

CONSOLIDATED PILLAR 3 REPORT

**FOR THE SIX MONTHS ENDED
30 JUNE 2026**

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Written Attestation

Pursuant to Article 431(3) of Part Eight of CRR, the Group has issued an internal approved by the Board of Directors (BoD) Consolidated Pillar 3 Disclosures Policy" in order to ensure consistent and continuous compliance with the Pillar 3 disclosures requirements, as these have been specified in the existing regulatory framework.

The Pillar 3 governance process ensures that both the Group's Management and the Board are given sufficient opportunity to debate and challenge the disclosures before their publication, hence, to examine that these have been subject to adequate verification, and they comply with applicable regulatory framework.

The information contained in the Pillar 3 Disclosures has been verified by the Audit Committee (AC) and was approved by the BoD on 21 October 2026 prior to their publication on the Group's website.

It should be noted that:

- data refers to the prudential (regulatory) scope of consolidation;
- the amounts reported are consistent with the recent submissions of the regulatory reporting for each period.

We declare that Eurobank's Consolidated Pillar 3 Disclosures for the period ended 30 June 2026, to the best of our knowledge, comply with Part Eight of the CRR, as amended, and the related EBA Guidelines and ITS on disclosures requirements and have been prepared in compliance with the Eurobank's formal policies and internal processes, systems and controls.

Harris Kokologiannis

Group Chief Financial Officer

Ekonomides Lefteris

Group Chief Risk Officer

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Introduction – General Information

1. Introduction – General Information

Following the merger by absorption of “Eurobank Ergasias Services and Holdings S.A.” (Eurobank Holdings) by Eurobank S.A. (Eurobank or the Bank), which was completed on 12 December 2025, Eurobank S.A. became the ultimate parent company of the Group. The Bank along with its subsidiaries (the Group), are active in retail, corporate and private banking, asset management, treasury, capital markets, insurance and other services. The Group operates mainly in Greece, Bulgaria, Cyprus and Luxembourg. The Bank is incorporated in Greece and its shares are listed on the Euronext Athens and the Cyprus Stock Exchange.

Eurobank S.A. is supervised on a standalone and consolidated basis by the European Central Bank (ECB) and the Bank of Greece (BoG).

1.1 Highlights

Risk profile

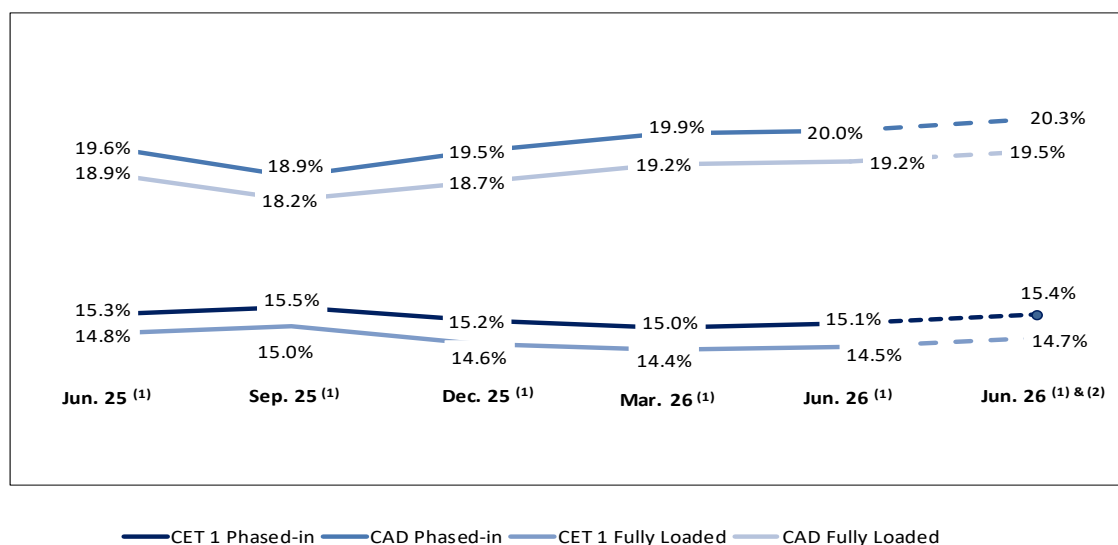
	30 June 2026 ^{(1) & (2)}	30 June 2026 ⁽¹⁾	31 March 2026 ⁽¹⁾	30 June 2025 ⁽¹⁾
	€ million	€ million	€ million	€ million
Available own funds				
Common Equity Tier 1 (CET1) capital	8,321	8,325	8,230	7,932
Tier 1 capital	9,411	9,414	9,319	8,427
Total capital	11,011	11,014	10,933	10,132
Risk-weighted exposure amounts				
Total risk-weighted exposure amount	54,201	55,050	54,849	51,720
Capital ratios				
Common Equity Tier 1 ratio (%)	15.4%	15.1%	15.0%	15.3%
Tier 1 ratio (%)	17.4%	17.1%	17.0%	16.3%
Total capital ratio (%)	20.3%	20.0%	19.9%	19.6%
Leverage ratio				
Leverage ratio	7.9%	7.9%	8.2%	7.9%
Liquidity Ratio				
Liquidity coverage ratio (%)		174.1%	165.3%	194.4%
Net Stable Funding Ratio (%)		142.8%	140.2%	143.5%
Credit Risk and Asset Quality				
Ratio of non-performing exposures (%)		2.5%	2.6%	2.8%
Coverage ratio of non-performing loans and advances (%)		82.4%	94.1%	92.8%

⁽¹⁾ Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities and AGM' approval.

⁽²⁾ Pro-forma with the completion of “Wave VII” securitization.

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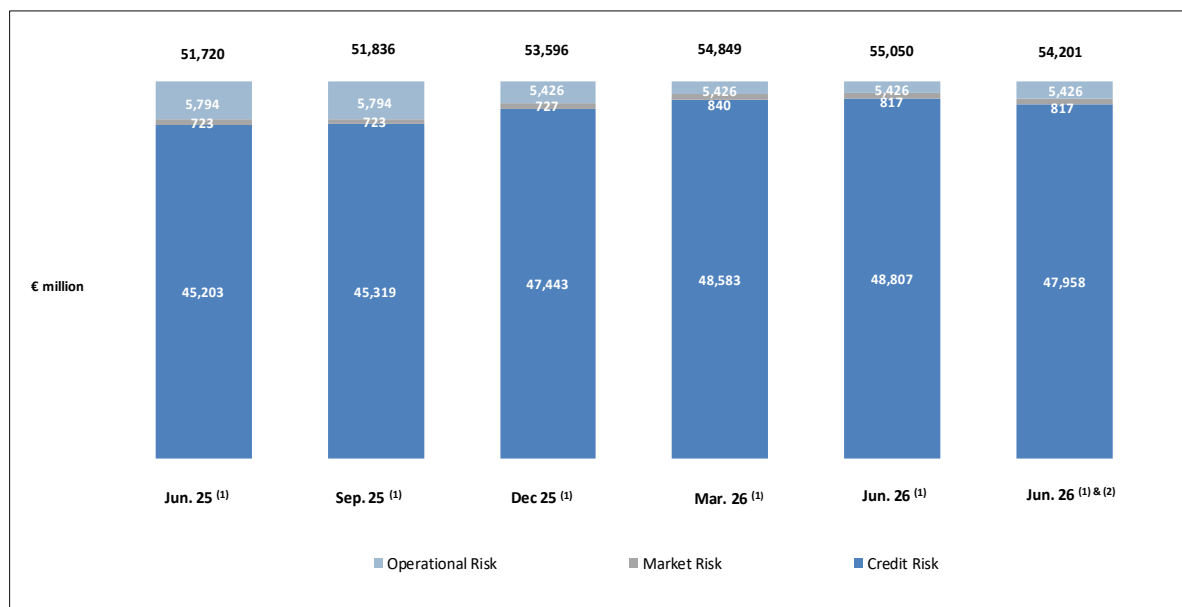
Evolution of Capital Ratios Evolution of Capital Ratios



⁽¹⁾ Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities and AGM' approval.

⁽²⁾ Pro-forma with the completion of "Wave VII" securitization.

Evolution of Risk Weighted Exposure Amount



⁽¹⁾ Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities and AGM' approval.

⁽²⁾ Pro-forma with the completion of "Wave VII" securitization.

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1.2 Non-Performing exposures (NPE)

As at 30 June 2026 the Group's NPE stock amounted to € 1,442 million (31 March 2026: € 1,470 million). The Group NPE ratio amounted to 2.5% (31 March 2026: 2.6%) while the NPE coverage ratio stood at 82.4% (31 March 2026 94.1%).

In the second quarter of 2026, the Bank enhanced its Unlikely-to-Pay (UtP) framework, resulting in the reclassification of a gross amount of approximately € 330 million of retail loans from performing to non-performing status, primarily from Stage 2 to Stage 3. In line with the Group's NPE deleveraging strategy, approximately €200 million of these exposures were subsequently included in the Project Moon II perimeter and classified as held for sale as at 30 June 2026.

For further details, please refer to Interim Consolidated Financial Statements, Note 17.

1.3 Project Sun (ex-“Solar”)

In the context of its NPE management strategy, the Group had initiated in 2025, its plan to recover the carrying amount of an NPE loan portfolio (ex-project “Solar”) through its disposal. The negotiations with potential investors were concluded in December 2025 for consideration of ca. € 23 million, which was adjusted to reflect the collections received on the underlying loans from the transaction's reference date. In April 2026, the sale and legal transfer of the loan portfolio were completed resulting in the derecognition of loans, previously recognized as held for sale, of gross carrying amount of € 237 million and impairment allowance of € 222 million. The completion of the transaction resulted in a loss of € 3 million, including associated costs, which was recognized within "Other Income".

1.4 Project “Moon I & II”

In December 2025, the Bank, as part of its NPE strategy plan, initiated a structured process for the disposal of a portfolio of secured non-performing retail exposures of gross carrying amount of ca. € 126 million which resulted in their classification as held for sale (Project Moon I). During the period up to second quarter of 2026, significant progress was achieved, with all key preparatory milestones substantially completed. Moreover, in the second quarter of 2026, the Bank revised its NPE sale target resulting in a higher target level by ca. € 5 million, which were also classified as held-for-sale.

As at 30 June 2026, the carrying amount of the aforementioned loan portfolio reached € 58 million, comprising loans with gross carrying amount of € 131 million, which carried an impairment allowance of € 72 million including the additional impairment loss of € 47 million recognized the fourth quarter of 2025 and calculated by reference to the estimated selling price.

As part of the continued execution of its balance sheet optimization strategy the Bank, in June 2026, initiated another structured process for the disposal of a secured non-performing retail exposures' portfolio of gross carrying amount of ca. € 374 million (Project Moon II). As at the reporting date, given the Management's commitment to the abovementioned portfolio's disposal plan that is expected to be completed in 2027, the Bank classified the respective loans as held for sale. Moreover, in accordance with the Group's accounting policy for the impairment of financial assets, the Bank remeasured the portfolio's expected credit losses by reference to the estimated selling price and recognized an impairment loss of ca. € 10 million.

As at 30 June 2026, the carrying amount of the aforementioned loan portfolio reached € 236 million, comprising loans with gross carrying amount of € 374 million, which carried an impairment allowance of € 138 million.

1.5 Project “Wave”

In the context of the Group's initiatives for the optimization of its regulatory capital, in December 2025, the Bank proceeded with the execution of the upsize of the existing (“Wave III”) synthetic risk transfer transaction referencing shipping loans (Project “Wave III Upsize” or “Transaction”). The Transaction provides credit protection over the mezzanine

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loss in the form of a financial guarantee and is actually an upsize of the original non disclosed reference portfolio of Shipping loan exposures of USD 1.68 billion (closed on 22 December 2022) to USD 2 billion. In order to upsize the reference portfolio to a total USD 2.0 billion, Credit Linked Notes (CLNs) of USD 240 million, due 2033, were issued in place of the existing CLNs. The Significant Risk Transfer (SRT) approval was granted by the SSM on 8 May 2026.

In September 2026, the Bank proceeded with the execution of another synthetic risk transfer transaction in the form of credit linked notes ('CLN'), referencing SME and large Corporate loans (Project "Wave VII" or "Transaction"). The Transaction provides credit protection over the mezzanine loss and will be the first transaction issued within the Program Framework and SRT Fast Track process. The reference portfolio is estimated at a total of € 1.4 billion, Credit Linked Notes (CLN) of € 122 million, due in 2040. On 4 September 2026 the Bank proceeded with a Fast track SRT notification to the ECB and an STS notification to the BoG on 31 July 2026.

The "Wave VII" transaction is expected to contribute approximately 24 bps to the CET1 ratio.

1.6 Agreement with Fairfax for the acquisition of Eurolife FFH Life Insurance and the partial disposal of ERB Asfaltistiki Ltd

On 6 May 2026, further to its announcement dated 13 October 2025, the Bank announced that it has entered into a definitive share purchase agreement ("SPA") with entities controlled by Fairfax Financial Holdings Limited ("Fairfax") in connection with the acquisition of 80% of Eurolife FFH life insurance Single Member S.A. ("Eurolife Life") (the "Transaction") for a consideration of approximately € 813 million. Following the completion of the Transaction, Eurobank will own 100% of Eurolife Life and will retain its 20% interest in Eurolife Holdings' general insurance business.

The completion of the Transaction is subject to the receipt of all required approvals, as well as the satisfaction of customary closing conditions, and is expected to occur during the fourth quarter of 2026.

In addition to the aforementioned Transaction, Fairfax shall procure that certain affiliates of Fairfax will acquire 45% of the share capital of ERB Asfaltistiki ("ERBA"), the non-life (property and casualty) insurance company of Eurobank Limited in Cyprus, for cash consideration of € 55 million. Fairfax will also have the right to acquire the remaining 55% of the share capital of ERBA over time. The transaction remains subject to the execution of the relevant transaction documentation and the receipt of the necessary regulatory approvals.

For further details, please refer to Interim Consolidated Financial Statements, Note 19.

1.7 Dividends/Shareholders' remuneration

Pursuant to the resolution of the AGM of the Bank's shareholders of 28 April 2026 and following the approval granted by the ECB, the Bank proceeded with the distribution of a cash dividend of € 258.7 million from its Special reserves account, in June 2026, in addition to the interim dividend of € 170 million distributed in November 2025.

The aggregate cash dividend of € 428.7 million together with the maximum consideration of € 288 million cost of the new share buy back programme, approved by the AGM on 28 April 2026 correspond, in total, to a shareholder reward ratio of 55% of the Group's net profit for 2025 excluding the € 58 million gain recognized on the acquisition of the CNP Cyprus subgroup.

For further details, please refer to Interim Consolidated Financial Statements, Note 27.

1.8 Additional Tier 1 capital instruments

The Group has issued fixed rate reset Additional Tier 1 (AT1) perpetual contingent temporary write-down notes ("Notes") with a total nominal value € 1,100 million. The Notes are listed on the Euro MTF market of the Luxembourg Stock Exchange. Based on their terms, such as the fully discretionary and non-cumulative nature of interest, perpetual maturity,

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and loss-absorbing features that relate to specific regulatory requirements or trigger events, the Notes from both issues have been classified as equity instruments. Accordingly, coupon payments, if any, are recognized as dividends in accordance with the principles of IAS 32. The Notes also qualify as Additional Tier 1 capital instruments under the Capital Requirements Regulation (CRR). As of 30 June 2026, detailed issuances are presented below:

On 4 June 2025, Eurobank Holdings issued fixed rate reset AT1 perpetual contingent temporary write-down notes (the “Notes”) of nominal value € 500 million. On the same date, the Bank issued notes of equivalent terms, which are held by Eurobank Holdings until its merger with the Bank in December 2025. Upon completion of the merger, these notes were cancelled, and the Bank assumed the corresponding Notes held by third parties. The Notes, subject to their terms and conditions, are redeemable in full at the Bank’s sole and full discretion on any interest payment date falling on or after 4 June 2031 (the first reset date) or at any time following the occurrence of certain events. They bear non-cumulative interest, which is cancellable subject to conditions, at a fixed rate of 6.625% per annum until the first reset date, and thereafter at a reset rate based on the aggregate of 5-year mid-swap rate plus a margin of 445.4 bps. The interest is payable semi-annually in arrears, commencing on 4 December 2025.

On 10 November 2025, Eurobank Holdings issued fixed rate reset AT1 perpetual contingent temporary write down notes (the “Notes” – second issuance) with a nominal value of € 600 million. On the same date, the Bank issued notes of equivalent terms, which were held by Eurobank Holdings until its merger with the Bank in December 2025. Upon completion of the merger, these notes were cancelled, and the Bank assumed the corresponding Notes held by third parties. The said Notes are callable by the Bank, subject to their terms and conditions, on any interest payment date falling on or after 10 November 2033 and bear non-cumulative interest at a fixed rate of 6.250% per annum until the first reset date, and thereafter at a reset rate based on the aggregate of 5-year mid-swap rate plus a margin of 379 bps, payable semi-annually in arrears, commencing on 10 May 2026.

Further information is available on the Company’s website.

1.9 Tier 2 Capital instruments

On 6 December 2022, the Company issued € 300 million subordinated Tier 2 debt instrument which matures in December 2032, is callable in December 2027 offering a coupon of 10% per annum and is listed on the Luxembourg Stock Exchange’s Euro MTF market. On the same date, the Bank issued a subordinated instrument of equivalent terms, held by the Company.

On 25 January 2024, the Company issued € 300 million subordinated Tier 2 debt instrument which matures in April 2034, is callable at par in April 2029 offering a coupon of 6.25% per annum and is listed on the Luxembourg Stock Exchange’s Euro MTF market. On the same date, the Bank issued a subordinated instrument of equivalent terms, held by the Company.

On 30 January 2025, the Company issued € 585.55 million subordinated Tier 2 debt instrument which matures in April 2035, is callable in April 2030 offering a coupon of 4.25% per annum.

On 29 January 2026, the Bank issued € 400 million subordinated Tier 2 debt instruments which mature in April 2037, are callable at par from 29 January 2032 until 29 April 2032, offering a coupon of 4.125% per annum and are listed on the Luxembourg Stock Exchange’s Euro MTF market.

1.10 Regulatory framework

The general CRR III regulatory framework is structured around three mutually reinforcing pillars:

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- Pillar 1 defines the minimum regulatory capital requirements, based on principles, rules and methodologies specifying and measuring credit, market and operational risk. These requirements are covered by regulatory own funds, according to the rules and specifications of CRR. The revised CRR III introduces substantial enhancements to Pillar 1, aiming to improve the consistency and comparability of risk-weighted asset calculations.
- Pillar 2 addresses the internal processes for assessing overall capital and liquid asset holdings are adequate in relation to risk profile (Internal Capital Adequacy Assessment Process - ICAAP and Internal Liquidity Assessment Process - ILAAP). Moreover, Pillar 2 introduces the Supervisory Review & Evaluation Process (SREP), which assesses the risks banks face and checks that banks are equipped to manage those risks properly. The CRR III framework indirectly reinforces Pillar 2 by elevating supervisory expectations regarding model governance, stress testing practices, and the integration of revised risk metrics into ICAAP methodologies.
- Pillar 3 intends to enhance market discipline by developing a set of quantitative and qualitative disclosure requirements, which allow market participants to assess key pieces of information on the scope of application, capital, risk exposures, risk assessment processes and hence the capital adequacy and the internal liquidity adequacy of credit institutions. CRR III further strengthens Pillar 3 by expanding transparency obligations enhancing comparability and accountability across institutions.

According to the CRD IV provisions:

- Minimum Common equity Tier 1 (CET1) ratio: 4.5%;
- Minimum Tier 1 ratio: 6%; and
- Minimum Total Capital ratio: 8%.

Furthermore, banks are required to maintain, in addition to the above minimum ratios, a Capital Conservation Buffer (CCB) equal to 2.5% of their total risk exposure amount.

As a result, the minimum ratios which must be met, including the CCB are:

- Minimum CET1 capital ratio 7%; and
- Total capital adequacy ratio 10.5%.

Additional capital buffers that CRD IV introduces are the following:

a) Countercyclical buffer (CCyB)

The purpose of this buffer is to counteract the effects of the economic cycle on banks' lending activity, thus making the supply of credit less volatile and possibly even reduce the probability of credit bubbles or crunches. Credit institutions may be required under the CRD IV to build up an additional buffer up to 2.5% of CET1 capital during periods of excess credit growth, according to national circumstances. According to BoG Executive Committee Act No 202/1/11.03.2022, which lays down the procedure for applying the CCyB rate in Greece and the relevant calibration methodology, the BoG assesses, on a quarterly basis, the intensity of cyclical systemic risk and the appropriateness of the CCyB rate, taking into account the standardised credit-to-GDP (Gross Domestic Product) gap, the buffer guide and, in particular, additional indicators for monitoring the build-up of cyclical systemic risk.

Under Executive Committee Act 235/2/07.10.2024, the CCyB rate that credit institutions are required to maintain is 0.25% for the period from 1.10.2025 to 30.09.2026. From 1 October 2026, under Executive Committee Act 248/1/06.10.2025, the BoG has decided to set the CCyB rate for Greece at 0.5%, i.e. to the level of the target positive neutral CCyB rate, applicable. The positive neutral CCyB is activated at an early stage in the economic and financial cycle, when cyclical systemic risks are neither elevated nor subdued.

b) Global systemic institution buffer

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CRD IV includes a mandatory Systemic Risk Buffer (SyRB) of CET1 for banks that are identified by the relevant authority as globally systemically important, which is not applicable to Greek banks.

c) Other systemically important institutions buffer (O-SIIs)

On 22 December 2022, the ECB published the November 2022 Governing Council statement on macroprudential policies regarding the revised floor methodology for assessing capital buffers for O-SIIs. The revised floor methodology increases the number of buckets to which O-SIIs are allocated from four to six and raises the floor level for the highest bucket to 1.50% while keeping the floor of the lowest bucket unchanged at 0.25%. The ECB uses the revised floor methodology to assess O-SII buffers proposed by national authorities as of 1 January 2024.

d) From 1 January 2024, the O-SII buffer for the Group increased to 1.25%, in accordance with the BoG Executive Committee Act 221/1/17.10.2023, following the above change in the floor methodology. On 15 September 2025, the BoG published the Executive Act 246/15.9.2025 confirming that O-SII buffer applicable to the Group remains unchanged at 1.25% for 2026 with effect from 1 January 2026.

Systemic Risk Buffer (SyRB)

According to Article 133 of CRD, SyRB can be used to address a broad range of systemic risks, which may also stem from exposures to specific sectors, as long as they are not already covered by the CRR or by the CCyB or the G-SII/O-SII buffers. The level of the SyRB may vary across institutions or sets of institutions as well as across subsets of exposures. There is no maximum limit for this buffer. Competent authority is in charge of setting up the SyRB and of identifying the sets of institutions to which it applies. According to BoG Executive Committee Act No 197/2/21.12.2021, the BoG decided to adopt the European Banking Authority (EBA) guidelines on the appropriate subsets of exposures to which the competent authority or the designated authority may apply a SyRB based on paragraph 5 of Article 133 of CRD.

The SyRB consists of CET1 capital and is expressed as a percentage of the total risk exposure amount of credit institutions. It can be set in multiples of 0.5% and may exceed 3% provided that the relevant procedures laid down in EU law are respected. The BoG has set neither a sectoral nor a broader SyRB rate as yet.

1.10.1 Regulatory Developments

On 8 January 2025, the EBA published the final guidelines on the management of environmental, social and governance (ESG) risks. The guidelines specify requirements regarding the internal processes and ESG risk management arrangements that institutions should have in place in accordance with the Capital Requirements Directive (CRD). These guidelines, which apply from 11 January 2026, establish requirements for institutions' internal processes and ESG risk management arrangements, including embedding ESG risks into their risk appetite, internal controls, and the ICAAP, as well as developing specific transition plans to manage the impact of ESG factors over short, medium, and long-term horizons.

On 16 June 2025, the EBA published three final draft technical standards that are crucial for the implementation of the EU Banking Package and will allow supervisors to monitor institutions' compliance. In particular, the EBA is publishing the following Regulatory Technical Standards (RTS) and Implementing Technical Standards (ITS):

- RTS concerning the calculation and adjustments of the Business Indicator (BI), which is central to the standardised and harmonised application of the operational risk capital requirements.
- ITS on the mapping to FINREP, which will ensure consistency and reduce implementation, administrative and operational costs.
- Amending ITS on operational risk reporting, which will keep the supervisory reporting framework relevant, meaningful and aligned with the amended regulation.

After the submission of the final draft ITS to the Commission for adoption, the EBA published on the website the IT tools, including binding instructions. The EBA has published a technical package, including the Data Point Model (DPM), validation rules and taxonomy, that is used by institutions to submit this supervisory reporting information to supervisors. The first applicable reference date for reporting under the draft ITS is 31 March 2026.

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On 5 November 2025, the EBA published its final guidelines on environmental scenario analysis, clarifying supervisory expectations on how institutions should incorporate physical and transition climate risks into both short-term stress-testing exercises and longer-term resilience assessments. The Guidelines complement the broader ESG risk management framework and set out high-level criteria for selecting scenarios, identifying transmission channels and integrating the results into risk management and strategic planning. The guidelines will apply from 1 January 2027.

On 28 January 2026, the EBA launched the Pillar 3 Data Hub (P3DH), a centralised platform established under CRR III and CRD VI for the submission and publication of Pillar 3 disclosures. Since June 2025 reporting reference date, relevant institutions are required to submit their Pillar 3 disclosures to the EBA in XBRL-CSV format, with the information being centrally published and made publicly available through the EBA Data Access Portal (EDAP).

On 20 April 2026, two legislative acts relating to Crisis Management & Deposit Insurance (CMDI) framework were published in the Official Journal of the EU: (i) Directive 2026/806 (BRRD III) amending Directive 2014/59/EU (BRRD), and (ii) Directive 2026/804 (DGSD II) amending Directive 2014/19/EU (DGSD). Member States must transpose both Directives in their national laws by 11 May 2028.

On 22 June 2026, the EBA published final draft ITS amending the Pillar 3 disclosure framework on ESG risks, amending disclosure requirements to reflect new NACE classification code and introducing disclosure requirements on equity and shadow banking exposures, completing the implementation of the relevant CRR III disclosure requirements. The revised framework streamlines existing disclosures, enhances consistency and usability, and aligns Pillar 3 requirements with the ESRS and the EBA's proposed ESG reporting framework.

On 26 July 2026, the EBA published the draft Release 4.4 technical package of its reporting and disclosure framework, introducing amendments to Pillar 3 ESG disclosures, new IFRS 18-related FINREP requirements, FRTB disclosure integration and other technical updates to the DPM and XBRL taxonomy. The package supports the implementation of upcoming regulatory reporting and disclosure requirements, with first application dates ranging from 31 December 2026 to 31 March 2027.

On 26 August 2026, the EBA issued a public consultation on draft RTS specifying the operational risk management framework required under CRR III. The proposed RTS establishes harmonised and proportionate requirements covering governance arrangements, operational risk management processes and operational risk assessment systems, while clarifying roles and responsibilities, data requirements, reporting and internal controls. The consultation period is open until 31 December 2026.

1.11 SSM 2026 Geopolitical Reverse Stress Test

The ECB has conducted in 2026 a geopolitical risk reverse stress test on 110 directly supervised banks, including Eurobank S.A. On 31 July 2026, the ECB published the aggregate results, at system level, for this exercise.

In line with previous ECB thematic stress tests conducted to comply with Article 100 of the CRD, the geopolitical risk reverse stress test is not intended to have any implications for Pillar 2 Guidance (P2G).

The outcome will be used to inform and complement the Supervisory Review and Evaluation Process (SREP) in a qualitative way and in line with the broader 2026 ICAAP.

1.12 2027 EU-wide Stress Test

In preparation for the 2027 EU-wide Stress Test, on 11 June 2026 the EBA has issued draft methodology, templates and guidance introducing targeted simplifications to the framework.

The proposed changes aim to streamline reporting requirements, enhance risk sensitivity and further align the exercise with existing supervisory reporting processes. In addition, the framework incorporates climate-related risk considerations, reflecting the increasing focus of supervisors on the assessment of ESG-related vulnerabilities.

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A total of 63 banks from the EU and Norway, including 47 from the euro area, will participate, covering 75% of the EU banking sector.

The final methodology is expected to be published by the end of 2026, with the stress testing exercise scheduled to commence in early 2027 and the publication of results anticipated in August 2027.

1.13 Scope of Pillar 3

The purpose of Pillar 3 report is to provide updated information on the Group's risk management practices, risk assessment processes and regulatory capital adequacy ratios.

Pillar 3 disclosures consist of both qualitative and quantitative information and are provided on a consolidated basis. They have been prepared in accordance with Part 8 of the Capital Requirements Regulation within CRD IV (Regulation 2013/575/EU) and according to the prudential consolidation framework, which is described in the following section.

In December 2016, the EBA published EBA/GL/2016/11 guidelines on revised Pillar 3 disclosures requirements to improve the consistency and comparability of institutions' regulatory disclosures. These guidelines harmonised the frequency of disclosures and updated the list of requirements to be considered for more frequent disclosures.

According to the above guidelines, for templates that require the disclosure for current and previous reporting periods, the previous reporting period is always referred to as the last data disclosed according to the frequency of the template. When the disclosure is being reported for the first time, the data of the previous period is not required.

In December 2018 the EBA published EBA/GL/2018/10 guidelines, which include enhanced disclosure formats for credit institutions for disclosures related to non-performing exposures, forbore exposures and foreclosed assets. Some templates are applicable to significant credit institutions that have a gross NPL ratio of 5% or above. Considering that Group's NPEs ratio remained consistently below 5% for five consecutive quarters, templates CQ2, CQ6, CQ8 and CR2a of the EBA Disclosure ITS are not published from 31 December 2024 and onwards.

In June 2019, the European Parliament (EP) and the Council published the Regulation (EU) No 876/2019 or CRR2 amending the CRR, regarding among others the reporting and disclosure framework. The CRR2 rules follow a phased implementation with significant elements entering into force in 2021.

In June 2020, the EBA published new ITS on public disclosures by institutions and revised final draft ITS on supervisory reporting that implements changes introduced in the revised CRR2 and the Prudential Backstop Regulation. The two ITS aim to promote market discipline through enhanced and comparable public disclosures for stakeholders and to keep the reporting requirements in line with the evolving needs for Supervisory Authorities' risk assessments.

On 6 August 2021, the EBA published an updated tool, which specifies the mapping between quantitative disclosure data points and the relevant supervisory reporting data points. This tool aims at facilitating institutions' compliance with disclosure requirements and improving the consistency and quality of the information disclosed.

On 24 May 2022, the EBA published an updated mapping between quantitative disclosure data points and the relevant supervisory reporting data points. The amendments mainly address issues raised by competent authorities and the industry. The updated mapping applies to the reporting framework 3.0 and the ITS on institutions' Pillar 3 public disclosures.

On 19 December 2022, the Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 was published in the Official Journal. The ITS amending the ITS laid down in Implementing Regulation (EU) 2021/637 as regards the uniform disclosure formats for the disclosure of ESG risks. This Implementing Regulation was entered into force on 8 January 2023.

On 20 June 2024, the EBA published a new draft ITS on Pillar 3 framework in order to cover all disclosures requirements for institutions under the new legislative CRR3 which is applicable from 01 January 2025

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1.14 Location, timing and frequency of disclosures

Pillar 3 disclosures are provided on a quarterly basis in electronic format, after taking into consideration the relevant recommendation of EBA Guidelines 2016/11, which include the list of requirements to be considered for more frequent, than annual basis, disclosures.

Pillar 3 disclosures are provided with reference date (corresponding period) the close of the previous quarter and in conjunction with the date of publication of the financial statements. Equivalent disclosures made by the Group under accounting, listing or other requirements are deemed to constitute compliance with the requirements of the aforementioned Regulation (EU) No 575/2013 (Part Eight) taking into consideration any existing relevant implementing Regulations as well as the EBA guidelines.

Based on the internal "Consolidated Pillar 3 Disclosures Policy" the Group ensures consistent and continuous compliance with the Pillar 3 disclosures requirements. In addition, the Group puts in place and maintains internal processes, systems and controls to verify that the disclosures are appropriate and in compliance with the aforementioned regulatory framework.

Pillar 3 disclosures are a standalone document that provides a readily accessible source of prudential information for users and is available on a designated location on the Company's website <https://www.eurobank.gr/en/group/investor-relations/oikonomika-apotelesmata-eurobank> in chronological order and cover both quantitative and qualitative information.

Quantitative information, which is included in the Group's Consolidated Financial Statements, is also provided at the above location. In this way, the Company ensures easy access of the market participants to continuous and complete information without cross-reference to other locations or media of communication.

Furthermore, following the launch of the EBA Pillar 3 Data Hub (P3DH) in January 2026, the Bank submitted the required historical quarterly Pillar 3 disclosures and, since then, Pillar 3 information has also been made available through the EBA Data Access Portal (EDAP) <https://edap-public.eba.europa.eu/Report/index/MTE1?rhversion=20260806152911-2>, a centralised platform designed to enhance the transparency, accessibility and comparability of prudential disclosures across EU institutions.

Regarding the timing of disclosures, CRR clarifies that disclosures shall be published on the same date as the date on which the institution publishes its financial reports or as soon as possible thereafter. The Group's Pillar 3 disclosures report will be published in accordance with EBA expectations the latest, as follows:

- Year-end Pillar 3 reports (reference date December): by end-June, with the exception of the remuneration policies information that would be expected by end-August;
- Quarterly and Semi- annual Pillar 3 reports: by "reference date + 4 months".

1.15 Prudential consolidation

The prudential consolidation applied for reporting to regulatory authorities follows the principles used for the accounting consolidation with the following difference: participations in insurance companies are excluded from prudential consolidation and are accounted for using the equity method.

According to CRD as in force, holdings in insurance companies and financial institutions that the Bank has a significant investment, must be deducted from CET1 in case the total investment exceeds 10% of the aggregate amount of CET1. Amount, which is not deducted, is risk weighted by 250%.

The following table presents a list of the Group's subsidiaries as at 30 June 2026 for which prudential consolidation is different compared to the accounting consolidation:

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Table 1: Group's insurance subsidiaries

a	b	c & g	h
Name of the entity	Method of accounting consolidation	Method of prudential consolidation	Description of the entity
HB Insurance Holding Ltd	Full consolidation	Equity consolidation	Insurance services
Cyprialife Greece Single Member S.A.	Full consolidation	Equity consolidation	Life Insurance
ERB Cyprialife Ltd	Full consolidation	Equity consolidation	Life Insurance
ERB Asfalistiki Ltd	Full consolidation	Equity consolidation	General Insurance
Cyprialife Insurance Brokers Ltd	Full consolidation	Equity consolidation	Insurance Brokerage
Laiki Brokers (Insurance & Consultancy Services) Ltd	Full consolidation	Equity consolidation	Insurance Brokerage
Laiki Insurance Agencies Ltd	Full consolidation	Equity consolidation	Insurance agency services

The following table shows a comparison between the Balance Sheet included in the Consolidated Financial Statements and the Balance Sheet prepared under the prudential scope of consolidation as at 30 June 2026 and 31 March 2026.

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Table 2: EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements

		30 June 2026		
		Balance sheet per published financial statements	Deconsolidation of insurance and consolidation by the equity method	Balance sheet per prudential scope of consolidation
Ref. ⁽¹⁾		€ million	€ million	€ million
Assets				
	Cash and Balances with central banks	14,440	-	14,440
	Due from credit institutions ⁽²⁾	2,497	(339)	2,158
	Securities held for trading	558	-	558
	Derivative financial instruments	547	-	547
	Loans and advances to customers ⁽²⁾	56,991	310	57,301
	Investment securities	28,554	(917)	27,637
	Investments in associates and joint ventures	260	290	550
	Property, plant and equipment	1,077	(25)	1,052
	Investment property	1,332	(54)	1,278
	Intangible assets	591	(7)	584
	Deferred tax asset	3,522	(2)	3,520
	<i>of which deferred tax assets that rely on future profitability and do not arise from temporary differences</i>	6	-	6
	<i>of which deferred tax assets that do not rely on future profitability (DTC)</i>	2,737	-	2,737
	<i>of which deferred tax assets that rely on future profitability and arise from temporary differences</i>	778	(2)	776
	Other assets	2,172	(47)	2,125
	Assets of disposal group classified as held for sale	402	-	402
	Total assets	112,943	(791)	112,152
Liabilities				
	Due to central banks	1,000	-	1,000
	Due to credit institutions ⁽²⁾	2,639	(180)	2,459
	Derivative financial instruments	1,016	-	1,016
	Due to customers ⁽²⁾	86,399	236	86,635
	Debt securities in issue	8,314	-	8,314
	<i>of which Tier 2 instruments</i>	1,600	-	1,600
	Other liabilities	2,671	(847)	1,824
	<i>of which Deferred tax liabilities</i>	58	(4)	54
	Total liabilities	102,039	(791)	101,248
Equity				
	Ordinary share capital	799	-	799
	Share premium	1,140	-	1,140
	Reserves and retained earnings	7,875	-	7,875
	<i>of which cash flow hedge reserves</i>	16	-	16
	AT1 Capital Instruments	1,090	-	1,090
	Total equity	10,904	-	10,904
	Total equity and liabilities	112,943	(791)	112,152

Introduction – General Information

		31 March 2026		
		Balance sheet per published financial statements	Deconsolidation of insurance and consolidation by the equity method	Balance sheet per prudential scope of consolidation
Ref. ⁽¹⁾		€ million	€ million	€ million
Assets				
		12,064	-	12,064
	Cash and Balances with central banks			
	Due from credit institutions ⁽²⁾	2,084	(241)	1,843
	Securities held for trading	456	-	456
	Derivative financial instruments	675	-	675
	Loans and advances to customers ⁽²⁾	55,745	211	55,956
	Investment securities	27,733	(897)	26,836
	Investments in associates and joint ventures	240	272	512
	Property, plant and equipment	1,071	(25)	1,046
	Investment property	1,331	(55)	1,276
	Intangible assets	540	(7)	533
	Deferred tax asset	3,570	(2)	3,568
	<i>of which deferred tax assets that rely on future profitability and do not arise from temporary differences</i>	-	-	-
	<i>of which deferred tax assets that do not rely on future profitability (DTC)</i>	2,785	-	2,785
	<i>of which deferred tax assets that rely on future profitability and arise from temporary differences</i>	785	(2)	783
	Other assets	2,294	(49)	2,245
	Assets of disposal group classified as held for sale	204	-	204
	Total assets	108,007	(793)	107,214
Liabilities				
	Due to central banks	700	-	700
	Due to credit institutions ⁽²⁾	2,731	(233)	2,498
	Derivative financial instruments	1,046	-	1,046
	Due to customers ⁽²⁾	82,448	262	82,710
	Debt securities in issue	7,654	-	7,654
	<i>of which Tier 2 Instruments</i>	1,613	-	1,613
	Other liabilities	2,612	(822)	1,790
	<i>of which Deferred tax liabilities</i>	50	(4)	46
	Total liabilities	97,190	(793)	96,398
Equity				
	Ordinary share capital	799	-	799
	Share premium	1,140	-	1,140
	Reserves and retained earnings	7,788	-	7,788
	<i>of which cash flow hedge reserves</i>	16	-	16
	AT1 Capital Instruments	1,090	-	1,090
	Total equity	10,817	-	10,817
	Total equity and liabilities	108,007	(793)	107,214

⁽¹⁾ References provide the mapping of items of the statement of financial position prepared under the regulatory scope of consolidation used to calculate regulatory capital as reflected in column "References" in Section 2.3 "Composition of regulatory capital".

⁽²⁾ According to Annex V "Reporting on Financial Information", specific amounts are categorised as Credit Institutions in Financial Statements while in Regulatory scope of consolidation as Other Financial Corporations (Loans and advances to customers or Due to customers).

Capital Management

2. Capital Management

2.1 CRR III transitional arrangements

On 19 June 2024, Regulation 2024/1623/EU and Directive 2024/1619/EU of the European Parliament and of the Council of 31 May 2024, amending Regulation 575/2013/EU and Directive 2013/36/EU, respectively, were published in the Official Journal of the European Union. The revised CRR (CRR III) became, in general, applicable from 1 January 2025, with a transitional period envisaged for certain rules set out therein.

The transitional arrangements relating to credit risk apply, inter alia, to the following exposures:

- **Unconditionally cancellable commitments**, for which a phased transition of the Credit Conversion Factor (CCF) is applied, gradually increasing from 0% to 10% over the period 2030-2033, in accordance with the applicable regulatory provisions.
- **Specialised lending (object finance) exposures**, where the Bank makes use of the regulatory discretion to assign a risk weight of 80% to exposures that are not externally rated but meet the criteria for high quality, for a transitional period up to 2032.
- **Equity exposures**, for which a gradual increase in the applicable risk weight from 100% to mainly 250% or to 400% in special cases over the period from 2026 to 2030.

As regards the Fundamental Review of the Trading Book (FRTB), the application of the own funds requirements for market risk has been postponed to 1 January 2027.

Although EU Member States had to transpose the revised CRD IV (CRD6) into national law, to be applied from 11 January 2026, this has not been transposed yet in Greek law.

Capital Management

2.2 Key Metrics

The following table provides an overview of the Group's prudential regulatory metrics.

Table 3: EU KM1 - Key Metrics template

	a	b	c	d	e
	30 June 2026	31 March 2026	31 December 2025	30 September 2025	30 June 2025
	€ million	€ million	€ million	€ million	€ million
Available own funds (amounts)					
1 Common Equity Tier 1 (CET1) capital	8,325	8,122	8,134	7,874	7,932
2 Tier 1 capital	9,414	9,212	9,224	8,369	8,427
3 Total capital	11,014	10,825	10,439	9,600	10,132
Risk-weighted exposure amounts					
4 Total risk exposure amount	55,050	54,843	53,596	51,756	51,720
4a Total risk exposure pre-floor	55,050	54,843	53,596	51,756	51,720
Capital ratios (as a percentage of risk-weighted exposure amount)					
5 Common Equity Tier 1 ratio (%)	15.1%	14.8%	15.2%	15.2%	15.3%
5b Common Equity Tier 1 ratio considering unfloored TREA (%)	15.1%	14.8%	15.2%	15.2%	15.3%
6 Tier 1 ratio (%)	17.1%	16.8%	17.2%	16.2%	16.3%
6b Tier 1 ratio considering unfloored TREA (%)	17.1%	16.8%	17.2%	16.2%	16.3%
7 Total capital ratio (%)	20.0%	19.7%	19.5%	18.5%	19.6%
7b Total capital ratio considering unfloored TREA (%)	20.0%	19.7%	19.5%	18.5%	19.6%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7d Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.75%	2.75%	2.85%	2.85%	2.85%
EU 7e of which: to be made up of CET1 capital (percentage points)	1.55%	1.55%	1.60%	1.60%	1.60%
EU 7f of which: to be made up of Tier 1 capital (percentage points)	2.06%	2.06%	2.14%	2.14%	2.14%
EU 7g Total SREP own funds requirements (%)	10.75%	10.75%	10.85%	10.85%	10.85%
Combined buffer requirement (as a percentage of risk-weighted exposure amount)					
8 Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
9 Institution specific countercyclical capital buffer (%)	0.77%	0.75%	0.68%	0.55%	0.55%
EU 9a Systemic risk buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
10 Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a Other Systemically Important Institution buffer	1.25%	1.25%	1.25%	1.25%	1.25%
11 Combined buffer requirement (%)	4.52%	4.50%	4.43%	4.30%	4.30%
EU 11a Overall capital requirements (%)	15.27%	15.25%	15.28%	15.15%	15.15%
12 CET1 available after meeting the total SREP own funds requirements (%)	9.04%	8.72%	8.61%	7.70%	8.15%
Leverage ratio					
13 Leverage ratio total exposure measure	119,042	113,528	113,523	108,295	107,100
14 Leverage ratio	7.9%	8.1%	8.1%	7.7%	7.9%
Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)					
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14c Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14e Overall leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%

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		a	a	a	c	d
		30 June 2026	31 March 2026	31 December 2025	30 September 2025	30 June 2025
		€ million	€ million	€ million	€ million	€ million
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	22,722	22,234	22,307	22,674	22,191
EU 16a	Cash outflows - Total weighted value	15,103	14,641	14,313	14,055	13,643
EU 16b	Cash inflows - Total weighted value	1,918	2,045	2,073	2,073	1,963
16	Total net cash outflows (adjusted value)	13,185	12,596	12,240	11,982	11,680
17	Liquidity coverage ratio (%) (adjusted value) ⁽¹⁾	172.7%	177.1%	182.6%	189.3%	190.1%
	Liquidity coverage ratio (%)	174.1%	165.3%	172.2%	180.4%	194.4%
Net Stable Funding Ratio						
18	Total available stable funding	85,549	82,271	83,136	80,021	79,366
19	Total required stable funding	59,894	58,681	57,650	56,067	55,301
20	NSFR ratio (%)	142.8%	140.2%	144.2%	142.7%	143.5%

⁽¹⁾ Average figures based on previous monthly data points.

Notes:

(a) Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission for profits recognition granted by the Supervisory Authorities.

(b) Pro-forma CET1, Tier 1 and Total Capital Adequacy ratios as at 30 June 2026 with the completion of "Wave VII" securitization would be 15.4%, 17.4% and 20.3%, respectively.

2.3 Regulatory capital

The Group has sought to maintain an actively managed capital base to cover risks inherent in the business. The adequacy of the Group's capital is monitored using, among other measures, the rules and ratios established by the Basel Committee on Banking Supervision and adopted by the European Union and the SSM in supervising the Group.

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The following table shows the composition of the Group's regulatory capital as at 30 June 2026 and 31 March 2026 which is calculated according to CRD IV as amended.

Table 4: Composition of regulatory capital

	c	a & b	
		30 June 2026 ⁽¹⁾	31 March 2026 ⁽¹⁾
		€ million	€ million
Ref.			
Total equity	f, g, h	9,814	9,727
Regulatory adjustments		-	-
Interim or year-end profit not eligible ⁽¹⁾		(662)	(747)
Minority interest not allowed in CET1		-	-
Cash flow hedge reserves	i	16	16
Intangible assets	b	(397)	(386)
of which Goodwill		(42)	(42)
Deferred tax assets that rely on future profitability and do not arise from temporary differences	c	(6)	-
Deferred tax assets that rely on future profitability and arise from temporary differences (amount above 10% threshold)	d	-	-
Prudent Valuation Adjustments ⁽²⁾		(4)	(4)
Other regulatory adjustments		(436)	(376)
Amount exceeding the 17.65% threshold	a, d	-	-
Common Equity Tier 1 capital		8,325	8,230
Additional Tier 1 capital	j	1,090	1,090
Total Tier 1 capital		9,414	9,319
Tier 2 capital - subordinated debt	e	1,600	1,613
Total Regulatory Capital		11,014	10,933
Risk Weighted Assets		55,050	54,849
Ratios			
Common Equity Tier 1 ⁽³⁾		15.1%	15.0%
Tier 1		17.1%	17.0%
Total Capital Adequacy Ratio		20.0%	19.9%

⁽¹⁾ Figures and ratios include 1H 2026 profits and 3M 2026 profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities and AGM approval.

⁽²⁾ The Additional Value Adjustments (AVA) calculation is based on the simplified approach according to Commission Delegated Regulation (EU) No 101/2016. The total AVAs are deducted from CET1 capital, in accordance with Article 34 of the CRR.

⁽³⁾ CET1 ratio increased mainly due to the Group's organic profitability, and the completion of Wave III securitization partially offset by the payout accrual, the acceleration of DTC amortization and the increased RWEAs from the new production of loans and the increase of the Investment securities.

Note: The pro-forma CET1, Tier 1 and Total Capital Adequacy ratios as at 30 June 2026 with the completion of "Wave VII" securitization would be 15.4%, 17.4% and 20.3%, respectively.

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The CET1 ratio is defined as CET1 capital divided by RWEAs, the Tier 1 ratio is defined as Tier 1 capital divided by RWEAs and Total Capital Adequacy ratio is defined as Total Regulatory Capital divided by RWEAs.

As at 30 June 2026, pursuant to the Law 4172/2013, as in force, the Bank's eligible Deferred Tax Assets/Deferred Tax Credits (DTCs) against the Greek State amounted to € 2,737 million (31 March 2026 € 2,785 million). DTCs are accounted for on: (a) the unamortised losses from the Bank's participation in the Private Sector Involvement and the Greek State Debt Buyback Program, which are subject to amortization for tax purposes over a thirty-year period and (b) on the sum of (i) the unamortised part of the DTC eligible crystallized tax losses arising from write-offs and disposals of loans, which are subject to amortization over a twenty-year period, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other losses in general due to credit risk recorded up to 30 June 2015. The DTCs will be converted into directly enforceable claims (tax credit) against the Greek State provided that the Bank's after tax accounting result for the year is a loss.

According to Regulation (EU) No. 575/2013, Article 39, deferred tax assets that can be replaced with a tax credit, shall not be deducted from CET1, but instead be risk weighted by 100%.

In line with the Bank's initiative to enhance the quality of its regulatory capital, the amortisation of DTC has been accelerated for regulatory purposes starting from 01.01.2025, by an amount equal to 29% of accrued shareholders remuneration, aiming at its elimination by 2033 or earlier. Following this, the DTC included in the calculation of the Group's capital ratios stands at € 2,412 million (31 March 2026 € 2,524 million) accounting for 29.0% of CET 1 capital.

2.4 Countercyclical buffer

The CCyB will be applied when the authorities deem that lending growth is giving rise to an unacceptable accumulation of systemic risks. This buffer is specifically calculated for each bank or group and consists of the weighted average of percentages of countercyclical buffers applied in regions in which the bank's credit exposures are located.

The following table presents the geographical distribution of the Group's credit exposures relevant for the calculation of its countercyclical capital buffer, which includes all private sector exposures according to Regulation (EU) 1152/2014.

Table 5: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of countercyclical buffer

	a	b	c	d	e	f	g	h	i	j	k	l	m
	30 June 2026												
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures	Total exposure value	Own funds requirements				Risk-weighted exposure amounts	Own funds requirements weights	Counter-cyclical capital buffer rate ⁽¹⁾
	Exposure value under the standardised approach ⁽¹⁾	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposure for internal models	Exposure value for non-trading book		Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)
Breakdown by country:													
Greece	35,344	-	16	-	1,005	36,365	1,946	1	14	1,961	24,510	59%	0.25%
Romania	84	-	-	-	-	84	5	-	-	5	65	0.2%	1.00%
Bulgaria	10,020	-	1	-	-	10,021	512	-	-	512	6,404	15%	2.00%
United Kingdom	1,181	-	-	-	228	1,409	60	-	4	64	800	2%	2.00%
Cyprus	7,686	-	-	-	20	7,706	20	-	2	22	277	13%	1.50%
Luxemburg	333	-	-	-	-	333	31	-	-	31	389	1%	0.50%
Ireland	32	-	-	-	6,323	6,355	2	-	100	102	1,274	3%	1.50%
Other Countries	4,839	-	-	-	1,419	6,258	627	-	23	649	8,117	7%	0.50%
Total	59,518	-	17	-	8,996	68,531	3,204	1	142	3,347	41,838	100%	0.77%

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a	b	c	d	e	f	g	h	i	j	k	l	m
31 December 2025												
General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures	Total exposure value	Own funds requirements				Risk-weighted exposure amounts	Own funds requirements weights	Counter-cyclical capital buffer rate
Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposure for internal models	Exposure value for non-trading book		Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)
35,451	-	16	-	1,161	36,628	1,967	1	17	1,985	24,813	61%	0.25%
99	-	-	-	-	99	5	-	-	5	63	0.2%	1.00%
9,178	-	-	-	-	9,178	457	-	-	457	5,713	14%	2.00%
1,096	-	-	-	180	1,276	59	-	3	62	775	2%	2.00%
6,512	-	-	-	35	6,547	390	-	3	393	4,913	12%	1.00%
282	-	-	-	-	282	23	-	-	23	288	1%	0.50%
11	-	-	-	5,285	5,296	1	-	91	92	1,150	3%	1.50%
4,769	-	1	-	1,543	6,313	209	-	26	235	2,938	7%	0.49%
57,398	-	17	-	8,204	65,619	3,111	1	140	3,252	40,653	100%	0.68%

⁽¹⁾ The increase in the CCyB requirement is mainly driven by higher exposure values under the Standardised Approach, primarily reflecting credit growth in Bulgaria and Cyprus. The increase was further supported by the rise in the applicable CCyB rate for Cyprus from 1.0% to 1.5%, effective from 14 January 2026.

Notes:

(a) The tables above exclude exposures on Central governments or Central banks, Regional governments or local authorities, Public sector entities, Multilateral development banks, International organisations and Institutions asset classes.

(b) For the period from 1.10.2025 to 30.09.2026, the CCyB rate for Greece stands at 0.25%, in accordance with Executive Committee Act 235/2/07.10.2024. Under Executive Committee Act 248/1/06.10.2025, the BoG has decided to set the CCyB rate for Greece at 0.5%, applicable from 1 October 2026.

The following table presents an overview of the Group's specific countercyclical capital risk exposure and buffer requirements.

Table 6: EU CCyB2 - Amount of institution-specific countercyclical capital buffer

	a	a
	30 June 2026	31 December 2025
1 Total risk exposure amount (€ million)	55,050	53,596
2 Institution specific countercyclical capital buffer rate ⁽¹⁾	0.77%	0.68%
3 Institution specific countercyclical capital buffer requirement (€ million)	424	365

⁽¹⁾ The increase in the CCyB requirement is mainly driven by higher exposure values under the Standardised Approach, primarily reflecting credit growth in Bulgaria and Cyprus. The increase was further supported by the rise in the applicable CCyB rate for Cyprus from 1.0% to 1.5%, effective from 14 January 2026.

2.5 Supervisory Review and Evaluation Process (SREP) capital requirements

Based on Council Regulation No 1024/2013, the ECB conducts annually a SREP in order to define the prudential requirements of the institutions under its supervision. The key purpose of SREP is to ensure that institutions have adequate arrangements, strategies, processes and mechanisms as well as capital and liquidity to ensure a sound management and coverage of their risks, to which they are or might be exposed, including those revealed by stress testing and risks the institution may pose to the financial system.

Capital Management

Based on the 2025 SREP decision, from 1 January 2026 the P2R of the Group stands at 2.75% (or 1.55% in terms of CET1 capital). In addition, in accordance with the Executive Committee Act 235/07.10.2024 of the BoG, from 1 October 2025, a countercyclical capital buffer (CCyB) rate of 0.25% applies to banks' exposures to Greece, which increased the Group's capital requirements by 15 bps. Under Executive Committee Act 248/1/06.10.2025, the BoG has decided to set the CCyB rate for Greece at 0.5% from 1 October 2026, resulting in a further increase of the Group's capital requirements by 15 bps. The countercyclical capital buffer is updated on a quarterly basis in accordance with the countercyclical capital buffer rates applicable in each country to which the Group has exposures.

Therefore, as of 30 June 2026, the Group is required to meet a CET1 Ratio of at least 10.60% (including AT1 shortfall) and a Total Capital Adequacy Ratio of at least 15.27% (Overall Capital Requirement or OCR) including Combined Buffer Requirement (CBR) of 4.52%, which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR).

The breakdown of the Group's CET1 and Total Capital requirements, applicable from 30 June 2026, is presented in the following table:

Table 7: Pillar 2 Requirements

	30 June 2026	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement	4.50%	8.00%
Pillar 2 Requirement (P2R)	1.55%	1.55%
Total SREP Capital Requirement (TSCR)	6.05%	10.75%
<u>Combined Buffer Requirement (CBR)</u>		
Capital conservation buffer (CCB)	2.50%	2.50%
Countercyclical capital buffer (CCyB)	0.77%	0.77%
Other systemic institutions buffer (O-SII)	1.25%	1.25%
Overall Capital Requirement (OCR)	10.57%	15.27%
AT1 capital shortfall	0.04%	-
Overall Capital Requirement (OCR), including shortfall	10.60%	15.27%

The above Group's CET1 capital requirement of 10.60% takes into account i) that the Group issued in June and in November 2025 AT1 instruments of € 500 million and € 600 million respectively, utilizing its capacity to issue AT1, as well as ii) a new issuance of € 400 million of Tier 2 instrument in January 2026, fully utilizing its capacity to issue Tier 2. Assuming the Group had fully utilized the AT1 capital capacity, the CET1 requirement would stand at 10.57% as of June 2026.

As at 30 June 2026, Eurobank's consolidated CET1 ratio and Total Capital ratio, including the profit attributable to the equity holders of the Parent Company for the period amounting to € 738 million and adjusted with the payout accrual of € 256 million from the profits for the financial year 2025 and of € 406 million from the second quarter of 2026 profits in accordance with the Group shareholders' remuneration policy, were 15.1% and 20.0% respectively, which exceeded the 2026 OCR of 10.60% and 15.27%.

2.6 Minimum Requirement for Own Funds and Eligible Liabilities (MREL)

Under the Directive 2014/59 (Bank Recovery and Resolution Directive) as in force, which was transposed into the Greek legislation pursuant to Law 4335/2015 as in force, European banks are required to meet the MREL. The Single Resolution Board (SRB) has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry strategy for resolution purposes. The applicable MREL target for Eurobank S.A. on a consolidated basis is set at 27.97% of its total RWEAs, including a CBR of 4.52%. The MREL target is updated by the SRB on an annual basis. As at 30 June 2026, the Bank's MREL ratio at consolidated level stands at 30.8% of RWEAs including profit for the period ended 30 June 2026, after deducting payout accrual (31 December 2025: 29.4%) maintaining an MREL buffer of 2.85% above the MREL target.

Capital Management

Pro-forma with the completion of “Wave VII”, the MREL ratio stands at 31.3%, having an MREL buffer of 3.3% above the MREL target.

In April and in May 2026, Eurobank S.A. successfully completed an issuance of € 400 million and € 700 million senior preferred instrument, respectively. The proceeds from the above issues will support the Group’s strategy to ensure ongoing compliance with its MREL requirement.

Table 8: EU KM2 - Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

		a	a	b	c	d	e	f
		Minimum requirement for own funds and eligible liabilities (MREL)	Minimum requirement for own funds and eligible liabilities (MREL)	G-SII Requirement for own funds and eligible liabilities (TLAC)				
		30 June 2026	31 December 2025	30 June 2026	31 March 2026	31 December 2025	30 September 2025	30 June 2025
		€ million	€ million	€ million	€ million	€ million	€ million	€ million
Own funds and eligible liabilities, ratios and components								
1	Own funds and eligible liabilities	16,964	15,765					
EU-1a	Of which own funds and subordinated liabilities	11,014	10,439					
2	Total risk exposure amount of the resolution group (TREA)	55,050	53,596					
3	Own funds and eligible liabilities as a percentage of the TREA	30.8%	29.4%					
EU-3a	Of which own funds and subordinated liabilities	20.0%	19.5%					
4	Total exposure measure (TEM) of the resolution group	113,528	113,523					
5	Own funds and eligible liabilities as percentage of the TEM	14.9%	13.9%					
EU-5a	Of which own funds or subordinated liabilities	9.7%	9.2%					
6a	Does the subordination exemption in Article 72b(4) of Regulation (EU) No 575/2013 apply? (5% exemption)							
6b	Aggregate amount of permitted non-subordinated eligible liabilities instruments if the subordination discretion in accordance with Article 72b(3) of Regulation (EU) No 575/2013 is applied (max 3.5% exemption)							
6c	If a capped subordination exemption applies in accordance with Article 72b (3) of Regulation (EU) No 575/2013, the amount of funding issued that ranks <i>pari passu</i> with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks <i>pari passu</i> with excluded liabilities and that would be recognised under row 1 if no cap was applied (%)							
Minimum requirement for own funds and eligible liabilities (MREL)								
EU-7	MREL expressed as a percentage of the TREA ⁽¹⁾	23.5%	23.5%					
EU-8	Of which to be met with own funds or subordinated liabilities	-	-					
EU-9	MREL expressed as a percentage of the TEM	5.9%	5.9%					
EU-10	Of which to be met with own funds or subordinated liabilities	-	-					

⁽¹⁾ Including a combined buffer requirement (CBR) of 4.52%, the MREL target stands at 27.97%.

Note:

Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders’ remuneration policy), following permission for profits recognition granted by the Supervisory Authorities.

Capital Management

2.7 Capital requirements under Pillar 1

The following table shows the Group's RWEAs and capital requirements as at 30 June 2026 and 31 March 2026. The minimum capital requirements under Pillar 1 are calculated as 8% of RWEAs.

Table 9: EU OV1 - Overview of risk weighted exposure amounts

		a		b		c	
		Risk weighted exposure amounts (RWEAs)		Total own funds requirements			
		30 June 2026		31 March 2026		30 June 2026	
		€ million		€ million		€ million	
1	Credit risk (excluding CCR) ⁽¹⁾	46,309		46,236		3,705	
2	Of which the standardised approach ⁽²⁾	46,309		46,236		3,705	
3	Of which the foundation IRB (FIRB) approach	-		-		-	
4	Of which: slotting approach	-		-		-	
EU 4a	Of which: equities under the simple riskweighted approach	-		-		-	
5	Of which the advanced IRB (AIRB) approach	-		-		-	
6	Counterparty credit risk - CCR	577		538		46	
7	Of which the standardised approach	319		342		26	
8	Of which internal model method (IMM)	-		-		-	
EU 8a	Of which exposures to a CCP	20		12		2	
9	Of which other CCR	238		184		19	
10	Credit valuation adjustments risk - CVA risk	147		167		12	
EU 10a	Of which the standardised approach (SA)	-		-		-	
EU 10b	Of which the basic approach (F-BA and R-BA)	147		167		12	
EU 10c	Of which the simplified approach	-		-		-	
15	Settlement risk	-		-		-	
16	Securitisation exposures in the non-trading-book (after the cap)	1,775		1,636		142	
17	Of which SEC-IRBA approach	-		-		-	
18	Of which SEC-ERBA (including IAA)	351		363		28	
19	Of which SEC-SA approach	1,424		1,272		114	
EU 19a	Of which 1250%/ deduction	-		-		-	
20	Position, foreign exchange and commodities risks (Market risk)	817		840		65	
21	Of which the alternative standardised approach (A-SA)	-		-		-	
EU 21a	Of which the Simplified standardised approach (S-SA)	106		90		8	
22	Of which Alternative Internal Model Approach (A-IMA)	-		-		-	
EU 22a	Large exposures	-		-		-	
23	Reclassifications between the trading and non-trading books	-		-		-	
24	Operational risk	5,426		5,426		434	
24a	Exposures to crypto-assets	-		-		-	
25	Amounts below the thresholds for deduction (subject to 250% risk weight) ⁽¹⁾	3,210		3,150		257	
26	Output floor applied (%)	0.725		0.725		-	
27	Floor adjustment (before application of transitional cap)	-		-		-	
28	Floor adjustment (after application of transitional cap)	-		-		-	
29	Total ⁽¹⁾	55,050		54,843		4,404	

⁽¹⁾ The increase of total RWEAs compared to 31 March 2026 is mainly due to the increase of new production of loans and the increase of the Investment securities, partially offset from the completion of Wave III securitization.

⁽²⁾ Amounts below the thresholds for deduction, subject to 250% risk weight, are included within the Credit Risk (excluding CCR) category.

Capital Management

The following table presents a comparison of modelled and standardised risk weighted exposure amounts at risk level as at 30 June 2026 and 31 March 2026.

Table 10: EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

	a	b	c	d	EU d
	30 June 2026				
	Risk weighted exposure amounts (RWEAs)				
	RWEAs for modelled approaches that banks have supervisory approval to use € million	RWEAs for portfolios where standardised approaches are used € million	Total actual RWEAs (a + b) € million	RWEAs calculated using full standardised approach € million	RWEAs that is the base of the output floor € million
1 Credit risk (excluding counterparty credit risk)	-	46,309	46,309	46,309	46,309
2 Counterparty credit risk	-	577	577	577	577
3 Credit valuation adjustment		147	147	147	147
4 Securitisation exposures in the banking book	-	1,775	1,775	1,775	1,775
5 Market risk	711	106	817	1,059	1,059
6 Operational risk		5,426	5,426	5,426	5,426
7 Other risk weighted exposure amounts		-	-	-	-
8 Total	711	54,340	55,050	55,293	55,293

	a	b	c	d	EU d
	31 March 2026				
	Risk weighted exposure amounts (RWEAs)				
	RWEAs for modelled approaches that banks have supervisory approval to use € million	RWEAs for portfolios where standardised approaches are used € million	Total actual RWEAs (a + b) € million	RWEAs calculated using full standardised approach € million	RWEAs that is the base of the output floor € million
1 Credit risk (excluding counterparty credit risk)	-	46,236	46,236	46,236	46,236
2 Counterparty credit risk	-	538	538	538	538
3 Credit valuation adjustment		167	167	167	167
4 Securitisation exposures in the banking book	-	1,636	1,636	1,636	1,636
5 Market risk	751	90	840	1,560	1,560
6 Operational risk		5,426	5,426	5,426	5,426
7 Other risk weighted exposure amounts		-	-	-	-
8 Total	751	54,093	54,843	55,563	55,563

Credit Risk

3. Credit Risk

3.1 Definition of credit risk

Credit risk is the risk that a counterparty will be unable to fulfill its payment obligations in full when due. Credit risk is also related with country risk and settlement risk specified below:

- Country risk is the risk of losses arising from cross-border lending and investment activities and refers to the uncertainty associated with exposure in a particular country. This uncertainty may relate to a number of factors including the risk of losses following nationalization, expropriation and debt restructuring and foreign exchange rates' movement.
- Settlement risk is the risk arising when payments are settled, for example for trades in financial instruments, including derivatives and currency transactions. The risk arises when the Group remits payments before it can ascertain that the counterparties' payments have been received.

Credit risk arises principally from the wholesale and retail lending activities of the Group, as well as from credit enhancement provided, such as financial guarantees and letters of credit. The Group is also exposed to credit risk arising from other activities such as investments in debt securities, trading activities, capital markets and settlement activities. Taking into account that credit risk is the primary risk the Group is exposed to, it is very closely managed and monitored by specialised risk units, reporting to the Group Chief Risk Officer (GCRO).

3.2 Credit exposures

3.2.1 Maturity analysis

The following table presents a breakdown of net exposures by residual maturity and exposure classes as at 30 June 2026 and 31 December 2025.

Table 11: EU CR1-A - Maturity analysis of exposures

	a	b	c	d	e	f
	30 June 2026					
	Net exposure value					
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
	€ million	€ million	€ million	€ million	€ million	€ million
1 Loans and advances ^{(1) & (2)}	-	18,247	18,238	34,788	7,866	79,140
2 Debt securities ⁽³⁾	-	1,817	9,035	16,571	-	27,423
3 Total	-	20,064	27,273	51,359	7,866	106,563

	a	b	c	d	e	f
	31 December 2025					
	Net exposure value					
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
	€ million	€ million	€ million	€ million	€ million	€ million
1 Loans and advances	-	19,808	17,669	31,844	7,409	76,730
2 Debt securities	-	1,483	8,464	13,945	-	23,892
3 Total	-	21,291	26,133	45,789	7,409	100,622

⁽¹⁾ The table above includes off-balance sheet items.

⁽²⁾ The increase in line Loans and advances is due to the new production of loans.

⁽³⁾ The increase in debt securities is mainly due to increased position in Sovereign, Institutions and International Organization bonds.

Credit Risk

3.3 Credit quality of financial assets

The Group recognizes allowance for expected credit losses (ECL) that reflect changes in credit quality since initial recognition to financial assets that are measured at Amortised Cost (AC) and Fair Value through Other Comprehensive Income (FVOCI), including loans, securitisation notes issued by special purpose entities established by the Group, lease receivables, debt securities, as well as financial guarantee contracts and loan commitments.

The following table presents an overview of the quality forborne exposures as at 30 June 2026 and 31 December 2025.

Table 12: EU CQ1 - Credit quality of forborne exposures

	a	b	c	d	e	f	g	h
	30 June 2026							
	Gross carrying amount/nominal amount with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
	Non-performing forborne				On non-performing forborne exposures		Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures	
Performing forborne		Of which defaulted	Of which impaired		On performing forborne exposures	On non-performing forborne exposures		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand	-	-	-	-	-	-	-	-
005 deposits								
010 Loans and advances	632	726	724	726	(32)	(251)	909	431
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	6	11	11	11	-	(10)	8	2
060 Non-financial corporations	336	281	281	281	(9)	(109)	421	154
070 Households	290	433	431	433	(23)	(132)	480	275
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	19	2	2	1	-	-	5	1
100 Total	651	728	725	727	(32)	(251)	914	432

	a	b	c	d	e	f	g	h
	31 December 2025							
	Gross carrying amount/nominal amount with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
	Non-performing forborne				On non-performing forborne exposures		Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures	
Performing forborne		Of which defaulted	Of which impaired		On performing forborne exposures	On non-performing forborne exposures		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand	-	-	-	-	-	-	-	-
005 deposits								
010 Loans and advances	720	656	653	656	(42)	(228)	941	392
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	10	12	12	12	-	(8)	14	4
060 Non-financial corporations	405	269	269	269	(14)	(105)	477	155
070 Households	305	375	372	375	(28)	(115)	450	233
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	-	-	-	-	-	-	-	-
100 Total	720	656	653	656	(42)	(228)	941	392

Credit Risk

The following templates provide an overview of the credit quality of performing and non-performing exposures and related impairments, provisions and valuation adjustments by portfolio and exposure class, by geography and industry as at 30 June 2026 and 31 December 2025.

Table 13: EU CR1 - Performing and non-performing exposures and related provisions

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	30 June 2026														
	Gross carrying amount/nominal amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received		
													On performing exposures	On non-performing exposures	
	Performing exposures		Non-performing exposures ⁽⁴⁾			Performing exposures - Accumulated impairment and provisions		Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions							
	of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3		of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
005 Cash balances at central banks and other demand deposits	14,791	14,791	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	58,070	53,607	4,312	1,442	-	1,358	(481)	(159)	(319)	(645)	-	(626)	(560)	36,049	680
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	287	287	-	-	-	-	-	-	-	-	-	-	-	39	-
040 Credit institutions	1,052	1,052	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
050 Other financial corporations	6,185	6,147	15	22	-	21	(5)	(4)	(1)	(19)	-	(18)	(59)	4,914	3
060 Non-financial corporations ⁽¹⁾	32,181	30,729	1,426	582	-	559	(131)	(76)	(56)	(286)	-	(282)	(211)	17,647	266
070 Of which: SMEs	11,197	10,234	943	454	-	431	(69)	(36)	(33)	(225)	-	(220)	(176)	7,988	210
080 Households	18,365	15,392	2,871	838	-	778	(344)	(78)	(262)	(340)	-	(326)	(290)	13,449	411
090 Debt Securities ⁽²⁾	27,309	27,275	33	29	-	29	(26)	(24)	(1)	(9)	-	(9)	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	18,367	18,367	-	-	-	-	(8)	(8)	-	-	-	-	-	-	-
120 Credit institutions	4,928	4,928	-	-	-	-	(10)	(10)	-	-	-	-	-	-	-
130 Other financial corporations	1,882	1,879	3	-	-	-	(1)	(1)	-	-	-	-	-	-	-
140 Non-financial corporations	2,132	2,101	30	29	-	29	(7)	(5)	(1)	(9)	-	(9)	-	-	-
150 Off-balance sheet exposures	19,878	19,139	493	73	-	66	(55)	(27)	(3)	(32)	-	(28)		2,605	25
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170 General governments	275	33	-	1	-	1	(25)	-	-	(1)	-	(1)		2	-
180 Credit institutions	297	297	-	-	-	-	-	-	-	-	-	-		-	-
190 Other financial corporations	1,517	1,510	8	1	-	1	-	-	-	-	-	-		190	1
200 Non-financial corporations	14,469	14,075	392	66	-	60	(15)	(12)	(2)	(30)	-	(27)		2,039	23
210 Households	3,320	3,224	93	5	-	4	(15)	(15)	(1)	(1)	-	-		374	1
220 Total	120,048	114,812	4,838	1,544	-	1,453	(562)	(210)	(323)	(686)	-	(663)	(560)	38,654	705

Credit Risk

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	31 December 2025														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off 		

⁽¹⁾ The increase in Non-Financial Corporations is mainly due to new corporate loans.

⁽²⁾ The increase in debt securities is mainly due to increased position in Sovereign, Institutions and International Organization bonds.

Credit Risk

Table 14: EU CQ4 - Quality of non-performing exposures by geography

	a	b	c	d	e	f	g
	30 June 2026						
	Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	of which: non-performing			of which: subject to impairment			
	of which defaulted						
	€ million	€ million	€ million				
010 On balance sheet exposures	86,850	1,471	1,468	86,826	(1,162)		-
020 Greece ⁽¹⁾	36,937	1,047	1,047	36,937	(785)		-
030 Romania	346	8	5	346	(15)		-
040 Bulgaria ⁽²⁾	10,835	233	233	10,835	(220)		-
050 United Kingdom	2,004	11	11	2,004	(4)		-
060 Cyprus	8,879	142	142	8,879	(103)		-
070 Other countries	27,849	30	30	27,825	(35)		-
080 Off balance sheet exposures	19,951	73	73			(87)	
090 Greece ⁽³⁾	12,968	47	47			(73)	
100 Romania	80	-	-			-	
110 Bulgaria	1,912	4	4			-	
120 United Kingdom	185	-	-			-	
130 Cyprus	2,626	21	21			(14)	
140 Other countries	2,180	1	1			-	
150 Total	106,801	1,544	1,541	86,826	(1,162)	(87)	-

	a	b	c	d	e	f	g
	31 December 2025						
	Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	of which: non-performing			of which: subject to impairment			
	of which defaulted						
	€ million	€ million	€ million				
010 On balance sheet exposures	82,074	1,461	1,458	82,051	(1,343)		-
020 Greece	36,228	1,048	1,048	36,227	(989)		-
030 Romania	357	8	5	357	(15)		-
040 Bulgaria	9,766	209	209	9,766	(198)		-
050 United Kingdom	1,848	11	11	1,848	(12)		-
060 Cyprus	8,531	155	155	8,531	(101)		-
070 Other countries	25,344	30	30	25,322	(28)		-
080 Off balance sheet exposures	20,008	71	71			(82)	
090 Greece	13,515	44	44			(72)	
100 Romania	1	-	-			-	
110 Bulgaria	1,819	8	8			-	
120 United Kingdom	214	-	-			-	
130 Cyprus	2,374	18	18			(10)	
140 Other countries	2,085	1	1			-	
150 Total	102,082	1,532	1,529	82,051	(1,343)	(82)	-

⁽¹⁾ The increase in Greece gross amount is mainly due to corporate loans.

⁽²⁾ The increase in Bulgaria is mainly due to new loans to Households and Non-Financial corporations.

⁽³⁾ The decrease in Greece off-balance sheet exposures is mainly due to Corporate loan commitments.

Credit Risk

The table below presents an overview of the credit quality of loans and advances to non-financial corporations as at 30 June 2026 and 31 December 2025.

Table 15: EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry

	a	b	c	d	e	f
	30 June 2026					
	Gross carrying/nominal amount				Accumulated negative changes in fair value due to credit risk on non-performing exposures	
	of which: non-performing		of which loans and advances subject to impairment		Accumulated impairment	
	€ million	€ million	of which defaulted € million	€ million	€ million	€ million
010 Agriculture, forestry and fishing	235	16	16	235	(10)	-
020 Mining and quarrying	30	2	2	30	(2)	-
030 Manufacturing ⁽¹⁾	4,995	94	94	4,995	(89)	-
040 Electricity, gas, steam and air conditioning supply	3,928	4	4	3,928	(12)	-
050 Water supply	89	1	1	89	(2)	-
060 Construction ⁽¹⁾	1,492	31	31	1,492	(23)	-
070 Wholesale and retail trade ⁽¹⁾	5,182	209	209	5,182	(143)	-
080 Transport and storage	6,249	12	12	6,249	(13)	-
090 Accommodation and food service activities	3,461	72	72	3,461	(37)	-
100 Information and communication	914	13	13	914	(17)	-
110 Financial and insurance activities	179	1	1	179	-	-
120 Real estate activities ⁽²⁾	3,447	42	42	3,447	(27)	-
130 Professional, scientific and technical activities	531	41	41	531	(23)	-
140 Administrative and support service activities	503	4	4	503	(5)	-
150 Public administration and defense, compulsory social security	1	-	-	1	-	-
160 Education	38	3	3	38	(2)	-
170 Human health services and social work activities	661	26	26	661	(7)	-
180 Arts, entertainment and recreation	703	1	1	703	(2)	-
190 Other services	126	10	10	126	(4)	-
200 Total	32,764	582	582	32,764	(418)	-

	a	b	c	d	e	f
	31 December 2025					
	Gross carrying/nominal amount				Accumulated negative changes in fair value due to credit risk on non-performing exposures	
	of which: non-performing		of which loans and advances subject to impairment		Accumulated impairment	
	€ million	€ million	of which defaulted € million	€ million	€ million	€ million
010 Agriculture, forestry and fishing	229	20	20	229	(15)	-
020 Mining and quarrying	25	3	3	25	(2)	-
030 Manufacturing	4,776	99	99	4,776	(89)	-
040 Electricity, gas, steam and air conditioning supply	3,807	4	4	3,807	(11)	-
050 Water supply	80	1	1	80	(1)	-
060 Construction	1,241	46	46	1,241	(25)	-
070 Wholesale and retail trade	4,644	198	198	4,644	(135)	-
080 Transport and storage	6,171	15	15	6,171	(17)	-
090 Accommodation and food service activities	3,339	71	71	3,339	(37)	-
100 Information and communication	710	15	15	710	(20)	-
110 Financial and insurance activities	128	-	-	128	-	-
120 Real estate activities	3,105	35	35	3,105	(26)	-
130 Professional, scientific and technical activities	534	46	46	534	(38)	-
140 Administrative and support service activities	593	4	4	593	(4)	-
150 Public administration and defense, compulsory social security	1	-	-	1	-	-
160 Education	38	3	3	38	(2)	-
170 Human health services and social work activities	676	26	26	676	(8)	-
180 Arts, entertainment and recreation	702	1	1	702	(1)	-
190 Other services	98	10	10	98	(6)	-
200 Total	30,897	597	597	30,897	(437)	-

⁽¹⁾ The increase in sectors "Wholesale and retail trade", "Construction" and "Manufacturing" is mainly due to the productions of new loans in Greece.

⁽²⁾ The increase in sector "Real estate activities" is mainly due to the productions of new loans in Cyprus and Bulgaria.

Credit Risk

The following table presents an overview of the movements (inflows and outflows) of non performing loans and advances as at 30 June 2026.

Table 16: EU CR2 - Changes in the stock of non-performing loans and advances

	a
	30 June 2026
	Gross carrying amount € million
010 Initial stock of non-performing loans and advances	1,434
020 Inflows to non-performing portfolios	743
030 Outflows from non-performing portfolios	(735)
040 Outflows due to write-offs	(23)
050 Outflow due to other situations ⁽¹⁾	(712)
060 Final stock of non-performing loans and advances	1,442

⁽¹⁾ It represents mainly the outflow: i) to performing portfolio, mainly retail ii) due to loan repayment, partial or total iii) of retail loans that have been reclassified as HFS.

The following table presents an overview of collateral obtained by taking possession by type, by time since date of foreclosure as at 30 June 2026 and 31 December 2025.

Table 17: EU CQ7 - Collateral obtained by taking possession and execution processes

	a		b	
	30 June 2026		31 December 2025	
	Collateral obtained by taking possession		Collateral obtained by taking possession	
	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million
010 Property Plant and Equipment (PP&E)	-	-	-	-
020 Other than PP&E	560	(111)	605	(124)
030 Residential immovable property	186	(35)	202	(38)
040 Commercial Immovable property	366	(76)	394	(85)
050 Movable property (auto, shipping, etc.)	2	-	2	-
060 Equity and debt instruments	7	-	7	-
070 Other collateral	-	-	-	-
080 Total	560	(111)	605	(124)

3.4 Standardised approach

The Group is applying since Q1 2023 the Common Reports requirements of EU Regulation 575/2013 ('CRR') under Title II, Chapter 2 ('Standardised approach') and its subsequent amendments and has aligned respectively the Pillar 3 disclosures.

Credit ratings are retrieved from External Credit Assessment Institutions, such as Moody's or Standard & Poor's or Fitch or ICAP-CRIF. In cases where more than one rating is available, the second better rating is used.

The Group continues utilizing its advanced risk management capabilities for internal purposes such as credit approvals, risk adjusted pricing, IFRS9 provisions where applicable and risk monitoring.

Credit Risk

The following table presents Standardised exposures on two different basis (before Credit Conversion Factor (CCF) and Credit Risk Mitigation (CRM) and after CCF and CRM) as at 30 June 2026 and 31 December 2025.

Table 18: EU CR4 - Standardised approach – Credit risk exposure and CRM effects

Exposure classes	a	b	c	d	e	f
	30 June 2026					
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On-balance-sheet exposures € million	Off-balance-sheet exposures € million	On-balance-sheet exposures € million	Off-balance-sheet amount € million	RWAs € million	RWAs density %
1 Central governments or central banks ⁽¹⁾	34,422	-	37,484	1	4,980	13%
2 Non-central government public sector entities	253	28	470	15	75	15%
EU 2a Regional government or local authorities	23	9	8	1	2	22%
EU 2b Public sector entities	230	19	462	14	73	15%
3 Multilateral development banks	496	-	1,107	13	4	0%
EU 3a International organisations ⁽²⁾	1,289	-	1,289	-	-	0%
4 Institutions ⁽³⁾	4,939	305	5,002	122	1,463	29%
5 Covered bonds	1,982	-	1,982	-	266	13%
6 Corporates	20,507	12,085	19,531	2,165	16,287	75%
6.1 Of which: Specialised Lending	7,746	3,483	7,604	138	5,426	70%
7 Subordinated debt exposures and equity	1,195	-	1,195	-	2,321	194%
EU 7a Subordinated debt exposures	414	-	414	-	620	150%
EU 7b Equity	782	-	782	-	1,701	218%
8 Retail	6,526	3,901	5,395	217	3,978	71%
9 Secured by mortgages on immovable property and ADC exposures	23,194	3,282	22,952	789	11,886	50%
9.1 Secured by mortgages on residential immovable property - non IPRE	12,690	580	12,609	158	4,063	32%
9.2 Secured by mortgages on residential immovable property - IPRE	608	56	602	8	267	44%
9.3 Secured by mortgages on commercial immovable property - non IPRE	6,800	1,365	6,682	185	4,291	62%
9.4 Secured by mortgages on commercial immovable property - IPRE	2,573	228	2,563	30	2,101	81%
9.5 Acquisition, Development and Construction (ADC)	523	1,053	496	409	1,163	129%
10 Exposures in default	1,150	37	1,112	11	1,196	107%
EU 10a Claims on Institutions and corporates with a short-term credit assessment	-	4	-	1	1	100%
EU 10b Collective investment undertakings (CIU)	103	-	103	-	131	127%
EU 10c Other items	4,837	-	4,837	-	3,720	77%
12 Total	100,893	19,643	102,460	3,333	46,309	44%

Exposure classes	a	b	c	d	e	f
	31 December 2025					
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On-balance-sheet exposures € million	Off-balance-sheet exposures € million	On-balance-sheet exposures € million	Off-balance-sheet amount € million	RWAs € million	RWAs density %
1 Central governments or central banks	32,740	-	36,418	1	5,096	14%
2 Non-central government public sector entities	309	30	487	10	74	15%
EU 2a Regional government or local authorities	25	11	10	-	2	20%
EU 2b Public sector entities	284	19	477	10	72	15%
3 Multilateral development banks	481	-	1,106	11	-	0%
EU 3a International organisations	727	-	727	-	-	0%
4 Institutions	3,695	402	3,726	174	1,234	32%
5 Covered bonds	2,258	-	2,258	-	304	13%
6 Corporates	20,022	12,389	18,889	2,215	15,925	75%
6.1 Of which: Specialised Lending	8,720	3,479	8,437	133	6,127	71%
7 Subordinated debt exposures and equity	1,179	-	1,179	-	2,213	188%
EU 7a Subordinated debt exposures	436	-	436	-	654	150%
EU 7b Equity	743	-	743	-	1,559	210%
8 Retail	6,245	3,847	5,117	148	3,738	71%
9 Secured by mortgages on immovable property and ADC exposures	22,619	2,997	21,990	808	11,536	51%
9.1 Secured by mortgages on residential immovable property - non IPRE	12,533	556	12,167	163	4,007	32%
9.2 Secured by mortgages on residential immovable property - IPRE	483	33	466	7	251	53%
9.3 Secured by mortgages on commercial immovable property - non IPRE	6,543	1,385	6,349	220	3,972	60%
9.4 Secured by mortgages on commercial immovable property - IPRE	2,290	282	2,273	23	1,820	79%
9.5 Acquisition, Development and Construction (ADC)	770	741	735	395	1,486	132%
10 Exposures in default	988	38	886	14	971	108%
EU 10a Claims on Institutions and corporates with a short-term credit assessment	-	4	-	1	1	100%
EU 10b Collective investment undertakings (CIU)	96	-	96	-	96	100%
EU 10c Other items	5,066	-	5,066	-	3,888	77%
12 Total	96,425	19,707	97,945	3,382	45,076	44%

⁽¹⁾ The increase of the exposures to Central Government or Central Bank is mainly due to the increased position of debt securities.

⁽²⁾ The increase of the exposures to International Organization is mainly due to the increased position of debt securities.

⁽³⁾ The increase of the exposures to Institutions is mainly due to the increased position of debt securities and new Nostros/Placings with other Institutions.

Notes:

(a) Exposures subject to counterparty credit risk are not included in the table.

(b) The table above does not include securitisations.

Credit Risk

The following table presents the credit exposures post conversion factor and post risk mitigation techniques (i.e. collaterals), broken down to different credit quality steps as at 30 June 2026 and 31 December 2025.

Table 19: EU CR5 – Standardised approach

Exposure classes	a	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	z	aa
	Risk weightings- 30 June 2026																						
	0%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%	Others	Total	Of which unrated
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Central governments or central banks	32,317	-	483	617	-	-	-	-	218	-	-	-	-	-	2,814	-	-	-	-	724	313	37,485	3,626
2 Non-central government public sector entities	403	-	-	9	-	-	-	-	-	-	-	-	-	-	73	-	-	-	-	-	-	485	73
EU 2a Regional governments or local authorities	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	9
EU 2b Public sector entities	403	-	-	-	-	-	-	-	-	-	-	-	-	-	73	-	-	-	-	-	-	476	341
3 Multilateral development banks	1,111	-	-	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	1,120	-
EU 3a International organisations	1,289	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,289	-
4 Institutions	575	-	-	2,426	803	-	105	-	1,126	-	-	-	-	-	2	-	-	-	88	-	-	5,124	694
5 Covered bonds	-	-	1,301	681	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,982	-
6 Corporates	-	-	-	2,815	-	-	-	-	4,214	-	3	2,873	1,155	-	9,513	-	-	331	793	-	-	21,696	8,520
6.1 Of which: Specialised Lending	-	-	-	1,062	-	-	-	-	1,883	-	-	1,055	1,155	-	2,239	-	-	331	18	-	-	7,742	3,664
7 Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	180	414	561	41	1,195	-
EU 7a Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	414	-	-	414	-
EU 7b Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	180	-	561	41	782	561
8 Retail exposures	-	-	-	-	-	-	-	207	-	-	-	5,291	-	-	113	-	-	-	-	-	-	5,612	5,612
9 Secured by mortgages on immovable property and ADC exposures	-	-	-	10,901	229	153	-	70	352	3,512	-	2,574	-	561	2,485	14	450	4	1,230	-	1,206	23,741	21,442
9.1 Secured by mortgages on residential immovable property - non IPRE	-	-	-	10,238	-	-	-	-	-	-	-	2,055	-	-	474	-	-	-	-	-	-	12,767	12,765
9.1.1 No loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	771	-	-	285	-	-	-	-	-	-	1,057	1,057
9.1.2 loan splitting applied (secured)	-	-	-	10,237	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10,237	10,236
9.1.3 loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	1,284	-	-	188	-	-	-	-	-	-	1,472	1,472
9.2 Secured by mortgages on residential immovable property - IPRE	-	-	-	44	229	153	-	69	4	-	5	-	-	3	14	-	-	89	-	-	-	610	610
9.3 Secured by mortgages on commercial immovable property - non IPRE	-	-	-	618	-	-	-	1	352	3,505	-	514	-	-	1,621	-	-	4	252	-	-	6,867	4,789
9.3.1 No loan splitting applied	-	-	-	542	-	-	-	1	287	-	-	336	-	-	1,004	-	-	4	218	-	-	2,391	1,104
9.3.2 loan splitting applied (secured)	-	-	-	-	-	-	-	-	3,505	-	-	-	-	6	-	-	-	-	-	-	-	3,512	2,975
9.3.3 loan splitting applied (unsecured)	-	-	-	76	-	-	-	-	66	-	-	178	-	-	611	-	-	34	-	-	-	964	711
9.4 Secured by mortgages on commercial immovable property - IPRE	-	-	-	1	-	-	-	-	3	-	-	-	-	561	-	-	450	-	371	-	1,206	2,593	2,373
9.5 Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	387	-	-	-	518	-	-	905	905
10 Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	977	-	-	-	146	-	-	1,123	1,121
EU 10a Claims on Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	1	-
EU 10b Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100	-	-	2	103	-
EU 10c Other items	1,054	-	-	78	-	-	-	-	-	-	-	-	-	-	3,705	-	-	-	-	-	-	4,837	4,837
EU 11c Total	36,748	-	1,784	17,527	1,032	153	105	277	5,920	3,512	3	10,738	1,155	561	19,682	14	450	615	2,669	1,284	1,562	105,793	89,498

Credit Risk

	a	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	y	z	aa
	Risk weightings - 31 December 2025																						
Exposure classes	0%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%	Others	Total	Of which unrated
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Central governments or central banks	30,369	352	1,349	466	-	-	-	-	263	-	-	-	-	-	2,884	-	-	-	-	736	-	36,419	3,687
2 Non-central government/public sector entities	414	-	-	10	-	-	-	-	-	-	-	-	-	-	73	-	-	-	-	-	-	497	72
EU 2a Regional governments or local authorities	-	-	-	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	10
EU 2b Public sector entities	414	-	-	-	-	-	-	-	-	-	-	-	-	-	73	-	-	-	-	-	-	487	303
3 Multilateral development banks	1,117	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,117	-
EU 3a International organisations	727	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	727	-
4 Institutions	419	-	-	1,719	457	-	101	-	1,091	-	-	-	-	-	-	-	-	-	113	-	-	3,900	469
5 Covered bonds	-	-	1,473	785	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,258	-
6 Corporates	-	-	-	2,512	-	-	-	-	3,927	-	2	2,946	1,738	-	9,016	-	-	289	674	-	-	21,104	8,953
6.1 Of which: Specialised Lending	-	-	-	1,031	-	-	-	-	1,953	-	-	1,064	1,738	-	2,477	-	-	289	18	-	-	8,570	4,461
7 Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	174	-	-	-	473	532	-	1,179	-
EU 7a Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	436	-	-	436	-
EU 7b Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	174	-	-	-	37	532	-	743	532
8 Retail exposures	-	-	-	-	-	-	-	157	-	1	5,005	-	-	102	-	-	-	-	-	-	-	5,265	5,265
9 Secured by mortgages on immovable property and ADC exposures	-	-	-	10,565	186	55	-	57	334	3,467	-	2,441	4	795	2,437	12	261	5	1,213	-	966	22,798	20,440
9.1 Secured by mortgages on residential immovable property - non IPRE	-	-	-	9,884	-	-	-	-	-	-	-	1,953	-	-	492	-	-	-	1	-	-	12,330	12,327
9.1.1 No loan split/line applied	-	-	-	-	-	-	-	-	-	-	-	704	-	-	329	-	-	-	1	-	-	1,034	1,033
9.1.2 loan splitting applied (secured)	-	-	-	9,884	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9,884	9,882
9.1.3 loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	1,249	-	-	163	-	-	-	-	-	-	1,412	1,411
9.2 Secured by mortgages on residential immovable property - IPRE	-	-	-	38	186	55	-	57	-	4	-	5	-	-	2	12	-	-	114	-	-	473	472
9.3 Secured by mortgages on commercial immovable property - non IPRE	-	-	-	642	-	-	-	-	334	3,459	-	483	4	-	1,525	-	-	5	117	-	-	6,569	4,643
9.3.1 No loan splitting applied	-	-	-	562	-	-	-	-	280	-	-	234	3	-	945	-	-	5	90	-	-	2,119	1,017
9.3.2 loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	3,459	-	-	-	-	7	-	-	-	-	-	-	3,466	2,945
9.3.3 loan splitting applied (unsecured)	-	-	-	80	-	-	-	-	54	-	-	249	1	-	573	-	-	-	27	-	-	984	681
9.4 Secured by mortgages on commercial immovable property - IPRE	-	-	-	1	-	-	-	-	4	-	-	-	-	795	-	-	261	-	269	-	966	2,296	1,874
9.5 Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	418	-	-	-	712	-	-	1,130	1,123
10 Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	760	-	-	-	140	-	-	900	899
EU 10a Claims on Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	1	-
EU 10b Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	96	-	-	-	-	-	-	96	-
EU 10c Other items	1,137	-	-	52	-	-	-	-	-	-	-	-	-	-	3,877	-	-	-	-	-	-	5,066	5,066
EU 11c Total	34,183	352	2,822	16,109	643	55	101	214	5,615	3,467	3	10,392	1,742	795	19,420	12	261	294	2,613	1,268	966	101,327	87,565

Notes:

(a) Exposures subject to counterparty credit risk are not included in the table.

(b) Credit exposures shown in the above table do not include goodwill, intangible assets and deferred tax, which are deducted from own funds.

Credit Risk

3.5 Credit risk mitigation

A key component of the Bank's business strategy is to reduce risk by utilizing various risk mitigating techniques. The most important risk mitigating means are collaterals' pledges, guarantees and master netting arrangements.

3.5.1 Analysis of collaterals

The following table shows the volume of unsecured and secured exposures including all collateral, financial guarantees and credit derivatives used as credit risk mitigants and are eligible under the respective regulatory approach.

Table 20: EU CR3 - CRM techniques – Overview: Disclosure of the use of credit risk mitigation techniques

	a	b	c	d	e
	30 June 2026				
	Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
	€ million	€ million	€ million	€ million	€ million
1 Loans and advances	36,448	36,729	32,945	3,784	-
2 Debt securities ⁽¹⁾	27,337	-	-	-	-
3 Total	63,785	36,729	32,945	3,784	-
4 Of which non-performing exposures	791	680	653	27	-
EU-5 Of which defaulted	788	680			

	a	b	c	d	e
	31 December 2025				
	Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
	€ million	€ million	€ million	€ million	€ million
1 Loans and advances	36,039	35,721	31,846	3,875	-
2 Debt securities	23,745	-	-	-	-
3 Total	59,784	35,721	31,846	3,875	-
4 Of which non-performing exposures	762	699	674	25	-
EU-5 Of which defaulted	759	699			

⁽¹⁾ The increase in debt securities is mainly due to increased position in Sovereign, Institutions and International Organizations bonds.

Notes:

(a) The value of collaterals and the amount of financial guarantees shown above are the allocated values after regulatory haircuts.

(b) For real estate properties the lower between the market value and the pledged amount is considered.

Credit Risk

3.6 Securitised exposures

The following table presents the risk weights of the purchased securitised exposures of the Group, as at 30 June 2026 and 31 December 2025.

Table 21: EU SEC1 - Securitisation exposures in the non-trading book

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o			
	30 June 2026																	
	Institution acts as originator						Institution acts as sponsor				Institution acts as investor							
	Traditional				Synthetic			Traditional		Synthetic		Traditional		Synthetic				
	STS		Non-STS		Sub-total			STS		Non-STS		STS		Non-STS		Sub-total		
	of which SRT		of which SRT		of which SRT			STS		Non-STS		STS		Non-STS		of which SRT		
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million		
1 Total exposures	-	-	879	879	3,413	3,413	4,292	-	-	-	-	100	1,671	-	1,771			
2 Retail (total)	-	-	861	861	-	-	861	-	-	-	-	-	17	-	17			
3 residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	17	-	17			
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
5 other retail exposures	-	-	861	861	-	-	861	-	-	-	-	-	-	-	-			
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
7 Wholesale (total)	-	-	18	18	3,413	3,413	3,431	-	-	-	-	100	1,654	-	1,754			
8 loans to corporates	-	-	18	18	3,413	3,413	3,431	-	-	-	-	-	1,654	-	1,654			
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
10 lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	100	-	-	100			
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	31 December 2025														
	Institution acts as originator						Institution acts as sponsor				Institution acts as investor				
	Traditional				Synthetic		Traditional		Synthetic		Traditional		Synthetic		
	STS		Non-STS		Sub-total		STS		Non-STS		STS		Non-STS		
	of which SRT		of which SRT		of which SRT		STS		Non-STS		STS		Non-STS		
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	-	-	922	922	2,346	2,346	3,268	-	-	-	-	100	1,761	-	1,861
2 Retail (total)	-	-	904	904	-	-	904	-	-	-	-	-	20	-	20
3 residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	20	-	20
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 other retail exposures	-	-	904	904	-	-	904	-	-	-	-	-	-	-	-
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Wholesale (total)	-	-	18	18	2,346	2,346	2,364	-	-	-	-	100	1,741	-	1,841
8 loans to corporates	-	-	18	18	2,346	2,346	2,364	-	-	-	-	-	1,741	-	1,741
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	100	-	-	100
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Credit Risk

Table 22: EU SEC2 - Securitisation exposures in the trading book is not included as no securitization positions exist in the trading book.

Table 23: EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements – institution acting as originator or as sponsor

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	30 June 2026																
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	3,411	-	856	25	-	-	-	4,292	-	-	-	1,400	-	-	-	112	-
2 Traditional transactions	-	-	856	23	-	-	-	879	-	-	-	955	-	-	-	76	-
3 Securitisation	-	-	856	23	-	-	-	879	-	-	-	955	-	-	-	76	-
4 Retail	-	-	856	5	-	-	-	861	-	-	-	845	-	-	-	68	-
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Wholesale	-	-	-	18	-	-	-	18	-	-	-	110	-	-	-	8	-
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Synthetic transactions	3,411	-	-	2	-	-	-	3,413	-	-	-	445	-	-	-	36	-
10 Securitisation	3,411	-	-	2	-	-	-	3,413	-	-	-	445	-	-	-	36	-
11 Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Wholesale	3,411	-	-	2	-	-	-	3,413	-	-	-	445	-	-	-	36	-
13 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	31 December 2025																
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	2,345	-	899	24	-	-	-	3,268	-	-	-	1,336	-	-	-	107	-
2 Traditional transactions	-	-	899	23	-	-	-	922	-	-	-	1,004	-	-	-	80	-
3 Securitisation	-	-	899	23	-	-	-	922	-	-	-	1,004	-	-	-	80	-
4 Retail	-	-	899	5	-	-	-	904	-	-	-	886	-	-	-	71	-
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Wholesale	-	-	-	18	-	-	-	18	-	-	-	118	-	-	-	9	-
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Synthetic transactions	2,345	-	-	1	-	-	-	2,346	-	-	-	332	-	-	-	27	-
10 Securitisation	2,345	-	-	1	-	-	-	2,346	-	-	-	332	-	-	-	27	-
11 Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Wholesale	2,345	-	-	1	-	-	-	2,346	-	-	-	332	-	-	-	27	-
13 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Credit Risk

Table 24: EU SEC4 - Securitisation exposures in the non-trading book and associated capital requirements - institution acting as investor

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	30 June 2026																
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	>50% to					SEC-ERBA				1250%				1250%			
	>20% to	100%	>100% to	1250% RW/		SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions
	≤20% RW	50% RW	RW	<1250% RW	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Total exposures	1,739	9	2	21	-	-	1,751	20	-	-	351	24	-	-	28	2	-
Traditional securitisation	1,739	9	2	21	-	-	1,751	20	-	-	351	24	-	-	28	2	-
Securitisation	1,739	9	2	21	-	-	1,751	20	-	-	351	24	-	-	28	2	-
Retail underlying	5	9	2	-	-	-	17	-	-	-	10	-	-	-	1	-	-
Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Wholesale	1,734	-	-	20	-	-	1,734	20	-	-	341	24	-	-	27	2	-
Of which STS	100	-	-	-	-	-	100	-	-	-	15	-	-	-	1	-	-
Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	31 December 2025																
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	>50% to					SEC-ERBA				1250%				1250%			
	>20% to	100%	>100% to	1250% RW/		SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions
	≤20% RW	50% RW	RW	<1250% RW	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Total exposures	1,813	10	3	35	-	-	1,826	35	-	-	367	41	-	-	29	3	-
Traditional securitisation	1,813	10	3	35	-	-	1,826	35	-	-	367	41	-	-	29	3	-
Securitisation	1,813	10	3	35	-	-	1,826	35	-	-	367	41	-	-	29	3	-
Retail underlying	7	10	3	-	-	-	20	-	-	-	11	-	-	-	1	-	-
Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Wholesale	1,806	-	-	35	-	-	1,806	35	-	-	356	41	-	-	28	3	-
Of which STS	100	-	-	-	-	-	100	-	-	-	15	-	-	-	1	-	-
Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Credit Risk

Table 25: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments

	a	b	c	a	b	c
	30 June 2026			31 December 2025		
	Exposures securitised by the institution - Institution acts as originator or as sponsor			Exposures securitised by the institution - Institution acts as originator or as sponsor		
	Total outstanding nominal amount	Total amount of specific credit risk adjustments made during the period		Total outstanding nominal amount	Total amount of specific credit risk adjustments made during the period	
	Of which exposures in default			Of which exposures in default		
	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures ⁽¹⁾	12,831	7,548	4,744	11,917	7,711	4,934
2 Retail (total)	7,426	6,029	3,528	7,719	6,140	3,695
3 residential mortgage	5,451	4,719	2,451	5,506	4,695	2,490
4 credit card	-	-	-	-	-	-
5 other retail exposures	1,975	1,310	1,077	2,213	1,445	1,205
6 re-securitisation	-	-	-	-	-	-
7 Wholesale (total)	5,405	1,519	1,216	4,198	1,571	1,239
8 loans to corporates	5,405	1,519	1,216	4,198	1,571	1,239
9 commercial mortgage	-	-	-	-	-	-
10 lease and receivables	-	-	-	-	-	-
11 other wholesale	-	-	-	-	-	-
12 re-securitisation	-	-	-	-	-	-

⁽¹⁾ The overall increase of € 0.9 billion was mainly driven by the new Synthetic Wave III transaction, partially offset by the decrease of traditional securitisations due to a portfolio sale within Cairo II transaction and scheduled amortisation.

For securitization exposures the Group uses one or more of the following external rating agencies: Moody's, Standard & Poor's and Fitch.

Market Risk

4. Market Risk

The Bank uses its own internal Value at Risk (VaR) model to calculate capital requirements for market risk in its trading book, for the Bank's activities in Greece. The Bank received the official validation of its model for market risk by the BoG in July 2005. The model is subject to periodic review by the regulator.

In 2011, the Bank updated its models and systems in order to fully comply with the BoG Governor's Act 2646/2011 for the trading book capital. The Bank calculates the capital for stressed VaR and Incremental Risk Charge (IRC) since 31.12.2011.

For the measurement of market risk exposure and the calculation of capital requirements for the Bank's subsidiaries in Greece and in International operations, the STD is applied.

Furthermore, the Bank calculates and monitors the market risk of the banking book for its operations in Greece and international subsidiaries on a daily basis using the internal VaR model, further supplemented by sensitivity analysis and stress testing, historical simulation and other market risk metrics (e.g., expected shortfall).

4.1 Internal model - Value at Risk (VaR) model & Credit Risk (IRC)

Since 2005 the Bank is validated by the Competent Authorities to employ the internal model approach (IMA) in the calculation of regulatory capital for the trading positions of its activities in Greece.

The following two tables summarize the components of the capital requirement, under the IMA approach applied by the Bank as at 30 June 2026 and 31 December 2025.

Table 26: EU MR2-A - Market risk under IMA

	30 June 2026		31 December 2025	
	a	b	a	b
	RWEAs	Own funds	RWEAs	Own funds
	€ million	requirements	€ million	requirements
	€ million	€ million	€ million	€ million
1 VaR (higher of values a and b)	144	11	117	9
(a) Previous day's VaR (VaRt-1)		2		2
(b) Multiplication factor (mc) x average of previous 60 working days (VaRavg)		11		9
2 SVaR (higher of values a and b)	341	27	260	21
(a) Latest available SVaR (SVaRt-1)		5		5
(b) Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		27		21
3 IRC (higher of values a and b)	226	18	213	17
(a) Most recent IRC measure		12		16
(b) 12 weeks average IRC measure		18		17
4 Comprehensive risk measure (higher of values a, b and c)	-	-	-	-
(a) Most recent risk measure of comprehensive risk measure		-		-
(b) 12 weeks average of comprehensive risk measure		-		-
(c) Comprehensive risk measure - Floor		-		-
5 Other	-	-	-	-
6 Total ⁽¹⁾	711	57	589	47

⁽¹⁾ The observed increase in the 1H 2026 RWEAs reflects the higher market volatility prevailing during the last six months, primarily as a result of ongoing geopolitical tensions in the Middle East.

Market Risk

Table 27: EU MR2-B - RWEAs flow of market risk exposures under IMA

	a	b	c	d	e	f	g
	30 June 2026						Total own funds requirements
	VaR € million	SVaR € million	IRC € million	Comprehensive risk measure € million	Other € million	Total RWEAs € million	€ million
1 RWEAs at 1 April 2026 ⁽¹⁾	124	357	269	-	-	751	60
1a Regulatory adjustment ⁽²⁾	(89)	(233)	-	-	-	(323)	(26)
1b RWEAs at the previous quarter-end (end of the day) ⁽³⁾	35	124	269	-	-	428	34
2 Movement in risk levels	19	(16)	(42)	-	-	(40)	(3)
3 Model updates/changes	-	-	-	-	-	-	-
4 Methodology and policy	-	-	-	-	-	-	-
5 Acquisitions and disposals	-	-	-	-	-	-	-
6 Foreign exchange movements	-	-	-	-	-	-	-
7 Other	-	-	-	-	-	-	-
8a RWEAs at the end of the reporting period (end of the day) ³	24	65	155	-	-	244	20
8b Regulatory adjustment ⁽²⁾	120	276	71	-	-	467	37
8 RWEAs at 30 June 2026 ⁽¹⁾	144	341	226	-	-	711	57

⁽¹⁾ RWEAs at previous and current reporting period (quarter end).

⁽²⁾ Regulatory Adjustment indicates the difference between RWEAs and RWEAs (end of day) at previous and current reporting period.

⁽³⁾ RWEAs that would be estimated on the basis of the previous or current quarter end figure (instead of the max of it and the 60-day average).

The following table shows the values resulting from the different types of internal models approved to use for computing the regulatory capital charge as at 30 June 2026 and 31 December 2025.

Table 28 EU MR3 – IMA values for trading portfolios

	a	a
	30 June 2026	December 2025
	€ million	€ million
VaR (10 day 99%)		
1 Maximum value	4	4
2 Average value	3	2
3 Minimum value	2	2
4 Period end	2	2
SVaR (10 day 99%)		
5 Maximum value	12	8
6 Average value	7	6
7 Minimum value	5	4
8 Period end	5	5
IRC (99.9%)		
9 Maximum value	38	25
10 Average value	19	16
11 Minimum value	12	11
12 Period end	12	16
Comprehensive risk measure (99.9%)		
13 Maximum value	-	-
14 Average value	-	-
15 Minimum value	-	-
16 Period end	-	-

Market Risk

4.1.1 Stress testing

VaR models are designed to measure market risk under normal market environment. It is assumed that any changes in the risk factors follow a normal distribution. Given that the VaR approach does not cover extreme market conditions, the Group has been applying stress tests, to simulate the effect of many standard deviation movements of risk factors and the breakdown of historical correlations.

The main types of stress tests performed are historical stress tests and subjective stress tests, where the portfolios are exposed to scenarios for risk factors that are deemed particularly relevant, focusing on sudden movements in interest rates, credit spreads, implied volatilities, fx rates, etc.

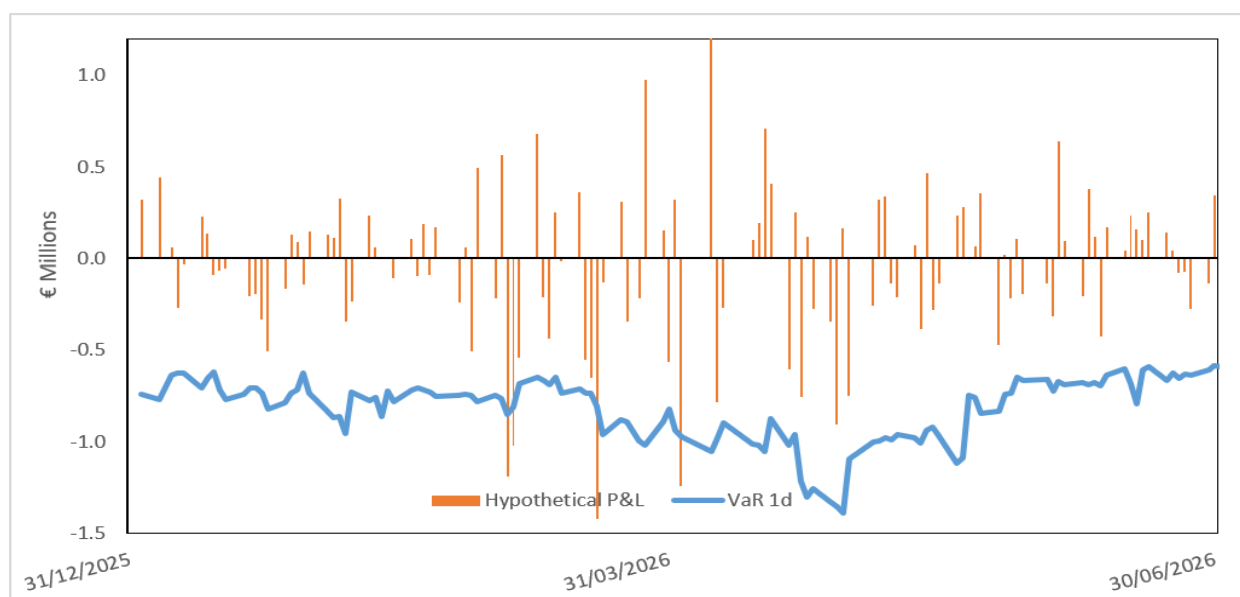
Stress tests that are applied to the IRC modelling parameters consist of:

- Sensitivity on the percentage on systematic factor;
- Sensitivity on pair-wise obligor correlation;
- Sensitivity on PDs;
- Sensitivity on LGDs.

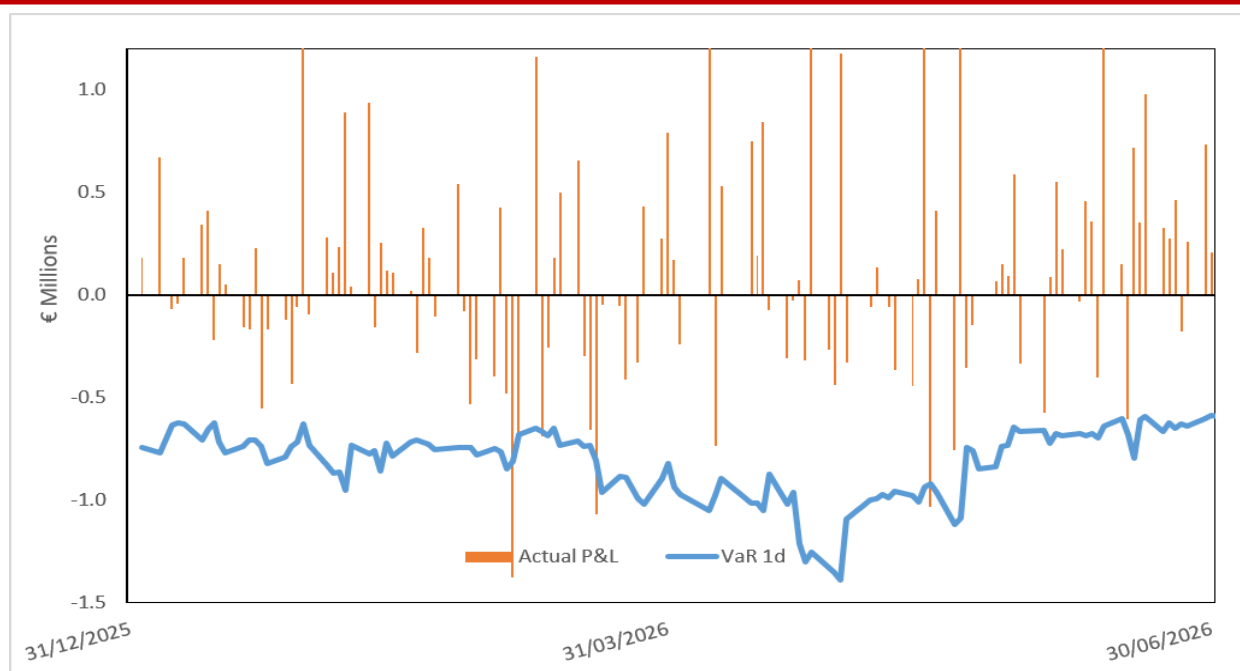
4.1.2 Back testing

Back testing for H1 2026 has revealed, as shown in the graphs below, four (4) overshootings out of a total of 119 working days, when comparing the VaR forecast to the Hypothetical Profit & Loss (P&L) and five (5) overshootings when comparing the VaR forecast to the Actual P&L. According to the regulatory framework, which takes into account a 250 working days period, the multiplier is equal to 3.40 (currently in the yellow zone, with four (4) overshootings when comparing the VaR forecast to Hypothetical P&L and five (5) overshootings when comparing to Actual P&L), regarding capital adequacy calculations for market risk. The calculation for RWEAs (VaR, Stressed Value-at-Risk (SVaR)) takes into account the amended multiplication factor (3.65), following the ECB's Decision on the additional supervisory measures, regarding the use of the internal models' approach for calculating OFR for market risk. The aforementioned overshootings observed in H1 2026, were due to exceptional volatility in the markets mostly driven by heightened geopolitical tensions in the Middle East.

Table 29: EU MR4 – Comparison of VaR estimates with gains/losses



Market Risk



4.2 Standardised approach for market risk

The Bank uses the STD for the measurement of market risk exposure and capital requirements of its subsidiaries in Greece and in International operations.

The following table summarises the capital requirements for market risk per risk factor, based on the STD, as at 30 June 2026 and 31 December 2025.

Table 30: EU MR1 – Market risk under the standardised approach

	a	a
	30 June 2026	31 December 2025
	RWEAs € million	RWEAs € million
Outright products		
1 Interest rate risk (general and specific)	27	28
2 Equity risk (general and specific)	25	29
3 Foreign exchange risk	53	81
4 Commodity risk	-	-
Options		
5 Simplified approach	-	-
6 Delta-plus approach	1	-
7 Scenario approach	-	-
8 Securitisation (specific risk)	-	-
9 Total	106	138

Market Risk

4.3 Interest rate risk in the Banking Book (IRRBB)

With regards to the estimation of the IRRBB, the Bank uses methodologies for the estimation of risk from positions at fair value (VaR approach), along with methodologies for the estimation of risk on Economic Value of Equity (EVE) and on Net Interest Income (NII), taking into account Banking Book positions (including portfolios measured at amortised cost).

Regarding positions at fair value, the Bank calculates and monitors the interest rate risk for the Bank's operations in Greece, and for its Subsidiary Banks on a daily basis, using the internal VaR model. The perimeter of the calculation includes the FVOCI portfolio; VaR provides an estimation of the potential losses from FVOCI positions measured at fair value, that will directly affect the Bank's Capital (income statement or equity).

The VaR that the Group measures for positions measured at fair value is based on a 99% confidence level and a holding period of 1 day. The methodology used for the calculation is Monte Carlo simulation (full re-pricing approach).

In addition to the VaR estimation, the Bank uses internal reports for the monitoring of the IRRBB taking into account FVOCI and AC portfolios (loans, deposits, debt securities and derivatives used for hedging etc.), including: Interest rate repricing analysis, sensitivity of NII and sensitivity of Bank's EVE on multiple scenarios of interest rates. For the calculation of these sensitivities, specific assumptions are made regarding the applicable duration (for EVE delta calculations) and pass-through rate (for NII delta calculations) on specific parts of the Group's Balance Sheet (for example Non-Maturing Deposits). These assumptions are based on historical observations processed using statistical analysis.

The disclosure has been prepared using the information referred to in Article 448(1), points (a) and (b), of Regulation (EU) No 575/2013 by using template EU IRRBB1 set out in Annex XXXVII of Regulation (EU) No 631/2022 of 13 April 2022 and by following the instructions set out in Annex XXXVIII to the same Regulation.

The analysis takes into account all assets, liabilities and off-balance sheet items, which are sensitive to interest rates.

Table 31: EU IRRBB1 - Interest rate risks of non-trading book activities

Supervisory shock scenarios	a	b	c	d
	30 June 2026			
	Changes of the economic value of equity		Changes of the net interest income	
	Current period € million	Last period € million	Current period € million	Last period € million
1 Parallel up	(579)	(346)	53	86
2 Parallel down	306	187	(243)	(266)
3 Steepener	118	130		
4 Flattener	(358)	(348)		
5 Short rates up	(521)	(439)		
6 Short rates down	233	196		

Market Risk

Supervisory shock scenarios	a	b	c	d
	31 December 2025			
	Changes of the economic value of equity		Changes of the net interest income	
	Current period € million	Last period € million	Current period € million	Last period € million
1 Parallel up	(346)	(200)	86	79
2 Parallel down	187	113	(266)	(266)
3 Steepener	130	137		
4 Flattener	(348)	(345)		
5 Short rates up	(439)	(394)		
6 Short rates down	196	181		

The sensitivities to the Supervisory Shock scenarios are calculated as defined in EBA/GL/2022/14 which came into force on the 30th of June 2023.

The specification of supervisory scenarios and the measurement of Economic value of Equity and of Net Interest Income is based on the Commission Delegated Regulation (EU) 2024/856. The application of Article 3 paragraph 8 of the Commission Delegated Regulation (EU) 2024/856 contributes to the asymmetry of the results. The change in the Interest Rate Risk profile between the reporting periods is mainly attributed to adjustments of the hedging strategy, changes on rates and on the balance sheet structure of the Group. It is worth noting that the Bank in response to the regulatory developments and requirements (EBA/GL/2022/14), has further enhanced its infrastructure, governance and limit structure accordingly, so as to measure and monitor its Credit Spread Risk in the Banking Book.

Counterparty Risk

5. Counterparty risk

5.1 Definition

Counterparty credit risk (CCR) is the risk that a counterparty in an off balance sheet transaction (i.e. derivative transaction) defaults prior to maturity and the Bank has a claim over the counterparty (the market value of the contract is positive for the Bank).

5.2 Mitigation of counterparty risk

To reduce the exposure towards single counterparties, risk mitigation techniques are used. The most common is the use of closeout netting agreements (usually based on standardised International Swaps and Derivatives Association - ISDA contracts), which allow the bank to net positive and negative replacement values in the event of default of the counterparty.

Furthermore, the Bank also applies margin agreements (CSAs) in case of counterparties. Thus, collateral is paid or received on a daily basis to cover current exposure. In case of repos and reverse repos, the Bank applies netting and daily margining using standardised Global Master Repurchase Agreement (GMRA) contracts.

5.3 Credit derivatives

As of 30 June 2026, the Group held a number of positions mainly on CDS Indices (protection bought € 525 million) and single name CDS (protection bought € 10 million).

As of 31 December 2025, the Group held a number of positions mainly on CDS Indices (protection bought € 375 million) and single name CDS (protection bought € 5 million).

The Bank does not have any brokerage activity in this market. Furthermore, the Bank does not hedge its loan portfolio with CDSs as this market in Greece is not developed.

Table 32: EU CCR6 – Credit derivatives exposures

	a		b	
	30 June 2026		31 December 2025	
	Protection bought	Protection sold	Protection bought	Protection sold
	€ million	€ million	€ million	€ million
Notionals				
1 Single-name credit default swaps	10	-	5	-
2 Index credit default swaps	525	-	375	-
3 Total return swaps	-	-	-	-
4 Credit options	-	-	-	-
5 Other credit derivatives	-	-	-	-
6 Total notionals	535	-	380	-
Fair values				
7 Positive fair value (asset)	-	-	-	-
8 Negative fair value (liability)	(12)	-	(9)	-

Counterparty Risk

5.4 Counterparty risk based on the calculation methodology employed

The following table shows the exposure to counterparty credit risk based on the calculation methodology employed as at 30 June 2026 and 31 December 2025.

Table 33: EU CCR1 – Analysis of CCR exposure by approach

	a	b	c	d	e	f	g	h
	30 June 2026							
	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
	€ million	€ million	€ million		€ million	€ million	€ million	€ million
EU-1 EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	199	290		1.4	975	684	682	319
2 IMM (for derivatives and SFTs)					-	-	-	-
2a Of which securities financing transactions netting sets					-	-	-	-
2b Of which derivatives and long settlement transactions netting sets					-	-	-	-
2c Of which from contractual cross-product netting sets					-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					3,002	1,758	1,758	238
5 VaR for SFTs					-	-	-	-
6 Total					3,977	2,442	2,440	557

	a	b	c	d	e	f	g	h
	31 December 2025							
	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
	€ million	€ million	€ million		€ million	€ million	€ million	€ million
EU-1 EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	191	282		1.4	927	663	662	273
2 IMM (for derivatives and SFTs)					-	-	-	-
2a Of which securities financing transactions netting sets					-	-	-	-
2b Of which derivatives and long settlement transactions netting sets					-	-	-	-
2c Of which from contractual cross-product netting sets					-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					3,099	1,464	1,464	175
5 VaR for SFTs					-	-	-	-
6 Total					4,026	2,127	2,126	448

5.5 Exposures to CCPs

The following table shows the exposures to Central Counterparties (CCPs) and the corresponding RWEAs as at 30 June 2026 and 31 December 2025.

Counterparty Risk

Table 34: EU CCR8 – Exposures to CCPs

	a	b	a	b
	30 June 2026		31 December 2025	
	Exposure value € million	RWEA € million	Exposure value € million	RWEA € million
1 Exposures to QCCPs (total)		20		11
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	497	10	161	3
3 (i) OTC derivatives	497	10	161	3
4 (ii) Exchange-traded derivatives	-	-	-	-
5 (iii) SFTs	-	-	-	-
6 (iv) Netting sets where cross-product netting has been approved	-	-	-	-
7 Segregated initial margin	-		-	
8 Non-segregated initial margin	475	10	394	8
9 Prefunded default fund contributions	-	-	-	-
10 Unfunded default fund contributions	-	-	-	-
11 Exposures to non-QCCPs (total)		-		-
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-	-	-
13 (i) OTC derivatives	-	-	-	-
14 (ii) Exchange-traded derivatives	-	-	-	-
15 (iii) SFTs	-	-	-	-
16 (iv) Netting sets where cross-product netting has been approved	-	-	-	-
17 Segregated initial margin	-		-	
18 Non-segregated initial margin	-	-	-	-
19 Prefunded default fund contributions	-	-	-	-
20 Unfunded default fund contributions	-	-	-	-

5.6 Standardised approach – CCR exposures by regulatory portfolio and risk

The following table shows the CCR exposures by regulatory portfolio and risk as at 30 June 2026 and 31 December 2025.

Table 35: EU CCR3 - Standardised approach – CCR exposures by regulatory exposure class and risk weights

	a	b	c	d	e	f	g	h	i	j	k	l
	30 June 2026											
Exposure classes	Risk weight											Total exposure value
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	€ million
1 Central governments or central banks	733	-	-	-	-	-	-	-	-	-	-	733
2 Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	30	-	-	-	-	-	-	-	-	-	-	30
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions ⁽¹⁾	-	957	15	-	1,010	1	-	-	-	-	302	2,285
7 Corporates	-	-	-	-	36	101	-	97	123	7	-	364
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	-	-
11 Total exposure value	763	957	15	-	1,046	102	-	97	123	7	302	3,412

Counterparty Risk

	a	b	c	d	e	f	g	h	i	j	k	l
	31 December 2025											
	Risk weight											Total exposure value
Exposure classes	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	€ million
1 Central governments or central banks	722	-	-	-	-	-	-	-	-	-	-	722
2 Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	29	-	-	-	-	-	-	-	-	-	-	29
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	580	10	-	824	19	-	-	-	-	204	1,637
7 Corporates	-	-	-	-	62	106	-	73	69	15	-	325
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	2	-	-	-	-	-	-	2
11 Total exposure value	751	580	10	-	888	125	-	73	69	15	204	2,715

⁽¹⁾ The increase of the exposure value in Institutions is mainly due to new securities lending and derivatives transactions with other counterparties.

5.7 RWEAs flow statements of CCR exposures under IMM

Table 36: EU CCR7 - RWEAs flow statements of CCR exposures under the IMM is not included as the Bank does not use an internal model for the calculation of the RWEAs of CCR exposures.

5.8 Composition of collateral for exposures to CCR

The following table shows the composition of collateral for exposures to CCR, as at 30 June 2026 and 31 December 2025.

Table 37: EU CCR5 - Composition of collateral for CCR exposures

	a	b	c	d	e	f	g	h
	30 June 2026							
	Collateral used in derivative transactions				Collateral used in SFTs			
Collateral type	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Cash – domestic currency	4	656	70	660	-	-	-	29
2 Cash – other currencies	-	4	1	6	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	65	-	59
4 Other sovereign debt	-	-	-	-	-	75	-	6
5 Government agency debt	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	1,323	-	3,477
7 Equity securities	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	1,590
9 Total	4	661	71	667	-	1,463	-	5,162

Counterparty Risk

	a	b	c	d	e	f	g	h
	31 December 2025							
Collateral type	Collateral used in derivative transactions				Collateral used in SFTs			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Cash – domestic currency	14	733	3	486	-	21	-	41
2 Cash – other currencies	-	3	1	8	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	11	-	74
4 Other sovereign debt	-	-	-	-	-	639	-	34
5 Government agency debt	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	1,188	-	3,421
7 Equity securities	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	1,588
9 Total	14	736	4	494	-	1,859	-	5,158

Leverage Ratio

6. Leverage Ratio

The regulatory framework has introduced the leverage ratio as a non-risk based measure which is intended to restrict the build-up of excessive leverage from on and off balance sheet items in the banking sector.

The leverage ratio is defined as Tier 1 capital divided by the total exposure measure.

The Bank submits to the regulatory authorities the leverage ratio on quarterly basis and monitors the level of the ratio and the factors that affect it.

The level of the leverage ratio with reference date 30 June 2026 was at 7.9% (31 December 2025: 8.1%), significantly over the proposed minimum threshold of 3%. In addition, based on the latest SREP Decision, the Group is not subject to a P2R or P2G in relation to the leverage ratio.

The following table includes the summary of the Group's leverage ratio with reference dates 30 June 2026 and 31 December 2025.

Table 38: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

	a	a
	30 June	31 December
	2026 ⁽¹⁾	2025 ⁽¹⁾
	€ million	€ million
1 Total assets as per published financial statements	112,943	107,976
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-	-
3 (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-
4 (Adjustment for temporary exemption of exposures to central bank (if applicable))	-	-
5 (Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-	-
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-	-
7 Adjustment for eligible cash pooling transactions	-	-
8 Adjustments for derivative financial instruments	586	6
9 Adjustment for securities financing transactions (SFTs)	2,157	1,876
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	4,885	4,937
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-	-
EU-11a (Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-11b (Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-
12 Other adjustments	(1,530)	(1,272)
13 Total exposure measure	119,042	113,523

⁽¹⁾ Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission for profits recognition granted by the Supervisory Authorities.

Leverage Ratio

Table 39: EU LR2 - LRCom: Leverage ratio common disclosure

	a	b
	30 June 2026 ⁽¹⁾	31 December 2025 ⁽¹⁾
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
On - balance sheet exposures (excluding derivatives and SFT's)		
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	111,541	105,940
2 Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(302)	(121)
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5 (General credit risk adjustments to on-balance sheet items)	-	-
6 (Asset amounts deducted in determining Tier 1 capital)	(437)	(399)
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	110,802	105,419
Derivative exposures		
8 Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	121	141
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	1,012	645
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b Exposure determined under Original Exposure Method	-	-
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11 Adjusted effective notional amount of written credit derivatives	-	-
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13 Total derivatives exposures	1,133	786
Securities financing transaction exposures		
14 Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	1,345	1,785
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	13	9
16 Counterparty credit risk exposure for SFT assets	863	586
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17 Agent transaction exposures	-	-
EU-17a (Exempted CCP leg of client-cleared SFT exposure)	-	-
18 Total securities financing transaction exposures	2,221	2,380
Other off-balance sheet exposures		
19 Off-balance sheet exposures of gross notional amount	19,709	19,767
20 (Adjustments for conversion to credit equivalent amounts)	(14,824)	(14,830)
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22 Off-balance sheet exposures	4,885	4,937
Excluded exposures		
EU-22k (Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	-	-
EU-22l (Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	-	-
EU-22m (Total exempted exposures)	-	-
Capital and total exposure measure		
23 Tier 1 capital	9,414	9,224
24 Total exposure measure	119,042	113,523
Leverage ratio		
25 Leverage ratio %	7.9%	8.1%
EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	7.9%	8.1%
25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	7.9%	8.1%
26 Regulatory minimum leverage ratio requirement (%)	3.0%	3.0%
EU-26a Additional own funds requirements to address the risk of excessive leverage (%)	0.0%	0.0%
EU-26b of which: to be made up of CET1 capital	0.0%	0.0%
27 Leverage ratio buffer requirement (%)	0.0%	0.0%
EU-27a Overall leverage ratio requirement (%)	3.0%	3.0%
Choice on transitional arrangements and relevant exposures		
EU-27b Choice on transitional arrangements for the definition of capital measure	Transitional	Transitional

⁽¹⁾ Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission for profits recognition granted by the Supervisory Authorities.

Notes:

(a) Total off-balance sheet items exposures presented in accordance with Article 111 (1) of Regulation (EU) No 575/2013 as in force.

(b) The decrease in the Leverage ratio is primarily attributable to the increase in total assets, mainly from Debt Securities and Loans and Advances, partially offset by the increase in Tier 1 capital.

Leverage Ratio

Table 40: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

	a	a
	30 June 2026 ⁽¹⁾	31 December 2025 ⁽¹⁾
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	111,239	105,819
EU-2 Trading book exposures	558	516
EU-3 Banking book exposures, of which:	110,681	105,303
EU-4 Covered bonds	1,982	2,258
EU-5 Exposures treated as sovereigns	36,424	34,219
EU-6 Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	96	97
EU-7 Institutions	4,637	3,574
EU-8 Secured by mortgages of immovable properties	23,194	22,620
EU-9 Retail exposures	6,526	6,243
EU-10 Corporates	20,507	20,022
EU-11 Exposures in default	1,150	988
EU-12 Other exposures (eg equity, securitisations, and other non-credit obligation assets)	16,165	15,282

⁽¹⁾ Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission for profits recognition granted by the Supervisory Authorities.

Liquidity Risk

7. Liquidity Risk

The Group is exposed on a daily basis to liquidity risk arising from potential deposits withdrawals, maturity of medium or long-term notes, maturity of secured or unsecured funding (interbank repos and money market takings), collateral revaluation as a result of market movements, loan drawdowns and forfeiture of guarantees. Furthermore, margin calls on secured funding transactions (with the ECB and the market) and on risk mitigation contracts (Credit Support Annex - CSAs, GMRAs) and on centrally cleared transactions with CCPs result in liquidity exposure. The Group maintains cash resources to meet all of these needs. The Board Risk Committee (BRC) sets liquidity limits to ensure that sufficient funds are available to meet such contingencies.

Past experience shows that liquidity requirements to support calls under guarantees and standby letters of credit are considerably less than the amount of commitment. This is also the case with credit commitments where the outstanding contractual amount to extend credit does not necessarily represent future cash requirements, as many of these commitments will expire or terminate without being funded.

The matching and controlled mismatching of the maturities and interest rates of assets and liabilities is fundamental to the management of the Group. It is unusual for banks to be completely matched, as transacted business is often of uncertain term and of different types. An unmatched position potentially enhances profitability but also increases the risk of losses.

The maturities of assets and liabilities and the ability to replace, at an acceptable cost, interest bearing liabilities as they mature are important factors in assessing the liquidity of the Group.

7.1 Liquidity Coverage Ratio (LCR) calculations

LCR as of 30 June 2026 is equal to 174.1% (31 March 2026: 165.3%). The corresponding High Quality Liquid Assets (HQLA) as of 30 June 2026, as these are defined by the regulation for the calculation of LCR, are € 25,033 million (31 March 2026: € 22,555 million). The increased ratio reflects mainly the combined impact of deposit inflows, higher ECB funding, and the issuance of new EMTNs, partially offset by new loan disbursements.

The next table presents the key components of Group's LCR, as per the respective guidelines on LCR disclosure (EBA/GL/2017/01). According to the guideline, 12 monthly data points are used in the calculations below.

Liquidity Risk

The following table shows the level and components of the LCR.

Table 41: LIQ1 - Quantitative information of LCR

	a	b	c	d	e	f	g	h
	Total unweighted value (average)				Total weighted value (average)			
EU 1a Quarter ending on	30 June 2026	31 March 2026	31 December 2025	30 September 2025	30 June 2026	31 March 2026	31 December 2025	30 September 2025
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
EU 1b Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS								
1 Total high-quality liquid assets (HQLA)					22,722	22,234	22,307	22,674
CASH-OUTFLOWS								
2 Retail deposits and deposits from small business customers, of which:	56,393	55,567	54,777	54,003	3,356	3,310	3,259	3,201
3 Stable deposits	31,293	30,686	30,036	29,469	1,565	1,534	1,502	1,473
4 Less stable deposits	16,617	16,434	16,284	16,032	1,792	1,775	1,758	1,727
5 Unsecured wholesale funding	20,205	19,392	18,985	18,745	9,875	9,441	9,182	9,015
6 Operational deposits (all counterparties) and deposits in networks of cooperative banks	709	899	1,080	1,222	176	222	266	299
7 Non-operational deposits (all counterparties)	19,449	18,483	17,887	17,504	9,652	9,209	8,899	8,698
8 Unsecured debt	47	10	18	18	47	10	18	18
9 Secured wholesale funding					106	107	50	71
10 Additional requirements	8,203	8,196	7,897	7,630	1,224	1,255	1,261	1,231
11 Outflows related to derivative exposures and other collateral requirements	437	475	514	516	437	475	514	516
12 Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13 Credit and liquidity facilities	7,766	7,721	7,384	7,114	787	779	747	715
14 Other contractual funding obligations	99	104	146	132	62	67	108	94
15 Other contingent funding obligations	7,782	7,413	7,176	6,987	479	462	452	444
16 TOTAL CASH OUTFLOWS					15,103	14,641	14,313	14,055
CASH-INFLOWS								
17 Secured lending (eg reverse repos)	118	124	79	98	108	106	57	80
18 Inflows from fully performing exposures	1,671	1,722	1,804	1,761	1,431	1,501	1,590	1,563
19 Other cash inflows	1,665	1,612	1,520	1,495	380	438	425	430
(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19a								
EU-19b (Excess inflows from a related specialised credit institution)					-	-	-	-
20 TOTAL CASH INFLOWS	3,453	3,458	3,402	3,354	1,918	2,045	2,073	2,073
EU-20a Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b Inflows Subject to 90% Cap	-	-	-	-	-	-	-	-
EU-20c Inflows Subject to 75% Cap	3,453	3,458	3,402	3,354	1,918	2,045	2,073	2,073
TOTAL ADJUSTED VALUE								
EU-21 LIQUIDITY BUFFER					22,722	22,234	22,307	22,674
22 TOTAL NET CASH OUTFLOWS					13,185	12,596	12,240	11,982
23 LIQUIDITY COVERAGE RATIO (%)					172.7%	177.1%	182.6%	189.3%

Liquidity Risk

7.2 Net Stable Funding Ratio (NSFR) calculations

NSFR as of 30 June 2026 is equal to 142.8% (31 March 2026: 140.2%). The increase is mainly due to increase in deposits and issuance of new EMTNs, partially offset by new loan disbursements. The minimum regulatory threshold for NSFR is set at 100%.

Table 42: LIQ2 - Net Stable Funding Ratio

	a	b	c	d	e
	30 June 2026				
	Unweighted value by residual maturity				Weighted value
	No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
	€ million	€ million	€ million	€ million	€ million
Available stable funding (ASF) Items					
1 Capital items and instruments	10,904	-	-	1,600	12,504
2 Own funds	10,904	-	-	1,600	12,504
3 Other capital instruments		-	-	-	-
4 Retail deposits		52,843	4,038	968	54,088
5 Stable deposits		36,392	2,150	698	37,313
6 Less stable deposits		16,451	1,888	270	16,775
7 Wholesale funding:		29,845	1,329	646	12,532
8 Operational deposits		593	-	-	296
9 Other wholesale funding		29,252	1,329	646	12,236
10 Interdependent liabilities		-	-	-	-
11 Other liabilities:	173	2,711	501	6,173	6,424
12 NSFR derivative liabilities	173				
13 All other liabilities and capital instruments not included in the above categories		2,711	501	6,173	6,424
14 Total available stable funding (ASF)					85,549
	a	b	c	d	e
	30 June 2026				
	Unweighted value by residual maturity				Weighted value
	No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
	€ million	€ million	€ million	€ million	€ million
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					701
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool		112	114	3,399	3,082
16 Deposits held at other financial institutions for operational purposes		293	-	48	195
17 Performing loans and securities:		6,050	2,984	49,249	45,066
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19 Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,350	145	1,498	1,703
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		4,027	2,403	32,847	37,670
21 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		231	50	344	3,756
22 Performing residential mortgages, of which:		268	225	8,468	-
23 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		138	111	5,027	-
24 Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		405	211	6,436	5,692
25 Interdependent assets		-	-	-	-
26 Other assets:		1,826	-	10,167	10,294
27 Physical traded commodities				-	-
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	374	318
29 NSFR derivative assets		-			-
30 NSFR derivative liabilities before deduction of variation margin posted		757			38
31 All other assets not included in the above categories		1,069	-	9,793	9,938
32 Off-balance sheet items		9,509	426	657	556
33 Total RSF					59,894
NSFR					
30 June 2026					
34 Net Stable Funding Ratio (%)					142.8%

Liquidity Risk

	a	b	c	d	e
	31 March 2026				
	No maturity[1]	Unweighted value by residual maturity			Weighted value
	€ million	< 6 months	6 months to < 1yr	≥ 1yr	€ million
Available stable funding (ASF) Items	€ million	€ million	€ million	€ million	€ million
1 Capital items and instruments	10,817	-	-	1,613	12,430
2 Own funds	10,817	-	-	1,613	12,430
3 Other capital instruments		-	-	-	-
4 Retail deposits		52,056	3,713	1,002	53,087
5 Stable deposits		35,770	2,091	740	36,707
6 Less stable deposits		16,286	1,622	263	16,380
7 Wholesale funding:		26,729	1,054	916	11,503
8 Operational deposits		471	-	-	235
9 Other wholesale funding		26,258	1,054	916	11,267
10 Interdependent liabilities		-	-	-	-
11 Other liabilities:	49	3,147	508	4,996	5,251
12 NSFR derivative liabilities	49				
13 All other liabilities and capital instruments not included in the above categories		3,147	508	4,996	5,251
14 Total available stable funding (ASF)					82,271

	a	b	c	d	e
	31 March 2026				
	No maturity[1]	Unweighted value by residual maturity			Weighted value
	€ million	< 6 months	6 months to < 1yr	≥ 1yr	€ million
Required stable funding (RSF) Items	€ million	€ million	€ million	€ million	€ million
15 Total high-quality liquid assets (HQLA)					650
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool		116	117	3,547	3,213
16 Deposits held at other financial institutions for operational purposes		207	-	48	151
17 Performing loans and securities:		5,328	3,085	48,120	43,901
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19 Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,179	59	1,407	1,552
20 Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,516	2,550	32,302	36,991
21 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		210	87	385	3,655
22 Performing residential mortgages, of which:		242	248	8,375	-
23 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		117	126	4,823	-
24 Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		390	228	6,037	5,358
25 Interdependent assets		-	-	-	-
26 Other assets:		1,699	-	10,033	10,177
27 Physical traded commodities				-	-
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	377	321
29 NSFR derivative assets		-			-
30 NSFR derivative liabilities before deduction of variation margin posted		652			33
31 All other assets not included in the above categories		1,047	-	9,656	9,824
32 Off-balance sheet items		9,716	585	955	589
33 Total RSF					58,681

NSFR	31 March 2026
34 Net Stable Funding Ratio (%)	140.2%

Liquidity Risk

	a	b	c	d	e
	31 December 2025				
	Unweighted value by residual maturity				Weighted value
	No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
	€ million	€ million	€ million	€ million	€ million
Available stable funding (ASF) Items					
1 Capital items and instruments	10,623	-	-	1,220	11,842
2 Own funds	10,623	-	-	1,220	11,842
3 Other capital instruments		-	-	-	-
4 Retail deposits		52,453	3,428	1,189	53,348
5 Stable deposits		35,405	1,913	873	36,325
6 Less stable deposits		17,048	1,515	316	17,023
7 Wholesale funding:		26,792	937	1,266	11,837
8 Operational deposits		707	-	-	353
9 Other wholesale funding		26,086	937	1,266	11,484
10 Interdependent liabilities		-	-	-	-
11 Other liabilities:	35	2,498	40	6,088	6,108
12 NSFR derivative liabilities	35				
13 All other liabilities and capital instruments not included in the above categories		2,498	40	6,088	6,108
14 Total available stable funding (ASF)					83,136
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					635
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool		121	118	3,433	3,122
16 Deposits held at other financial institutions for operational purposes		334	-	47	214
17 Performing loans and securities:		5,246	2,923	47,131	42,952
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		67	-	-	-
19 Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,063	141	1,406	1,581
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,486	2,399	31,643	36,064
21 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		196	74	741	3,616
22 Performing residential mortgages, of which:		237	244	8,068	-
23 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		107	116	4,443	-
24 Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		392	140	6,014	5,307
25 Interdependent assets		-	-	-	-
26 Other assets:		2,624	-	10,013	10,093
27 Physical traded commodities				-	-
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	377	320
29 NSFR derivative assets		-			-
30 NSFR derivative liabilities before deduction of variation margin posted		513			26
31 All other assets not included in the above categories		2,111	-	9,636	9,746
32 Off-balance sheet items		10,587	519	999	636
33 Total RSF					57,650
NSFR					
	31 December 2025				
34 Net Stable Funding Ratio (%)					144.2%

Liquidity Risk

		a	b	c	d	e
		30 September 2025				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
		€ million	€ million	€ million	€ million	€ million
Available stable funding (ASF) Items						
1	Capital items and instruments	9,908	-	-	1,235	11,143
2	Own funds	9,908	-	-	1,235	11,143
3	Other capital instruments		-	-	-	-
4	Retail deposits		50,926	3,495	945	51,757
5	Stable deposits		34,905	1,757	692	35,521
6	Less stable deposits		16,021	1,738	253	16,236
7	Wholesale funding:		24,454	778	1,294	11,003
8	Operational deposits		495	0	-	248
9	Other wholesale funding		23,959	778	1,294	10,755
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	-	2,647	32	6,102	6,118
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		2,647	32	6,102	6,118
14	Total available stable funding (ASF)					80,021
		a	b	c	d	e
		30 September 2025				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
		€ million	€ million	€ million	€ million	€ million
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					635
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		123	106	3,619	3,271
16	Deposits held at other financial institutions for operational purposes		303	-	47	198
17	Performing loans and securities:		5,841	2,547	45,162	41,267
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,353	138	1,090	1,293
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,915	1,985	30,433	34,945
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		75	37	770	3,471
22	Performing residential mortgages, of which:		241	205	7,960	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		103	102	4,326	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		332	218	5,678	5,030
25	Interdependent assets		-	-	-	-
26	Other assets:		2,509	-	9,980	10,111
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	403	343
29	NSFR derivative assets		9			9
30	NSFR derivative liabilities before deduction of variation margin posted		451			23
31	All other assets not included in the above categories		2,049	-	9,577	9,737
32	Off-balance sheet items		9,647	537	831	585
33	Total RSF					56,067
		30 September 2025				
NSFR						
34	Net Stable Funding Ratio (%)					142.7%

Environmental, Social and Governance (ESG) Risks

8. Environmental, Social and Governance (ESG) Risks

8.1 Qualitative Information on Environmental Risks

8.1.1 Business Strategy and Processes

8.1.1.1 Alignment of Our Business Strategy with Environmental Risk Management Expectations

Business Strategy & Business Model

The Group supports the transition towards a sustainable economy and considers sustainability and climate change as an opportunity. A key strategic objective is to adapt the Group's business and operations in a way that addresses climate change challenges, accommodates social needs within its business model, and safeguards prudent governance for itself and its counterparties, in accordance with supervisory initiatives and following international standards and best practice.

To this end, Eurobank has designed, approved and is currently implementing its Sustainability Strategy, including targets and commitments along two key pillars:

- **Operational Impact Strategy:** Impact arising from Eurobank's operational activities and footprint;
- **Financed Impact Strategy:** Impact arising from Eurobank's lending and investing activities to specific sectors and clients.

A. Operational Impact Strategy

The Operational Impact Strategy (OIS) focuses on minimising the operational environmental footprint, ensuring that its own activities are sustainable, and aligning its operations with climate and sustainability goals. The key elements of this strategy are:

- **Environmental Impact:** Minimising negative impact of Eurobank's operations, to promote environmental stewardship with a clear goal of achieving climate neutrality.
- **Societal Impact:** Providing a diverse and inclusive environment for Eurobank's people and clients, while fostering sustainable development and prosperity for the benefit of society.
- **Governance and Business Impact:** Focusing on building sustainability awareness, internally and across its value chain, while intensifying Eurobank's efforts for ethics and transparency.

The OIS is supported by a governance structure of multiple project streams (one per each commitment) and the supervisory ESG/OIS Committee. Progress is regularly reviewed by the Sustainability Management Committee.

Each project stream is planned with milestones, KPIs, annual targets and long-term interim targets, serving the declared commitments. Links are established with Transformation streams, as well as corresponding ISO Management System standards, to ensure substantiation and certification of activities, validate target setting and measured performance, and systematically monitor progress through internal reviews and external assurance.

B. Financed Impact Strategy

The Financed Impact Strategy (FIS) focuses on fostering favorable economic, social, and environmental outcomes across all aspects of its financing activities, with a commitment to sustainability and responsible stewardship. To achieve this objective, the Financed Impact Strategy (FIS) is structured around the following 4 strategic pillars:

- **Client Engagement and Awareness:** Helping clients transition to more sustainable business models by raising awareness of climate change challenges and opportunities.

Environmental, Social and Governance (ESG) Risks

- **Supporting Clients in Transition:** Facilitating the transition of clients towards sustainable practices by offering financing solutions, that are guided by the financing approaches and the eligible activities of the Sustainable Finance Framework (SFF) goals and ambitions.
- **Enablers and Tools for Sustainable Financing:** Providing frameworks, tools, and products to underpin sustainable financing.
- **Assessment and Management of Sustainability-related Risks:** Identifying and managing the sustainability-related risks within the Group's loan and investment portfolios, including assessing exposure to transition and physical risks linked to climate change.

The Financed Impact Strategy supports Eurobank's commitment to sustainable financing, ensuring that the Group's financial activities align with sustainability goals, such as reducing the carbon footprint of financed projects.

While the Sustainability Strategy described above remains the formally approved and applicable strategic framework during the 1H 2026 reporting period, Eurobank is, in parallel, in the process to review and update its Group Sustainability Strategy. The objective of this process is to build on the existing strategy, further strengthen its effectiveness and embed sustainability more deeply across the Group's operations, decision making and business activities. In this context, the update of the Group Sustainability Strategy has been developed through a structured and comprehensive, Group wide process, aimed at strengthening the contribution of sustainability to long term value creation. This process includes research, benchmarking, and re-alignment on sustainability mega-trends and regulatory developments to redefine the key sustainability topics based on assessment of the Group's strategic priorities and performance, and consideration of stakeholder expectations and leading market practices.

This work enables a more focused articulation of the Group's sustainability strategic direction and leads to the identification and prioritisation of strategic drivers and focus areas designed to enhance value creation, notably through supporting business growth, strengthening risk management and improving operational efficiency across the Group.

Following formal approval of the updated Group Sustainability Strategy, subsequent phases will translate this strategic direction into clear targets, KPIs and detailed action plans tailored to each Group entity, underpinned by appropriate governance and monitoring frameworks.

The Pathway to Net-Zero

Climate change remains a strategic priority for Eurobank. Through its Transition Plan, the Group has established a structured approach to managing the risks and opportunities arising from the transition to a low-carbon economy, while supporting clients in their own transition journeys. The Transition Plan is integrated with the Group's strategy, risk management, business planning and client engagement activities, supporting the alignment of the portfolio with net-zero emissions by 2050. The Group has developed sectoral decarbonisation pathways and financed emissions reduction targets for selected carbon-intensive sectors, applying recognised methodologies and industry standards (e.g. NZBA, PCAF), as well as science-based scenarios aligned with a 1.5°C objective. The Group combines portfolio-level analysis, sectoral transition pathways, scenario analysis and client engagement to guide capital allocation decisions, monitor progress and support the financing of activities that contribute to the transition towards a more sustainable economy.

As part of this approach, the Group aims to regularly review and enhance its Transition Plan, expanding sectoral coverage and refining targets, methodologies and implementation actions in response to evolving market practices, regulatory developments and transition pathways.

The following table presents key information regarding the emission reduction targets for the first 4 carbon-intensive sectors:

Environmental, Social and Governance (ESG) Risks

Sector	Boundaries	Scopes covered	Target Metric	Scenario / Pathway	Base year	Baseline value	Eurobank's emission reduction targets			
							2030 target	2030 reduction	2025 Performance	2024 Performance
Power generation	Fossil and RES electricity generators	1, 2	Intensity kgCO ₂ e / MWh	IEA NZE 2050 (2023 Update)	2023	244	220	-10%	199 (-18% vs baseline)	193 (-22% vs baseline)
Oil and gas	Mid / Downstream activities	1, 2	Absolute tCO ₂ e	IEA NZE 2050 (2023 Update)	2024	558 (100 indexed)	530 (95 indexed)	-5%	636 (+14% vs baseline)	n/a (base year)
Iron and steel	Up / Mid / Downstream manufacturer	1, 2	Intensity tCO ₂ e / t steel	IEA Net Zero by 2050 (2021)	2023	0.37	0.33	-11%	0.30 (-19% vs baseline)	0.42 (+14% vs baseline)
Cement	Cement and concrete manufacturers	1, 2	Intensity tCO ₂ e / t cement	IEA NZE 2050 (2023 Update)	2023	0.67	0.59	-12%	0.63 (-6% vs baseline)	0.66 (-1% vs baseline)

For more details, please refer to section “The pathway to net zero” of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

Business Environment

Eurobank's strategy as regards sustainability risk management is regularly updated, considering, inter alia, market, regulatory, as well as technological developments. In particular, the Bank's approach with respect to the financing of its clients' green transition considers the changing regulatory environment and the transition risk that borrowers are subject to.

In this context, the applicable provisions defined by the Bank in this respect, as well as its relevant documents/ policies/ frameworks are updated periodically, accounting for emerging best market practices in sustainability risk management. In addition, stakeholders' (e.g. consumers, borrowers, investors and issuers) sustainability priorities are accounted for in the Group's Sustainable Finance Framework (SFF), the Green Bond Framework and the Sustainable Investment Framework, allowing the Bank to conduct its relevant financing/ investment/ funding activities, while ensuring compliance with regulatory requirements and supervisory expectations.

The Bank continuously monitors the implications from changes in the physical environment and is prepared to adjust its business strategy through the establishment of additional safeguards to mitigate potential threats deriving from physical risk events. Recognising that climate change presents new challenges and unique opportunities, we strive to be at the forefront of enabling our clients to develop and reap these opportunities as a means of supporting their low carbon transition.

Financed Impact Strategy - Commitments & Targets

The Group recognises that the most significant part of its impact on climate arises from the financing it extends to its clients. Therefore, the second pillar of its Sustainability Strategy, Financed Impact Strategy, evolves around the following key components:

Environmental, Social and Governance (ESG) Risks

- **Sustainable Financing:** Development of strategies that will promote the green transition of the Group's clients through sustainable financing.
- **Portfolio Alignment:** Gradual alignment of the Group's portfolio with sectoral transition pathways that are aligned with the 1.5°C climate transition scenario.
- **Net-Zero Strategy:** Sectoral decarbonisation targets covering the Group's lending portfolios, with phased target-setting up to 2050.

Quantitative Targets

Portfolio Targets
2 billion in new green disbursements to corporates by 2025 (for 2023-2025)
20% of annual new corporate disbursements to be classified as Green/Environmentally Sustainable
20% stock of green exposures by 2027 for the corporate portfolio
Mobilise €2.25 billion total green RRF funds in the Greek economy by 2026
No new investments in fixed income securities (excluding exposures in sustainability/ green bonds) towards the top 20 most carbon-intensive corporates worldwide
€200 million annual disbursements of Sustainability-Linked Loans for the CIB portfolio

Sectoral Targets
35% of new disbursements in the energy sector to be directed to Renewable Energy Sources (RES) financing
80% of disbursements related to the construction of new buildings to be allocated to green buildings
20% of new disbursements related to mortgage loans (excluding "Spiti mou" (I + II)) to be allocated with EPC B+ and above

Retail Banking Targets
€ 150 million new Retail green disbursements by 2026

8.1.1.2 Green Financing

Objectives

The Group acknowledges that sustainable development is a key driver of long-term prosperity and resilience. Supporting the transition to a low carbon and inclusive economy through financing advisory and capital-raising solutions is central to Eurobank's business model and is embedded in its Financed Impact Strategy. Through this strategy, the Group aims to generate measurable positive environmental and social outcomes by directing capital towards activities that support the green transition and social investments, while also incentivising clients to improve their sustainability performance. Eurobank's sustainable finance approach is underpinned by dedicated frameworks and tools, including the Sustainable Finance Framework. In parallel, the Group has developed and approved its holistic Transition Plan, aligned with regulatory requirements and international best practices, which supports the implementation of its Net Zero ambitions and sectoral decarbonisation objectives.

Eurobank has finalised and is currently in the process of operationalising its Transition Finance Framework, which will serve as a core tool for facilitating both client level and portfolio level transitions. By providing clear eligibility criteria and

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guidance for financing transitional activities, the Framework will strengthen the Group's ability to support counterparties in decarbonising their operations and align the overall portfolio with credible transition pathways.

Sustainable financing and investments for corporate clients

Eurobank finances robust business plans, growth strategies, investment programmes and export activities in strategic sectors. The Bank provides financing for landmark initiatives in the areas, among others, of renewable energy sources (RES), sustainable infrastructure and environmentally friendly solutions.

Sustainable financing for individuals and businesses

The Bank offers a range of financing solutions for consumers and small businesses that support inclusive and sustainable growth, including financing SMEs through Action Finance Initiative (AFI) to promote social and economic inclusion, employment generation and access to financing. Additionally, the Recovery and Resilience Facility (RRF) loans are available for investments that demonstrate a positive net present value and repayment capacity. Furthermore, financing programmes offered by supranational institutions, such as the European Investment Fund (EIF), European Investment Bank (EIB) and Hellenic Development Bank (HDB), are assessed based on their purpose against the respective eligibility criteria and are classified as Sustainable Finance Framework (SFF)-aligned.

Asset and wealth management products with ESG criteria

Currently, the Group manages three UCITS and one Discretionary Portfolio Management strategy, all of which qualify as "financial products that promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices," in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR). Furthermore, the Group ensures that these products remain fully compliant with all regulatory requirements on pre-contractual and periodic disclosures, thereby providing investors with transparent, consistent, and up-to-date information on the promoted sustainability characteristics. Beyond regulatory obligations, Eurobank is committed to integrating ESG considerations across its investment processes, aiming to deliver long-term value to clients while contributing positively to society and the environment.

Deposit solutions with ESG criteria

Eurobank was the first Greek bank to offer ESG Deposits to its corporate clientele, and continues to offer this product, allowing its clients to contribute to sustainable development projects. The amount raised by ESG Deposits is allocated to financing green and sustainability linked loans, in agreement with Eurobank's SFF.

For more details, please refer to section "Actions on sustainable financing and investment offerings" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

Guiding Frameworks

Committed to being transparent about its approach and to ensure that decision-making is in line with best practices in environmental protection and sustainability, Eurobank has developed guiding frameworks, defining the approach and criteria for classifying its financing and investing activities as sustainable.

Sustainable Finance Framework (SFF)

Through its Sustainable Finance Framework (SFF), the Group is able to classify sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing. The purpose of establishing the SFF is to provide a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financing in line with the Financed Impact Strategy. Eurobank has drawn on internationally recognized industry guidelines and principles for the development of the SFF and is fully committed to being transparent

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about its Sustainability approach. It is noted that Eurobank remains vigilant about the latest developments in guiding frameworks and market practices and will continuously update its SFF in response to these advancements.

Specifically, the SFF has been developed based on the following standards and principles:

- Green Bond Principles, International Capital Market Association (ICMA), June 2025
- Social Bond Principles, ICMA, June 2023
- Sustainability-Linked Bond Principles, ICMA, June 2024
- Green Loan Principles, Loan Market Association (LMA), March 2025
- Sustainability-Linked Loan Principles, LMA, March 2025
- Climate Bonds Standard, Climate Bonds Initiative, August 2025 (v4.3)
- EU Taxonomy regulation and Climate delegated act published in April 2021 and formally adopted on 4 June 2021

The SFF defines two levels of transaction alignment:

- SFF alignment – Fulfilment of criteria dictated by established market practice
- EU Taxonomy alignment – Fulfilment of criteria associated with each of the EU Taxonomy assessment steps (substantial contribution, Do No Significant Harm (DNSH), minimum social safeguards).

The SFF defines five classification approaches for classifying its financing and investing activities as sustainable:

1. Dedicated-purpose – Green/ Social Loans

Project-specific loans or financing instruments whose use of proceeds is 100% directed towards eligible green/ social activities. The SFF defines the eligible activities (for the Wholesale and Retail portfolios) along with the applicable eligibility and exclusionary criteria that need to be fulfilled. The eligible areas and activities include energy efficiency, renewable energy, clean transportation, shipping, green buildings, pollution prevention and control, circular economy, Carbon Capture, Utilisation and Storage (CCUS), green hydrogen, water and wastewater management, information and communication, climate change adaptation, economic inclusion, affordable basic infrastructure, access to essential services, and affordable housing.

2. Dedicated-purpose – Recovery and Resilience Facility-based Approach

Activities approved through the Greek Recovery and Resilience Facility, contributing to the Green pillar.

3. General-purpose – Company Business Mix

Financing to companies that fulfil the eligibility green/ social criteria and derive their revenue from eligible activities. Specifically, companies are eligible under the business mix category when:

- They derive a minimum predefined percentage of their total revenue from eligible activities.
- None of their activities are among the excluded ones (as described in Eurobank's Exclusion List).

4. General-purpose – Sustainability-Linked Loans/ Facilities

The second type of general-purpose lending adopted relates to Sustainability Linked Loans (SLL). The purpose of SLLs is to enable and accelerate the sustainability transition of clients. Through SLLs, Eurobank provides sustainability - related incentives to its clients, by offering products (loans, bond loans, etc.) with terms linked to ambitious and predefined Sustainability Performance Targets (SPTs). The SPTs are specific targets that aim to improve the sustainability performance of the client. The SFF outlines the methodology for defining SPTs and proposes overarching, as well as industry-specific targets.

The client commits to achieve them during the loan repayment period and as such, the SPTs are also included in the loan agreement (i.e. in the form of non-financial covenants). The accomplishment of the relevant targets is monitored using specific KPIs according to the client's activity sector/ industry. SLLs are linked to specific incentives provided by Eurobank, including, but not limited, to reduced interest rate or longer repayment period.

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5. General-purpose – Cases requiring special treatment

Cases that do not strictly fulfill the characteristics of the key financing approaches, dedicated / general purpose, but have a sustainable aspect to them can be assessed for their alignment with the SFF on a standalone basis. Such cases could include, among others, financing related to capital share increases and /or acquisitions of companies with sustainable activity or financing that will be directed to various SFF-aligned purposes.

For further details, please refer to section “The Sustainable Finance Framework” of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

Transition Finance Framework (TFF)

Through its Transition Finance Framework (TFF), the Group is able to classify transition finance solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access transition financing.

The purpose of establishing the TFF is to provide a clear, transparent and science-based methodology for identifying, evaluating, monitoring and reporting transition finance activities, in line with the Group’s Financed Impact Strategy and net-zero ambitions. The Framework focuses on activities that are not eligible under the Sustainable Finance Framework (SFF), as well as on sectors and entities that are committed to, and demonstrably progressing along, credible decarbonisation pathways towards a net-zero economy by 2050.

The Group has drawn on internationally recognised standards, principles and guidance for the development of the TFF and remains committed to continuously monitoring developments in transition finance market practices and regulatory expectations.

Green Bond Framework (GBF)

Eurobank’s Green Bond Framework assists the Bank in meeting its environmental/ sustainability commitments and finance projects that will deliver environmental benefits to the economy and support its business strategy and vision.

The Green Bond Framework has been developed in accordance with global best practices and standards, and considers EU Taxonomy eligibility criteria to classify potential investments as green. The Framework defines the eligible assets and associated criteria, the use of proceeds, the process for project evaluation and selection, the management of proceeds, as well as the relevant reporting obligations. The eligible green projects contribute to the UN SDGs, the EU environmental objectives and the eligibility criteria align, on a best effort basis, with the Technical Screening Criteria of the EU Taxonomy Climate Delegated Act. In addition, EU Taxonomy DNSH principles and minimum social safeguards are considered for specific projects where relevant information can be provided by the clients. The Green Bond Framework has obtained a Second Party Opinion ([Green Bond Framework- Second Party Opinion](#)) for its alignment with the ICMA Green Bond Principles 2025 (GBP) and has received an “Excellent” alignment.

For further details, please refer to Eurobank’s Green Bond Framework: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/pistotikoi-titloi/green-bond-framework/green-bond-framework-july-2026.pdf>

Sustainable Investment Framework (SIF)

The Bank has developed its Sustainable Investment Framework (SIF) for the assessment and classification of investments as sustainable based on criteria observed in international market practices, frameworks and guidelines. Eurobank’s SIF outlines the Bank’s potential sustainable investment approaches/ strategies, the process for selecting eligible investments, as well as the monitoring frequency regarding the sustainable portfolio. It is noted that the sustainability assessment based on the criteria of the SIF, irrespective of the eligibility outcome, does not prevent the Bank from including non-eligible sustainable investments in its investment portfolio.

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The classification approaches used by the Bank in the context of its SIF are presented below:

- Value-based exclusions and AML: Exclusion of companies, sectors, or countries whose behaviors do not align with basic societal values and the Bank's Risk Appetite.
- Norm-based exclusions: Exclusion of issuers who do not comply with basic standards of business and international norms.
- Avoid harm: A combination of value-based and norm-based exclusions, with additional activities with negative impacts excluded.
- Sustainable bonds: Selection of bonds that follow sustainable, green or social standards (i.e. selection of bonds that have been labelled as Green, Social or Sustainable and Sustainability-linked labeled (SLB) bonds).

Engagement with Our Counterparties for Environmental Risk Mitigation

Aiming to facilitate the green transition of its clients, Eurobank has developed a dedicated approach to increase client engagement and awareness regarding sustainability risks. Besides the initiatives aiming to build sustainability literacy and capacity among its clients (e.g. online events, articles and webinars, digital academy for businesses), the Bank also uses tools to engage with its counterparties in the context of its credit granting and asset management activities, so as to understand their strategies and mitigate the sustainability risks exposures.

Engagement in the context of Credit Granting Activities

Eurobank has implemented a range of tools to identify, measure and manage sustainability risks, which are integrated into the credit granting and monitoring processes. These tools are used by various units across the Group, ensuring that relevant tasks are carried out collaboratively and efficiently:

- Moody's Risk Analyst (MRA) Model
- Exclusion List
- Climate Risk Scorecard
- Interbank ESG Questionnaire
- ESG Risk Assessment
- Sustainable Finance Framework Tool
- Collateral Valuation

For more details, please refer to the "Sustainability Risk Management Tools & Processes" in the Qualitative Information on Environmental Risks, Risk Management section, as well as the section "Actions related to the integration of sustainability in risk management" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

Engagement in the context of Asset Management Activities

For Eurobank Asset Management M.F.M.C., engagement and dialogue represent an integral and crucial part of responsible investment. In this context, as per its Responsible Investment Policy, Eurobank Asset Management M.F.M.C. is committed at two levels, as regards the environmental risk assessment of the Greek investee companies in which the Company's Funds and Portfolios invest:

Company engagement: The aim is to encourage companies to achieve the highest possible standards in terms of environmental responsibility and to support them in this process.

Voting engagement: The use of voting rights at general meetings is one of the cornerstones of the strategy of continuous dialogue with the companies concerned implemented by Eurobank Asset Management M.F.M.C. and also an integral part of its investment process.

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8.1.2 Governance

8.1.2.1 Sustainability Risks Management Framework

Eurobank has incorporated sustainability risks aspects across all pillars of its Risk Management Framework, through the establishment of comprehensive policies and processes. It is among the Group's priorities to identify, assess, manage and mitigate relevant risks, with a view towards ensuring alignment with its business strategy, as well as regulatory and industry developments.

In addition, the Group's Sustainability Governance structure defines specific roles and responsibilities to support the roll-out of the Sustainability Strategy and the integration of sustainability risks, through the involvement of various key stakeholders (e.g. Business & Risk Units, Committees etc.) across the three Lines of defense, embedding regulatory guidelines and market practices.

In this context and considering the significant impact of sustainability risks both on financial institutions and on the global economy, Eurobank developed a Sustainability Risk Management Policy which aims at fostering a holistic understanding of the effects of sustainability risks on its business model, as well as support decision-making regarding these matters and provide a robust governance under its Risk Management Framework.

The Sustainability Risk Management Policy encompasses, among others, information on the following areas:

- **Sustainability Risks Governance:** Definition of the Group's main sustainability risks management pillars and summary of the responsibilities of Eurobank's Board, Board Committees and Management Committees and the three Lines of Defense regarding the management of sustainability risks.
- **Sustainability Risks Definitions, Drivers & Transmission Channels:** Detailed presentation of the sustainability risks definitions and drivers identified by the Group, including the transmission channels through which these risks impact Group's traditional risk types.
- **Sustainability Risks Management Tools:** Indication of the main tools utilised by the Group for the identification, measurement and management of sustainability risks.

8.1.2.2 Overview of governance structure for the oversight and management of sustainability matters

Sustainability at Eurobank is embedded within a governance framework that addresses both regulatory requirements and voluntary commitments. Board oversight of the Sustainability Strategy is ensured through the regular inclusion of sustainability matters in the Board meetings agenda, in line with legal and regulatory requirements and international best practices. The Group applies the Three Lines of Defense model for the management of climate-related, environmental and sustainability risks. This model, through structured policies, further delineates duties across each line, ensuring that each body and individual within the organisation has a defined responsibility for managing sustainability impacts, mitigating risks and leveraging opportunities within their operational scope.

The Sustainability Governance structure aims to further enhance the effective oversight of sustainability matters at Management/ Board level through direct reporting lines as described below.

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The Group Senior Sustainability Officer (GSSO) as represented in the chart, along with the GCRO, co-manages Group Sustainability Risk, which involves coordinating sustainability efforts and ensuring the integration of sustainability principles across the organisation. The GSSO plays a critical role in embedding sustainability into the Group's strategic decision-making, ensuring that sustainability is considered in policies, business and operational strategies.

To further strengthen the Group's sustainability oversight and to support the consistent implementation of sustainability-related requirements across all entities, the Group introduced in 2025 the Group Sustainability Integration & Data function. This new role enhances coordination between central units and international subsidiaries, coordinates the implementation of sustainability-related actions across the Group, oversees and harmonises the Group-wide data-collection processes, and ensures the integration of sustainability data into common systems and central data-management structures.

Governance Structure and Committees

- Oversight of sustainability risks at management body level through allocation of responsibilities to Board and management committees. Specifically, Chairman of the Sustainability Management Committee (SMC) is the General Manager, Group Strategy.
- Appointment of an executive member by the Board, who is responsible for climate-related and environmental risks. This member updates the Board Risk Committees (BRC) and the Board at least semi-annually.
- Establishment of two Committees that supplement the governance arrangements on sustainability risks (i.e. Sustainability Management Committee and Climate Risk Stress Test Committee).
- Appointment of Group Senior Sustainability Officer (GSSO) to lead the Group's sustainability initiatives.

Integration of Sustainability Risk Management across the Three Lines of Defense.

- Dedicated teams within Corporate & Investment Banking (CIB) and Retail Banking units for overseeing sustainability and sustainable financing activities.
- Automated process established to assess and classify sustainable financing opportunities.
- Group Sustainability Unit, responsible for managing and coordinating sustainability strategy related issues, developing action plans for the Group's Net Zero portfolio strategies, as well as monitoring sustainability performance and coordinating sustainability-linked activities that enhance the Group's Impact. In this context, the Unit is responsible

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for facilitating the development of the sustainability data framework to coordinate and prepare external and internal sustainability-related reports.

- Group Sustainability Risk, responsible for overseeing, monitoring and managing sustainability risks, and preparing and maintaining the Bank's sustainability risk management policies, processes and methodologies, in collaboration with the Group Sustainability Unit, Business and other Risk Units.
- Training on sustainability, sustainable finance and sustainability risk topics to Group personnel.
- The Group Internal Audit (Group IA) independently reviews the adequacy and effectiveness of the internal control framework in place regarding Sustainability risk management on a regular basis, following a risk-based approach in line with its Annual Risk Assessment and Audit Planning Methodology.

8.1.2.3 Role of Board, Board Risk Committee, Management committees and GSSO on the supervision of sustainability and climate related & environmental matters

The Group's Sustainability Governance structure has been updated to ensure that Sustainability risks, including CR&E risks, are appropriately monitored and managed, aiming to further enhance their effective oversight at management/Board level, as follows:

Eurobank Board of Directors (Board or BoD)

The Eurobank Boards' role is to provide entrepreneurial leadership to the Group within a framework of prudent and effective controls that facilitate the assessment and management of risks. The Board establishes the Group's strategic objectives, ensures the availability of the necessary financial and human resources to achieve its strategic objectives and fulfill its purpose, and oversees and evaluates management performance. The Board defines the Group's values and standards, ensuring that its responsibilities to shareholders and other stakeholders are acknowledged and fulfilled. All members of the Board are required to act in the best interests of the Group, and in accordance with their legal and fiduciary responsibilities. The Board has designated an executive member as the Board Member responsible for climate-related and environmental risks. This designated Board Member provides updates to, at least on a semi-annual basis, the Board Risk Committee (BRC), which, in accordance with its Terms of Reference, is responsible for overseeing (among others) the climate-related and environmental risks. In line with regulatory requirements and international best practices, effective Board oversight of the Group's Sustainability Strategy is also reinforced through the regular inclusion of sustainability-related items in the agendas of Board meetings.

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Eurobank Board Risk Committee

The Eurobank Board Risk Committee (BRC), among others, oversees the implementation of the strategies for capital and liquidity management, as well as for all material risks of the Group, including climate-related and environmental risks, as identified through the Risk Identification and Materiality Assessment (RIMA) process and listed in the relevant RIMA report, to assess their adequacy against the approved risk appetite and strategy. In addition, the BRC establishes and oversees the principles which govern risk management (including climate-related and environmental risks) across the Group in terms of identifying, measuring, monitoring, controlling, and mitigating risks. To this end, the BRC approves risk principles, risk policies, risk procedures and risk methodologies and the specific Risk Management Frameworks and Policies (e.g. Sustainability Risk Management Policy). Furthermore, the Board has designated an executive member of the Board as the Board Member responsible for climate-related and environmental risks, who provides updates to the BRC at least on a semi-annual basis regarding the management and oversight of climate related and environmental risk.

Executive Board (ExBo)

The Executive Board reviews the business plan and the budget and ensures their alignment with the risk strategy, the risk appetite and the risk limits. Also, it ensures that appropriate metrics are in place for monitoring both financial and non-financial risks.

Eurobank Sustainability Management Committee (Sustainability ManCo - SMC)

The Eurobank Sustainability Management Committee (Sustainability ManCo - SMC) provides strategic direction on sustainability initiatives, reviews the Sustainability Strategy, Net Zero targets and transition plans prior to approval, ensures that the elements of the Sustainability Strategy and the Net Zero commitments are integrated into the Group's business model and operations, approves changes in eligible assets of Green Bond and Sustainable Finance Frameworks, regularly measures and analyses the progress of the Sustainability Strategy goals and performance targets and ensures the proper implementation of sustainability-related policies and procedures, in accordance with supervisory requirements and voluntary commitments.

Eurobank Climate Risk Stress Test Committee (CRSTC)

The Eurobank Climate Risk Stress Test Committee (CRSTC) is responsible for designing and executing the Group's CRST Programme, as well as for coordinating all activities relating to Climate Risk Stress Testing, including risk identification, scenario design and stress test execution and reviewing and challenging the output at each stage of the process prior to escalating to the Executive Board.

Products & Services Committee

The Products & Services Committee is responsible for creating and supervising the governance framework for the products and services offered to Eurobank's clients in Greece through the physical and alternative channels, in accordance with the supervisory and regulatory requirements. As part of this process, products and services are assessed for potential adverse impacts on the Group arising from climate-related and environmental risks, as well as from any misalignment with sustainable finance principles. This assessment includes a review of their sustainability risks to determine their eligibility for green or social classification, ensuring alignment with the Group's Sustainable Finance Framework.

Green Bond Working Group (GBWG)

The Eurobank Green Bond Working Group (GBWG) is mainly responsible to review the proposed eligible assets (based on the eligible categories and criteria as defined in the Green Bond Framework), to propose the loans to be excluded in case they no longer meet the eligibility criteria (including the qualifying substitution assets), as well as to review the annual Green Bond Report.

Group Senior Sustainability Officer (GSSO)

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The Group Senior Sustainability Officer (GSSO) is responsible for leading and coordinating the Group's sustainability initiatives, for both Operational and Financed impact. GSSO manages the Group Sustainability Unit, co-manages, as a secondary reporting line, along with the Group Chief Risk Officer the Group Sustainability Risk, coordinates the Sustainability Center of Excellence of CIB and Retail and oversees the sustainability programs of international subsidiaries.

The role of the GSSO is to foster a deep understanding of sustainability principles and practices across the organisation by building a culture of sustainability and collaborating with senior management to embed sustainability into the Group's strategic decision-making processes. GSSO secures and allocates resources effectively to support the Group's sustainability initiatives and advocates for necessary investments in sustainability projects and technologies. GSSO serves as the liaison between the Group and Market/ External Stakeholders, closely monitoring industry trends, regulatory changes and best practices in sustainability and ensuring that the Group remains at the forefront of sustainability innovation and compliance.

8.1.2.4 Dedicated functions for integrating sustainability matters into the operating model

Integration of Sustainability Risk Management across the three lines of defense

Eurobank addresses short-term, medium-term and long-term effects of sustainability risks for the purposes of risk management by integrating them into its business environment and strategy. In this context, the Bank has defined the following time horizons as follows:

- Short term: <3 years aligned with budget - The Bank conducts a materiality assessment of all identified risk drivers and key risks. This assessment considers the Bank's operating environment, business model and emphasises the achievement of its short-term strategic goals with regards to the budget.
- Medium term: 3-10 years aligned with business planning - To assess medium term risks, the Bank has defined a longer period to understand sustainability risks and evaluate how its business model can handle different future scenarios.
- Long term: >10 years aligned with strategic planning - The Bank has defined a longer horizon, to conduct long term assessments. Additionally, the Bank aims to include the impact of climate change and environmental factors in its strategic targets and decision-making processes, as these risks are expected to have a greater impact in the long term.

The Group applies a model of defined roles and responsibilities regarding the management of sustainability risks across the 3 Lines of Defense, considering all relevant guidelines and regulatory requirements:

1st Line of Defense

Dedicated functions, namely the Sustainability Centers of Excellence (CoE), within the Business Units (Corporate & Investment Banking - CIB and Retail Banking) are responsible for assessing, managing and monitoring risk levels in all risk categories, including sustainability risks. The Head of CIB Sustainability CoE is responsible for overseeing sustainable financing activities, while two Retail Banking Sustainability Coordinators (for Business and Individual clients respectively) are responsible for organising and supporting sustainable-related product financing activities. In addition, the role of the Group Sustainability Unit in the 1st line includes the responsibility for managing and coordinating sustainability strategy related issues, the development of action plans for the Group's Net Zero portfolio strategies, the Group's Transition Plan and the facilitation of the Sustainability data framework development, as well as Sustainability Reporting, Environmental & Energy Reporting (EMAS Report, Greenhouse Gases Emissions Report per ISO14064) and Sustainability ratings. The 1st Line of Defense, in coordination with other Units, execute and monitor financing and specific operational sustainable goals and performance targets based on the Group's Sustainability Strategy and in line with the Net Zero Strategy.

2nd Line of Defense

Group Risk Management (GRM) is independent from the Business Units and has full responsibility in setting the Risk Strategy and Risk Appetite Framework, including sustainability risks. Within GRM, the dedicated Group Sustainability Risk (GSR) Unit has the overall responsibility for overseeing, monitoring and managing sustainability risks in cooperation with the other GRM Units, as well as with Group Compliance. In addition, the Group Compliance's mission is to promote within

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the Group, a compliance culture and a commitment to compliance with the applicable regulatory framework. Group Compliance's key roles and responsibilities include regulatory capturing and analysis, compliance risk assessment, compliance monitoring and control testing, provision of advisory and maintenance of compliance policies. Group Compliance also provides advice and recommends appropriate controls for the Bank's product offerings through its participation in the Products and Services Committee and related governance processes.

3rd Line of Defense

The Group Internal Audit (Group IA) independently reviews the adequacy and effectiveness of the internal control framework in place regarding Sustainability risk management on a regular basis, following a risk-based approach in line with its Annual Risk Assessment and Audit Planning Methodology.

Dedicated roles in existing Units on sustainability matters

Business Units

The Business Units – CIB and Retail Banking – are primarily involved in executing all portfolio-related sustainable activities, including the implementation of the Net Zero and Financed Impact Strategies. Key responsibilities are classified, inter alia, under the following three main categories:

1. Sustainability Strategy

- Executing and monitoring financed and specific operational sustainable goals and performance targets in line with the Net Zero Strategy.

2. Sustainable Financing/ Funding and Investments

- Identifying sustainable financing opportunities and designing relevant solutions and sustainable products.
- Performing the sustainable financing assessment, in line with the Sustainable Finance Framework.
- Implementing and monitoring the Sustainable Investment and Green Bond Frameworks.

3. Sustainability Risk Management

- Performing the clients' ESG Risk Assessment, where applicable.
- Identifying and implementing mitigation action plans for sustainability risks.

Group Sustainability Unit

The Group Sustainability Unit acts as a custodian of Sustainability Principles and Culture to enhance the Group's Impact, and as a cross-functional coordinator to ensure alignment on sustainability issues and interdependencies, as well as compliance with relevant existing and upcoming regulations. Specifically, the Group Sustainability Unit is responsible for managing and coordinating sustainability strategy related issues, ensuring alignment of subsidiaries' programs with the Group's overall sustainability strategy and goals, supporting their implementation efforts. The Group Sustainability Unit coordinates the development of action plans for the Group's Net Zero portfolio strategies and ensures the aligned development of corresponding plans for subsidiaries. It directs the actions of the Bank's units and subsidiaries on sustainable financing matters and provides advisory support on broader sustainability issues. The Unit facilitates the development of the Sustainability data framework and promotes sustainability knowledge and culture. Furthermore, it coordinates and prepares external and internal sustainability-related reports in line with applicable standards/ regulations, in cooperation with involved subject-matter responsible Units, while it is responsible for the UNEP FI PRB implementation. Being responsible for the oversight of the Bank's overall sustainability performance, its key roles include the centralised management of Sustainability Ratings, seeking continuous improvement in related scores. The Group Sustainability Unit also manages the ISO Management Systems under the related provisions of equivalent policies and the Sustainability Strategy, supporting also the development and maintenance of ISO Management Systems at Group level, where applicable. It collects, calculates and reviews data, in line with the associated certified ISO Management Systems, while it also ensures implementation of corresponding initiatives (e.g. operational net zero transition, energy self-production, energy and emission monitoring, green building certifications, recycling and circular economy

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management). To further strengthen the Group's sustainability oversight and to support the consistent implementation of sustainability-related requirements across all entities, the Group introduced in 2025 the Group Sustainability Integration & Data function. This new role enhances coordination between central units and international subsidiaries, coordinates the implementation of sustainability-related actions across the Group, oversees and harmonises the Group-wide data collection processes, and ensures the integration of sustainability data into common systems and central data management structures.

Group Sustainability Risk (GSR)

The GSR has the overall responsibility for overseeing, monitoring and managing sustainability risks. More specifically, the GSR prepares and maintains the Bank's Sustainability risk management policies, processes and methodologies, in collaboration with the Group Sustainability Unit, Business and other Risk Units. In addition, it leads the development and implementation of the sustainability risk related framework, policies and processes, in coordination with other units, as well as acts, monitors and reports the progress of the implementation of the developed Climate Risk Action Plan and reports to the Board for sustainability risk matters.

Moreover, the GSR reviews and challenges the involved stakeholders in setting Net Zero targets, the Financed Impact Strategy, and the development of the Transition Plan and reports financial targets and KPIs. The GSR also leads the 2nd line of defense independent sustainable lending re-assessment process against the Sustainable Finance criteria, including the characterisation of Retail Portfolio products as sustainable. Additionally, the Unit reviews and confirms the outcomes of the ESG Risk Assessment, evaluates their consistency and completeness and formally challenges the adequacy of the proposed mitigating actions. Furthermore, the GSR develops and maintains the Climate Risk Stress Testing Framework, as well as the Scenario Analysis and Stress Testing methodologies, and coordinates the performance of sustainability risk scenario analysis and relevant stress test exercises at Group level.

Group Compliance

Group Compliance is an independent function reporting to the Board of Directors through the Audit Committee and its mission is to promote, within the Group, a robust compliance culture that encourages ethical conduct through integrity and a commitment to compliance with laws and regulations, as well as the application of international governance standards.

Group Compliance's key roles and responsibilities include:

1. Regulatory compliance
 - Identifies and monitors on an ongoing basis the regulatory environment and emerging trends around sustainability and suggests to the Group the respective changes/enhancements to the relevant policies and documents.
 - Issues a regulatory bulletin, which includes regulatory developments and their impact on the Bank's operation.
 - Monitors the alignment of the Group's activities with applicable laws, regulations and standards, including sustainability regulatory aspects.
2. Regulatory compliance risk assessment
 - Designs appropriate risk assessment methodologies for compliance risk.
 - Utilizes a range of processes and tools for managing compliance risk.
 - Maintains an overlay on risk assessment methodologies and is responsible jointly with the competent sustainability units, so that an effective compliance monitoring program for the relevant activities is in place, the respective compliance programs are monitored by Group Compliance.
 - Assesses conduct risk in relation to sustainability financing.
3. Policy updates
 - Maintains the Bank's conduct-related policies, including their sustainability components.

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4. Product offering monitoring

- Provides advice and recommends controls over the Bank's product offerings, while it also checks that promotional statements do not misrepresent products or services offered to customers, through its participation in the Products and Services Committee and related processes.

Group Compliance actively supports upskilling in key sustainability regulatory areas. Dedicated training, for example on Compliance tools and Compliance Methodologies—ensures that Compliance officers remain equipped to meet evolving supervisory expectations and to effectively advise the business on sustainability-linked regulatory requirements. It is also noted that the personnel of Group Compliance include executives who hold recognized professional certifications in sustainability-related areas.

Within Group Sustainability, two FTEs maintain a secondary reporting line to the Group Chief Compliance Officer, supporting the Group Compliance function on matters related to monitoring and analysing regulatory developments in sustainability, assessing associated risks, providing supplementary advisory services and conducting controls, with an emphasis on identifying and preventing greenwashing.

Group Internal Audit (Group IA)

The role of the 3rd Line of Defense within Eurobank's governance and organisational structure is allocated to the Group IA for the independent review of the adequacy and effectiveness of the internal control framework. The Group IA mandate covers all processes, risks, and mechanisms for all business lines and internal units. In recent years, the Group IA has recognised sustainability internal controls and risk management framework as areas of focus and has taken several initiatives and actions within its strategy. These aim to ensure adequate coverage of the area, in line with the Bank's strategy, as well as industry and regulatory developments.

Specifically, the Group IA strategically focuses on the Sustainability risks, building on the following pillars:

- **Methodology/ Infrastructure:** The Management of Sustainability risks and the Bank's initiatives are recognised as a separate auditable area, subject to risk assessment. Furthermore, climate-related & environmental risk is recognised as a separate risk category, assessed in all relevant areas of the audit universe, in line with the Bank's risk taxonomy. This category will be extended to cover the entire spectrum of sustainability risks, in line with respective developments in the Bank's risk definitions.
- **Resources:** The Group IA has extended its pool of professional qualifications/ certifications to the area of sustainability, with two staff members certified in Sustainability/ ESG and Climate Risk through different professional bodies to diversify relevant expertise, and with additional auditors planned to pursue relevant industry-recognised professional body certifications in the future. This comes simultaneously with other initiatives in place, aimed at further upskilling through dedicated training sessions, on-the-job upskilling (participation in and consultation on the Bank's projects and initiatives around sustainability) and increased awareness (e.g. Group IA ESG Focus Group focused at sharing knowledge on sustainable practices and regulatory initiatives). At this stage, the Group IA has opted to embed the right mix of skills and knowledge within its existing organisational structure, given the multifaceted nature of Sustainability risks, affecting all businesses and operations of the Bank, to a siloed approach, aiming at a holistic consideration of the Bank's Sustainability risks.
- **Sustainability / Audit Universe Coverage and Audit Planning:** Following the infrastructure steps described above, since 2021, the Group IA has been carrying out several assignments around sustainability, along with monitoring the Bank's initiatives in this area on a risk-based approach. Key areas of focus include risk materiality, governance and strategy, sustainability risk management framework, product design and offering, reporting disclosures, etc.

Overall Group IA follows a risk-based approach to independently review and provide objective assurance, advice and insight, having in scope all activities, operations and units of the organisation. The Group IA's multi-year audit plan ensures

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that all of the Group's activities/operations are subject to review, in compliance, inter alia, with EU laws and regulations and supervisory expectations, as well as the Global Internal Audit Standards.

The Group IA documents the outcome of audits in audit deliverables that are used to provide information to several recipients (e.g. AC, Board Risk Committee, Senior Management, external auditors). The Group IA attends the Audit Committee meetings to present a summary of its activity and highlight key issues, at least on a quarterly basis.

8.1.2.5 ESG awareness and capacity building

Eurobank places great emphasis on building capacity among its employees, so they are able to support its clients on their sustainability journey and their green transition. To this end, in addition to launching sustainability initiatives for its clients, Eurobank implements an ESG upskilling plan for its employees. Eurobank's ESG awareness programme regarding sustainability matters, is directed to all of the Group's personnel – employees and management. Additionally, the Group has offered trainings to stakeholders from all 3 Lines of Defense (i.e. Business Units, Risk Management Units, Group IA) regarding the SFF, to enhance their understanding. Finally, the Group conducts training sessions/ seminars tailored to its supervisory and management bodies, tailored to their specific areas of interest/ expertise.

For further details, please refer to section "ESG awareness and capacity building" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

8.1.2.6 Lines of Reporting and Frequency of Reporting relating to Sustainability Risks

The Bank has adequate monitoring and reporting mechanisms in place to ensure appropriate management of the Sustainability risks generated by its business activities. For this purpose, the Bank has developed appropriate Key Performance Indicators (KPIs) and Key Risk Indicators (KRIs) that are reported to the senior management and management body in order to effectively oversee Sustainability risks across the Bank, leveraging on the insights gained from the 2022 ECB Climate Risk Stress Test, the ECB's Report on CR&E Risk Good Practices, the Group's internal exercises (e.g. scenario analysis/ materiality assessment processes for transition and physical risk), as well as taking into account best market practices.

In this context, the Bank has established a Climate & Environmental Risks Monitoring Dashboard with appropriate KPIs/ KRIs, including Group-wide metrics, that are reported to the senior management and management body on a semi-annual basis, while RAS and Sustainability Strategy targets are reported quarterly, to enable the efficient oversight of Sustainability risks through selected metrics. For the selection and the definition of the climate risk monitoring indicators, the following were also taken into account: (a) Guidelines on non-financial reporting: Supplement on reporting climate-related information (2019/C 209/01), (b) Task Force on Climate-related Financial Disclosures – Guidance on Metrics, Targets, and Transition Plans, and (c) Development of Tools and Mechanisms for the Integration of ESG Factors into the EU Banking Prudential Framework and into Banks' Business Strategies and Investment Policies.

Additionally, the Bank's Business Units maintain and update appropriate templates and mechanisms to monitor respective sustainable financing disbursements (e.g. Green and Social Loans), in line with the provisions of the Group's SFF. The ongoing and timely monitoring of sustainable loans allows senior management to assess the evolution of sustainable financing volumes and trends, considering Bank's relevant targets and facilitates internal reporting.

Selected KPIs/ KRIs are also monitored and reported at Group level to provide clear insights into the Group's exposure to sustainability risks, facilitating their effective management.

Going forward, Eurobank aims to implement further systemic enhancements in its IT and data infrastructure, support the standardisation of the monitoring of pertinent information, as well as safeguard data availability and accuracy.

The following table describes indicative KRIs/ KPIs included in the Bank's Sustainability Risks Monitoring Dashboard:

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	Area	Indicator Category	Sustainability Risks Monitoring Indicator
1	Transition Risk	Credit Risk Indicators – Sectors Subject to Transition Risk (Corporate & Retail Portfolios)	Concentration of exposures to sectors with high transition risk in Group's portfolios
2	Sustainable Financing	Credit Risk Indicators – Exposures (Corporate Portfolio)	New CIB disbursements in Green / Environmentally sustainable loans over total new CIB disbursements
3	Physical Risk	Credit Risk Indicators – Sectors Subject to Physical Risk (Corporate & Retail Portfolios)	Concentration of exposures to sectors subject to physical risk in Group's portfolios
4	Physical Risk	Credit Risk Indicators – Collateral Subject to Physical Risk (Corporate & Retail Portfolios)	Concentration of exposures collateralized with immovable property located in areas subject to physical risks in Group's real estate secured portfolio
5	Transition Risk	Market Risk Indicators – Exposures (Corporate Portfolio)	Exposures towards the top 20 most carbon intensive counterparties globally in Group's trading and banking portfolios
6	Real Estate Energy Performance Certificate (EPC) & Energy Consumption	Credit Risk Indicators – Energy Performance Certificate (EPC) and Energy Consumption (Corporate & Retail Portfolios)	Concentration of real estate collateral in Energy Performance Certificate (EPC) and Energy Consumption Bands in Group's portfolios
7	Green Asset Ratio	Green Asset Ratio Stock	Green Asset Ratio Stock
8	Green Asset Ratio	Taxonomy-aligned Exposure	Taxonomy-aligned Exposure
9	Sustainable Financing	Credit Risk Indicators – Exposures (Corporate & Retail Portfolios)	% of SFF financing over Bank's portfolios

8.1.2.7 Alignment of the Remuneration Policy with the Bank's CR&E risks objectives

Eurobank has established a Remuneration Policy that is applicable to all employees and covers their total remuneration. The Remuneration Policy forms an integral part of the Bank's corporate governance practice and is developed in accordance with its operational model, business strategy, objectives, long-term interests of the Bank and incorporates measures to avoid conflict of interest in accordance with, among others, the Markets in Financial Instruments Directive ("MiFID") II framework. The Remuneration Policy promotes sound and effective risk management. It is consistent with the objectives of the Bank's business and risk strategy, corporate culture, values and risk culture. It also considers sustainability risk factors, as well as the long-term interests of the Bank and the measures used to avoid conflicts of interest and should not encourage excessive risk-taking on behalf of the Bank. The Bank ensures that remuneration practices are aligned with the overall risk appetite, taking into account all risks, including sustainability risks, reputational risks, as well as risks resulting from the mis-selling of products or services.

The Remuneration Policy has been designed to (i) be consistent with and to promote sound and effective risk management, (ii) stimulate behavior consistent with climate-related & environmental and sustainability risks approach, as well as (iii) comply with Bank's voluntary commitments. Its basic principles are to (a) be gender neutral and non-discriminatory in any aspect of its implementation, (b) safeguard that remuneration is sufficient to retain and attract executives with appropriate skill and experience, (c) monitor that internal equity between all units is applied, (d) avoid excessive risk-taking with respect to direct or indirect sustainability risks and (e) link remuneration with long-term performance.

The Bank defines value creation as extending beyond financial performance to encompass sustainability as a core element of its operations. ESG principles are embedded at the heart of its strategic framework, reflecting the Group's commitment to acting responsibly, supporting clients through a fair and just transition, and balancing the interests of all stakeholders in its decision-making. Over time, the Bank has strengthened its ESG approach by enhancing its product offering, building strategic partnerships, supporting communities and employees, and committing to key international sustainability initiatives, including Net Zero targets. This is supported by a robust risk management and ESG reporting framework, as well as initiatives aimed at promoting a strong ESG culture both internally and externally.

The Remuneration Policy is closely aligned with its long-term strategy and sustainability objectives, ensuring that remuneration philosophy is based on risk-adjusted performance and does not incentivize excessive risk-taking, in relation to sustainability risks. A key pillar of the Remuneration Policy is the alignment of remuneration with sustainable

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performance, linking rewards to long-term value creation and not only to achieved results but also to how these results are delivered.

The Bank is committed to promoting an ethical, inclusive, and respectful environment, grounded in diversity, human rights, workplace safety, and fair labor standards. This commitment is supported by robust oversight and monitoring mechanisms that ensure accountability and transparency across the Bank. Guided by its Human Rights Statement, the Diversity, Equity & Inclusion (“DEI”) Policy, the Code of Conduct and Ethics, and the Policy Against Violence and Harassment, the Bank upholds zero tolerance for discrimination, inequality, and workplace misconduct, while fostering trust-based relationships with employees, customers, and partners throughout its value chain. Respect for human dignity is at the core of the Bank’s workplace culture.

In addition, the Remuneration Policy has been enhanced with the establishment of Variable Remuneration Framework, Key Performance Indicators (to balance employees’ performance and encourage proper conduct) and Key Risk Indicators (to promote sound and effective risk management including sustainability risks) at Group/ Unit/ Individual level, as appropriate. The Variable Remuneration Framework aims at providing (i) an appropriate balance of variable remuneration elements, aligning the interests of employees, shareholders and other stakeholders, strengthening the Bank’s position as a leading European bank and (ii) effective remuneration practices in compliance with the applicable regulatory environment. In this context, Eurobank has set specific sustainability KRIs/ KPIs in the Variable Remuneration Framework in line with the Risk Appetite Framework. Based on the above, a KRI of at least 60% coverage of the Group’s NFC and RRE portfolios should be achieved by the end of 2026. On top of that, Eurobank has also set a specific KRI considering also its Risk & Compliance Culture.

The Remuneration Committee approves any incentive scheme both at Bank and Group level, while the Non-Executive Members of the BoD approve and periodically review the Remuneration Policy and are responsible for overseeing its implementation.

8.1.2.8 Sustainability Ratings

Eurobank actively participates in internationally recognised sustainability ratings to highlight the continuous improvement in its environmental, social and governance performance, enhance the related disclosures, and further strengthen investor confidence. In 2025 and 2026, the Group continued to demonstrate progress across key Sustainability ratings. The ratings presented below highlight Eurobank’s continued progress in sustainability performance and reinforce its position as a responsible financial institution committed to creating long-term value for its stakeholders.

- **Sustainalytics** – Eurobank has been ranked in the **“Low Risk” category** and received the **ESG Regional Top Rated 2025** and **ESG Industry Top Rated 2025** distinctions, placing it among the **top 6%** of banks globally (47th out of 1,001 banks).
 - **MSCI** – Eurobank retained its strong **“AA”** rating for the 2nd consecutive year, remaining in the **MSCI ESG Ratings Leader category**.
 - **S&P Global** – Eurobank’s Global ESG Score showed a notable increase to **64/100** from 56, while maintaining “High” data availability. Eurobank’s performance in the S&P Global assessment was significantly above the banking industry average across all three assessment pillars: Environmental, Social, and Governance & Economic.
 - **CDP** – Eurobank successfully upheld its strong **“B”** rating.
- FTSE Russell** – The overall ESG Score increased significantly to **4.8 out of 5** (from 4.2), with the Environment and Governance pillars achieving the highest possible score, while outperforming both the global banking average and the Greek market average.

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8.1.3 Risk Management

8.1.3.1 Integration of Environmental Factors in Our Risk Management Framework

Eurobank has incorporated Sustainability risks (including CR&E risks) aspects across all pillars of its Risk Management Framework, through the establishment of comprehensive policies and processes. It is among the Group's priorities to identify, assess, manage and mitigate relevant risks, with a view to ensuring alignment with its business strategy, as well as regulatory and industry developments.

Group Risk Management Framework and Sustainability Risk Management Framework

The Group Risk Management Framework defines the roles and responsibilities of the Group Risk Management (GRM), which is independent from the Business Units as a 2nd Line of Defense, having full responsibility for the establishment of the Group's Risk Strategy and Risk Appetite Framework, as well as for monitoring all risks assessed as material through the Risk Identification & Materiality Assessment (RIMA) process, including sustainability risks undertaken by the Group.

In accordance with relevant supervisory expectations and the Group's enhanced Sustainability Governance operating model for the incorporation of sustainability risks across the three lines of defense (described in the Sustainability Governance section), new roles and responsibilities regarding sustainability risk management have been embedded into the Group Risk Management Framework. In addition, Eurobank has developed its Sustainability Risk Management Policy which aims at fostering a holistic understanding of the effects of sustainability risks on its business model, as well as support decision making regarding these matters and providing robust governance under its Risk Management Framework.

Risk Appetite

The Group articulates its Risk Appetite through a set of qualitative and quantitative statements with respect to, inter alia, solvency, liquidity, profitability, asset quality and other areas related to material risks. The purpose of these indicators and thresholds is to support the assessment of whether the Group operates within its defined risk appetite levels. The outcome of this process is the Risk Appetite Statements (RAS) document, whereas the principles, process and governance aspects related to the RAS are outlined in the Risk Appetite Framework (RAF). The RAS are complemented by a set of Business Line Statements (BLS) which constitute operational metrics (and limits) at business level where the risks are undertaken.

Based on the above, the Bank has established relevant Risk Appetite Statements, both quantitative and qualitative, related to Sustainability Risks to effectively manage these risks, in line with the Bank's monitoring and escalation processes. Within this framework, Eurobank has achieved its key Risk Appetite Statement (RAS) for at least 20% of the annual new CIB disbursements to be classified as green/ environmentally sustainable loans, by applying the methodology and criteria set in the Group's Sustainable Finance Framework, thereby demonstrating the Bank's commitment towards green transition. In addition, Eurobank has set a RAS connected with specific EPC targets based on new disbursements on its Retail Mortgage portfolio. Furthermore, the Bank has also developed a new RAS, within Q4 2025, to monitor the portfolio's composite emissions-intensity index versus the expected Net Zero 2030 pathway.

Finally, the Bank maintains a qualitative RAS in relation to the environmental risk posed to biodiversity. Based on its exclusion list, the Bank shall refrain from financing activities prohibited by host country legislation or international conventions relating to the protection of biodiversity resources.

Risk Identification & Materiality Assessment

The Risk Identification & Materiality Assessment (RIMA) process sets the appropriate mechanisms to identify, measure and monitor risks at an early stage, as well as to manage their potential impact on the achievement of the Group's objectives. In this context, RIMA is an essential part of the overall risk appetite process, enabling the Group to build its risk inventory, identify the risks that the Group is or might be exposed to, assess their relevance and materiality and define

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appropriate risk appetite metrics for the monitoring of the material risks. Eurobank has established respective definitions of climate-related risks and has performed materiality assessment exercises regarding the impacts arising from these risks, the results of which are included in the Group's RIMA Report, Risk Library and Risk Inventory.

8.1.3.2 Sustainability Risks Definitions

Eurobank considers sustainability risks as drivers of existing risk types, undertaking a holistic and systemic approach when examining the complex links between sustainability risks and both financial and non-financial risks. Eurobank has integrated sustainability risks elements into its existing risk management processes, creating additional procedures, policies and tools so that these risks can be properly identified and measured.

In this context, Eurobank has defined Sustainability Risks, leveraging on key regulatory requirements and market guidelines (e.g. ECB Guide on Climate-related and Environmental Risks, EBA implementing technical standards on prudential disclosures on ESG risks, Task Force on Climate related Financial Disclosures, CRR Regulation (EU) No 575/2013), as well as on related internal exercises (e.g. scenario analysis/ materiality assessment processes for transition and physical risks).

Sustainability risks: Sustainability risks are defined as potential losses arising from any negative financial impact for the Group, stemming from the current or prospective impacts of any climate-related & environmental, social or governance factors on the Group's counterparties or invested assets.

Climate-related and Environmental risks: Climate-related and environmental risks are defined as the risks deriving from potential loss or negative impact to the Group, including loss/ damage to physical assets, disruption of business or system failures, transition expenditures and reputational effects from the adverse consequences of climate change and environmental degradation.

Climate risk includes the following risks:

Climate-related physical risk: Physical risk refers to the financial impact of climate change, including more frequent extreme weather events and gradual changes in climate, as well as the impact of environmental degradation, such as air, water and land pollution, water stress, biodiversity loss and deforestation.

Climate-related transition risk: Transition risk refers to financial loss that can result, directly or indirectly, from the process of adjustment towards a lower- carbon and more environmentally sustainable economy.

Environmental risk: Risk of actual or potential threat associated with the dependency on nature and nature impacts and/ or the misalignment between the Group's strategy and the changing regulatory, policy, or societal landscape in which it operates, with regards to environmental risks management. Environmental risk excludes the impacts from climate change.

8.1.3.3 Climate-related & Environmental Risk Drivers and Transmission Channels

The Group identifies and assesses CR&E risks within the context of the Risk Identification and Materiality Assessment (RIMA) process, which is performed at least on an annual basis, or ad-hoc, if necessary. Through the RIMA process, the Group identifies material risks that could potentially have a significant adverse impact on its financials, capital base, liquidity position or business model. In this context, the Group considers several different sources to identify new risks, such as the SSM's Supervisory Priorities, the European Union and national legislation changes, developments in the regulatory landscape in general, along with EBA or BCBS reports.

As CR&E risks interact with other risks and result in direct distributional impacts and indirect macroeconomic impacts, the Group understands that careful consideration of their cross-cutting nature is necessary to ensure the effective implementation of risk management activities. Thus, the Group considers CR&E risks as drivers of existing risk types, undertaking a holistic and systemic approach when examining the complex links between CR&E risks and both financial

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and non-financial risks. Eurobank has integrated CR&E risks elements into its existing risk management processes, creating additional procedures, policies and tools so that these risks can be properly identified and measured. In this context, the Group has identified the risk drivers related to climate change and environmental degradation that are most relevant for the business environment in which it operates. In parallel, the Group considers various external sources of information, including, inter alia, cooperation with external advisors and the consultation of public sources (e.g. ThinkHazard!, ENCORE, World Resources Institute etc.) to determine the key risk drivers that could potentially have a significant adverse impact on its operations.

In this context, the Group has identified the following list of CR&E risk drivers:

Climate-Related Risk		Environmental Risk
Transition Risk	Physical Risk	
Behavioural Changes	Acute Hazards (floods, wildfires)	Water Scarcity
Policy & Regulatory Changes	Chronic Hazards (droughts, heat waves)	Biodiversity Loss
Technological Changes		

Sectoral Analysis

To inform the materiality assessment process, the Group performed a heat-mapping exercise to determine how CR&E risks affect certain sectors that the Group is exposed to, and subsequently to interpret the impact on the overall Bank's risk profile and operations in terms of financial losses, business disruptions, legal claims and/or reputational damages. Traditional economic variables such as demand, prices, and productivity may be impacted by CR&E risks. With this exercise, the Group considered the unique characteristics of each sector, while also leveraging on the pertinent analysis for the transmission channels through which CR&E risks may manifest for the Group. For the sectoral analysis, the Group integrated both qualitative and quantitative aspects. Under climate-related transition risk and environmental risk, all identified CR&E risk drivers were assessed, namely Behavioural Changes, Policy & Regulatory Changes, Technological Changes for the former, as well as Water Scarcity and Biodiversity Loss for the latter, while under climate-related physical risk the following risk drivers were selected due to their relevance to the Greek geographical area (where the core operations of the Group are located), as well as pertinent data availability:

- Acute Hazards: Floods, wildfires
- Chronic Hazards: Droughts, heat waves

In this context, the sectors that were designated for the assessment are considered to significantly contribute to climate change and environmental degradation. Each sector received a severity score for each of the determined risk drivers. The scores had the following dimensions: 1-Minor Impact, 2-Low Impact, 3-Medium Impact, 4-High Impact.

For more details, please refer to _section "Description of the processes to identify and assess material climate-related impacts, risks and opportunities" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>

Materiality Assessment per Risk

The Group has carried out several actions to ensure that there is a concrete process via which CR&E risks are fully considered and evaluated to conduct a robust materiality assessment. A proportionate approach was used in the evaluation of the materiality of the CR&E risks, focusing on those that can have the most detrimental effects. It is noted that the materiality assessment process follows the "gross approach" without considering specific mitigation techniques of the underlying risks. In this year's RIMA, the Bank further enhanced its CR&E materiality assessment by incorporating the risk of biodiversity loss. In this context, the Bank conducted a thorough loan portfolio analysis to determine the sectors most vulnerable to biodiversity loss by analysing sector-specific dependencies and impacts based on the ENCORE tool.

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Importantly, the materiality assessment was not limited to CR&E aspects but also encompassed Social and Governance factors, which are presented in the respective sections of this Report. The results of the materiality assessment exercise are included in the Group's RIMA Report, Risk Library and Risk Inventory. The risks identified as material form the basis for the Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity Adequacy Assessment Process (ILAAP) exercises, in the context of which the Group identifies mitigating actions to ensure that it remains adequately capitalised and maintains sufficient liquidity buffers to support its business strategy.

Materiality Assessment Results

The aggregated results of the CR&E Materiality Assessment are shown in the table below along with the approach and criteria that were used to assess each risk type:

		Risk	Approach	Materiality Result
Climate Risk	Physical Risk	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	Material
		Liquidity Risk	Scenario analysis	Non-Material
		Operational Risk	Scenario analysis / Historical analysis	Non-Material
	Transition Risk	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	Material
		Market Risk	Concentration (trading exposures) / Heatmapping analysis	Non-Material
		Liquidity Risk	Scenario analysis / Heatmapping analysis	Non-Material
		Business Risk and Strategic Risk	Concentration (gross interest income) / Heatmapping analysis	Material
		Reputational Risk	Qualitative assessment	Non-Material
Environmental Risk	Water Scarcity	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	Non-Material
	Biodiversity Loss	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	Material

CR&E Risks Scenario Analysis

The Bank provides an in-depth analysis regarding climate change transition and physical risks within the context of the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. The Bank considers scenario analysis as an important tool to use in its strategic planning process. The methodological approach adopted allows the measurement of impacts, based on different scenarios and time horizons (2030, 2040 and 2050). The multiple scenarios utilised enable the Bank to explore and understand how different combinations of climate-related risks, both transition & physical risks, might impact its businesses, strategies and financial performance over the short, medium and long term.

Based on the above, the Bank uses scenario analysis for developing its strategic plan, business model and adjusting its risk management framework as it assesses business implications. This integration is crucial for identifying potential opportunities and risks posed by climate-related & environmental factors, particularly for the sectors that are considered as high transition and physical risk sensitive. More specifically, based on the scenario analysis' results, the Bank assessed the potential range of plausible business, strategic and financial impacts from climate change and the relevant management actions that may be considered during the strategic and financial plans. In this context, the Bank informed its strategic planning by considering how different climate scenarios might affect its business model and leverage on sustainable strategies to mitigate risks and capitalise on opportunities. In addition, the Bank developed new sustainable services and products supporting the transition to a sustainable and low-carbon economy. On the other hand, by evaluating the risks associated with the climate-related physical & transitions risks, the Bank enhanced its overall risk

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management framework including specific climate-related risk appetite and limits to better address these emerging challenges.

Scenario analysis is an ongoing process that plays a vital role in understanding and managing climate-related risks and opportunities. By analysing the evolving developments of climate change and its impacts, the Bank will continue refining its scenario analysis approach. The scenario analysis process considers current economic national & global developments and market practices to provide relevant and reliable insights. As a result, the Bank can better align its strategies and risk management practices with emerging trends and stakeholder expectations. This process not only enhances the Bank's resilience to climate-related challenges but also positions it to capitalise on opportunities within a transitioning economy.

The results of the scenario analysis, which provide a comparison of economic and financial evolutions by sectors and geographies over a range of scenarios and time horizons, indicate that Bank's strategy remains resilient and adaptive. The Network for Greening the Financial System (NGFS) scenarios that the Bank has adopted, provides a common starting point for analysing climate risks to the economy and financial system. The set of scenarios that are utilised by the Bank, include four representative scenarios that cover different dimensions.

More specifically, the NGFS scenarios are:

1. Orderly: Net Zero 2050, where climate policies involve early, ambitious action and the impacts are low for both physical and transition risks.
2. Disorderly: Delayed transition, in which climate policies are not introduced until 2030 and the outcome has a higher impact on transition risk.
3. Hot House World: Current Policies, with limited climate policies and severe physical risks and irreversible changes, including higher sea level.
4. Too-little-too-late: Fragmented World, in which delayed and divergent climate policy ambition globally, leads to elevated transition risks due to the overall ineffectiveness of the transition.

The table below illustrates the impact (transition risk) in terms of sectoral production, comparing Orderly - Net Zero 2050 to Hot House World - Current Policies:

Sector	2030	2040	2050
Agriculture	Moderate Negative	Moderate Negative	Moderate Negative
Mining and Quarrying	Strong Negative	Strong Negative	Strong Negative
Other Manufacturing	Moderate Negative	Moderate Negative	Negative
Electricity Supply	Moderate Positive	Positive	Positive
Water Supply	Same Level	Same Level	Same Level
Construction	Moderate Positive	Positive	Positive
Wholesale & Retail Trade	Same Level	Same Level	Same Level
Transporting and Storage	Negative	Negative	Strong Negative
Real Estate Activities	Same Level	Same Level	Same Level
Oil and Gas	Strong Negative	Strong Negative	Strong Negative
Renewable Energy Sources	Strong Positive	Strong Positive	Strong Positive
Basic Metals	Negative	Negative	Negative
Non-Metallic Minerals	Moderate Negative	Moderate Negative	Negative
Chemicals	Negative	Negative	Strong Negative
Consumer Goods industries	Moderate Negative	Moderate Negative	Moderate Negative
Accommodation	Same Level	Same Level	Same Level
Shipping	Negative	Negative	Strong Negative

Additionally, the Bank assessed the physical impacts on its strategy utilising two RCPs (Representative Concentration Pathways) scenarios:

1. RCP2.6: that incorporates strong climate policies and limit the increase in average global temperature to below 2°C.
2. RCP8.5: implying strong climate changes and the necessity of strong adaptation to the new conditions.

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The following table illustrates the impact of sectoral production under RCP2.6:

Sector	2030	2040	2050
Agriculture	High	High	High
Mining and Quarrying	Low	Low	Medium
Other Manufacturing	Low	Low	Low
Electricity Supply	Medium	Medium	Medium
Water Supply	Low	Low	Low
Construction	Low	Low	Low
Wholesale & Retail Trade	Minor	Low	Low
Transporting and Storage	Low	Medium	Medium
Real Estate Activities	Minor	Minor	Minor
Oil and Gas	Minor	Minor	Minor
Renewable Energy Sources	Minor	Minor	Minor
Basic Metals	Minor	Low	Low
Non-Metallic Minerals	Low	Low	Low
Chemicals	Low	Low	Low
Consumer Goods industries	Low	Low	Medium
Accommodation	Low	Medium	Medium
Shipping	Minor	Minor	Minor

For more details, please refer to _section “Description of the processes to identify and assess material climate-related impacts, risks and opportunities” of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

8.1.3.4 Sustainability Risk Management Tools & Processes

Eurobank has put in place a set of tools for identifying, measuring and managing Sustainability risks, including the credit granting and monitoring processes across the Group’s both 1st and 2nd Lines of Defense.

A) Collateral Insurance Requirements

At the point of loan origination, the Bank requires that borrowers provide insurance policies for real estate properties accepted as collateral, excluding plots of land. Compulsory coverage includes protection against physical risks such as fire, earthquake and flood for both corporate and retail borrowers. Desirable coverages vary based on real estate type and circumstances, such as properties under construction or proximity to protected areas. These coverages encompass, among others, damages from smoke, vehicle collision and civil liability. In cases of Real Estate construction financing, the Bank requires from its clients an insurance contract against every risk during the construction phase, which indicatively should cover physical risks such as fire, earthquake, flood etc.

B) Incorporation of Environmental Risk Factors into the Creditworthiness Assessment

Moody’s Risk Analyst (MRA) models

The Group’s MRA Models assess the CIB borrowers’ credit profile based on qualitative and quantitative criteria. Specifically, the “Risk of Adverse Events” criterion assesses a client’s vulnerability to adverse developments or business interruptions, fines, litigation and negative publicity, stemming among others, from environmental, social and governance parameters (including health and safety of employees).

Exclusion List

Environmental, Social and Governance (ESG) Risks

Eurobank maintains a list of activities that are excluded from financing. For all financing transactions, the Group ensures that its clients demonstrate an organised and systematic approach to E&S risk management that complies with applicable local, national and international environmental, health and safety, and labour legislation and standards, relevant permits, as well as public disclosure requirements.

Climate Risk Scorecard

In line with leading market practices, as well as considering supervisory requirements/ expectations regarding the establishment of an approach for further assessing clients with high climate risk exposure, the Bank has developed a Climate Risk Scorecard for the consideration of CR&E risks. In this context, an assessment process based on the Climate Risk Scorecard is performed for all new financing transactions, limit increases and limit renewals (existing and new clients based on the climate risk scorecard's applicability), initially for the Bank's CIB portfolio. The Climate Risk Scorecard comprises a modular questionnaire which includes targeted climate risk and sustainable financing related questions, both qualitative and quantitative, capturing the following key dimensions: Transition risk, Taxonomy Aligned Activities, Physical risk, Sustainable financing, Emissions, Strategy, Climate & environmental incidents, Transition - Green technology. In addition, the questions of the Climate Risk Scorecard have been developed to examine climate risk and sustainable financing aspects both at client and at transaction level. The output of the Climate Risk Scorecard is one of the following three scores: (a) High Risk, (b) Medium Risk and (c) Low Risk.

Interbank ESG Questionnaire

In recent years, the banking sector has faced increased regulatory focus on ESG matters. Banks are now required to improve their credit risk assessment processes to better identify and evaluate climate-related and environmental risks. In response, an interbank initiative in the Greek banking market was jointly launched, by the Hellenic Bank Association (HBA) and the major Greek Banks, to design a common Interbank ESG Questionnaire for their clients. The objective is to develop a comprehensive ESG Questionnaire to be used by the Greek Banks, ensuring a harmonised assessment approach and a level-playing field, to incorporate a holistic assessment of client ESG factors. The ESG Questionnaire ensures the alignment with supervisory expectations/ requirements (e.g. meeting obligations regarding the EBA Guidelines on Loan Origination and Monitoring, the ECB Guide on Climate-Related and Environmental Risks and the recent EBA Guidelines on the management of ESG risks), the applicable international standards/ guidelines (e.g. Task Force on Climate-related Financial Disclosures), as well as the Banks' operational needs, and leading market practices.

ESG Risk Assessment

Eurobank has developed an ESG Risk Assessment by combining its Climate Risk Scorecard with the Interbank ESG Questionnaire. This comprehensive approach helps assess and classify the Group's clients based on ESG criteria, in line with regulatory requirements. More specifically, Eurobank's ESG Risk Assessment assesses its CIB clients both at obligor, as well as at transaction level, along with the Sustainable Finance Framework classification. In this context, Eurobank has developed an internal ESG Risk Scoring methodological approach for the ESG Risk Assessment to facilitate the final ESG Risk scoring assessment and classification of the client. The output of the ESG Risk Assessment is one of the following three scores: (a) High ESG Risk, (b) Medium ESG Risk and (c) Low ESG Risk.

During the credit decision/ granting process, Eurobank uses the ESG Risk Assessment to consider the client's ESG risk scoring and profile, as well as possible mitigating actions depending on the outcome of the assessment. In this context, the Bank maintains a comprehensive list of specific mitigating actions to address the environmental dimension of sustainability risks, ensuring broad applicability. Based on each client's ESG score and profile, as well as the unique characteristics of each transaction, customised mitigating actions can be proposed to meet the specific needs of each client. Examples may include the development of a specific policy/ process or the acquisition of an ISO certificate in relation to environmental aspects, as well as a set of specific qualitative/ quantitative targets (e.g. reduction of GHG emissions). These mitigating actions are included in the final credit proposal and submitted for approval to the relevant Bank's Committee.

Environmental, Social and Governance (ESG) Risks

Overall, the ESG Risk Assessment aligns with Eurobank's business strategy, enhances ESG risk awareness, promotes sustainable financing and enables the adherence to the Group's risk appetite and credit policies.

Sustainable Finance Framework Assessment Tool

The Group's Sustainable Finance Framework (SFF) provides a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financial products. If a potentially eligible financing fulfils the criteria outlined for each classification category, then, upon following the necessary evaluation and approval verification process, it can be classified as sustainable financing. In this context, the Group has developed and integrated into its system the Sustainable Finance Framework (SFF) Assessment Tool for the CIB portfolio to underpin the classification and evaluation of sustainable/ green financing opportunities in a structural manner, as part of the loan origination process. The SFF Assessment Tool automates the process of assessing the Group's financing solutions against the criteria defined in the SFF. In addition, the SFF Tool assists the Business Units in identifying and mitigating potential greenwashing risks based on the Group's SFF criteria, thereby ensuring the integrity and credibility of the sustainable financing solutions provided. This process is further supported by the CIB Sustainability CoE which reviews and assesses the proposed sustainable financings to ensure alignment with the criteria and guidelines of the Group's SFF. Also, the Group Sustainability Risk, acting as a second line of defense, conducts independent assessments of selected cases to ensure that sustainable financing solutions are in alignment with the Group's SFF.

Collateral Valuation

The Bank acknowledges that collateral valuation should account for climate risk, as it may affect the value of collateral (e.g. increased flood risks). Recognizing the potential impact of climate risk on collateral value, the Bank has incorporated climate-related factors into its Collateral Valuation Policy and procedures, aiming to mitigate risks associated with properties vulnerable to environmental hazards, in alignment with the regulatory standards.

In this context, the Bank updated its Collateral Valuation Policy (CVP) to specify accepted collateral types and valuation procedures, as well as integrated assessments of CR&E risks. This involves collecting pertinent information such as Energy Performance Certificates (EPCs) and incorporating forward-looking estimates of natural hazards. The updated Policy also considers broader CR&E factors, such as waste management and accessibility, enhancing valuation accuracy and risk management.

Where Energy Performance Certificates (EPCs) or actual energy consumption data are not available for a specific collateral, Eurobank applies a structured fallback mechanism to ensure valuation records remain complete and usable for risk monitoring. In such cases, the Bank estimates energy consumption (kWh/m²) in collaboration with a specialized external provider, using property specific characteristics (e.g., building type, year of construction, location) rather than generic averages. This model-based estimation primarily supports coverage of legacy collateral and portfolio level reporting where data gaps may persist.

8.1.3.5 Asset Management Activities

The Bank has outsourced portfolio management services to Eurobank Asset Management M.F.M.C., which is the investment arm of the Group. Thus, due diligence, research and investment decision processes when selecting or recommending financial instruments are conducted based on the applicable policies of Eurobank Asset Management M.F.M.C. Eurobank Asset Management M.F.M.C. was the first asset management company in Greece to join the global Principles for Responsible Investment (PRI) initiative.

The Responsible Investment Policy specifies Eurobank Asset Management MFMC efforts to integrate Environmental, Social & Governance (ESG) information/ criteria into the investment processes, and outlines the foundation, ownership, and oversight mechanisms that support Eurobank Asset Management MFMC's approach. ESG integration is the practice of incorporating material ESG information/ criteria into the investment process in order to mitigate risks over the long-term for UCITS, AIFs, and portfolios under management.

Environmental, Social and Governance (ESG) Risks

The Responsible Investment Policy of the Company is also in line with the requirements set by Regulations (EU) 2019/2088 and (EU) 2020/852 on sustainability-related disclosures in the financial services sector and on the establishment of a framework to facilitate sustainable investment.

Overview of Approaches & Processes

As per the Responsible Investment Policy document of Eurobank Asset Management M.F.M.C., the Company integrates ESG factors into the investment process. In particular, the ESG analysis includes the assessment of environmental criteria (e.g. emissions of greenhouse gases, exposure to fossil fuel) and social (e.g. violations of UN Global Compact principles) at the level of the companies in which the Funds and Portfolios invest. The specific sustainability factors considered may vary, as they depend on the specific investment strategy followed by each Fund/ Portfolio.

The Investments & Corporate Strategy division of the Company pays close attention to investments in sensitive sectors. The sectors concerned include, but are not limited to, thermal coal exposure, thermal coal power generation, oil & gas production, oil sands extraction, shale-energy extraction, off-shore Arctic Oil & Gas Exploration, exposure to weapons (meaning: Anti-personnel mines, chemical and biological weapons, cluster weapons, and nuclear weapons with the exception of government controlled nuclear weapon programs in NATO countries under the Nuclear Non-Proliferation Treaty) and exposure to cultivation and manufacturing tobacco products. Companies from these sensitive sectors may be excluded from the investment. The effect of ESG factors on the investments of a Fund/ Portfolio is considered throughout the whole investment lifecycle. In accordance with Principle 2 of the PRI, the Company aims via active ownership to reduce risks and encourage improvement in ESG practices and performance where they are material to long-term shareholder value creation.

Eurobank Asset Management uses the Sustainable Investment Strategies described below:

1. ESG Integrated: Integration of ESG metrics in the analysis, selection, and composition of managed portfolios. Securities of issuers with high sustainability risks and/ or principal adverse impacts may be purchased and retained in the portfolio.
2. Best in Class: Preferences towards securities with low or medium sustainability risks and/ or decreases the weight of securities with high sustainability risks, as defined by ESG scores, without excluding entire industries.
3. Best in Class Plus: Seeks to invest in securities of issuers with low sustainability risks compared to their peers within the respective industry/ sector, while: a) Excluding those with high sustainability risks (ESG risk classified as “severe”), b) In addition, a negative screen is used to exclude the 20% worst ESG scoring stocks from the investable universe.
4. Transition Investing: Seeks to invest in securities of issuers that are on a credible transition path or have commitments to future improvements.
5. Sustainable Investing: Seeks to invest mainly in issuers that contribute to sustainability objectives, including environmental and social objectives. In addition, the Best in Class Plus process as above is applied in this strategy.

The Responsible Investment Policy also presents the applicable Investee company exclusions based on Controversial Activities and Revenue Thresholds. Also, the Policy sets out Investee company exclusions based on breaches of International Norms Companies in severe breach of OECD Guidelines for Multinational Enterprises, and UN Global Compact Principles on human rights, labor standards, environment and anti-corruption.

For more details on the Responsible Investment Policy please refer to: <https://www.eurobankam.gr/en/politikes>.

8.1.3.6 Scenario Analysis & Stress Testing

A) Climate Stress Test Scenario Analysis in the 2026 ICAAP

As part of ICAAP 2026, the Group introduced a short-term climate transition risk scenario and a scenario for acute physical risk in the Normative Perspective, while a long-term climate risk scenario embedding both transition and chronic physical risk was used in the Economic Perspective. In this context, the following applies:

Environmental, Social and Governance (ESG) Risks

Economic Perspective: The Group assessed forward-looking climate risk using targeted Climate Stress Test scenarios to quantify the impacts of climate-related risks on its credit risk exposures. These impacts were integrated into the economic perspective as an indicative internal capital requirement. More specifically, Eurobank utilised a long-term climate scenario to assess sectoral Gross Value Added (GVA) impact, considering both transition and chronic risks. The scenario is based on the Network for Greening the Financial System (NGFS) 'Orderly Scenario', which aligns with EU and Greece's Net Zero 2050 targets, anticipating that climate policies are introduced early and become gradually more stringent precise. The scenario provides GDP, GVA and unemployment projections extending up to 2050, which incorporate the impact from both the transition and physical chronic risk affecting the PD models. The additional impact, primarily driven by SICR was quantified based on top-down analysis. Specifically, for counterparties operating in the sectors that are adversely affected under the scenario, deterioration in their credit rating has been considered.

Normative Perspective: The Group assessed its vulnerabilities to climate-related risks and their transmission channels to credit risk through targeted scenario analyses capturing both transition risks and physical risks. The analysis quantified the credit risk impact on the Group's loan portfolios by examining two sensitivity scenarios:

- **Transition Risk:** The Group conducted a counterparty-level assessment of the Top 30 Clients operating in sectors identified as most sensitive to transition dynamics. The analysis incorporated an idiosyncratic evaluation of each counterparty under a short-term disorderly climate scenario ("Sudden Wake-Up Call") aligned with NGFS assumptions.
- **Physical Risk:** The Group applied a sensitivity shock on the CRE and RRE prices, in line with the dedicated climate scenario, which examines acute risks under the RCP8.5, resulting from a flood event. This approach aligns with the ECB's flood risk scenario examined, as part of 2022 Climate Risk Stress Test.

B) Group Climate Risk Stress Test (CRST) Framework

The Group Climate Risk Stress Test (CRST) Framework accommodates a dedicated governance structure and defines the minimum requirements for designing, executing, approving, and applying the climate risk stress test. The Framework provides a transparent and repeatable process for designing and executing the climate risk stress test, as well as for reporting and evaluating stress test outcomes and determining management actions.

The CRST Framework has been developed as per the overall Stress Testing Policy of the Group, also considering the provisions of the ECB Guide on CR&E risks and the requirements of the 2022 ECB Climate Risk Stress Test. Additionally, the Framework complies with other best practices and supervisory requirements, such as the EBA Guidelines on institutions' stress testing (EBA/GL/2018/04).

8.1.3.7 Non-Financial Risk Management Policies & Processes

The Bank has established policies and processes to assess and manage its exposure to operational and other non-financial risks stemming from sustainability-related risk events. In particular, the Bank evaluates the potential impact of such risk events on business continuity, as well as the possibility of reputational harm or liability – such as through association with counterparties involved in environmental controversies or through engagement in inappropriate business practices such as "greenwashing".

The Bank is committed to safeguarding business continuity and assessing risks associated with outsourced services and IT operations (e.g. those arising from environmental vulnerabilities affecting service providers).

To integrate sustainability considerations into its non-financial risk management framework, the following practices are applied at Group level:

- **Operational Risk Management**

The Bank has assessed the potential impact of environmental & climate-related risk drivers - both physical risks and transition risks - across all Operational Risk Themes. These Risk Themes constitute the Bank's tailored operational risk

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taxonomy and provide a structured, thematic classification of operational risk sub-types. In this context, climate-related drivers have been mapped to each Risk Theme to ensure comprehensive identification and monitoring of sustainability-related operational risk exposures.

Operational risk events are categorised in accordance with the Risk Themes defined in the Operational Risk Taxonomy. To support consistent identification and recording, detailed guidance has been issued to relevant staff, clarifying the scope, definitions and criteria for capturing sustainability-driven operational risk events. Furthermore, the Group's Operational Risk Events Management Guideline sets out the end-to-end methodology for the classification, analysis, management and closure of operational risk events, including those arising from sustainability drivers, as well as the implementation of corrective actions where required.

Such events may originate from both physical and transition risk drivers and may include, inter alia, damage to the Bank's premises, system failures or disruptions, utility outages, conduct-related matters (e.g. alleged greenwashing), regulatory non-compliance, material deterioration in services provided by third-party vendors, and similar incidents. The impact of these events is assessed across multiple dimensions, including financial loss (e.g. asset damage, compensation or restitution), operational disruption (e.g. business interruption) and reputational impact.

For risk measurement purposes, selected climate-related and environmental drivers are embedded within the Bank's operational risk scenarios. Within the ICAAP framework, climate-related and environmental drivers are incorporated into the scenario assessment process to ensure forward-looking risk evaluation, where such risks are assessed as material.

From a risk identification and mitigation perspective, operational risks associated with sustainability drivers are assessed through the Risk & Control Self-Assessment (RCSA) process. Where relevant, mitigation measures and corrective action plans are defined and monitored to address identified exposures.

In the event of severe disruptions - including environmental and climate-related incidents - the Bank activates its Business Continuity Plan (BCP). The BCP framework ensures preparedness and operational resilience during serious incidents or disasters and supports the timely restoration of normal business activities. It addresses a broad spectrum of potential disruption scenarios, including natural disasters (e.g. fires, floods), accidents, IT system failures, cyber incidents (e.g. virus infections), key supplier insolvency, adverse media events, market disruptions and other material events. The framework incorporates both organisational and technical measures to safeguard the continuity of critical operations and, progressively, all business activities.

The Bank continues to enhance its management reporting framework to further integrate sustainability-driven operational risks and other non-financial risk considerations, ensuring comprehensive monitoring and informed decision-making.

- **Reputational Risk Management**

The Group's Reputational Risk Management Policy outlines the governance framework and approach for the identification, assessment, proactive mitigation, avoidance, management and reporting of the key sources and causes of reputational risk. In this context, the Group identifies various sources of reputational risk, including those arising from environmental and social issues. When a reputational crisis is identified, it is escalated in accordance with the Group's Crisis Management Policy.

8.1.3.8 Sustainability Risk Data

The Group manages sustainability risk data through dedicated infrastructure operating within the Group's overarching data governance framework. Sustainability risk data management is embedded in the Bank's established data control environment (including ownership, quality controls and monitoring), ensuring consistency with broader governance standards. In parallel, the Bank is developing sustainability specific capabilities to address the distinct characteristics of sustainability data, such as diverse external sources, evolving methodologies, and increased granularity required for risk measurement and reporting.

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Having already performed an assessment of sustainability data availability in its internal systems against regulatory requirements/expectations, the Group continues to enhance its sustainability risk data aggregation capabilities and IT infrastructure accordingly, while also using appropriate controls and safeguards to ensure the accuracy and completeness of the compiled information. The Group seeks to further improve sustainability risk data granularity through allocating detailed roles and responsibilities as part of the bank-wide data governance framework, for the purposes of sustainability data management and implementing approaches for addressing data needs (i.e. engaging with external data providers, developing methodological approaches for estimating required information).

8.2 Qualitative Information on Social Risks

8.2.1 Business strategy and processes

8.2.1.1 Adjustment of Our Business Strategy to Integrate Social Factors and Risks

Eurobank recognises that social risk management is essential for a sustainable business model and has taken actions to adjust its business model, strategy and financial planning to address risks arising from social matters, planning to further enhance such activities in the foreseeable future.

The Bank recognises the importance of managing social risks and has ensured that its lending and investing activities do not support activities that harm society. In parallel, through the implementation of existing policies (e.g. Group Environmental and Social Policy) and the establishment of new processes and tools (e.g. ESG Risk Assessment), the Bank continues to strengthen its capacity to identify and manage social risk stemming from client operations, also determining relevant mitigating actions where it is deemed necessary.

Sustainable Finance Framework (SFF)

The Group has developed the SFF, which defines the eligible activities to access sustainable financing (green and social assets).

Social risk considerations are integrated into the SFF as follows:

- Corporate Portfolio: Dedicated-purpose – Social Loans

Eligible social activities aim to promote positive social outcomes and are classified as follows: Employment generation and access to financing, Equitable access to and control over assets, services, resources, and opportunities, Road Networks, Transportation Infrastructure, Community inclusion, Energy, Healthcare and Education.

- Corporate Portfolio: General-purpose – Sustainability-Linked Loans & Facilities

For Social Risk, overarching Sustainability Performance Targets (SPTs) aim to promote positive performance on material social areas, inter alia, to:

- (i) Diversity: Promotion of gender diversity throughout the organisation
- (ii) Link of ESG target to compensation: Incorporation of ESG targets in performance management/ LTIP (Long Term Incentive Program)
- (iii) Community support: Reinforcement of local community through Corporate Social Responsibility initiatives

In addition, the SFF specifies industry-specific SPTs which target sector-specific areas, inter alia, to: Health & Safety, Labor Management, Privacy & Data Security, Access to communications, Product Safety & Quality and Supply Chain Labor Standards.

- Retail Portfolio: Dedicated-purpose –Social Loans:

i) The Framework specifies activities that promote positive social outcomes for small businesses and individuals, with a focus, among others, on the following areas:

- Access to essential services (Education)
- Affordable housing

ii) Small Business:

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Eligible social assets are organised per eligible area:

- Employment generation & Access to financing
- Agricultural productivity and promote sustainable land use

It is noted that the Bank's approach towards addressing borrowers' compliance with social risk mitigation requirements for loans that integrate social factors, is aligned with the process followed as regards green lending.

Product Governance

Eurobank has established and operates a robust governance framework for all products and services, throughout their lifecycle, where material financial and non-financial risks are assessed by the related Group Risk Management Units and other 2nd Line of Defence Units. As part of this process products and services are also assessed for alignment with the Sustainable Finance Framework.

The Bank offers products and services tailored to specific sectors and client segments, promoting sustainable practices among its clients, aiming to alleviate the social risk stemming from their operations. The products/ initiatives demonstrate that the Bank has effectively integrated social risk considerations in its practices in different stages of the credit granting and monitoring process. Furthermore, investment products/ services that do not meet the Group's sustainability standards are not offered to clients.

For further details, please refer to section "Supporting small businesses and social finance" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

8.2.1.2 Objectives, Targets and Limits to Assess and Address Social Risk

Bank's approach towards Sustainable Development

Committed to actively contributing to the achievement of the United Nations SDGs and the 2030 Agenda goals, the Bank has been a signatory of the UN Global Compact since 2008. In September 2019, Eurobank signed the UNEP FI Principles for Responsible Banking (PRB), affirming its commitment to play an active role in implementing the SDGs and the Paris Agreement on Climate Change. In full compliance with its obligations relating to implementing the Principles, the Bank issued its 6th PRB Progress Statement.

The Bank has identified social impact financing as a focus area. This Social Impact financing relates to activities such as education, upskilling health care, financial inclusion, social cohesion and gender equality.

Recognising the importance of social risk management, the Bank has taken steps to adapt its business model, strategy and processes, as well as its financial planning, to address risks arising from social factors. In this context, Eurobank focuses on the development of a range of sustainable products (e.g. student loans) and the adoption of socially responsible practices.

8.2.1.3 Engagement with Our counterparties on Social Risk Mitigation

The following policies and processes facilitate the Bank's engagement with its clients, with a view to mitigating their social risks:

1. Engagement with our Clients

Eurobank actively engages with its clients to mitigate social risks during the credit granting process, in line with regulatory expectations and leading practices. Through a structured dialogue process, Eurobank seeks to identify and address social risk factors that may have a negative impact on its clients' business and by extension on the Bank. By fostering open communication, Eurobank not only supports its clients in achieving sustainable business practices but also ensures that its lending activities contribute to positive social outcomes. This proactive approach to client engagement is integral to

Environmental, Social and Governance (ESG) Risks

Eurobank's broader sustainability risk management, reinforcing its commitment to responsible banking and sustainable development. In addition, through the ESG Risk Assessment, the Bank assesses the client's ESG risk scoring and profile; a process which facilitates setting clear expectations on social risk management by providing tailored guidance and mitigating actions to enhance clients' social risk profiles.

2. Sustainable Finance Framework

Eurobank plays a key role in the financing of landmark projects that are necessary for pursuing economic growth in line with sustainability criteria. The SFF encompasses a wide range of sustainable lending activities, including social financing. The operationalisation of the SFF assessment for the CIB Portfolio has been implemented and integrated into the Bank's systems.

The Bank leverages on the results of the above evaluation process to determine the integration of sustainability considerations in the business model and strategy of its clients, aiming to identify social financing opportunities.

3. Interbank ESG Questionnaire

An Interbank initiative in the Greek Banking market was jointly launched, by the Hellenic Bank Association (HBA) and the major Greek Banks, in order to design a common Interbank ESG Questionnaire for their clients. The objective was to develop a comprehensive ESG Questionnaire to be used by the Greek Banks, ensuring a harmonised assessment approach and a level-playing field, in order to incorporate a holistic assessment of client ESG factors. The Interbank ESG Questionnaire includes a variety of environmental, social and governance questions to facilitate the assessment of the overall ESG profile of the Banks' clients.

8.2.2 Governance

Eurobank has given priority to managing and mitigating any underlying social risks arising as an integral part of developing and offering products and services, while complying with the applicable regulatory framework. Furthermore, it develops and improves mechanisms to identify, measure and communicate impact, across the entire range of its activities. In this context, the assessment of counterparties' social risk is embedded in the risk management process as described in the next section, "Risk Management".

The BoD and the relevant Board Committees are responsible for the approval of the Group key policies and strategies and the supervision of their application, including strategy and policies on social matters and corporate sustainability policies. For more details on governance arrangements, please refer to the Governance section of the Qualitative Information on Environmental Risks.

8.2.3 Risk Management

8.2.3.1 Integration of Social Risk in Our Risk Management Framework

Eurobank has defined social risk leveraging on key regulatory requirements and market guidelines. In this context, social risk refers to potential losses arising from any negative financial impact on the Group stemming from the current or prospective impacts of social factors (such as human rights violation, income inequality, customer safety & protection and consumers' changing preferences) on the Group's counterparties or invested assets.

In addition, the Bank maintains a list of activities that are excluded from financing. Through this exclusion list, the Bank ensures that activities associated with a high degree of social risk are not supported, thereby promoting positive social outcomes and mitigating potential social risks. For all financing transactions, the Bank ensures that its clients demonstrate an organised and systematic approach to ESMS that complies with applicable local, national and international environmental, health and safety and labour legislation and standards, relevant permits, as well as public disclosure requirements.

More specifically, social matters have been integrated in the Bank's risk management framework through the following policies and processes:

Environmental, Social and Governance (ESG) Risks

1. ESG Risk Assessment

Eurobank's ESG Risk Assessment assesses its CIB clients both at obligor, as well as at transaction level. The Interbank ESG Questionnaire is part of the ESG Risk Assessment, forming a robust assessment of client's overall ESG profile by incorporating specific social aspects through social-related questions, capturing among others: Occupational Health & Safety, Community Relations, and Diversity & Inclusion. Through this process the social risk assessment is enhanced aiming to establish the client's sustainability performance and determine potential social risks.

Eurobank uses the ESG Risk Assessment during the credit decision/ granting process and proposes possible mitigating actions depending on the outcome of the assessment. In this context, the Bank maintains a comprehensive list of specific mitigating actions to address the social dimension of sustainability risks, ensuring broad applicability. However, based on each client's ESG score and profile, as well as the unique characteristics of each transaction, customised mitigating actions can also be proposed. Examples of these mitigating actions may include the development of a specific policy/ process or the acquisition of an ISO certificate in relation to social aspects, as well as the measurement of core social KPIs (e.g. diversity metrics). These mitigating actions are included in the final credit proposal and submitted for approval to the relevant Bank's Committee.

2. Materiality Assessment

The Bank has considered social aspects as part of its risk identification and materiality assessment process to effectively identify and manage associated risks linked to its counterparties' activities. To this end, social risk has been recognised as material. The approach implemented for the assessment of social risk involved the utilisation of publicly available sources and the use of the results of the Interbank ESG questionnaire for the identification, and in turn, risk classification of specific business sectors that are either associated with a high degree of social risk or likely to be negatively affected by social risk hazards. Following the risk classification assessment, the Bank also analysed the exposure to sectors that are classified as high risk within its loan portfolio as a means of establishing their potential impact.

3. Know-Your-Customer (KYC) and Anti-Money Laundering/ Terrorist Financing (AML/ TF) Policies & Processes

Eurobank has established comprehensive Know-Your-Customer (KYC) and Anti-Money Laundering/Counter-Terrorist Financing (AML/CTF) policies, procedures, and guidelines aimed at mitigating risks associated with financial crime. These safeguards help prevent cooperation with clients who pose an elevated risk of involvement in money laundering or terrorist financing. As part of its KYC profiling, Eurobank applies Enhanced Due Diligence (EDD) measures when initiating business relationships or during clients lifecycle with individuals or entities classified as High Risk, in accordance with the Bank's internal policies and criteria. Furthermore, Eurobank has implemented monitoring systems to detect potential adverse media coverage related to its customers, including aspects linked to sustainability.

4 MRA models

The Bank uses the MRA Borrower Rating System where clients' risks that arise from social matters are evaluated in terms of the following:

- Risk of Adverse Events including social issues (health and safety of customers)
- Reputation: The Bank assesses the client's reputation with customers, employees, vendors.

8.2.3.2 Lines of Reporting relating to Social Risks

The Bank has in place monitoring and internal reporting mechanisms to ensure appropriate oversight and management of the social risks generated by its business activities. To this end, the Bank has developed a monitoring dashboard that facilitates the regular monitoring and reporting of the ESG Risk Assessment at Management level. The monitoring dashboard provides a comprehensive overview of the results generated by the ESG Risk Assessment including the client's ESG risk score and classification. In addition, it tracks specific qualitative and quantitative information/ metrics as derived

Environmental, Social and Governance (ESG) Risks

from client's responses on the Interbank ESG Questionnaire. These cover various social factors, enabling the Bank to maintain a thorough understanding of each client's ESG profile and its overall portfolio.

8.3 Qualitative Information on Governance Risks

Integration of Governance Factors in Our Governance and Risk Management Framework

Eurobank assesses its exposure to governance risk on an ongoing basis, given that unsuitable governance practices of its counterparties could have adverse impacts. The Bank has established effective internal governance arrangements and processes to manage such risks and better evaluate the governance performance of its clients.

Eurobank has defined governance risk leveraging on key regulatory requirements and market guidelines. In this context, governance risk refers to potential losses arising from any negative financial impact on the Group stemming from the current or prospective impacts of governance factors (such as anti-financial crime, non-compliance with policies or regulations and governance practices) on the Group's counterparties or invested assets.

The Bank monitors and reports governance risk through a dedicated monitoring dashboard which tracks qualitative and quantitative information from the clients' responses on the Interbank ESG Questionnaire. This process enables the Bank to maintain a comprehensive understanding of the governance risk associated with its clients.

For more details on governance arrangements, please refer to the Governance section of the Qualitative Information on Environmental Risks.

Materiality Assessment

The assessment of governance risk was included in the Bank's risk identification and materiality assessment exercise, and this risk category was recognised as material for the Bank. The results of the Interbank ESG Questionnaire were utilised to establish the business sectors associated with high risk in relation to governance aspects.

The Bank has placed great emphasis on strengthening its risk management processes to evaluate its clients' ESG performance. Specifically, the exposure to governance risks is assessed as follows:

Engagement with our Clients

The Bank actively engages with its clients to manage sustainability risks, including governance risks, during the credit granting process. Through structured dialogue, Eurobank enables its clients to identify and address governance issues that could negatively impact their operations. As part of its sustainability risk management, Eurobank uses the ESG Risk Assessments to evaluate the clients' governance profiles, providing guidance to improve their practices.

Know-Your-Customer (KYC) and Anti-Money Laundering/ Terrorist Financing (AML/ TF) Policies & Processes

Eurobank has established Know-Your-Customer (KYC) and Anti-Money Laundering/Counter-Terrorist Financing (AML/CTF) policies and guidelines designed to safeguard against, among other risks, engaging with clients who pose an elevated financial crime risk, such as potential involvement in money laundering or terrorist financing.

Sustainable Finance Framework (SFF) – Sustainability Performance Targets (SPTs)

In the context of the Group's SFF, for Sustainability-Linked Loans, the Group provides specific incentives to counterparties to achieve defined measurable ESG targets, which address inter-alia governance aspects, based on specific SPTs. SPTs constitute ESG targets which the clients aim to meet by utilising respective KPIs to quantify their performance.

Interbank ESG Questionnaire

The Interbank ESG Questionnaire includes a variety of ESG questions to facilitate the assessment of the overall ESG profile of the Banks' clients. In relation to the Governance aspect, the following indicative topics are captured: (i) Business Ethics

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and Anti-corruption, (ii) ESG Governance and Policies, (iii) Corporate Governance and Incidents, and (iv) Governance Targets. The Interbank ESG Questionnaire is used under the ESG Risk Assessment.

ESG Risk Assessment

The governance risk assessment has been further enhanced following the roll out of the ESG Risk Assessment process which includes governance-related questions, address among others aspects such as: Policies, Sustainability Governance (incl. allocation of oversight for sustainability matters to the highest governance body or individual), Accountability, Reporting & Transparency, Corporate Governance, Remuneration, Business Ethics & Anti-corruption, and Sustainable Procurement. During the credit decision/ granting process, Eurobank may propose possible mitigating actions related to governance risk, depending on each client's ESG score and profile. These mitigating actions are included in the final credit proposal and submitted for approval to the relevant Bank's Committee.

MRA Models

The Bank's credit rating models for Corporate clients consider borrowers' management quality and governance, which are evaluated in terms of the following:

- Management character: The Bank assesses the integrity of the senior management of the client.
- Management organisation: The Bank evaluates elements including information quality, leadership, planning and structure.
- Management skill: The Bank examines the financial, marketing and operations skills of the client's management.
- Management succession: The Bank considers the clients' succession plan and the preparation of successors.

For more details, please refer to the Qualitative Information on Environmental Risks section.

8.4 Quantitative Information on ESG Risks

The Group fully consolidated Hellenic Bank from the third quarter of 2024 onwards. The disclosures presented herein as of 31 December 2025 incorporate the corresponding consolidated information.

8.4.1 Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

The objective of this template is to present information about the Group's banking book exposure towards non-financial corporates operating in carbon-related sectors, and on the quality of those exposures including non-performing status, stage 2 classification, the corresponding provisions, and exposures' maturity.

Regarding the disclosures in column b ("of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation"), as per Article 12.1 and Article 12.2 of Commission Delegated Regulation (EU) 2020/1818 the counterparties are identified based on the following criteria:

- companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- companies that derive 10% or more of their revenues from exploration, extraction, distribution or refining of oil fuels;
- companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels; and
- companies that derive 50% or more of their revenues from electricity generation with a Greenhouse Gas (GHG) intensity of more than 100g CO₂ e/kWh.

The identification of counterparties subject to the exclusion criteria was conducted by mapping the relevant counterparties' activities based on NACE and other internally available information.

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Concerning column c (“of which environmentally sustainable (CCM)”), the disclosure was in line with the Taxonomy-aligned exposures that contribute to Climate Change Mitigation (CCM), as also reported in Template 7.

The financed GHG emissions attributed to the Group have been estimated based on the Partnership for Carbon Accounting Financials (PCAF) Financed Emissions Standard. Specifically, the following approaches were applied to calculate the counterparties’ emissions, which are then used as a basis for calculating the financed emissions attributed to the Group:

- a. GHG emissions published by the counterparty are collected through multiple sources including inter alia counterparties’ sustainability reports, Interbank ESG Questionnaire and Carbon Disclosure Project data;
- b. GHG emissions were calculated based on physical activity data collected from the counterparty when emissions information was not published by the counterparties;
- c. GHG emissions were calculated based on the economic activity data by applying appropriate emission factors per economic activity. The emission factors per economic activity were derived based on a multiregional input-output analysis that relied on the Input-Output tables of the Organisation for Economic Cooperation and Development (OECD).

For the calculation of GHG emissions the Group follows a waterfall approach, prioritizing approaches (a) and (b) where possible.

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Table 43: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

	a	b	c	d	e	f	g	h
	30 June 2026							
Sector/subsector	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation					Of which Stage 2 exposures		
	€ million	€ million	Of which environmentally sustainable (CCM) € million	Of which stage 2 exposures € million	Of which non-performing exposures € million	€ million	Of which Stage 2 exposures € million	Of which non-performing exposures € million
1 Exposures towards sectors that highly contribute to climate change ⁽¹⁾	30,846	3,184	2,661	1,323	513	(372)	(49)	(256)
2 A - Agriculture, forestry and fishing	243	-	-	43	16	(11)	(1)	(8)
3 B - Mining and quarrying	81	28	-	2	25	(9)	-	(9)
4 B.05 - Mining of coal and lignite	-	-	-	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	28	28	-	-	23	(7)	-	(7)
6 B.07 - Mining of metal ores	23	-	-	-	1	(1)	-	(1)
7 B.08 - Other mining and quarrying	29	-	-	2	1	(1)	-	(1)
8 B.09 - Mining support service activities	-	-	-	-	-	-	-	-
9 C - Manufacturing	5,815	1,083	241	389	100	(93)	(20)	(57)
10 C.10 - Manufacture of food products	1,371	-	2	136	25	(26)	(10)	(13)
11 C.11 - Manufacture of beverages	177	-	-	9	7	(4)	-	(3)
12 C.12 - Manufacture of tobacco products	27	-	-	1	-	-	-	-
13 C.13 - Manufacture of textiles	194	-	1	1	2	(1)	-	(1)
14 C.14 - Manufacture of wearing apparel	61	-	-	9	6	(4)	-	(4)
15 C.15 - Manufacture of leather and related products	21	-	-	1	2	(1)	-	(1)
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	49	-	-	2	4	(3)	-	(2)
17 C.17 - Manufacture of pulp, paper and paperboard	255	-	-	33	7	(4)	(1)	(2)
18 C.18 - Printing and service activities related to printing	38	-	-	9	4	(3)	(1)	(2)
19 C.19 - Manufacture of coke oven products	1,013	1,012	13	11	-	(1)	-	-
20 C.20 - Production of chemicals	199	71	1	17	4	(4)	(1)	(3)
21 C.21 - Manufacture of pharmaceutical preparations	263	-	-	11	-	(1)	-	-
22 C.22 - Manufacture of rubber products	240	-	-	10	1	(2)	(1)	(1)
23 C.23 - Manufacture of other non-metallic mineral products	301	-	7	22	3	(5)	(2)	(2)
24 C.24 - Manufacture of basic metals	448	-	65	40	-	(2)	(1)	-
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	146	-	2	10	16	(14)	-	(13)
26 C.26 - Manufacture of computer, electronic and optical products	58	-	2	3	1	(1)	-	(1)
27 C.27 - Manufacture of electrical equipment	485	-	135	32	4	(9)	(1)	(3)
28 C.28 - Manufacture of machinery and equipment n.e.c.	113	-	-	19	9	(5)	(1)	(4)
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	241	-	13	1	1	(1)	-	(1)
30 C.30 - Manufacture of other transport equipment	15	-	-	2	1	-	-	-
31 C.31 - Manufacture of furniture	55	-	-	6	2	(2)	(1)	(1)
32 C.32 - Other manufacturing	15	-	-	4	-	-	-	-
33 C.33 - Repair and installation of machinery and equipment	30	-	-	1	-	-	-	-
34 D - Electricity, gas, steam and air conditioning supply	4,367	337	1,934	44	4	(13)	-	(2)
35 D35.1 - Electric power generation, transmission and distribution	4,030	-	1,842	44	4	(12)	-	(2)
36 D35.11 - Production of electricity	1,845	-	1,415	40	4	(9)	-	(2)
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	337	337	92	-	-	(1)	-	-
38 D35.3 - Steam and air conditioning supply	-	-	-	-	-	-	-	-
39 E - Water supply; sewerage, waste management and remediation activities	129	-	1	8	1	(2)	(1)	(1)
40 F - Construction	1,513	-	217	44	31	(23)	(2)	(15)
41 F.41 - Construction of buildings	393	-	-	22	12	(9)	(1)	(7)
42 F.42 - Civil engineering	905	-	214	12	14	(10)	(1)	(6)
43 F.43 - Specialised construction activities	214	-	3	9	5	(4)	-	(2)
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	5,330	-	53	314	209	(143)	(12)	(116)
45 H - Transportation and storage	6,359	1,737	108	28	12	(14)	(2)	(6)
46 H.49 - Land transport and transport via pipelines	264	102	1	10	9	(7)	(1)	(6)
47 H.50 - Water transport	4,324	1,634	-	-	1	(2)	-	-
48 H.51 - Air transport	50	-	2	-	-	-	-	-
49 H.52 - Warehousing and support activities for transportation	1,695	-	103	9	3	(3)	-	-
50 H.53 - Postal and courier activities	27	-	2	9	-	(1)	(1)	-
51 I - Accommodation and food service activities	3,472	-	-	261	72	(37)	(3)	(25)
52 L - Real estate activities	3,537	-	109	191	42	(28)	(7)	(16)
53 Exposures towards sectors other than those that highly contribute to climate change ⁽¹⁾	4,162	1	42	160	98	(62)	(8)	(41)
54 K - Financial and insurance activities	289	-	11	12	1	(1)	(1)	-
55 Exposures to other sectors (NACE codes J, M - U)	3,873	1	31	148	98	(61)	(8)	(40)
56 TOTAL	35,007	3,185	2,704	1,483	611	(434)	(57)	(296)

⁽¹⁾ In accordance with the Commission delegated regulation (EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks -Climate Benchmark Standards Regulation – Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006.

Environmental, Social and Governance (ESG) Risks

	i	j	k	l	m	n	o	p
	30 June 2026							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)	GHG emissions (column j): gross carrying amount percentage of the portfolio derived from company-specific reporting						
Sector/subsector								
	Of which Scope 3 financed emissions							
		%	€ million	€ million	€ million	€ million		
1 Exposures towards sectors that highly contribute to climate change ⁽¹⁾	29,040,509	19,502,557	32.4%	16,672	8,222	4,764	1,187	6
2 A - Agriculture, forestry and fishing	445,223	230,319	0.1%	189	51	3	-	3
3 B - Mining and quarrying	333,661	276,764	0.2%	67	12	1	1	3
4 B.05 - Mining of coal and lignite	-	-	0.0%	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	277,370	232,221	0.1%	28	-	-	-	2
6 B.07 - Mining of metal ores	34,439	31,127	0.1%	17	6	-	-	3
7 B.08 - Other mining and quarrying	21,683	13,288	0.0%	21	6	1	1	4
8 B.09 - Mining support service activities	169	128	0.0%	-	-	-	-	2
9 C - Manufacturing	14,118,377	12,013,912	11.0%	4,300	1,102	381	32	4
10 C.10 - Manufacture of food products	1,647,854	1,325,275	1.7%	1,006	306	57	2	3
11 C.11 - Manufacture of beverages	111,573	86,313	0.1%	93	34	50	1	6
12 C.12 - Manufacture of tobacco products	20,647	20,338	0.1%	26	-	1	-	1
13 C.13 - Manufacture of textiles	53,104	44,352	0.1%	45	7	141	-	10
14 C.14 - Manufacture of wearing apparel	23,714	19,319	0.1%	27	31	1	1	6
15 C.15 - Manufacture of leather and related products	4,508	3,893	0.0%	7	13	1	-	5
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	30,089	24,020	0.0%	24	10	1	14	9
17 C.17 - Manufacture of pulp, paper and paperboard	255,171	188,956	0.5%	167	52	35	1	4
18 C.18 - Printing and service activities related to printing	26,693	18,487	0.0%	29	7	1	1	4
19 C.19 - Manufacture of coke oven products	7,094,566	6,586,897	3.2%	981	31	-	1	3
20 C.20 - Production of chemicals	219,379	168,353	0.4%	126	60	13	-	4
21 C.21 - Manufacture of pharmaceutical preparations	51,462	42,757	0.4%	167	90	6	-	4
22 C.22 - Manufacture of rubber products	242,299	159,593	0.4%	162	73	5	-	4
23 C.23 - Manufacture of other non-metallic mineral products	880,786	196,054	0.4%	233	65	1	2	3
24 C.24 - Manufacture of basic metals	1,718,484	1,484,147	1.3%	397	51	-	-	2
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	143,060	122,492	0.1%	108	30	6	2	4
26 C.26 - Manufacture of computer, electronic and optical products	9,366	8,053	0.1%	30	27	1	1	5
27 C.27 - Manufacture of electrical equipment	937,285	913,673	1.4%	419	24	42	1	4
28 C.28 - Manufacture of machinery and equipment n.e.c.	53,164	45,419	0.1%	90	21	1	1	4
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	532,671	499,580	0.6%	93	138	10	-	5
30 C.30 - Manufacture of other transport equipment	12,078	11,542	0.0%	13	-	2	-	4
31 C.31 - Manufacture of furniture	27,683	24,028	0.0%	28	20	2	4	6
32 C.32 - Other manufacturing	5,172	4,510	0.0%	10	3	2	-	6
33 C.33 - Repair and installation of machinery and equipment	17,569	15,861	0.0%	21	9	-	-	4

	i	j	k	l	m	n	o	p
	30 June 2026							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)	GHG emissions (column j): gross carrying amount percentage of the portfolio derived from company-specific reporting						
	Of which Scope 3 financed emissions							
		%	€ million	€ million	€ million	€ million		
34 D - Electricity, gas, steam and air conditioning supply	1,990,698	737,518	8.4%	1,441	850	2,014	62	9
35 D35.1 - Electric power generation, transmission and distribution	1,930,759	719,888	7.5%	1,383	571	2,014	62	10
36 D35.11 - Production of electricity	287,184	33,677	1.4%	281	330	1,175	59	12
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	58,791	17,561	0.9%	58	278	-	-	7
38 D35.3 - Steam and air conditioning supply	1,148	69	0.0%	-	-	-	-	5
39 E - Water supply; sewerage, waste management and remediation activities	318,796	78,989	0.1%	84	43	1	-	4
40 F - Construction	804,073	730,139	0.1%	801	201	92	419	10
41 F.41 - Construction of buildings	244,938	218,448	0.0%	257	105	30	2	4
42 F.42 - Civil engineering	439,800	403,192	0.1%	448	21	46	390	13
43 F.43 - Specialised construction activities	119,335	108,499	0.0%	96	75	16	27	8
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	5,499,639	4,140,171	5.8%	3,979	1,181	136	34	3
45 H - Transportation and storage	4,741,426	757,327	4.1%	2,610	2,280	869	600	7
46 H.49 - Land transport and transport via pipelines	1,393,289	219,723	0.3%	127	81	54	1	6
47 H.50 - Water transport	2,484,319	33,312	0.0%	2,218	2,041	65	-	5
48 H.51 - Air transport	27,625	8,008	0.1%	10	11	28	-	13
49 H.52 - Warehousing and support activities for transportation	828,365	490,735	3.6%	232	144	720	598	14
50 H.53 - Postal and courier activities	7,828	5,549	0.0%	23	2	2	-	3
51 I - Accommodation and food service activities	695,255	518,844	2.4%	941	1,622	890	19	7
52 L - Real estate activities	93,361	18,574	0.3%	2,260	881	376	19	5
53 Exposures towards sectors other than those that highly contribute to climate change ⁽¹⁾				2,785	1,061	225	91	4
54 K - Financial and insurance activities				192	35	1	62	3
55 Exposures to other sectors (NACE codes J, M - U)				2,594	1,026	225	29	5
56 TOTAL	29,040,509	19,502,557	32.4%	19,458	9,283	4,989	1,278	6

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	a	b	c	d	e	f	g	h
	31 December 2025							
Sector/subsector	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation					Of which Stage 2 exposures		
	Of which environmentally sustainable (CCM)					Of which non-performing exposures		
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Exposures towards sectors that highly contribute to climate change	29,023	2,913	2,668	1,348	520	(373)	(58)	(253)
2 A - Agriculture, forestry and fishing	237	-	-	49	20	(15)	(1)	(13)
3 B - Mining and quarrying	84	27	-	2	25	(10)	-	(10)
4 B.05 - Mining of coal and lignite	-	-	-	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	27	27	-	-	22	(8)	-	(8)
6 B.07 - Mining of metal ores	34	-	-	-	1	(1)	-	(1)
7 B.08 - Other mining and quarrying	23	-	-	2	2	(1)	-	(1)
8 B.09 - Mining support service activities	-	-	-	-	-	-	-	-
9 C - Manufacturing	5,537	1,032	233	357	104	(93)	(22)	(56)
10 C.10 - Manufacture of food products	1,283	-	1	126	28	(24)	(10)	(12)
11 C.11 - Manufacture of beverages	132	-	-	11	7	(4)	-	(3)
12 C.12 - Manufacture of tobacco products	35	-	-	-	-	-	-	-
13 C.13 - Manufacture of textiles	164	-	1	1	1	(1)	-	(1)
14 C.14 - Manufacture of wearing apparel	65	-	-	8	5	(4)	-	(4)
15 C.15 - Manufacture of leather and related products	17	-	-	-	1	(1)	-	(1)
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	46	-	-	3	6	(3)	-	(3)
17 C.17 - Manufacture of pulp, paper and paperboard	218	-	-	4	7	(3)	-	(3)
18 C.18 - Printing and service activities related to printing	38	-	-	8	4	(3)	-	(2)
19 C.19 - Manufacture of coke oven products	1,066	984	10	10	-	(1)	-	-
20 C.20 - Production of chemicals	170	48	1	18	7	(5)	(1)	(3)
21 C.21 - Manufacture of pharmaceutical preparations	282	-	-	10	-	(1)	-	-
22 C.22 - Manufacture of rubber products	209	-	-	10	1	(2)	(1)	(1)
23 C.23 - Manufacture of other non-metallic mineral products	259	-	11	28	3	(6)	(3)	(2)
24 C.24 - Manufacture of basic metals	407	-	90	34	-	(2)	(1)	-
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	140	-	1	9	16	(14)	(1)	(13)
26 C.26 - Manufacture of computer, electronic and optical products	81	-	-	6	1	(1)	-	(1)
27 C.27 - Manufacture of electrical equipment	426	-	106	27	6	(8)	(1)	(3)
28 C.28 - Manufacture of machinery and equipment n.e.c.	111	-	-	22	8	(5)	(1)	(4)
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	256	-	12	10	1	(2)	-	(1)
30 C.30 - Manufacture of other transport equipment	24	-	-	2	-	-	-	-
31 C.31 - Manufacture of furniture	49	-	-	5	2	(2)	(1)	(1)
32 C.32 - Other manufacturing	15	-	-	1	-	-	-	-
33 C.33 - Repair and installation of machinery and equipment	44	-	-	1	-	-	-	-

	a	b	c	d	e	f	g	h
	31 December 2025							
Sector/subsector	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation					Of which Stage 2 exposures		
	Of which environmentally sustainable (CCM)					Of which non-performing exposures		
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
34 D - Electricity, gas, steam and air conditioning supply	4,192	303	1,948	45	4	(11)	(1)	(2)
35 D35.1 - Electric power generation, transmission and distribution	3,890	-	1,865	44	4	(10)	(1)	(2)
36 D35.11 - Production of electricity	1,912	-	1,511	40	4	(8)	-	(2)
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	303	303	83	-	-	(1)	-	-
38 D35.3 - Steam and air conditioning supply	-	-	-	-	-	-	-	-
39 E - Water supply; sewerage, waste management and remediation activities	98	-	1	7	1	(1)	(1)	(1)
40 F - Construction	1,295	-	211	62	46	(25)	(4)	(17)
41 F.41 - Construction of buildings	547	-	-	33	31	(14)	(2)	(11)
42 F.42 - Civil engineering	559	-	208	17	12	(7)	(2)	(5)
43 F.43 - Specialised construction activities	190	-	3	12	4	(4)	(1)	(2)
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	4,747	-	84	323	198	(135)	(16)	(105)
45 H - Transportation and storage	6,285	1,551	135	53	15	(19)	(3)	(8)
46 H.49 - Land transport and transport via pipelines	267	108	1	12	9	(8)	(2)	(6)
47 H.50 - Water transport	3,895	1,442	-	18	2	(4)	(1)	(1)
48 H.51 - Air transport	69	-	-	3	-	-	-	-
49 H.52 - Warehousing and support activities for transportation	2,020	2	131	15	4	(6)	(1)	(1)
50 H.53 - Postal and courier activities	35	-	2	5	-	(1)	-	-
51 I - Accommodation and food service activities	3,364	-	-	286	71	(37)	(6)	(25)
52 L - Real estate activities	3,184	-	56	166	35	(26)	(3)	(17)
53 Exposures towards sectors other than those that highly contribute to climate change	3,889	1	34	224	104	(80)	(20)	(49)
54 K - Financial and insurance activities	210	-	7	8	-	(1)	-	-
55 Exposures to other sectors (NACE codes J, M - U)	3,679	1	27	216	104	(79)	(20)	(49)
56 TOTAL	32,912	2,914	2,702	1,572	624	(453)	(78)	(303)

Environmental, Social and Governance (ESG) Risks

	i	j	k	l	m	n	o	p
	31 December 2025							
Sector/subsector	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)	GHG emissions (column i): gross carrying amount	percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
	Of which Scope 3 financed emissions							
	%	€ million	€ million	€ million	€ million			
1 Exposures towards sectors that highly contribute to climate change (1)	29,260,727	19,578,643	25.7%	15,544	8,293	4,028	1,159	6
2 A - Agriculture, forestry and fishing	491,020	220,432	0.0%	180	54	3	-	3
3 B - Mining and quarrying	816,218	494,142	0.1%	63	20	-	1	4
4 B.05 - Mining of coal and lignite	-	-	0.0%	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	724,242	413,433	0.0%	27	-	-	-	3
6 B.07 - Mining of metal ores	84,085	77,196	0.1%	18	16	-	-	5
7 B.08 - Other mining and quarrying	7,519	3,349	0.0%	18	3	-	1	5
8 B.09 - Mining support service activities	372	164	0.0%	-	-	-	-	1
9 C - Manufacturing	15,386,164	13,038,111	9.2%	3,932	1,294	280	32	4
10 C.10 - Manufacture of food products	1,750,381	1,280,989	1.0%	880	350	50	3	3
11 C.11 - Manufacture of beverages	103,259	76,085	0.0%	85	31	16	-	5
12 C.12 - Manufacture of tobacco products	18,798	18,587	0.1%	34	-	1	-	1
13 C.13 - Manufacture of textiles	48,359	39,453	0.0%	36	9	119	-	7
14 C.14 - Manufacture of wearing apparel	26,260	21,266	0.1%	27	35	2	1	6
15 C.15 - Manufacture of leather and related products	3,701	2,987	0.0%	6	10	1	-	5
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	35,611	28,452	0.0%	22	8	3	14	6
17 C.17 - Manufacture of pulp, paper and paperboard	218,397	173,540	0.2%	155	36	26	1	4
18 C.18 - Printing and service activities related to printing	30,140	23,082	0.0%	29	7	1	1	4
19 C.19 - Manufacture of coke oven products	8,824,870	8,204,416	3.6%	1,058	8	-	-	3
20 C.20 - Production of chemicals	261,368	156,209	0.2%	121	49	-	-	3
21 C.21 - Manufacture of pharmaceutical preparations	80,939	61,100	0.3%	170	109	2	-	4
22 C.22 - Manufacture of rubber products	220,342	164,751	0.1%	116	87	5	-	3
23 C.23 - Manufacture of other non-metallic mineral products	776,337	178,862	0.4%	172	85	1	2	4
24 C.24 - Manufacture of basic metals	930,816	629,823	1.1%	353	53	1	-	2
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	135,247	114,054	0.0%	107	25	6	2	4
26 C.26 - Manufacture of computer, electronic and optical products	11,239	10,440	0.1%	75	5	1	1	4
27 C.27 - Manufacture of electrical equipment	802,243	775,709	1.3%	223	175	28	-	4
28 C.28 - Manufacture of machinery and equipment n.e.c.	43,981	34,546	0.1%	94	15	1	1	3
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	990,007	977,389	0.6%	98	148	10	-	5
30 C.30 - Manufacture of other transport equipment	17,503	17,007	0.0%	22	-	2	-	3
31 C.31 - Manufacture of furniture	29,797	26,027	0.0%	24	18	2	5	7
32 C.32 - Other manufacturing	7,626	6,730	0.0%	7	5	2	-	6
33 C.33 - Repair and installation of machinery and equipment	18,943	16,607	0.0%	18	25	-	-	4
34 D - Electricity, gas, steam and air conditioning supply	2,123,703	777,921	7.6%	1,248	1,283	1,602	59	9
35 D35.1 - Electric power generation, transmission and distribution	2,046,891	749,903	6.8%	1,190	1,038	1,602	59	10
36 D35.11 - Production of electricity	239,962	20,694	1.0%	211	392	1,250	59	13
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	75,246	27,916	0.8%	58	245	-	-	7
38 D35.3 - Steam and air conditioning supply	1,566	102	0.0%	-	-	-	-	5
39 E - Water supply; sewerage, waste management and remediation activities	283,523	55,681	0.0%	51	45	1	-	4
40 F - Construction	831,196	762,281	0.2%	910	204	75	106	5
41 F.41 - Construction of buildings	324,639	297,596	0.0%	367	122	53	5	5
42 F.42 - Civil engineering	345,623	316,389	0.2%	447	36	7	69	5
43 F.43 - Specialised construction activities	160,934	148,296	0.0%	97	46	15	31	8
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	4,524,755	3,218,277	3.0%	3,742	830	135	39	3
45 H - Transportation and storage	4,139,725	548,200	4.6%	2,576	1,991	823	895	8
46 H.49 - Land transport and transport via pipelines	399,593	106,478	0.4%	131	79	54	3	6
47 H.50 - Water transport	2,916,053	29,374	0.0%	2,108	1,784	2	-	5
48 H.51 - Air transport	35,026	10,106	0.1%	37	3	29	-	9
49 H.52 - Warehousing and support activities for transportation	777,082	395,576	4.0%	280	124	724	892	16
50 H.53 - Postal and courier activities	11,971	6,666	0.0%	19	1	15	-	6
51 I - Accommodation and food service activities	543,658	430,030	0.1%	995	1,602	746	21	8
52 L - Real estate activities	120,765	33,568	0.9%	1,847	970	362	5	6
53 Exposures towards sectors other than those that highly contribute to climate change (1)				2,633	1,017	209	30	4
54 K - Financial and insurance activities				208	1	1	1	1
55 Exposures to other sectors (NACE codes J, M - U)				2,425	1,017	209	29	4
56 TOTAL	29,260,727	19,578,643	25.7%	18,176	9,310	4,238	1,189	6

Environmental, Social and Governance (ESG) Risks

8.4.2 Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

This template reports the gross carrying amount of loans collateralised by immovable property and of collaterals obtained by taking possession along with information about the energy efficiency of the immovable property in terms of kWh/m² energy consumption and Energy Performance Certificate (EPC).

The reporting perimeter is in line with other regulatory reporting of the Group and includes collaterals that are eligible for EPC, while a breakdown between EU area and non-EU area based on collateral's location is presented. The Group's immovable property collaterals are located mainly in the EU and more specifically Greece, Cyprus and Bulgaria, while a relatively smaller proportion is located in the United Kingdom.

As per the Directive 2010/31/EU, energy performance certificate is defined as a certificate recognised by a Member State or by a legal person designated by it, which indicates the energy performance of a building or building unit, calculated according to a methodology adopted in accordance with Article 3 of the Directive.

For the purposes of this template, the Group considered only actual EPC labels based on internally available information, while for energy consumption (kWh/m²) both actual and estimated consumption are reported. For collaterals that actual consumption information was not available, the Group proceeded with the estimation of consumption in collaboration with a specialized external provider. The methodological approach that was followed is a model-based estimation of consumption based on collateral characteristics.

The gross carrying amount of exposures that are linked to more than one collateral is allocated and disclosed separately under energy efficiency levels based on the collateral value.

Table 44: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

Counterparty sector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	30 June 2026															
	Total gross carrying amount amount															
	Level of energy efficiency (EP score in kWh/m² of collateral)							Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
	0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500		A	B	C	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	%
1 Total EU area	21,215	3,297	6,531	2,415	1,656	1,661	2,648	1,191	816	676	577	235	147	280	17,293	84%
2 Of which Loans collateralised by commercial immovable property	7,781	86	69	544	770	1,424	2,550	565	667	481	308	30	13	12	5,705	64%
3 Of which Loans collateralised by residential immovable property	12,883	3,198	6,363	1,800	792	171	54	626	141	160	204	153	110	237	11,251	96%
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	551	13	99	71	94	66	45	1	8	35	64	52	24	31	337	52%
5 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	17,901	3,273	6,474	2,357	1,603	1,644	2,550								14,611	100%
6 Total non-EU area	578	-	26	92	-	-	385	7	24	53	37	21	-	-	437	83%
7 Of which Loans collateralised by commercial immovable property	540	-	23	84	-	-	366	7	24	51	36	21	-	-	402	83%
8 Of which Loans collateralised by residential immovable property	38	-	3	8	-	-	18	-	-	2	1	-	-	-	35	78%
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100%
10 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	502	-	26	92	-	-	385								362	100%

Environmental, Social and Governance (ESG) Risks

Counterparty sector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	31 December 2025															
	Total gross carrying amount amount															
	Level of energy efficiency (EP score in kWh/m² of collateral)							Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
	0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500		A	B	C	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	%
1 Total EU area	20,949	3,296	6,785	2,440	1,482	1,631	2,591	736	630	627	376	188	129	225	18,037	85%
2 Of which Loans collateralised by commercial immovable property	7,502	108	95	622	653	1,395	2,474	418	565	457	157	21	17	7	5,859	63%
3 Of which Loans collateralised by residential immovable property	12,851	3,174	6,579	1,739	727	169	72	317	57	125	157	110	86	186	11,812	97%
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	596	14	110	79	102	67	45	1	8	45	62	57	26	31	366	51%
5 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	17,906	3,268	6,698	2,336	1,431	1,608	2,565								15,314	100%
6 Total non-EU area	476	2	32	44	27	6	301	20	50	63	54	28	3	-	257	75%
7 Of which Loans collateralised by commercial immovable property	451	2	20	37	27	6	301	20	50	60	54	27	3	-	237	75%
8 Of which Loans collateralised by residential immovable property	24	-	12	7	-	-	1	-	-	3	1	1	-	-	20	77%
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100%
10 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	369	-	29	42	-	-	298								193	100%

8.4.3 Template 3: Banking book – Climate change transition risk: Alignment metrics

This template provides information on alignment metrics related to the Paris Agreement, focusing on key carbon-intensive sectors. Eurobank has committed to aligning its portfolios with the objective of limiting global warming to 1.5°C and supports the transition to a net-zero economy by 2050, following the guidance set by the Net-Zero Banking Alliance (NZBA) framework. The Bank's approach is based on disclosures published by counterparties and is guided by industry standards such as PCAF and other accredited science-based decarbonisation scenarios.

As also noted in section 8.1.1.1, to achieve these commitments, Eurobank joined in March 2024 the NZBA and started developing sector-specific targets for financed emissions and emission intensity reductions, with a focus on sectors that have the highest carbon impact. The pathways to decarbonisation follow the International Energy Agency's (IEA) Net Zero Emissions by 2050 Scenario (NZE2050).

An integral component in setting sectoral targets is the determination of portfolio emissions intensity, defined as financed emissions per unit of activity data (e.g., kgCO₂e/m², kgCO₂e/kWh, kgCO₂e/ton of cement). The process consists of three main steps:

- Measuring the absolute GHG emissions of each investment or loan within a specific asset class.
- Calculating the share of the counterparties' emissions attributed to the Group (i.e., financed emissions).
- Dividing the total financed emissions by the total attributed activity data of all investments or loans in the specific sector.

The resulting emission intensity metrics include data from counterparties that account for most sectoral financed emissions and exposures in the prioritised sectors.

In relation to the NACE sectors presented in the table below, there are instances where the primary NACE sector of certain counterparties differs from the ones proposed in the template. For example, in the Power Sector, there are counterparties whose NACE Code is not within the provided codes for the Power Sector, yet they are actively engaged in electricity generation.

Environmental, Social and Governance (ESG) Risks

Table 45: Banking book – Climate change transition risk: Alignment metrics

a	b	c	d	e	f	g
Sector	NACE Sectors (a minima)	Portfolio gross carrying amount € million	Alignment metric	Year of reference	Distance to IEA NZE2050 in % *	Target (year of reference + 3 years)
Power	D.35.1	3,515	176 kgCO ₂ /Mwh	2026	-5%	220
	D.35.1.1					
	D.35.1.4					
Fossil fuel combustion	B.06	1,609	540.7 ktCO ₂ e	2026	72%	530 (95 indexed)
	B.09.1					
	C.19.2					
	D.35.2					
	D.35.2.2					
	G.46.7.1					
Automotive						
Aviation						
Maritime transport						
Cement, clinker and lime production	C.23.5	162	0.63 tCO ₂ e/t cement	2026	34%	0.59
	C.23.5.1					
	C.23.6					
	C.23.6.1					
	C.23.6.3					
	C.23.6.4					
Iron and steel, coke, and metal ore production	C.24	545	0.35 tCO ₂ e / t steel	2026	-4%	0.33
	C.24.1					
	C.24.2					
	C.24.4					
	C.24.4.2					
	C.24.4.4					
	C.24.5					
	C.24.5.1					
	C.24.5.2					
	C.24.3.4					
	C.24.5					
	C.24.5.2					
	C.25					
	C.25.1					
	C.25.1.1					
	G.46.7.2					
Chemicals						

* Pit distance to 2030 NZE2050 scenario in % (for each metric)

* For the year of reference, data are reported as at 30 June 2026.

a	b	c	d	e	f	g
Sector	NACE Sectors (a minima)	Portfolio gross carrying amount € million	Alignment metric	Year of reference	Distance to IEA NZE2050 in % *	Target (year of reference + 3 years)
Power	D.35.1	3,450	199.3 kgCO ₂ /Mwh	2025	7%	220
	D.35.1.1					
	D.35.1.4					
Fossil fuel combustion	B.06	1,598	636.2 ktCO ₂ e	2025	103%	530 (95 indexed)
	B.09.1					
	C.19.2					
	D.35.2					
	D.35.2.2					
	G.46.7.1					
Automotive						
Aviation						
Maritime transport						
Cement, clinker and lime production	C.23.5	130	0.63 tCO ₂ e/t cement	2025	34%	0.59
	C.23.5.1					
	C.23.6					
	C.23.6.1					
	C.23.6.3					
	C.23.6.4					
Iron and steel, coke, and metal ore production	C.24	500	0.30 tCO ₂ e / t steel	2025	-18%	0.33
	C.24.1					
	C.24.2					
	C.24.4					
	C.24.4.2					
	C.24.4.4					
	C.24.5					
	C.24.5.1					
	C.24.5.2					
	C.24.3.4					
	C.24.5					
	C.24.5.2					
	C.25					
	C.25.1					
	C.25.1.1					
	G.46.7.2					
Chemicals						

* Pit distance to 2030 NZE2050 scenario in % (for each metric)

Environmental, Social and Governance (ESG) Risks

8.4.4 Template 4: Banking book – Climate change transition risk: Exposure to top 20 carbon-intensive firms

The template includes aggregated and anonymized information on the Group's exposure towards the top 20 most carbon-intensive counterparties globally. The identification of the top 20 most carbon-intensive corporates in the world is based on the list of the top 20 carbon emitting companies published in 2021 by Carbon Majors Database.

Column c ("of which environmentally sustainable (CCM)") is in line with the Taxonomy-aligned exposures that contribute to Climate Change Mitigation (CCM), as also reported in Template 7.

Table 46: Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

	a	b	c	d	e
	30 June 2026				
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate) (1)	Of which environmentally sustainable (CCM) (2)	Weighted average maturity	Number of top 20 polluting firms included
	€ million	%	€ million		
1	27	0.03%	-	3	2

	a	b	c	d	e
	31 December 2025				
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
	€ million	%	€ million		
1	25	0.03%	-	4	2

⁽¹⁾ For counterparties among the top 20 carbon emitting companies in the world.

8.4.5 Template 5: Banking book – Indicators of potential climate change physical risk: Exposures subject to physical risk

This template includes information on exposures in the banking book, including loans and advances, debt securities and equity instruments not held-for-trading and not held-for-sale, towards non-financial corporates, on loans collateralized with immovable property and on repossessed real estate collaterals, exposed to chronic and acute climate-related hazards.

The geographical breakdown of the template (Greece and Rest of the World) is in line with the Group's main activities' location. It should be noted that Group's exposure is mainly concentrated in counterparties operating/residing in Southeast Europe and more specifically Greece, Cyprus and Bulgaria.

The Group considers as chronic climate change events those that arise from a progressive shift in climate conditions and their effect is long lasting, while acute climate change events are defined as those that originate from extreme events in a short period of time.

The climate-related hazards were assessed based on physical risks scenarios developed by an external provider. The analysis was based on RCP 8.5 climate scenario and spanned from short to medium-term, in line with the average maturity of the Group's portfolio. Climate data and indices were derived from Copernicus Climate Data Store database and GFDRR – ThinkHazard!. Historical values were calculated by using ERA5 Reanalysis data, while future projections derived from climate model simulations with general circulation and regional climate model pairs under the EURO-CORDEX program.

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A total of 4 to 8 model combinations (depending on the climate index and variable) at a horizontal resolution of 0.11 x 0.11 degrees (approximately 11.5 x 11.5 km) were used. Multi-model mean values were used to minimize the range of uncertainty in climate model simulations while both historical data and future projections are bias-adjusted versus the ERA5 Reanalysis data.

The methodological approach developed was applied at the appropriate level of spatial analysis (i.e. at NUTS 2 level for chronic physical events and at Postal Code level in Greece, while for the other countries, it was conducted at the NUTS 3 level for acute effects). This approach also considered the varying levels of vulnerability across economic activities and real estate properties. While acute risks (e.g., storms, floods, wildfires) are highly localized, chronic risks (e.g., rising temperatures, prolonged droughts) tend to have broader, long-term impacts. The analysis was performed at NACE code 2- digits level for economic activities and based on property characteristics for real estate assets. The results were then categorized on a 5-point RAG scale, indicating from negligible to very high sensitivity.

Chronic Climate Change Events

The Group identified as chronic climate change events those that arise from a progressive shift in climate conditions and which affect counterparties' revenue or operating costs. The analysis utilized climate indicators source from European and International databases (e.g., Copernicus) and results of European programs (e.g., COACCH project, CLIMPACT I and JRC studies). More specifically, the Group utilized:

- The outcomes of research projects as regards the impact of climate change on the yield / revenue of the primary sector (i.e., agriculture, fishery, and forestry);
- The outcomes of research projects as regards the impact of climate change on the productivity of the mining, manufacturing, and construction sectors;
- The outcomes of research projects as regards the impact of climate change on the productivity of different power generation technologies (both renewables and fossil-fueled);
- The number of heating and cooling degree days attributed to various climatic scenarios i to assess the changes in heating and cooling needs of the non-residential buildings, which usually affect the operating costs of the companies of the services sector;
- The changes on the Tourism Climate Index associated with the different climatic scenarios that affect tourism activity and associated companies.

The above-mentioned climate indicators are considered as the drivers of the potential chronic impacts of climate change on the companies of the respective economic sectors, affecting either their operating costs or their revenues. In the context of the analysis, these effects either directly (due to the structure of the climate indicators used) or indirectly (through the input-output tables of the respective economies or other econometric models) were expressed as percentage changes in the turnover of the respective businesses.

Acute Climate Change Events

For the analysis of acute climate change events the Group took into consideration several extreme phenomena such as:

- fluvial floods (high-water levels in river channels, causing dike breach);
- pluvial floods (rainfall intensity exceeding infiltration capacity);
- coastal floods;
- extreme heat;
- wildfires;
- water scarcity;
- landslides.

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The analysis was performed at Postal Code area level in Greece and at NUTS 3 region level for the other countries as well as at NACE code 2- digits level and considered the following three main dimensions:

- Climate Hazards:** Utilizing data and indicators from European databases (i.e., Copernicus and EPSON) the severity of the 7 extreme phenomena in each Postal Code area in Greece and in each NUTS 3 region for the other countries under consideration was assessed, assigning a risk score according to the 5-point RAG scale;
- Exposure:** Utilizing data and indicators (e.g., population in settlements exposed to coastal hazard) from European databases (i.e., RESIN, EPSON, and the Hellenic Statistical Authority - ELSTAT) the exposure of the Postal Code area in Greece and of the NUTS 3 region for the other countries in question to the above hazards was assessed and categorized in the 5-point RAG scale;
- Vulnerability:** The vulnerability of the various economic activities to the extreme events in question was assessed. Specifically, the assessment was performed at sector level and separately for the buildings using a 4-point qualitative scale.

The product of these three dimensions formulated the sensitivity to each extreme event per economic activity / property type and geographical location. Following, the resulted score was categorized in the 5-point RAG scale. It should be noted that the reported gross carrying amount sensitive to climate-related hazards does not consider mitigating measures, such as insurance coverages, that are in place. A considerable proportion of the Group's collateralised exposures is secured by insurance contracts and as such it is expected that the impact of physical risk events on the Group's portfolio is reduced.

Table 47: Banking book - Climate change physical risk: Exposures subject to physical risk

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o				
	30 June 2026																		
	Gross carrying amount																		
	of which exposures sensitive to impact from climate change physical events																		
Greece	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact from both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions							
	≤ 5 years	> 5 year ≤ 10 years	> 10 year ≤ 20 years	> 20 years	Average weighted maturity	€ million						€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 A - Agriculture, forestry and fishing	104	85	16	1	-	3	31	-	71	28	12	(6)	(1)	(5)					
2 B - Mining and quarrying	29	-	-	-	-	4	-	1	-	-	-	-	-	-					
3 C - Manufacturing	3,876	216	206	2	16	5	-	440	-	16	18	(14)	(1)	(12)					
4 D - Electricity, gas, steam and air conditioning supply	3,443	11	416	782	-	12	296	912	-	-	-	(2)	-	-					
5 E - Water supply; sewerage, waste management and remediation activities	43	2	-	-	-	2	-	2	-	-	-	-	-	-					
6 F - Construction	985	16	2	3	24	13	-	45	-	1	3	(2)	-	(2)					
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,555	205	64	5	4	4	-	278	-	37	9	(6)	(2)	(4)					
8 H - Transportation and storage	1,674	19	21	125	-	10	-	166	-	1	1	(1)	-	(1)					
9 L - Real estate activities	866	1	2	2	-	8	-	5	-	-	1	-	-	-					
10 Loans collateralised by residential immovable property ⁽¹⁾	6,464	23	47	125	154	18	-	349	-	99	24	(12)	(5)	(6)					
11 Loans collateralised by commercial immovable property ⁽¹⁾	4,512	281	481	111	10	7	123	667	92	24	46	(11)	(1)	(9)					
12 Repossessed collaterals	451	-	-	-	32	-	-	32	-	-	-	(5)	-	-					
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-					

Environmental, Social and Governance (ESG) Risks

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
Other Countries	30 June 2026														
	Gross carrying amount														
	of which exposures sensitive to impact from climate change physical events														
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			
	<= 5 years	> 5 year <= 10 years	<= 20 years	> 20 years	Average weighted maturity	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 A - Agriculture, forestry and fishing	139	23	8	-	-	4	9	23	-	1	2	(3)	-	(2)	
2 B - Mining and quarrying	52	34	1	-	-	2	29	6	-	-	24	(8)	-	(8)	
3 C - Manufacturing	1,939	14	14	3	-	1	-	20	10	-	-	-	-	-	
4 D - Electricity, gas, steam and air conditioning supply	924	71	91	59	-	7	212	9	-	42	2	(2)	-	-	
5 E - Water supply; sewerage, waste management and remediation activities	86	1	-	-	-	3	-	2	-	1	-	-	-	-	
6 F - Construction	528	14	4	-	-	2	5	13	-	-	1	(1)	-	(1)	
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,775	59	10	13	-	2	-	68	14	1	3	(1)	-	(1)	
8 H - Transportation and storage	4,685	3	-	-	-	2	-	4	-	1	-	-	-	-	
9 L - Real estate activities	2,671	11	57	30	2	4	-	65	34	4	9	-	-	-	
10 Loans collateralised by residential immovable property ⁽¹⁾	6,457	21	57	195	150	8	-	422	1	6	8	(2)	-	(1)	
11 Loans collateralised by commercial immovable property ⁽¹⁾	3,809	140	105	93	-	6	1	302	35	7	14	(3)	-	(3)	
12 Repossessed collaterals	101	-	-	-	-	-	-	-	-	-	-	-	-	-	
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
Greece	31 December 2025														
	Gross carrying amount														
	of which exposures sensitive to impact from climate change physical events														
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			
	<= 5 years	> 5 year <= 10 years	<= 20 years	> 20 years	Average weighted maturity	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 A - Agriculture, forestry and fishing	112	96	15	1	-	2	0	43	-	69	34	16	0	(11)	(1)
2 B - Mining and quarrying	28	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 C - Manufacturing	3,757	137	203	1	13	4	-	355	-	27	17	(14)	(1)	(11)	
4 D - Electricity, gas, steam and air conditioning supply	3,447	133	933	1,391	59	12	1,698	818	-	1	4	(6)	-	(2)	
5 E - Water supply; sewerage, waste management and remediation activities	31	1	-	-	-	5	-	1	-	-	-	-	-	-	
6 F - Construction	713	3	-	1	17	1	-	21	-	1	1	(1)	-	(1)	
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,143	111	62	1	4	4	-	179	-	26	3	(3)	(2)	(1)	
8 H - Transportation and storage	2,038	12	-	127	-	11	-	140	-	-	-	-	-	-	
9 L - Real estate activities	960	2	-	1	-	-	-	4	-	-	-	-	-	-	
10 Loans collateralised by residential immovable property	6,831	369	-	-	-	8	-	369	-	115	26	(20)	(12)	(6)	
11 Loans collateralised by commercial immovable property	4,227	186	266	8	7	6	18	371	79	21	43	(10)	(2)	(7)	
12 Repossessed collaterals	489	-	-	-	32	-	-	32	-	-	-	(5)	-	-	
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Environmental, Social and Governance (ESG) Risks

a	b	c	d	e	f	g	h	i	j	k	l	m	n	o		
Other Countries	31 December 2025															
	Gross carrying amount															
	of which exposures sensitive to impact from climate change physical events															
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					
	<= 5 years	> 5 year <= 10 years	<= 20 years	> 20 years	Average weighted maturity	chronic climate change events	acute climate change events	climate change events	Stage 2	non-performing exposures		of which Stage 2 exposures	Of which non-performing exposures			
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million		
1 A - Agriculture, forestry and fishing	125	10	15	-	-	4	0	9	17	-	1	3	0	(3)	-	(3)
2 B - Mining and quarrying	56	34	11	-	-	3		38	7	-	-	23		(9)	-	(9)
3 C - Manufacturing	1,780	116	2	13	-	14		-	52	80	35	-		(7)	(7)	-
4 D - Electricity, gas, steam and air conditioning supply	746	33	66	78	-	11		163	9	5	42	-		(2)	-	-
5 E - Water supply; sewerage, waste management and remediation activities	66	4	-	-	-	1		-	2	3	-	-	-	-	-	-
6 F - Construction	582	34	12	-	-	5		7	29	10	-	11		(1)	-	(1)
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,603	68	17	12	-	17		-	88	8	6	3	-	-	-	-
8 H - Transportation and storage	4,248	11	-	-	-	5		-	4	7	1	-	-	-	-	-
9 L - Real estate activities	2,224	10	17	4	2	12		-	33	-	-	-	-	-	-	-
10 Loans collateralised by residential immovable property	6,045	20	55	226	109	15		-	411	-	25	12		(14)	(3)	(7)
11 Loans collateralised by commercial immovable property	3,726	138	64	52	1	3		-	255	-	54	15		(11)	(8)	(2)
12 Repossessed collaterals	107	-	-	-	-	-		-	-	-	-	-	-	-	-	-
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-		-	-	-	-	-	-	-	-	-

⁽¹⁾ The gross carrying amount of exposures that are collateralised by both residential and commercial immovable properties is disclosed proportionally in rows "Loans collateralised by residential immovable property" and "Loans collateralised by commercial immovable property" based on the collateral value.

8.4.6 Template 6: Summary of GAR KPIs

Group's implementation of the EU Taxonomy Regulation

The EU Taxonomy (Regulation (EU) 2020/852 of the European Parliament and of the Council) represents an important step for the EU to achieve the Paris Agreement climate neutrality goals. It sets out the criteria to establish a common classification system for sustainable economic activities. The EU Taxonomy Regulation determines whether an economic activity is environmentally sustainable and obligates financial and non-financial entities subject to the Non-Financial Reporting Directive (NFRD) / Corporate Sustainability Reporting Directive (CSRD) to disclose the alignment of their activities.

Article 8 of the Taxonomy Regulation prescribes that undertakings subject to the NFRD/CSRD, including financial undertakings, publish to what extent their activities are associated with economic activities that qualify as environmentally sustainable under EU Taxonomy Regulation. Separate disclosures requirements and extensive criteria are in place for financial and non-financial undertakings under Article 8 of EU Taxonomy Regulation Delegated Act (Commission Delegated Regulation (EU) 2021/2178).

Credit institutions publish the Green Asset Ratio (GAR), which determines the extent to which the Group's assets finance and are invested in Taxonomy-aligned economic activities, that is the ratio of the Group's Taxonomy-aligned assets to covered assets. Moreover, as required by the EU Taxonomy Regulation, activities, to be taxonomy-aligned, must meet the specific taxonomy criteria and ensure that they cause no significant harm to any of the other environmental objectives (DNSH) and meet minimum social safeguards (MSS).

Environmental, Social and Governance (ESG) Risks

The following table provides an overview of the GAR KPIs calculated based on templates 7 and 8:

Table 48: Summary of GAR KPIs

30 June 2026				
KPI				
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	% coverage (over total assets)*
	%	%	%	%
GAR stock	3.8%	0.1%	3.9%	71.2%
GAR flow	3.8%	0.0%	3.8%	67.3%

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

31 December 2025				
KPI				
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	% coverage (over total assets)*
	%	%	%	%
GAR stock	3.8%	0.0%	3.8%	72.3%
GAR flow	4.5%	0.1%	4.6%	77.8%

8.4.7 Template 7: Mitigating actions: Assets for the calculation of GAR

The perimeter of this template includes loans and advances, debt securities and equity instruments on the Banking Book, with a breakdown of the information by type of counterparty, including financial corporations, non-financial corporations, households, local governments as well as real estate lending towards households, and the taxonomy eligibility and taxonomy alignment of the exposures with regards to the environmental objectives of climate change mitigation and climate change adaptation:

Table 49: Mitigating actions: Assets for the calculation of GAR

	30 June 2026															
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)							
	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)							
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
GAR - Covered assets in both numerator and denominator																
1 Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	32,761	21,074	3,075	1,886	76	414	251	41	-	-	11	21,325	3,116	1,886	76	425
2 Financial corporations	4,323	2,038	326	104	11	17	35	2	-	-	-	2,073	328	104	11	17
3 Credit institutions	3,911	1,748	197	-	10	15	34	2	-	-	-	1,782	199	-	10	15
4 Loans and advances	605	290	23	-	1	2	1	-	-	-	-	291	24	-	1	2
5 Debt securities, including UoP	3,307	1,458	174	-	10	13	33	1	-	-	-	1,491	175	-	10	13
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	412	290	129	104	1	2	1	-	-	-	-	291	129	104	1	2
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	5	1	-	-	-	-	1	-	-	-	-	2	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	5	1	-	-	-	-	1	-	-	-	-	2	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Non-financial corporations (subject to NFRD disclosure obligations)	9,236	3,514	2,704	1,747	65	397	216	39	-	-	11	3,729	2,743	1,747	65	409
21 Loans and advances	8,066	3,098	2,512	1,747	44	289	185	38	-	-	11	3,283	2,551	1,747	44	301
22 Debt securities, including UoP	1,151	410	188	-	21	107	29	1	-	-	-	439	189	-	21	107
23 Equity instruments	19	6	3	-	-	1	1	-	-	-	-	7	3	-	-	1
24 Households	19,202	15,523	45	35	-	-	-	-	-	-	-	15,523	45	35	-	-
25 of which loans collateralised by residential immovable property	12,920	12,920	31	31	-	-	-	-	-	-	-	12,920	31	31	-	-
26 of which building renovation loans	2,001	2,001	-	-	-	-	-	-	-	-	-	2,001	-	-	-	-
27 of which motor vehicle loans	601	601	15	5	-	-	-	-	-	-	-	601	15	5	-	-
28 Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	551	437	-	-	-	-	-	-	-	-	-	437	-	-	-	-
32 TOTAL GAR ASSETS	33,312	21,511	3,075	1,886	76	414	251	41	-	-	11	21,762	3,116	1,886	76	425

Environmental, Social and Governance (ESG) Risks

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
	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 specialised lending						Of which specialised lending					Of which specialised lending				
	Of which enabling						Of which enabling					Of which enabling				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Assets excluded from the numerator for GAR calculation (covered in the denominator)																
33 EU Non-financial corporations (not subject to NFRD disclosure obligations)	19,771															
34 Loans and advances	19,402															
35 Debt securities	306															
36 Equity instruments	63															
37 Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	5,998															
38 Loans and advances	5,296															
39 Debt securities	702															
40 Equity instruments	-															
41 Derivatives	514															
42 On demand interbank loans	1,158															
43 Cash and cash-related assets	756															
44 Other assets (e.g. Goodwill, commodities etc.)	19,015															
45 TOTAL ASSETS IN THE DENOMINATOR (GAR)	80,524															
Other assets excluded from both the numerator and denominator for GAR calculation																
46 Sovereigns	18,367															
47 Central banks exposure	13,632															
48 Trading book	558															
49 TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	32,558															
50 TOTAL ASSETS	113,082															

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
	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 specialised lending						Of which specialised lending					Of which specialised lending				
	Of which enabling						Of which enabling					Of which enabling				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
GAR - Covered assets in both numerator and denominator																
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	32,558	18,823	2,969	1,944	14	372	116	30	-	-	1	18,940	2,999	1,944	14	373
2 Financial corporations	4,834	1,361	234	90	7	11	31	10	-	-	-	1,392	244	90	7	12
3 Credit institutions	4,410	1,116	116	-	7	11	25	10	-	-	-	1,141	125	-	7	11
4 Loans and advances	1,130	203	18	-	1	2	1	-	-	-	-	204	18	-	1	2
5 Debt securities, including UoP	3,280	914	98	-	5	9	24	10	-	-	-	938	107	-	5	9
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	425	244	119	90	-	1	6	1	-	-	-	251	119	90	-	1
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	11	1	-	-	-	-	1	-	-	-	-	2	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	11	1	-	-	-	-	1	-	-	-	-	2	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Non-financial corporations (subject to NFRD disclosure obligations)	8,755	3,467	2,702	1,821	8	361	85	20	-	-	-	3,552	2,722	1,821	8	361
21 Loans and advances	7,692	3,048	2,532	1,821	-	265	69	19	-	-	-	3,116	2,552	1,821	-	265
22 Debt securities, including UoP	1,047	415	168	-	7	96	17	1	-	-	-	431	168	-	7	96
23 Equity instruments	16	4	2	-	-	-	-	-	-	-	-	4	2	-	-	-
24 Households	18,968	13,996	33	33	-	-	-	-	-	-	-	13,996	33	33	-	-
25 of which loans collateralised by residential immovable property	12,876	12,876	28	28	-	-	-	-	-	-	-	12,876	28	28	-	-
26 of which building renovation loans	1,738	1,738	-	-	-	-	-	-	-	-	-	1,738	-	-	-	-
27 of which motor vehicle loans	574	574	5	5	-	-	-	-	-	-	-	574	5	5	-	-
28 Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	596	596	-	-	-	-	-	-	-	-	-	596	-	-	-	-
32 TOTAL GAR ASSETS	33,154	19,419	2,969	1,944	14	372	116	30	-	-	1	19,535	2,999	1,944	14	373

Environmental, Social and Governance (ESG) Risks

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	31 December 2025															
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)							
	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 specialised lending				Of which specialised lending				Of which specialised lending							
	Of which transitional enabling				Of which transitional enabling				Of which transitional enabling							
	Of which enabling				Of which enabling				Of which enabling							
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Assets excluded from the numerator for GAR calculation (covered in the denominator)																
33 EU Non-financial corporations (not subject to NFRD disclosure obligations)	18,626															
34 Loans and advances	18,314															
35 Debt securities	249															
36 Equity instruments	63															
37 Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	5,531															
38 Loans and advances	4,892															
39 Debt securities	639															
40 Equity instruments	-															
41 Derivatives	752															
42 On demand interbank loans	327															
43 Cash and cash-related assets	887															
44 Other assets (e.g. Goodwill, commodities etc.)	19,307															
45 TOTAL ASSETS IN THE DENOMINATOR (GAR)	78,584															
Other assets excluded from both the numerator and denominator for GAR calculation																
46 Sovereigns	15,178															
47 Central banks exposure	14,413															
48 Trading book	516															
49 TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	30,107															
50 TOTAL ASSETS	108,691															

8.4.8 Template 8: GAR (%)

Template 8 presents the proportion of exposures related to Taxonomy-eligible and Taxonomy-aligned activities compared to the covered assets based on data disclosed in Template 7 as well as the GAR KPIs on flow of new Taxonomy eligible and aligned exposures:

Table 50: GAR (%)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	30 June 2026: KPIs on stock															
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)							
	Proportion of eligible assets funding taxonomy relevant sectors				Proportion of eligible assets funding taxonomy relevant sectors				Proportion of eligible assets funding taxonomy relevant sectors							
	Of which environmentally sustainable				Of which environmentally sustainable				Of which environmentally sustainable							
	Of which specialised lending				Of which specialised lending				Of which specialised lending							
	Of which transitional enabling				Of which transitional enabling				Of which transitional enabling							
	Of which enabling				Of which enabling				Of which enabling							
% (compared to total covered assets in the denominator)																
1 GAR	26.7	3.8	2.3	0.1	0.5	0.3	0.1	-	-	-	27.0	3.9	2.3	0.1	0.5	71.2
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	64.3	9.4	5.8	0.2	1.3	0.8	0.1	-	-	-	65.1	9.5	5.8	0.2	1.3	29.0
3 Financial corporations	47.1	7.5	2.4	0.3	0.4	0.8	-	-	-	-	48.0	7.6	2.4	0.3	0.4	3.8
4 Credit institutions	44.7	5.0	-	0.3	0.4	0.9	-	-	-	-	45.6	5.1	-	0.3	0.4	3.5
5 Other financial corporations	70.5	31.3	25.2	0.2	0.4	0.3	-	-	-	-	70.7	31.3	25.2	0.2	0.4	0.4
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	20.4	0.6	-	-	0.1	20.4	1.3	-	-	0.1	40.8	1.8	-	-	0.1	-
9 Non-financial corporations subject to NFRD disclosure obligations	38.0	29.3	18.9	0.7	4.3	2.3	0.4	-	-	0.1	40.4	29.7	18.9	0.7	4.4	8.2
10 Households	80.8	0.2	0.2	-	-						80.8	0.2	0.2	-	-	17.0
11 of which loans collateralised by residential immovable property	100.0	0.2	0.2	-	-						100.0	0.2	0.2	-	-	11.4
12 of which building renovation loans	100.0	-	-	-	-						100.0	-	-	-	-	1.8
13 of which motor vehicle loans	100.0	2.4	0.8	-	-						100.0	2.4	0.8	-	-	0.5
14 Local government financing	-	-	-	-	-						-	-	-	-	-	-
15 Housing financing	-	-	-	-	-						-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-						-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	79.2	-	-	-	-						79.2	-	-	-	-	0.5

Environmental, Social and Governance (ESG) Risks

	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	30 June 2025: KPIs on flows															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
% (compared to total covered assets in the denominator)	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
	Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/adaptation	Of which enabling			
1 GAR	21.1	3.8	2.3	0.1	0.5	0.4	-	-	-	-	21.6	3.8	2.3	0.1	0.5	67.3
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	38.8	6.9	4.2	0.2	1.0	0.8	-	-	-	-	39.6	7.0	4.2	0.2	1.0	54.5
3 Financial corporations	42.3	14.1	10.1	0.4	0.4	4.2	0.1	-	-	-	46.6	14.1	10.1	0.4	0.4	7.0
4 Credit institutions	37.2	4.5	-	0.5	0.4	5.0	0.1	-	-	-	42.2	4.6	-	0.5	0.4	6.0
5 Other financial corporations	72.0	69.8	68.8	0.1	0.7	-	-	-	-	-	72.0	69.8	68.8	0.1	0.8	1.0
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Non-financial corporations subject to NFRD disclosure obligations	9.8	8.0	4.8	0.2	1.6	0.4	0.1	-	-	-	10.2	8.0	4.8	0.2	1.6	32.5
10 Households	100.0	1.3	-	-	-						100.0	1.3	-	-	-	15.0
11 of which loans collateralised by residential immovable property	100.0	1.4	-	-	-						100.0	1.4	-	-	-	11.5
12 of which building renovation loans	100.0	-	-	-	-						100.0	-	-	-	-	2.0
13 of which motor vehicle loans	100.0	1.6	-	-	-						100.0	1.6	-	-	-	1.5
14 Local government financing	-	-	-	-	-						-	-	-	-	-	-
15 Housing financing	-	-	-	-	-						-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	100.0	-	-	-	-						100.0	-	-	-	-	-

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	31 December 2025: KPIs on stock															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
% (compared to total covered assets in the denominator)	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of total assets covered
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
	Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/adaptation	Of which enabling			
1 GAR	24.7	3.8	2.5	0.0	0.5	0.1	0.0	-	-	0.0	24.9	3.8	2.5	0.0	0.5	72.3
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	57.8	9.1	6.0	0.0	1.1	0.4	0.1	-	-	0.0	58.2	9.2	6.0	0.0	1.1	30.0
3 Financial corporations	28.1	4.8	1.9	0.1	0.2	0.6	0.2	-	-	0.0	28.8	5.1	1.9	0.1	0.2	4.4
4 Credit institutions	25.3	2.6	-	0.1	0.2	0.6	0.2	-	-	0.0	25.9	2.8	-	0.1	0.2	4.1
5 Other financial corporations	57.6	27.9	21.2	0.0	0.1	1.5	0.1	-	-	0.1	59.0	28.1	21.2	0.0	0.2	0.4
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	10.7	0.9	-	0.1	0.3	10.7	2.1	-	-	-	21.4	3.0	-	0.1	0.3	0.0
9 Non-financial corporations subject to NFRD disclosure obligations	39.6	30.9	20.8	0.1	4.1	1.0	0.2	-	-	0.0	40.6	31.1	20.8	0.1	4.1	8.1
10 Households	73.8	0.2	0.2	-	-						73.8	0.2	0.2	-	-	17.5
11 of which loans collateralised by residential immovable property	100.0	0.2	0.2	-	-						100.0	0.2	0.2	-	-	11.8
12 of which building renovation loans	100.0	-	-	-	-						100.0	-	-	-	-	1.6
13 of which motor vehicle loans	100.0	0.9	0.9	-	-						100.0	0.9	0.9	-	-	0.5
14 Local government financing	-	-	-	-	-						-	-	-	-	-	-
15 Housing financing	-	-	-	-	-						-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	100.0	-	-	-	-						100.0	-	-	-	-	0.5

Environmental, Social and Governance (ESG) Risks

	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	31 December 2025: KPIs on flows															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
% (compared to total covered assets in the denominator)	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
	Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/adaptation	Of which enabling			
1 GAR	17.5	4.5	2.4	0.0	0.9	0.2	0.1	-	-	0.0	17.7	4.6	2.4	0.0	0.9	77.8
2 Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	53.0	13.8	7.4	0.1	2.8	0.7	0.2	-	-	0.0	53.7	14.0	7.4	0.1	2.8	25.6
3 Financial corporations	23.3	3.7	-	0.1	0.2	0.1	0.1	-	-	-	23.5	3.8	-	0.1	0.2	7.8
4 Credit institutions	21.8	2.4	-	0.1	0.2	0.1	0.0	-	-	-	22.0	2.5	-	0.1	0.2	7.4
5 Other financial corporations	53.0	30.5	-	0.0	0.2	0.7	0.6	-	-	-	53.7	31.0	-	0.0	0.2	0.4
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	4.0	1.4	-	0.1	0.6	4.0	3.4	-	-	-	8.1	4.8	-	0.1	0.6	0.1
9 Non-financial corporations subject to NFRD disclosure obligations	40.1	31.9	18.7	0.2	6.8	1.6	0.5	-	-	0.0	41.7	32.4	18.7	0.2	6.8	10.2
10 Households	100.0	-	-	-	-						100.0	-	-	-	-	7.7
11 of which loans collateralised by residential immovable property	100.0	-	-	-	-						100.0	-	-	-	-	6.6
12 of which building renovation loans	100.0	-	-	-	-						100.0	-	-	-	-	0.6
13 of which motor vehicle loans	100.0	-	-	-	-						100.0	-	-	-	-	0.4
14 Local government financing	-	-	-	-	-						-	-	-	-	-	-
15 Housing financing	-	-	-	-	-						-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Collateral obtained by taking possession:																
17 residential and commercial immovable properties	100.0	-	-	-	-						100.0	-	-	-	-	0.0

8.4.9 Template 10: Other climate change mitigating actions that are not covered in the EU Taxonomy

As described in detail in section 8.1.1.2 Green Financing, the Group through its SFF, classifies sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing. The purpose of establishing the SFF is to provide a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financing in line with the financed impact strategy. The SFF has been drawn from international best practices and is based on two key guiding frameworks: The ICMA principles on sustainable financing (Green Bond Principles, Green Loan Principles and Sustainability linked Bond Principles) and the EU Taxonomy. The SFF defines two levels of transaction alignment:

- SFF alignment - Fulfilment of criteria dictated by established market practice
- EU Taxonomy alignment - Fulfilment of criteria associated with each of the EU Taxonomy assessment steps (substantial contribution, DNSH, minimum social safeguards)

For general purpose financing / transactions (i.e. where the use of proceeds is not known) the SFF defines two other approaches: a) Company Business mix - Financing to companies that fulfil the eligibility green/ social criteria and derive most of their revenues from eligible activities. b) Sustainability-linked loans - Financing linked to ambitious and predefined SPTs.

The purpose of this template is to report exposures that aim to support counterparties in the transition and adaptation process related to the objectives of climate change mitigation and climate change adaptation and which are not taxonomy-aligned as per EU Taxonomy Regulation.

Environmental, Social and Governance (ESG) Risks

Table 51: Other climate change mitigating actions that are not covered in the EU Taxonomy

a	b	c	d	e	f
		30 June 2026			
Type of financial instrument	Type of counterparty	Gross carrying amount € million	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	850	Yes	No	Includes Green/Sustainable bonds
	Non-financial corporations	437	Yes	Yes	Includes Green bonds and Sustainability Linked Bonds with climate-related Sustainability Performance Targets (SPT)
	Of which Loans collateralised by commercial immovable property	-			
	Households	-			
	Of which Loans collateralised by residential immovable property	-			
	Of which building renovation loans	-			
	Other counterparties	860	Yes	Yes	Includes Green/Sustainable bonds
Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	180	Yes	No	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Non-financial corporations	2,443	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Of which Loans collateralised by commercial immovable property	671	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Households	1,165	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Of which Loans collateralised by residential immovable property	1,063	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Of which building renovation loans	56	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Other counterparties	-	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
a	b	c	d	e	f
		31 December 2025			
Type of financial instrument	Type of counterparty	Gross carrying amount € million	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	735	Yes	No	Includes Green/Sustainable bonds
	Non-financial corporations	378	Yes	Yes	Includes Green bonds and Sustainability Linked Bonds with climate-related Sustainability Performance Targets (SPT)
	Of which Loans collateralised by commercial immovable property	-			
	Households	-			
	Of which Loans collateralised by residential immovable property	-			
	Of which building renovation loans	-			
	Other counterparties	697	Yes	Yes	Includes Green/Sustainable bonds
Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	142	Yes	No	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Non-financial corporations	2,306	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Of which Loans collateralised by commercial immovable property	666	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Households	980	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Of which Loans collateralised by residential immovable property	935	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Of which building renovation loans	44	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
	Other counterparties	63	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned

Appendix 1: Composition of regulatory own funds

Appendix 1: EU CC1 - Composition of regulatory own funds

		a	b	
		30 June 2026 ⁽¹⁾	31 December 2025 ⁽¹⁾	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
		Current period	Current period	
		€ million	€ million	
Common Equity Tier 1 (CET1) capital: instruments and reserves				
1	Capital instruments and the related share premium accounts	1,939	1,939	<i>f & g</i>
2	Retained earnings	3,981	2,914	
3	Accumulated other comprehensive income (and other reserves)	3,066	3,220	
5	Minority interests (amount allowed in consolidated CET1)	-	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	332	815	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	9,318	8,888	
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	(4)	(5)	
8	Intangible assets (net of related tax liability) (negative amount)	(397)	(350)	<i>b</i>
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	(6)	(1)	<i>c</i>
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	16	16	<i>i</i>
12	Negative amounts resulting from the calculation of expected loss amounts	-	-	
15	Defined-benefit pension fund assets (negative amount)	-	-	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	(166)	(25)	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	<i>a</i>
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	(75)	(57)	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-	
EU-20c	of which: securitisation positions (negative amount)	(75)	(57)	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	-	<i>d</i>
22	Amount exceeding the 17.65% threshold (negative amount)	-	(13)	<i>a & d</i>
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	(6)	<i>a</i>
25	of which: deferred tax assets arising from temporary differences	-	(8)	<i>d</i>
EU-25a	Losses for the current financial year (negative amount)	-	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	-	
27a	Other regulatory adjustments	(360)	(319)	
28	Total regulatory adjustments to Common equity Tier 1 (CET1)	(992)	(754)	
29	Common Equity Tier 1 (CET1) capital	8,325	8,134	
Additional Tier 1 (AT1) capital: instruments				
30	Capital instruments and the related share premium accounts	1,090	1,090	<i>j</i>
31	<i>of which: classified as equity under applicable accounting standards</i>	1,090	1,090	
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	-	-	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	1,090	1,090	
Additional Tier 1 (AT1) capital: regulatory adjustments				
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	-	
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	-	
44	Additional Tier 1 (AT1) capital	1,090	1,090	
45	Tier 1 capital (T1 = CET1 + AT1)	9,414	9,224	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	1,600	1,215	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests not included in row 5 or 34) issued by subsidiaries and held by third parties	-	-	
51	Tier 2 (T2) capital before regulatory adjustments	1,600	1,215	
Tier 2 (T2) capital: regulatory adjustments				
56b	Other regulatory adjustments to T2 capital	-	-	
57	Total regulatory adjustments to Tier 2 (T2) capital	-	-	
58	Tier 2 (T2) capital	1,600	1,215	
59	Total Capital (TC = T1 + T2)	11,014	10,439	
60	Total risk exposure amount	55,050	53,596	

Appendix 1: Composition of regulatory own funds

		a	a	b
		30 June 2026 ⁽¹⁾	31 December 2025 ⁽¹⁾	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
		Current period	Current period	
		€ million	€ million	
Capital ratios and requirements including buffers				
61	Common Equity Tier 1	15.1%	15.2%	
62	Tier 1	17.1%	17.2%	
63	Total capital	20.0%	19.5%	
64	Institution CET1 overall capital requirements	10.57%	10.53%	
65	of which: capital conservation buffer requirement	2.50%	2.50%	
66	of which: countercyclical capital buffer requirement	0.77%	0.68%	
67	of which: systemic risk buffer requirement	0.00%	0.00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.25%	1.25%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	9.04%	8.61%	
Amounts below the thresholds for deduction (before risk weighting)				
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	676	630	
73	Direct and indirect holdings by the institution of CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% threshold and net of eligible short positions)	560	532	
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in 38 (3) are met)	724	736	
Applicable caps on the inclusion of provisions in Tier 2				
76	Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)	-	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	688	671	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	-	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	-	

⁽¹⁾ Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission for profits recognition granted by the Supervisory Authorities.

Appendix 2: List of Abbreviations

Appendix 2: List of Abbreviations

Abbreviation	Definition
AC	Amortised Cost
AML/TF	Anti-Money Laundering/Terrorist Financing
AT1	Additional Tier 1
AVA	Additional Value Adjustments
BoD	Board of Directors
BoG	Bank of Greece
BRC	Board Risk Committee
BRRD	Bank Recovery and Resolution Directive
CCB	Capital Conservation Buffer
CCF	Credit Conversion Factor
CCM	Climate Change Mitigation
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CCyB	Counter Cyclical Buffer
CET1	Common equity Tier 1
CIB	Corporate & Investment Banking
COREPs	Common Reports
CR&E	Climate-Related and Environmental
CRD	Capital Requirements Directive
CRM	Credit Risk Mitigation
CRR	Capital Requirements Regulation
CRSTC	Climate Risk Stress Test Committee
CSA	Credit Support Annex
CSR	Corporate Social Responsibility
CSRD	Corporate Sustainability Reporting Directive
CVA	Credit Value Adjustment
CVP	Collateral Valuation Policy
DNSH	Do No Significant Harm
DPM	Data Point Model
DTC	Deferred Tax Credit
E&S	Environmental & Social
EBA	European Banking Authority
EC	European Commission
ECB	European Central Bank
ECL	Expected Credit Loss
ELSTAT	Hellenic Statistical Authority
EMAS	Eco-Management and Audit Scheme
EPC	Energy Performance Certificate
ESG	Environmental, Social and Governance
ESMS	Environmental and Social Management System
EVE	Economic Value of Equity
FRTB	Fundamental Review of the Trading Book
FVOCI	Fair Value through Other Comprehensive Income
GAR	Green Asset Ratio
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GMRA	Global Master Repurchase Agreement
GRM	Group Risk Management
G-SIIs	Global Systemic Institution Buffer
GVA	Gross Value Added
HBA	Hellenic Bank Association
HFS	Held For Sale
HQLA	High Quality Liquid Assets

Appendix 2: List of Abbreviations

Abbreviation	Definition
ICAAP	Internal Capital Adequacy Assessment Process
ICMA	International Capital Markets Association
IFRS	International Financial Reporting Standards
ILAAP	Internal Liquidity Adequacy Assessment Process
IMA	Internal Model Approach
IRC	Incremental Risk Charge
IRRBB	Interest Rate risk in the Banking Book
ISDA	International Swaps and Derivatives Association
KPIs	Key Performance Indicators
KRIs	Key Risks Indicators
KYC	Know-Your-Customer
LCR	Liquidity Coverage Ratio
LMA	Loan Market Association
MRA	Moody's Risk Analyst
MRC	Management Risk Committee
MREL	Minimum Requirement for own funds and Eligible Liabilities
NFRD	Non-Financial Reporting Directive
NGFS	Network for Greening the Financial System
NII	Net Interest Income
NPE	Non-Performing exposures
NSFR	Net Stable Funding Ratio
OCR	Overall Capital Requirement
OIS	Operational Impact Strategy
O-SIIs	Other Systemically Important Institution
P&L	Profit & Loss
P2G	Pillar 2 Guidance
P2R	Pillar 2 Requirement
P3DH	Pillar 3 Data Hub
PCAF	Partnership for Carbon Accounting Financials
PRI	Principles for Responsible Investment
RAF	Risk Appetite Framework
RAS	Risk Appetite Statements
RCSA	Risk & Control Self-Assessment
RES	Renewable Energy Sources
RIMA	Risk Identification & Materiality Assessment
RRF	Recovery and Resilience Facility
RTS	Regulatory Technical Standards
RWEAs	Risk Weighted Exposure Amounts
SDGs	Sustainable Development Goals
SFF	Sustainable Finance Framework
SFTs	Securities Financing Transactions
SIF	Sustainable Investment Framework
SLL	Sustainability Linked Loans
SPTs	Sustainability Performance Targets
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SRT	Significant Risk Transfer
SSM	Single Supervisory Mechanism
STD	Standardised Approach
SVAR	Stressed VaR
SyRB	Systemic Risk Buffer
TCFD	Task Force on Climate-Related Financial Disclosures
TSCR	Total SREP Capital Requirement
UNEP FI	UN Environment Programme Finance Initiative
VAR	Value at Risk

Appendix 3: Guidelines and Regulations mapping on Disclosures Requirements

Appendix 3: Guidelines and Regulations mapping on Disclosures Requirements

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