases for which a relevant provision has already been formed.

**d) Asset commitments**

Due from banks:

- Placements of EUR 30,169 thousand relate to derivative instruments transaction guarantees as of 31/12/2025 (EUR 25,622 thousand as of 31/12/2024).
- Amount of a book value of EUR 6,414 thousand (EUR 3,485 thousand on 31/12/2024) 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:

- For liquidity-raising purposes through interbank repurchase (repo) transactions, securities with a total value of EUR 209,378 thousand have been pledged (31/12/2024: EUR 48,542 thousand).
- As of 31/12/2024, the amount of EUR 3,326 thousand relates to securities lending to partner banking institutions as part of the Bank's asset utilization strategy, generating interest income. As of 31/12/2025, there were no securities on loan.

Loans and advances to customers:

An amount with a nominal value of EUR 44,438 thousand corresponds to a portfolio of loan claims against corporate customers (pool of credit claims) as of 31/12/2024, which is eligible with the Bank of Greece as collateral for the Eurosystem's monetary policy operations. The above amount is subject to a 60% haircut and is therefore reduced to EUR 17,775 thousand, which represents the maximum potential funding the Bank may obtain from the Eurosystem against the portfolio of loan claims. As of 31/12/2025, the Bank had not utilized this specific collateral for liquidity-raising purposes.

## 40. 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.

### 40.1. Transactions with subsidiaries and associates of Optima Bank

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **a) Accounts Receivable** | | |
| **Receivables from subsidiaries** | **31/12/2025** | **31/12/2025** |
| Loans and advances to customers | 0 | 292,580 |
| Other receivables | 0 | 796 |
| **Total** | **0** | **293,376** |

| **Receivables from associates** | **31/12/2025** | **31/12/2025** |
|---|---|---|
| Loans net of provisions | 14,991 | 8,764 |
| **Total** | **14,991** | **8,764** |

Loans net of provisions include an impairment provision of EUR 77 thousand for loans to subsidiaries (EUR 39 thousand 31/12/2024).

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **b) Accounts payable** | | |
| **Payables to subsidiaries** | **31/12/2025** | **31/12/2025** |
| Due to customers | 0 | 14,205 |
| Other liabilities | 0 | 22 |
| **Total** | **0** | **14,227** |

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **c) Income** | | |
| **Income from subsidiaries** | **1/1/2025-31/12/2025** | **1/1/2025-31/12/2025** |
| Interest and similar income | 0 | 8,451 |
| Fee and commission income | 0 | 2,741 |
| Other income | 0 | 267 |
| **Total** | **0** | **11,459** |

| **Income from associates** | **1/1/2025-31/12/2025** | **1/1/2025-31/12/2025** |
|---|---|---|
| Interest and similar income | 1,037 | 779 |
| Fee and commission income | 229 | 56 |
| **Total** | **1,266** | **835** |

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **d) Expenses** | | |
| **Expenses from subsidiaries** | **1/1/2025-31/12/2025** | **1/1/2025-31/12/2025** |
| Interest expense and similar charges | 0 | (39) |
| **Total** | **0** | **(39)** |

| **Expenses from associates** | **1/1/2025-31/12/2025** | **1/1/2025-31/12/2025** |
|---|---|---|
| Fee and commission expenses | (1) | (1) |
| **Total** | **(1)** | **(1)** |

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **a) Accounts Receivable** | | |
| **Receivables from subsidiaries** | **31/12/2024** | **31/12/2024** |
| Loans and advances to customers | 0 | 136,877 |
| Other receivables | 0 | 869 |
| **Total** | **0** | **137,746** |

| **Receivables from associates** | **31/12/2024** | **31/12/2024** |
|---|---|---|
| Loans and advances to customers | 16,343 | 10,502 |
| **Total** | **16,343** | **10,502** |

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **b) Accounts payable** | | |
| **Payables to subsidiaries** | **31/12/2024** | **31/12/2024** |
| Due to customers | 0 | 17,575 |
| Other payable | 0 | 153 |
| **Total** | **0** | **17,728** |

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **c) Income** | | |
| **Income from subsidiaries** | **1/1/2024-31/12/2024** | **1/1/2024-31/12/2024** |
| Interest and similar income | 0 | 7,242 |
| Fee and commission income | 0 | 1,362 |
| Other income | 0 | 196 |
| **Total** | **0** | **8,800** |

| **Income from associates** | **1/1/2024-31/12/2024** | **1/1/2024-31/12/2024** |
|---|---|---|
| Interest and similar income | 935 | 761 |
| Fee and commission income | 173 | 51 |
| **Total** | **1,108** | **812** |

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **d) Expenses** | | |
| **Expenses from subsidiaries** | **1/1/2024-31/12/2024** | **1/1/2024-31/12/2024** |
| Interest expense and similar charges | 0 | (24) |
| **Total** | **0** | **(24)** |

| **Expenses from associates** | **1/1/2024-31/12/2024** | **1/1/2024-31/12/2024** |
|---|---|---|
| Fee and commission expenses | (1) | (1) |
| **Total** | **(1)** | **(1)** |

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).

### 40.2. Transactions with key management personnel, members of the Board of Directors, and related parties

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **a) Accounts receivable** | **31/12/2025** | **31/12/2025** |
| Loans and advances to customers | 2,542 | 2,542 |
| **Total** | **2,542** | **2,542** |
| **b) Accounts payable** | **31/12/2025** | **31/12/2025** |
| Due to customers | 4,356 | 4,356 |
| **Total** | **4,356** | **4,356** |
| **c) Income** | **1/1/2025 - 31/12/2025** | **1/1/2025 - 31/12/2025** |
| Interest and similar income | 48 | 48 |
| Fee and commission income | 14 | 13 |
| Other income | 1 | 1 |
| **Total** | **63** | **62** |

| Amounts in Eur '000 | GROUP | BANK |
|---|---|---|
| **a) Accounts receivable** | **31/12/2024** | **31/12/2024** |
| Loans and advances to customers | 1,848 | 1,848 |
| **Total** | **1,848** | **1,848** |
| **b) Accounts payable** | **31/12/2024** | **31/12/2024** |
| Due to customers | 5,413 | 5,413 |
| **Total** | **5,413** | **5,413** |
| **c) Income** | **1/1/2024 - 31/12/2024** | **1/1/2024 - 31/12/2024** |
| Interest and similar income | 82 | 82 |
| Fee and commission income | 18 | 18 |
| Other income | 1 | 1 |
| **Total** | **101** | **101** |

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).

### 40.3. Remuneration of Management and members of the Board of Directors

| | GROUP | BANK |
|---|---|---|
| Amounts in Eur '000 | 1/1/2025 - 31/12/2025 | 1/1/2025 - 31/12/2025 |
| Salaries, social insurance contributions and other expenses | 4,952 | 4,564 |
| Compensation & other benefits | 159 | 135 |
| **Total** | **5,111** | **4,699** |

| | GROUP | BANK |
|---|---|---|
| Amounts in Eur '000 | 1/1/2024 - 31/12/2024 | 1/1/2024 - 31/12/2024 |
| Salaries, social insurance contributions and other expenses | 4,165 | 3,716 |
| Compensation & other benefits | 150 | 127 |
| Stock awards | 968 | 968 |
| **Total** | **5,283** | **4,811** |

## 41. 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:

| Amounts in Eur '000 | 31/12/2025 | 31/12/2024 |
|---|---|---|
| Statutory Audit | 450 | 332 |
| Tax Certificate | 92 | 87 |
| Non audit services | 130 | 155 |
| **Total** | **672** | **574** |

## 42. Segment Reporting

Bank's management monitors returns from banking, brokerage and treasury & 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 | | | | 1/1/2025 - 31/12/2025 | | | | |
|---|---|---|---|---|---|---|---|---|
| | **Banking** | **Brokerage** | **Treasury** | **Other** | **Total Bank** | **Subsidiaries** | **Eliminations** | **Total Group** |
| **Income from operating activities** | | | | | | | | |
| Net interest income | 162,764 | 2,640 | 45,397 | (5,132) | **205,669** | 4,330 | 38 | **210,037** |
| Net fee and commission income | 41,101 | 13,496 | 0 | 19 | **54,616** | 7,135 | 0 | **61,750** |
| Gains/losses from financial transactions | 0 | 0 | 15,555 | 3,068 | **18,623** | 76 | 0 | **18,699** |
| Other operating income | 0 | 0 | 2,931 | 4,261 | **7,192** | (126) | 0 | **7,067** |
| **Total operating income** | **203,865** | **16,136** | **63,883** | **2,216** | **286,100** | **11,415** | **38** | **297,553** |
| **Other non allocated amounts** | | | | | (87,709) | (3,921) | 0 | **(91,629)** |
| **Profit before tax** | | | | | **198,391** | | | **205,924** |
| **Profit after tax** | | | | | **164,283** | | | **170,060** |
| **Assets 31/12/2025** | 4,980,134 | 125,239 | 2,302,616 | 128,775 | **7,536,764** | 351,104 | (329,433) | **7,558,434** |
| **Liabilities 31/12/2025** | 6,249,149 | 71,128 | 299,753 | 191,634 | **6,811,664** | 308,095 | (308,481) | **6,811,278** |

| Amounts in Eur '000 | | | | 1/1/2024 - 31/12/2024 | | | | |
|---|---|---|---|---|---|---|---|---|
| | **Banking** | **Brokerage** | **Treasury** | **Other** | **Total Bank** | **Subsidiaries** | **Eliminations** | **Total Group** |
| **Income from operating activities** | | | | | | | | |
| Net interest income | 145,727 | 2,738 | 39,275 | (730) | **187,010** | 2,776 | 71 | **189,857** |
| Net fee and commission income | 27,584 | 9,074 | 0 | 34 | **36,692** | 4,640 | 0 | **41,332** |
| Gains/losses from financial transactions | 0 | 0 | 18,126 | 2,043 | **20,169** | 138 | 0 | **20,307** |
| Other operating income | 0 | 0 | 496 | 2,847 | **3,343** | 80 | (196) | **3,227** |
| **Total operating income** | **173,311** | **11,812** | **57,897** | **4,194** | **247,214** | **7,634** | **(125)** | **254,723** |
| **Other non allocated amounts** | | | | | (75,084) | (2,858) | (139) | **(78,081)** |
| **Profit before tax** | | | | | **172,130** | | | **176,640** |
| **Profit after tax** | | | | | **136,712** | | | **140,226** |
| **Assets 31/12/2025** | 3,588,389 | 90,987 | 1,707,272 | 145,545 | **5,532,193** | 186,053 | (177,299) | **5,540,947** |
| **Liabilities 31/12/2025** | 4,609,620 | 50,978 | 212,484 | 56,066 | **4,929,148** | 147,499 | (155,999) | **4,920,648** |

## 43. Irrevocable payment commitments to the Single Resolution Board (SRB)

The Bank does not make use of irrevocable payment commitments to the Single Resolution Fund (SRB). In the fiscal years 2025 and 2024, there was no obligation to pay a contribution.

## 44. Distribution of dividend

Following the decision of the Annual General Meeting of Shareholders dated 29/4/2025, the Bank proceeded to the distribution of gross dividend amounting to EUR 0.57 per share, from the profits of the financial year 2024 for a total amount of EUR 42,051 thousand.

The dividend was paid on 27/6/2025.

## 45. 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 31/12/2025 the turnover amounted to EUR 297,553 thousand (EUR 254,716 thousand on 31/12/2024), profits before tax amounted to EUR 205,924 thousand (EUR 176,640 thousand on 31/12/2024), income tax amounted to EUR 35,864 thousand (EUR 36,414 thousand on 31/12/2024) and the number of employees was 626 (575 employees on 31/12/2024).

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

As of 31/12/2024, the company's turnover amounted to EUR 7 thousand, while the result was a profit of EUR 0.1 thousand. For the fiscal year 2025, the company had no turnover and therefore the financial result was zero.

There is no personnel and no tax liability. The company that operated in the country was the following:

| **Company** | **Activity** |
|---|---|
| IBG INVESTMENTS S.A. | Investment services |

On 27/6/2025, the dissolution process and the deletion from the relevant companies' registry of IBG INVESTMENTS S.A., a subsidiary of the Bank based in the British Virgin Islands, were completed.

It is noted that neither the Bank nor any of the Group's companies have received any amounts relating to public subsidies.

## 46. Disclosures of Law 4151/2013

According to the provisions of Article 8 paragraph 3 of Law 4151/2013, every credit institution operating in Greece is obliged, immediately after the expiry of the twenty-year period, to remit to the Hellenic State, on a consolidated basis by the end of April each year, the balances of dormant deposits, including the corresponding interest. In 2025, the Bank remitted the amount of EUR 1,095.83 for principal and interest of deposits that were written off in favor of the Hellenic State.

**47. Events after the reporting period date**

There are no events subsequent to the financial statements issue.

**Maroussi, March 02, 2026**

| | |
|---|---|
| **The Chairman of the Board of Directors** | **The Chief Executive Officer** |
| **Georgios Taniskidis** | **Dimitrios Kyparissis** |
| **The Head of Finance** | **The Head of Accounting and Tax Services** |
| **Angelos Sapranidis** | **Eleni Peristera** |