EUROBANK

INTERNAL GOVERNANCE CONTROL MANUAL SUMMARY

SEPTEMBER 2025

Introduction

Outline of Manual - Purpose and Scope

1. The Internal Governance Control Manual (IGCM) describes the overall framework by which Eurobank SA (Bank) and its Group of Companies (Eurobank or Group) is directed and controlled. It includes a formal record of the high level internal control principles in operation and is intended to meet the requirements laid down by regulators and internal governance policies. The content of the manual has been reviewed and approved by the Bank's Executive Board (ExBo), reviewed by the Bank's Nomination and Corporate Governance Committee and proposed for approval to the Board of Directors (Board)[1].

2. The policies and controls outlined in this manual are designed to minimize the possibility of error or financial loss to Eurobank and to protect the interest of shareholders and depositors as well as to ensure that the requirements of the relevant regulatory authorities are complied with at all times.

3. This manual provides an outline of high level control policies, whilst detailed operating procedures are set out in individual procedures, manuals maintained by each division. Subsidiaries are required to have their own IGCMs and/or procedures, manuals and adopt Eurobank's policies as required. The principles of the IGCM apply fully to all divisions and subsidiaries, unless this is prohibited by local circumstances or regulations.

4. All the policies and controls described in this manual and all the detailed procedures contained in the individual procedures manuals of each division and subsidiary adhere to Eurobank's standards on matters of routine, operational or business nature, which have been enhanced to take into account factors such as local legal, regulatory, operating and other requirements relevant to Eurobank.

5. Individual manuals kept by divisions and subsidiaries are supplementary to the IGCM and not part of it.

6. A high-level organization chart and a brief description of the key responsibilities of the main control functions of Eurobank are included in this manual.

7. The IGCM, supplemented by the procedures manuals of individual divisions and subsidiaries, includes a written description of the uppermost levels of Eurobank's System of Internal Controls.

8. This manual is drafted according to the provisions of article 14 par. 1 of L. 4706/2020 (Greek Law on Corporate Governance), as in force.

[1] As provided for in Greek Law on Corporate Governance, as in force.

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D.6.12. General Manager, Group Information Technology, Group Chief Information Officer (Group CIO)
D.6.13. General Manager, Chief Retail Growth Officer
D.6.14. General Manager, Head of Shipping
D.6.15. General Manager, Large Corporate & Loan Syndications
D.6.16. General Manager, Structured Finance
D.6.17. General Manager, Economic Analysis and Research, Group Chief Economist
D.6.18. Chief Executive Officer, Eurobank Ltd
D.6.19. General Manager, Head of Wealth Management
D.6.20. Chief Data Officer
D.6.21. Group Chief Digital Officer
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