

Sustainability Policy Framework

Update: March 2022

1 Purpose

Eurobank (hereinafter also referred to as “Bank”) recognizes the significance of the impact of its activities in society and the environment. The Bank places high importance on the effective integration of Sustainability principles and ESG aspects throughout the activities of the organization, its governance model and related commitments.

This Policy Framework outlines the approach for adherence to applicable regulatory requirements and voluntary initiatives as well as adopted standards and guidelines enabling Eurobank’s contemporary and continuously updated approach to Sustainability, in line with international best practice.

2 Approach

Eurobank acknowledges its important role in creating sustainable value for its stakeholders. The Bank’s approach towards Sustainability focuses on the continued efforts as a financial institution, an employer and a corporate citizen to address environmental and societal challenges. Eurobank develops its approach across the Environmental, Social and Governance spectrum (ESG) and balances objectives across two distinct levels of impact and:

1. **Financed impact:** Impact resulting from the Bank’s lending and investing activities to specific sectors and clients.
2. **Operational impact:** Impact arising from the Bank’s operational activities and footprint.

Eurobank recognizes that its business and financial activities may, by definition, contribute to the improvement of the economic, environmental, and social regime or at least to the mitigation of degradation of such factors. To that extent, the Bank’s approach aligns with operations, balancing Purpose and Impact and constantly developing and improving the mechanisms in order to:

- Identify, measure and communicate impacts, direct and indirect, that the Bank can influence and control. In order to effectively achieve this, the Bank engages its stakeholders and accounts for their expectations.
- Ensure that clients and suppliers undertake all required actions to comply with applicable local, national, and international environmental and social legislation as a prerequisite for the initiation and maintenance of business relationships with Eurobank.
- Encourage stakeholders and the society at large to join the adoption of sustainability practices in accordance with international guidelines and initiatives.
- Integrate climate-related and broader ESG risks in its risk management, governance arrangements, policies and procedures, as well as reporting and disclosure frameworks.

3 Guiding principles

In line with the Bank's sustaining commitment to the United Nations Global Compact, the Bank adopts and upholds the related sustainability principles for Human Rights, Labour Relations, Environmental Impact and Anti-Corruption. Furthermore, the Bank acknowledges the United Nations Sustainability Development Goals (SDGs) and the Agenda 2030, contributing to the global effort for addressing major sustainability challenges.

Moreover, Eurobank abides by the United Nations Environment Program Finance Initiative (UNEP FI) Principles for Responsible Banking (PRB). The six PRB principles (Alignment, Impact & Target Setting, Clients & Customers, Stakeholders, Governance & Culture and Transparency & Accountability) are adopted by Eurobank as key driver for the ESG approach, by which the Bank addresses requirements and expectations, both current and emerging.

Eurobank also acknowledges and applies international standards related to sustainability / ESG. The adopted list of standards and framework evolves dynamically, in line with industry practice and emerging developments in Sustainability management. The Bank acknowledges, adopts and is certified in accordance to ISO Management Systems that include but not limited to:

- ISO 14001 - International standard for environmental management
- ISO 50001 - International standard for energy management
- ISO 14064 – International standard for quantifying, monitoring, reporting, and validating or verifying GHG emissions.

Eurobank's plans and actions for Sustainability are consistently guided by our corporate values: Empathy, Drive, Cooperation, Innovation and Trust.

4 ESG and Climate Risk management

Transitioning to a low-carbon and more circular economy entails both risks and opportunities for the economy and financial institutions. To this end, the adoption of a strategic approach for the management of risks and the identification of opportunities in relation to sustainability and climate change is of great importance to the bank. In full alignment with applicable supervisory expectations, the bank's approach aims to integrate climate-related and broader ESG risks into its business model, strategy, risk management, governance arrangements, policies and procedures, as well as reporting and disclosure frameworks.

5 Sustainable Finance

Eurobank envisages to play a key role for the financing of landmark projects that are necessary for pursuing economic growth in line with ESG criteria. The Group's Sustainable Finance Framework, adopting international standards, classifies sustainable lending solutions offered to its customers, specifying the classification approach and the activities defined as eligible to access sustainable financing (eligible green and social assets). The Sustainable Finance Framework scope encompasses a wide range of sustainable lending products covering both

Wholesale and Retail banking portfolios. Moreover, through its Green Bond Framework, the Bank plans to secure funding, committed to financing projects that yield environmental benefits.

6 ESG Awareness & Culture

The Bank is placing great emphasis in building capacity among its employees in order to be able to support its clients on their sustainability journey and their green transition. To this end, the Bank is in the processes of implementing an ESG upskilling plan for its employees as well as launching ESG awareness initiatives for its clients.

7 Sustainable Procurement

Eurobank applies a Green Procurement Policy, in line with strict environmental specifications included in the Environmental Policy, for guidance on what products to choose and which suppliers to trust. Furthermore, the Bank takes into account ESG evaluation criteria in the procurement tender processes.

8 Governance

Sustainability in Eurobank is deployed across an ESG governance structure that addresses both regulatory requirements and voluntary commitments. Board oversight with respect to ESG Strategy is addressed through the inclusion of ESG items in the Board Meetings agenda, per international best practice. Eurobank's ESG governance model also ensures that the management of relevant climate-related and environmental risks is integrated in the bank's three lines of defense.

The ESG Management Committee has been appointed in order to provide strategic direction on ESG initiatives, review the ESG Strategy, integrate the elements of the ESG Strategy into the Bank's business model & operations, review the progress of the ESG goals and performance targets, and ensure proper implementation of ESG-related policies, in accordance with supervisory requirements and voluntary commitments.

9 Stakeholder Engagement

Eurobank selects ESG material topics, as part of the annual sustainability reporting process, resulting from an identification process taking into consideration cross sector megatrends, ESG standards, peer review and Bank's specific priorities. In order for the Bank to select and prioritize ESG topics, a stakeholder engagement process is followed resulting in the identification of top Material Issues (Materiality Analysis)

The outcome of the Materiality Analysis is validated by the ESG Management Committee and embedded in the content of the Annual Report Business and Sustainability.

Eurobank actively participates in sectoral and other business associations and initiatives aiming at exchanging knowledge and effectively influencing market advancements with respect to ESG.

10 Transparency and reporting

The Annual Business and Sustainability Report provides stakeholders with a holistic view on the Bank's ESG performance and compiled in accordance with the GRI Standards. Through the Report, the Bank provides full disclosure on sustainability impacts such as environmental performance, energy and emissions, social impact and corporate governance.

Aiming to promote transparency and build trust among stakeholders, the Bank's sustainability-related disclosures in the Annual Business & Sustainability Report are assured by an independent assurance provider in accordance with ISAE 3000 and the AA1000 Principles related to inclusivity, materiality, responsiveness, and impact.

As part of promoting transparency on its ESG performance and build confidence in the investment community, the Bank participates and aims to continuously enhance its scoring in reputable ESG rating indices. Evaluation of ESG Rating scores is used for identifying and addressing areas for improvement and for guiding Sustainability disclosures.

Eurobank is also demonstrating transparency to its stakeholders through a dedicated ESG section in its corporate website. Through the ESG section, Eurobank presents its strategic approach towards ESG, dedicated actions associated with each ESG pillar, the Bank's performance in ESG ratings and all ESG-related progress reports including but not limited to:

- Annual Business & Sustainability Report,
- UNEP FI PRB Report, and
- EMAS Environmental Report.

Eurobank updates the disclosed information on a regular basis and as important matters arise, they will be communicated to stakeholders.

Eurobank's sustainability disclosures are integral element of the Bank's public disclosures that include financial reports, remuneration disclosures and regulator-required disclosures.