PIRAEUS GROUP SUSTAINABILITY STATEMENT 2025



Piraeus

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This version constitutes a standalone report and at the same time an excerpt from the Piraeus Group's Annual Financial Report 2025, which is available at the link below.

www.piraeusgroup.gr/-/jssmedia/Com/2025/Files/Investors/Financials/Financial-Results/12M/Piraeus-Bank-SA_Annual-Financial-Report-2025-of-PB.pdf?sc_lang=en

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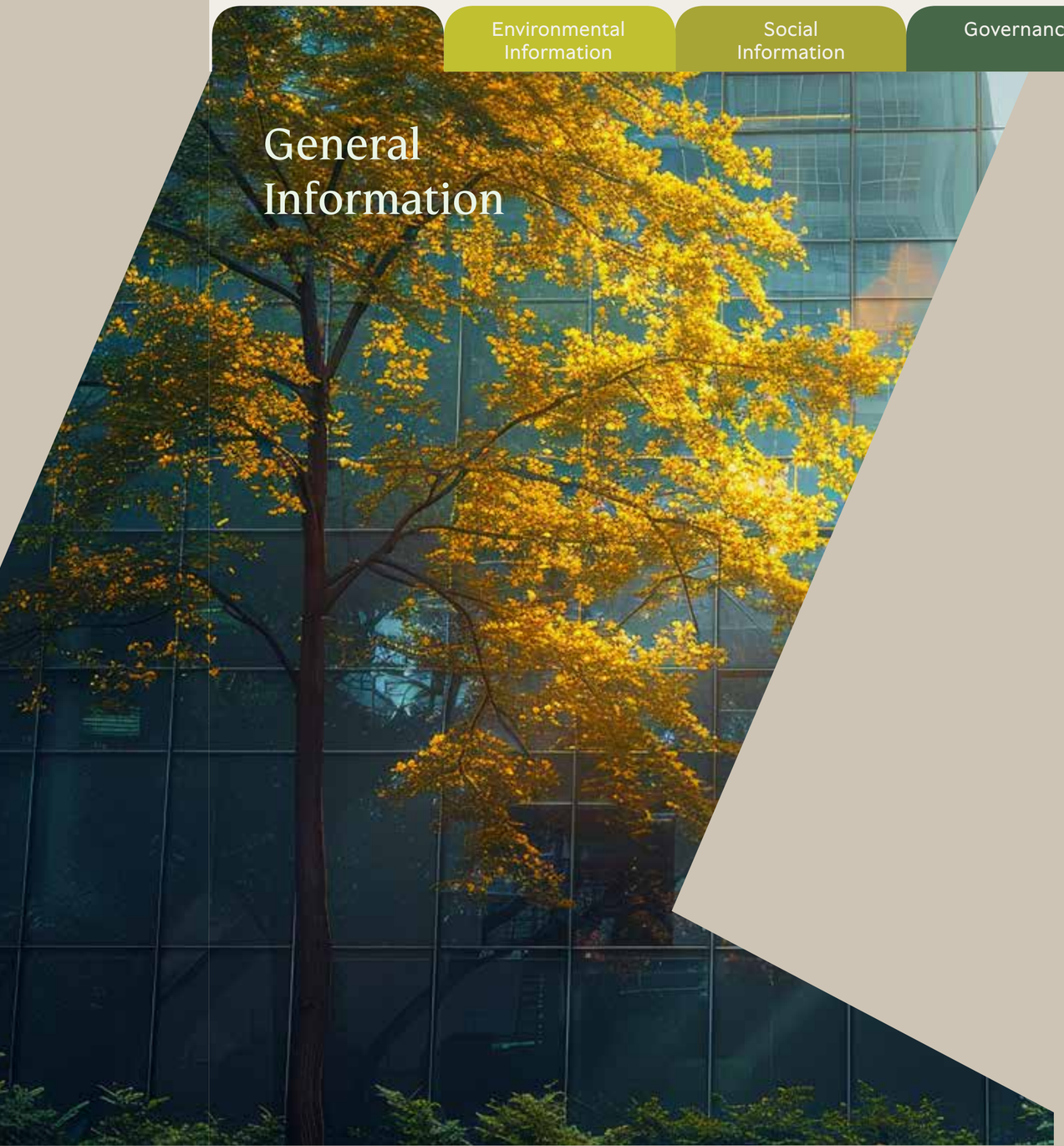
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General Information



1. General Information

1.1. Basis for Preparation

1.1.1. General basis for preparation of the Sustainability Statement [BP-1]

The Sustainability Statement for the fiscal year 2025 has been prepared on a consolidated basis for Piraeus Group S.A. (hereinafter "the Group" or "Piraeus").

In accordance with Article 29a of the EU Directive 2013/34, Piraeus applies consolidated non-financial reporting according to the European Sustainability Reporting Standards (ESRS). The scope of consolidation is the same as for the Group's financial statements, and the subsidiaries controlled directly or indirectly.

Ethniki Insurance was officially integrated into the Piraeus Group on November 27, 2025. The entity was consolidated in the Sustainability Statement disclosures for the relevant period that is part of Piraeus Group, considering any interconnections with the approach adopted for the consolidated Financial Statements.

Given that Ethniki Insurance contributed to the Group for only a short portion of the 2025 reporting period, the extent of available sustainability information is subject to this timeframe. Piraeus is currently examining Ethniki's policies, actions and targets to evaluate completeness and consistency with the Group's practices and sustainability strategy. As a result, information about Ethniki Insurance policies, actions and targets is limited in the 2025 Sustainability Statement, considering the usefulness of information to be provided to the users of the Sustainability Statement, unless otherwise stated. Further details will be provided in the next Sustainability Statements, as Ethniki is being incorporated into the Group's operations.

Furthermore, following the completion of the reverse merger of Piraeus Financial Holdings S.A. into Piraeus Bank S.A. ("Piraeus Bank") in December 2025, sustainability information and metrics formerly reported by Piraeus Financial Holdings have been consolidated into Piraeus Group's 2025 Sustainability Statement. The comparatives presented for 2024 correspond to those disclosed in Piraeus Financial Holdings prior year Sustainability Statement.

To ensure alignment with the ESRS requirements, information related to the upstream and downstream value chain of Piraeus has been included, where directly available. In cases where such information could not be derived, the Group has relied on internal data sources supplemented by estimations or approximations (proxies). The Sustainability Statement outlines in detail the Group's approach to the material sustainability topics according to the Double Materiality Assessment (DMA) which was conducted in accordance with the ESRS requirements.

No relevant information has been omitted due to its classification as sensitive or related to intellectual property, know-how, or innovation results.

1.1.2. Disclosures in relation to Specific Circumstances [BP-2]

Value chain estimation, sources of estimation and outcome uncertainty, and time horizons

Quantitative data is derived from the Group's internal systems. In relation to data based on value chain estimations, relevant basis of preparation, level of accuracy and enhancement efforts are provided in the relevant disclosures in each topical standard. Such data typically has an inherent degree of estimation uncertainty due to the indirect methods used for calculation.

Table 1: Value chain estimations

Topic	Sub-topic	Specific Metric	Value Chain Estimation	Reference in Section
ESRS E1: Climate Change	E1-6: Gross Scope 1, 2, 3 and Total GHG emissions	Scope 3 Emissions, Categories 1-14	• Upstream • Downstream	2.1.3.3. Gross Scope 1, 2, 3 and Total GHG emissions [E1-6]
		Scope 3 Emissions from Investments and financings, Category 15	• Downstream	

To meet the reporting requirements, Piraeus applies expert judgment and estimations on the reported data. This includes forward-looking information such as global, European or national trends, ambitions, objectives, targets, and expectations. Considering the above, such estimations may include uncertainty and actual future outcomes may differ from current projections.

The Group applies the following definitions regarding time horizons:

Short term: one year post the end of the reporting period adopted in the financial statements: i.e., 2026.

Medium term: from the second to the fifth year, i.e., 2027-2030.

Long term: following the fifth year, i.e., from 2031 onwards.

The time horizons applied in the context of the Sustainability Statement are aligned with Piraeus' Risk Management Framework, the Double Materiality Assessment, and the Business Planning process of Piraeus Group. They constitute a common foundation upon which the Group identifies, assesses and manages its Impacts, Risks and Opportunities (IROs) across sustainability matters, including decision making, target setting and performance monitoring.

Numerical amounts and their respective measurement units are presented at each relevant disclosure within the Sustainability Statement, while figures may show slight variations due to rounding. For the metrics presented, Piraeus has not obtained any additional assurance beyond the mandatory assurance provided for the Sustainability Statement.

No significant capital expenditure (CapEx) and operational expenditure (OpEx) have been identified regarding actions relevant to the material topics, unless otherwise stated.

Disclosures stemming from other generally accepted sustainability reporting pronouncements

Piraeus includes within this Sustainability Statement information from generally accepted reporting standards, beyond the information required by the ESRS.

In line with ESRS 1 requirements, Piraeus has incorporated in its disclosures, entity-specific metrics where ESRS sub-topics do not provide sufficient disclosures granularity. To ensure performance measurement against material Impacts, Risks and Opportunities, Piraeus utilized metrics derived from existing internal KPIs applied within relevant business units, as well as sustainability standards such as GRI and SASB.

- For labour related considerations under ESRS S2 – Workers in the Value Chain, Piraeus leverages internal KPIs to monitor responsible financing practices.
- For positive impacts stemming from ESRS S3 – Affected Communities that relate to gender equality, youth empowerment, and cultural heritage, metrics reflect the scale and reach of initiatives.
- For customer access and digital inclusion under ESRS S4 – Consumers and End-users, Piraeus applies indicators on accessibility features in branches, adoption of digital banking channels, and service responsiveness.
- For Business Conduct matters under the ESRS G1 – Business Conduct, entity-specific metrics track ethical conduct and transparency through whistleblowing cases submitted.

Piraeus applies the SASB Sector Specific Standards to address supplementary metrics that are pertinent to material impacts and risks of ESRS S4 – Consumers and End-users.

Furthermore, the GRI Standards Framework is also utilized in the respective topical disclosures, specifically the standards:

- GRI 201-1: Direct economic value generated and distributed,
- GRI 203-2: Significant indirect economic impacts,
- GRI FS7: Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose,
- GRI FS8: Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose, and
- GRI FS14: Initiatives to improve access to financial services for disadvantaged people.

Piraeus provides precise references within the Sustainability Statement and the content index to the paragraphs of the standards or frameworks applied, as appropriate.

Incorporation by reference

To supplement the disclosure requirements, Piraeus has incorporated information by reference to other sections / parts of the Annual Report. In this context, the following table provides the relevant ESRS requirements along with the corresponding references.

Table 2: Incorporation by reference

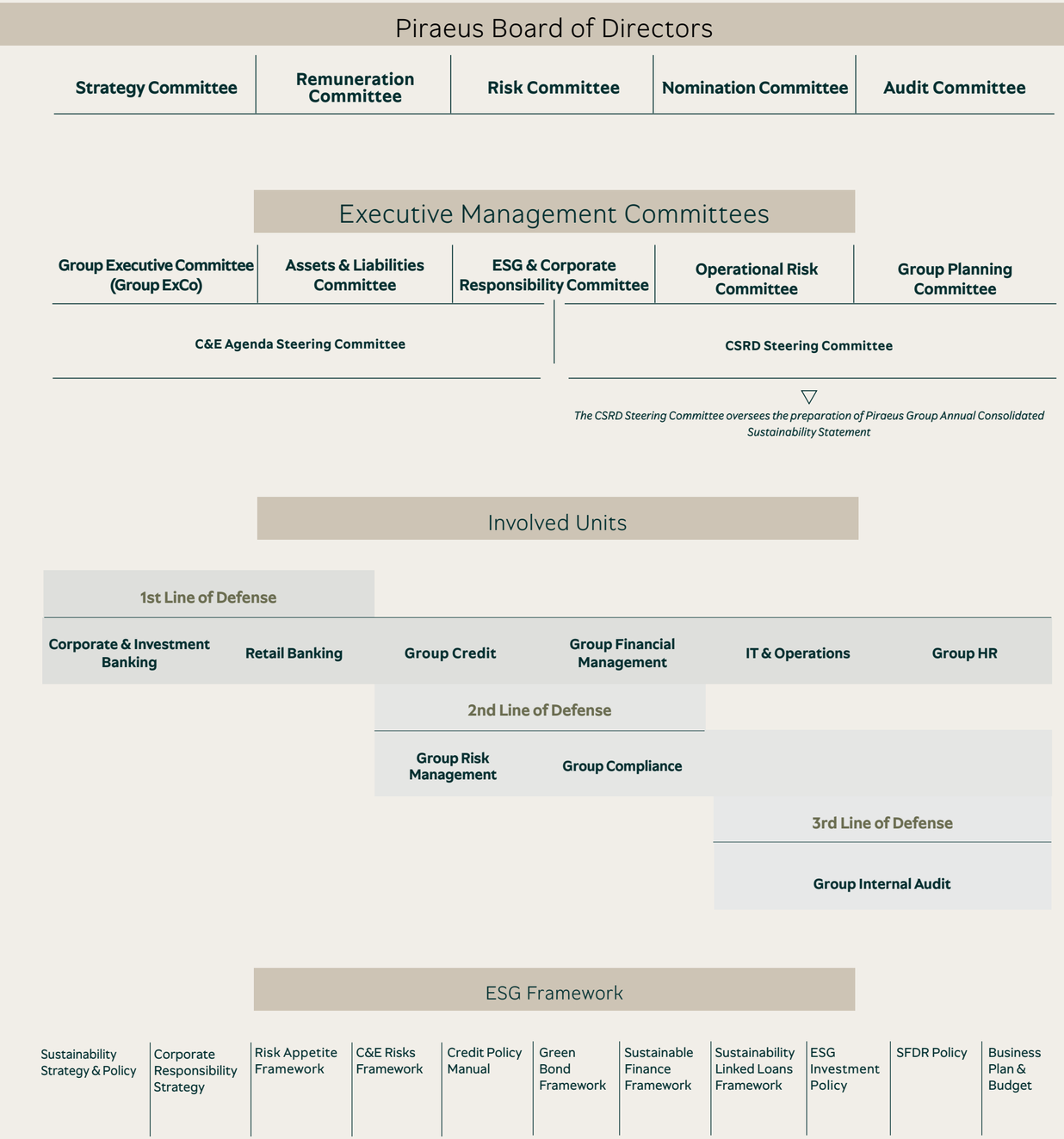
Disclosure Requirement	Reference	Section
ESRS 2 GOV-1: The role of the administrative, management and supervisory bodies	Corporate Governance Statement	2. The Board of Directors

1.2. Governance

Piraeus has established a robust governance that integrates comprehensive oversight and management practices into its operational and business model. This approach ensures that all aspects of the Group's activities are managed with a focus on long-term value creation and responsible operations. The key components of Piraeus' governance framework include committees and units dedicated to upholding ethical conduct, while ensuring strategic oversight, effective risk management, and a strong commitment to sustainability.

1.2.1. The role of the administrative, management and supervisory bodies [GOV-1]

Piraeus operates a one tier Board governance structure. The Board of Directors (BoD) is responsible for the overall administration of the Group, management of its assets, and the formulation and periodic review of strategy, including sustainability priorities and related targets. According to the Bank of Greece (BoG) Act 243/7.7.2025 incorporating the European Banking Authority (EBA) Guidelines on Corporate Governance, the BoD fulfils its obligations under the Act, with the aim of ensuring a business model and governance arrangements that take into consideration all risks to which the credit institution is exposed, including environmental, social and governance risks (ESG risks). Matters reserved by law or the Articles of Association remain under the exclusive authority of the General Meeting of Shareholders.



Board of Directors (BoD) composition (as of 31 December 2025)

Women represent 36% of the Board of Directors, while men account for 64%, reflecting the Group's ongoing commitment to diversity and inclusion at the highest governance level.

Table 3: Board of Directors

Board Members (31.12.2025)

Executive Members	Non-Executive Members	Independent Members
2	9	55%

Further details on composition and diversity: Corporate Governance Statement, section 2 "The Board of Directors" of the 2025 AFR.

In 2025, members of the Board of Directors participated in eleven (11) structured training sessions totaling fourteen (14) hours, designed to strengthen governance capabilities and strategic oversight. A key focus of these sessions was ESG and sustainability, ensuring that Board members are well-equipped to address climate-related challenges and integrate sustainability considerations into decision-making. Additional topics included strategic planning, legal and regulatory compliance, digital transformation, banking governance, and core banking business.

Further details on the skills and expertise of BoD members: Corporate Governance Statement, section "2. The Board of Directors" of the 2025 AFR.

Board Committees' Responsibilities

Audit Committee

The Audit Committee plays a critical role in safeguarding the integrity and transparency of the Group's reporting and governance framework. It is responsible for overseeing both financial and non-financial disclosures, including sustainability information presented in the Annual Report. The Committee monitors the adequacy and effectiveness of internal control and risk management systems, with explicit attention to ESG-related risks (e.g., fraud, whistleblowing, violence and harassment, greenwashing etc.). In addition, it supervises the statutory audit process, recommends the appointment of statutory auditors, and ensures their independence is maintained at all times.

Risk Committee

The Risk Committee provides strategic advice and support to the Board of Directors on the monitoring and oversight of the Group's risk management framework and risk appetite, covering all material risk types, including climate related and ESG risks. It ensures that risk management practices remain fully aligned with the Group's business strategy, objectives, corporate culture, and values. The Committee also oversees the implementation of the Group's risk strategy, reviews stress testing scenarios and resilience assessments and evaluates preparedness for emerging risks and evolving regulatory expectations.

Strategy Committee

The Strategy Committee is responsible for providing guidance and recommendations to the Board of Directors on the Group's strategic priorities and the key axes of its Business Plan. It reviews and evaluates the execution of the approved strategy; monitors progress against targets and assesses alternative strategic options when necessary.

Remuneration Committee

The Remuneration Committee ensures that the Group's Remuneration Policy is fully aligned with its business and risk strategy, including ESG risk objectives, corporate culture, values, and long-term interests. It plays a key role in linking executive and senior management compensation to strategic priorities by incorporating ESG-related performance metrics into both short-term and long-term incentive plans. The Committee also oversees regular updates to remuneration policies to maintain compliance with regulatory requirements, ensure competitiveness in the market, and uphold transparency for shareholders.

Nomination Committee

The Nomination Committee is responsible for identifying, evaluating, and nominating candidates for the Board of Directors, ensuring diversity, independence, and alignment with the Group's strategic priorities. It regularly reviews the structure, size, and composition of the Board and its committees, recommending adjustments where necessary to maintain effectiveness. The Committee also oversees succession planning for the Board, the CEO, and senior management, securing continuity of leadership across the organization. In addition, it conducts annual evaluations of the Board, including its Chair and committees, to assess performance and effectiveness. To support ongoing capability development, the Committee adopts and monitors the Induction and Training Policy for Board members, ensuring they remain equipped to fulfill their responsibilities in a dynamic business environment.

Executive Management Level – ESG & Corporate Responsibility Committee

At the executive level, the ESG & Corporate Responsibility Committee ensures strong leadership and alignment of sustainability objectives with the Group's strategic direction. Chaired by the CEO and comprising members of the Executive Committee, the Group General Counsel, and the Head of Corporate Responsibility, the Committee provides a structured governance framework for ESG integration. Its purpose is to maintain a holistic ESG and Corporate Responsibility strategy with clearly defined medium- and long-term goals, while fostering management commitment across all business areas. Key responsibilities include approving and monitoring ESG policies, overseeing climate and social initiatives, and ensuring full compliance with regulatory requirements.

Reporting Lines for ESG Risks

The Group applies a structured three lines of defense model to manage ESG-related risks effectively. The first line of defense consists of business units that directly own and manage risks, ensuring daily operations remain within the defined risk appetite and aligned with strategic objectives. These units are responsible for implementing corrective actions to address any deficiencies in processes and controls.

The second line of defense includes functions such as Risk Management and Compliance, which oversee risk management practices, ensure regulatory compliance, and provide guidance to the first line in implementing risk frameworks and policies. Acting as a control function, it monitors the effectiveness of risk management across the organization.

The third line of defense is Internal Audit, which provides independent assurance on governance, risk management, and internal controls. It evaluates the overall risk framework and the effectiveness of the first and second lines, reporting directly to the Board of Directors to maintain independence and objectivity. This layered approach ensures robust oversight, accountability, and resilience in managing ESG risks.

1.2.2. Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies [GOV-2]

The Board of Directors, in coordination with its relevant committees, receives structured and systematic updates on material impacts, risks, and opportunities (IROs), the implementation of due diligence processes, and the results and effectiveness of related policies, actions, metrics, and targets. These processes ensure that governing bodies are well informed to oversee the Group's strategic direction, major transactions, and risk management framework, reinforcing alignment with sustainability objectives.

Table 4: Informing Committees on Sustainability Matters

Committee	Frequency	By Whom	Content of Information	Outcomes / Actions

Pop-up table

During the reporting period, the Audit Committee was formally informed on the list of impacts, risks and opportunities (IROs) identified through the Double Materiality Assessment (DMA) conducted under the Steering Committee overseeing the preparation of the Piraeus Group Annual Consolidated Sustainability Report ("CSRD Steering Committee").

Consideration of material IROs in strategy, major transactions and risk management

Strategy & Business Plan: The BoD approves key strategic decisions including the Business Plan, and the sustainability related targets and goals integrated within it. The Risk Committee ensures that the Group Risk Appetite Framework (RAF), explicitly covering ESG risks, are integrated into the Business Plan and day to day decisions.

Major transactions: The administrative, management and supervisory bodies oversee ESG due diligence in major transactions (i.e. large credit exposures). Where relevant, the analysis includes transition and physical risk exposure, human rights and business conduct considerations and reputational risk.

Risk management: The Risk Committee oversees the embedding of ESG risk into the RAF, policies, limits and product approval processes; the integration of scenario analysis and stress testing; and the alignment of incentives and risk adjusted performance with sustainability objectives.

Due diligence, policies, actions, metrics & targets: The Audit Committee reviews the effectiveness of due diligence and key policies/actions (e.g., sectoral emission targets, exclusion/engagement frameworks, social safeguards), monitor KPI performance against targets, and assess lessons learned to improve outcomes year over year.

Reporting & assurance: The Audit Committee oversees the sustainability reporting process under ESRS, including identification of reportable information, data governance and controls, and external assurance of the Annual and Consolidated Sustainability Reporting, with a focus on performance metrics.

1.2.3. Integration of sustainability-related performance in incentive schemes [GOV-3]

The Group Remuneration Policy, which applies to all employees of Piraeus Group, is consistent with the corporate strategy, aiming to align the organization's interests with the interests of its stakeholders. Incorporation of climate-related metrics into performance management is enhanced further, as climate change and the sustainability agenda are becoming more prominent in Piraeus' strategic priorities within the latest Business Plan. Piraeus continuously monitors and adjusts its actions to align performance and compensation with risk-taking, in a rapidly changing environment.

In accordance with the Group Remuneration Policy, the unit or pillar performance is a key component in determining the amount of variable pay. Unit/pillar performance is measured by specific KPIs per area, with targets agreed upon at the beginning of the measurement period. These KPIs are defined consistently, cascading from the CEO to ExCo Members and subsequently to levels below. The mix of KPIs per area includes business, risk, efficiency, technology, people, pure ESG, and other metrics.

The Group Remuneration Policy aims, inter alia, to:

- support a performance-driven culture, rewarding excellence and delivery of ESG goals,
- embrace equal pay policy for male and female employees for equal work or work of equal value, supporting a culture of fairness.

The Directors' Remuneration Policy contributes to the Group's business strategy and long-term interests by:

- Being consistent with and promoting sound and effective risk management and encouraging Executive Directors to focus on sustained long-term value creation incorporating environmental, social and governance (ESG) risk-related objectives.
- Offering competitive and fair levels of remuneration and benefits for Directors that incentivize their dedication to the Company, with the aim of making an increasingly challenging work environment.
- Creating a work environment which is comprehensive in its diversity, fostering and unlocking individual potential and creating competitive advantage.
- Making adherence to the Group's values, business principles, risk culture and the measures used to avoid conflicts of interests.

Piraeus Group embeds climate-related and broader sustainability considerations into the performance evaluation of Directors through the Annual Variable Incentive Scheme. The pay amount remains influenced by the performance of specific units or pillars, assessed against KPIs with targets agreed at the start of the measurement period.

To reinforce accountability and long-term commitment, sustainability objectives maintain a dedicated weight in both short-term and long-term variable remuneration components:

- 15% weight of sustainability in short-term variable remuneration,
- 10% weight of sustainability in long-term variable remuneration.

The Group monitors, reviews, and updates the remuneration processes and structures on a periodic basis and whenever there is a material change, so that they are continuously aligned with the evolving business objectives and regulatory framework. The Remuneration Committee (RemCo) monitors the ongoing appropriateness of remuneration practices and proposes changes to the policy as needed. Legal Services, Group Internal Audit, Group Compliance, Group Risk Management (GRM), and Group Human Resources (HR) are involved in the Group Remuneration Policy design, according to their area of responsibility. The Remuneration Policy is designed and closely reviewed by GHR, advised/assisted by Legal Services and Control Functions (Group Risk Management, Group Compliance and Group Internal Audit). Moreover, the Group Remuneration Policy is approved by the non-executive members of the BoD, and the central independent review of the Group Remuneration Policy is performed by the Group Internal Audit, and the RemCo ensures that a remedial action plan is proposed, approved, and implemented in a timely manner when required. Remuneration data is annually reported to the supervisory authorities and published in Pillar III Disclosures as indicated by the regulatory framework.

The KPIs are measured and monitored by the internal Performance & Value Management Unit (PVM), while the governance of the process is managed by Group HR. This approach is similar to the financial targets cascaded within the Bank's units. There is an ongoing campaign to incorporate ESG KPIs into the targets of all pillars, which have started being monitored from 2023 onwards.

In total, 32 KPIs related to climate and ESG factors are included in Piraeus Group's performance management, as part of distinct ESG category. These sustainability-related metrics in performance and compensation frameworks include indicatively the reduction of carbon footprint, the provision of sustainable finance and financial inclusion products, accountability measures such as leadership in the climate and sustainability related area, Green Asset Ratio, ESG data architecture, high transition risk exposures, enhancement of C&E factors regarding collaterals and loan origination, gender pay gap, training hours per employee, and social return on investment ratio. Specifically for sustainable finance, the amounts are cascaded at ExCo level to subsegments.

Long Term Incentive Plan for executive members of the BoD

In November 2023, a Long-Term Incentive Plan (LTIP) was approved by the BoD following a recommendation by the Remuneration Committee (RemCo), and its mechanism has been incorporated into the Group's and Directors' Remuneration Policy documents since December 2023.

The LTIP is a complementary variable incentive scheme that is based on the Group's performance. This scheme was designed to encourage the Group's leadership towards long-term thinking and behaviors, by aligning performance metrics with Business Plan targets and therefore the shareholders' interests. The LTIP is designed to run in 3-year cycles and is linked to the Business Planning process. This also applies to the executive board members.

LTIP's performance metrics for the performance cycle 2023-2025 are linked to Group Business Plans' achievement rating, while individual performance acts as gate condition. Target individual awarded amounts vary per level, as percentage (%) of annual fixed salary. Final evaluation of the LTIP award will take place at the end of the 3-year cycle to define total pay for the period. 100% of the amount will be awarded in instruments and the vesting schedule starts the following year at the end of the 3-year performance cycle. Amounts awarded but not yet vested will be subject to a strict malus policy.

Table 5: Long Term Incentive Plan (LTIP) performance metrics – cycle 2023-2025

KPI	Weight	Business Plan Target	Grade
Return on TBV	35%	11.8%	1-5
Capital	30%	19.3%	1-5
NPE Ratio	25%	3.3%	1-5
Sustainable Finance	10%	€ 1.0 billion	1-5
Total Grade			1-5

Table 6: Performance metrics grading – cycle 2023-2025

Grade	% of Business Plan Target Achievement	% of LTIP Amount Awarded
1-2	<80%	0%
3	≥80%	50%
4	≥90%	80%
5	>100%	100%

Based on the experience gained from the initial implementation of the LTIP (for cycle 2023-2025), the BoD, following a respective recommendation by RemCo, proceeded with a comprehensive redesign of the scheme to ensure stronger alignment with European best market practices, regulatory expectations and investor guidelines. The objective of the redesign is to enhance long-term value creation, strengthen the link between executive remuneration and shareholder interests, and support leadership retention and continuity in line with the Bank's strategic planning horizon. The new LTIP adopts a rolling, multi-year, performance-share-based structure, with a strong emphasis on the relative Total Shareholder Return (TSR), commencing with the 2026 – 2028 cycle. The structure of the redesigned LTIP, along with the KPIs for the 2026 – 2028 cycle, is described in the Remuneration Report for the year 2025.

1.2.4. Statement on due diligence [GOV-4]

Piraeus is committed to responsible business conduct, in line with its commitment to the UN Global Compact. To identify and act on any potential or actual negative impacts that occur in its value chain, the Group recognizes the importance of conducting environmental and human rights due diligence. The due diligence is an iterative process that involves an ongoing assessment of actual and potential impacts on people or the environment, integrating and acting upon the assessment findings, tracking progress, and communicating how impacts are addressed.

The Group aims to continually improve its Due Diligence processes and mechanisms in line with recognized guidelines such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Table 7: Due Diligence

Core Elements of Due Diligence[1]	Section / Area

Pop-up table

1. Elements of due diligence are incorporated in Piraeus processes regarding the identification of potential negative impacts.

1.2.5. Risk management and internal controls over sustainability reporting [GOV-5]

Piraeus Group has established a robust risk management process and the necessary systems for effective sustainability reporting. These processes are designed to ensure accurate identification, assessment, and mitigation of risks, as well as the integration of sustainability considerations into the organization's overall strategy and operations.

The Steering Committee oversees the preparation of the Piraeus Group Annual Consolidated Sustainability Statement (CSRD Steering Committee) and validates key decisions made in the process of preparing the Sustainability Statement. To ensure a structured and effective decision-making process, the following procedure outlines the steps from data collection to the final presentation to the Audit Committee. More specifically, the project team is responsible for the collection of the necessary input and the performance of reviews and checks that verify the disclosures' accuracy and completeness. Following the preparation of the relevant disclosures, the Steering Committee performs a review and provides any necessary feedback. During the dedicated Steering Committee meetings, the results are presented and discussed in detail. Subsequently, the Audit Committee reviews the reports and requests any updates, as appropriate.

The CSRD Steering Committee is chaired by the Deputy CFO - Strategic Planning and Sustainability, and the members of the Committee have the following roles:

- Deputy Group Chief Financial Officer (CFO), Group Financial Reporting, Accounting and Taxation,
- Deputy Group Chief Risk Officer (CRO) and Head of Balance Sheet and Capital Planning,
- Deputy Group Chief Risk Officer (CRO) and Group Controller,
- Deputy Group Chief Human Resources Officer (CHRO),
- Group Compliance Officer,
- Group Chief Data & Analytics Officer,
- Head of Corporate Responsibility, and
- Senior Executives from the following Departments: Sustainability & Engagement, Group Risk Management, Group Financial Reporting, Accounting & Taxation, Group Credit, Regulatory Compliance & Control, Business Coordination, and Development and Sustainable Banking.

The sustainability reporting process is governed by a structured internal control framework designed to ensure compliance with CSRD requirements. The CSRD Steering Committee, the Project Team responsible for the Annual Sustainability Statement and the relevant Units are responsible for implementing the necessary processes, while the Audit Committee performs the overall supervision. Key features include formalized data collection based on the Double Materiality Assessment results, segregation of duties between sustainability governance teams and supporting units, and multi-level review mechanisms to validate inputs and resolve discrepancies. Each step incorporates traceability and accountability measures, creating an auditable trail that supports internal audit and external verification. These controls collectively mitigate risks of incomplete or inaccurate disclosures, strengthen oversight of governance, and uphold transparency in sustainability reporting.

The final stage of the sustainability reporting process incorporates additional governance and control measures to ensure proper oversight. After initial data review and clarifications, the draft Sustainability Statement undergoes iterative refinement, including incorporation of comments and necessary adjustments. Once finalized, the report is consolidated and forwarded to the Group Financial Management, followed by submission to the Audit Committee for review and approval. External limited assurance is embedded through the involvement of the external auditor, who reviews the preliminary annual report and provides comments. The process is completed by a formal presentation to the Board of Directors for sign-off, ensuring top level accountability.

Piraeus continues to prioritize areas of highest risk, focusing on disclosures that involve significant complexity, estimation uncertainty, and reliance on approximations. Risk assessment for potential error-prone areas is carried out through structured reviews by relevant stakeholders and dedicated workshops analyzing the outcomes of sustainability reporting processes.

Building on prior experience, internal collaboration among sustainability-related Units, Business Development, and Risk Management has been strengthened to promptly identify and address issues. Any critical matters arise are escalated for approval to the CSRD Steering Committee. Furthermore, the organization is advancing the formalization and dissemination of enhanced controls, alongside periodic evaluations of their effectiveness, as part of its ongoing effort to mature risk assessment and sustainability reporting governance.

1.3. Strategy

1.3.1. Strategy, business model and value chain [SBM-1]

Overview of the Group's strategy and business model

Piraeus follows globally recognized standards such as the United Nations (UN) Global Compact, the UN Principles for Responsible Banking, the UN Principles for Responsible Investment, and the UN Women's Empowerment Principles. The relevant principles, frameworks and initiatives, combined with regulatory and legal requirements serve as foundational references for identifying and managing climate and environmental, social and governance matter that may arise from its activities and business relationships in Greece and abroad.

The Group has a systemic position in the Greek banking market as its total assets amounted to € 90.9 billion as of 31 December 2025. The market share of deposits in Greece stood at 28% whereas the share in total performing loans stood at 26% based on 9M.25 available data. The Group operates the most extensive physical network in Greece with 368 Branches and a wide customer base of 4.5 million active customers, including individuals (retail customers), small businesses, SMEs and Corporates. Real Estate and Digital Banking are also an important aspect of the Group's strategy to diversify its revenue sources, with subsidiaries such as Trastor REIC, Snappi, and Piraeus Bank ICB in Ukraine spearheading this effort.

Piraeus offers a comprehensive range of financial products and services tailored to meet the diverse needs of its customers. For large corporate clients, the Bank provides specialised financial services across various industries, through its Large Corporate Segment. It also offers customized financing for new investments through its Structured and Shipping Finance Segment. For small and medium enterprises (SMEs), Piraeus Bank delivers high-quality products and services to address business opportunities and challenges. The Group supports agricultural businesses through its Agricultural Entrepreneurship Centers, offering credit facilities and tailored financial services. It also provides wealth and asset management services, digital banking solutions, and a wide array of retail banking products, including loans, deposits, and investment offerings. Retail loans include consumer and mortgage loans, with personalized pricing and tailored financial planning.

In terms of the key income-generating activities, commercial and retail banking have the largest share of the total revenue. Other key services also include the provision of insurance contracts, the provision of fixed income products and foreign exchange, as well as treasury activities.

Greece remains the key geographical area of the Group's operations with more than 97% of Piraeus' total revenue, while operations in Ukraine, Serbia, and Germany represent contributions from other countries.

At the end of the reporting period, 31 December 2025, the total Group's headcount, was 8,102 in Greece and 380 in international activities.

For more details on the total headcount by geographical region, kindly refer to the Social section, Table 42 "Total number of employees by employment type and region".

In November 2025, Ethniki Insurance became part of the Piraeus Group. Ethniki Insurance, a landmark institution in the Greek insurance market, offers a broad range of specialized insurance products covering three main pillars: Life & Health Insurance, Property & Casualty Insurance, and investment linked products (Unit Linked), serving both individuals and businesses. With a customer base exceeding 1.8 million policyholders, the company's presence includes a network of 112 Sales Offices staffed by 1,407 Corporate Network Insurance Agents, along with 1,065 affiliated Insurance Agencies and 136 collaborating Insurance Brokers.

Overview of Piraeus' Business Model and Value Chain

Piraeus' business model is founded on essential inputs and a structured approach to sourcing, developing, and safeguarding the resources critical to its operations. The Group leverages its strong capital structure, ample liquidity, and efficiently managed operational expenses to ensure financial stability and growth, actively incorporating sustainability principles and targets into its operations. The Group's output and outcomes are reflected in its comprehensive range of products and services, which provide significant benefits to customers, investors, and other stakeholders. For its customers, Piraeus offers enhanced digital banking solutions, innovative financial products, access to insurance services and improved customer experience, whereas investors benefit from strategic growth and profitability targets.

The Group's value chain includes key suppliers such as technology providers, data providers, and financial institutions, which are important to its operations. The Group actively engages with these suppliers through strategic partnerships, ensuring quality and security in its inputs. Moreover, Piraeus partners with institutions such as the European Investment Bank and the European Bank for Reconstruction and Development to design and deliver specialized financing products including green loans and SME support programs that support sustainable development and economic resilience. Also, the newly acquired insurance entity leverages additional resources, such as reinsurance arrangements and specialized service delivery models, for the provision of healthcare and property-related services (e.g., repair networks). Regulators also play a pivotal role by shaping the framework within which Piraeus must operate, thereby ensuring stability and fostering trust in the financial system.

The Group's customers include retail clients, small businesses and large corporates, with distribution channels including physical branches, digital platforms, and strategic partnerships. End-users benefit from the comprehensive financial and insurance solutions offered. The Group's value chain is formed to support its sustainability goals, creating value for all stakeholders through responsible and sustainable practices.

Sustainability in Piraeus' products and services

Piraeus' sustainability strategy integrates environmental, social and governance considerations into its operational and business activities alongside growth and financial performance objectives, reinforcing the Group's commitment to long-term value creation and responsible business conduct. The Group's approach addresses three priority areas:

- strengthening sustainability performance,
- accelerating the transition and supporting its clients, and
- delivering positive social impact.

Key commitments include achieving Net Zero by 2050, validating updated interim targets under the Science-Based Targets initiative (SBTi) and using 100% renewable energy in its branches.

Furthermore, Piraeus strengthens its responsible banking practices through AI-driven digital transformation, robust ESG risk management, and sustainability-linked remuneration, aligned with strategic objectives. To support Greece's sustainable growth, the Group has set a target to reach € 7.1 billion in sustainable financing by 2030, prioritizing renewable energy, green bonds, and sustainability-linked loans.

Social impact initiatives address customers' accessibility and inclusion to Piraeus' products and services, employee development, gender pay equity, community development and support to vulnerable groups through the EQU**ALL** Program and cultural heritage preservation through the Piraeus Cultural Foundation.

Piraeus focuses on the following:

- Reaching net-zero in own operations by monitoring and managing environmental impact closely, investing in operational efficiency solutions, and sourcing 100% renewable energy for Piraeus Bank's buildings.
- Steering lending portfolio towards net-zero by 2050, by focusing on the carbon-intensive sectors and measuring alignment of lending with climate decarbonization pathways.
- Supporting and advising clients in line with a carbon neutral and nature positive economy by accelerating the sustainable economy, financing transition, and pioneering financing for new technologies and business models.
- Managing climate and nature risks by fully integrating climate and environmental risks in the risk management framework and by supporting clients to protect their businesses from climate risks, providing advice, and financing their transition.
- Supporting society and its people through initiatives that promote employee well-being and personal development, enhance service accessibility and assist vulnerable social groups by building trust and contributing to a more inclusive service.

In addition, Piraeus has established the following key frameworks and initiatives steering its sustainability strategy:

Sustainable Finance Framework: Identifying and providing financing based on sustainability criteria as outlined in the dedicated Sustainable Finance Framework of the Group.

Sustainability Linked Loans Framework: Linking lending instruments characteristics to predetermined sustainability performance objectives in line with Piraeus' Sustainability Linked Loans framework.

Green Bonds Framework: Sourcing dedicated capital for green lending activities, in alignment with the updated 2024 Green Bond Framework.

ESG Investment management and advisory activities: Adopting principles for sustainable investment management and responsible investments performed by the Asset Management and Insurance segments.

Utilizing the enabling mechanisms and focusing on lending and financing activities in Greece, Piraeus' goals regarding significant market offerings, clients, and customers, enable and contribute to National, European and International goals towards climate neutrality and customers' accessibility.

Table 8: Piraeus' key Sustainability-related Goals

Goals	Description
Sustainable Financing	Achieve € 7.1 bn of sustainable financing balance by 2030 (€ 4.7 bn in 2025)
Portfolio Decarbonization	Implementation of Piraeus' Transition Plan and SBTi objectives aiming to support clients' decarbonization through its financing product offering and engagement initiatives.
Percentage of products accessed by clients via e-banking	Targeting 87% of products accessible via banking by 2030.
Percentage of self-services accessed by clients via e-banking	Targeting 96% of self-services accessible via banking by 2030.
Impact Investing	Focused on delivering the capital necessary to support Greece's impact-driven investment needs.

This involves specific products related to sustainable financing and sustainability linked loans (including green loans), designed to drive positive environmental impact. It is acknowledged that these targets/efforts are highly dependent on external factors, such as public policies, economic development, and market sentiment. Due to the highly intricate relationships between such factors, there is a possibility that the goals set by the Group may be derailed by exogenous circumstances. Furthermore, as the methodologies, tools and market practices in setting and achieving these goals evolve, the Group commits to update as necessary any policies' actions and targets set.

1.3.2. Interests and views of stakeholders [SBM-2]

Piraeus was actively involved in the development and adoption of the UN Principles for Responsible Banking. To this end and recognizing their importance, Piraeus treats each stakeholder group as important and engages with them accordingly. Thus, as outlined in the "Description of the process to identify and assess material impacts, risks and opportunities" sub-section, stakeholders' input regarding their views and interests constituted a key element for assessing material Impacts, Risks and Opportunities in relation to the assessment of the sustainability matters.

As part of its activities and business operations, Piraeus has set up appropriate channels to encourage constructive dialogue with its stakeholders, inter alia, through its branch network and call center, its social media platforms, customer and/or employee satisfaction surveys, customer complaints mechanism, interaction with supervisory authorities etc.

Piraeus' stakeholders include its retail customers and corporate clients, its own workforce, supervisory and regulatory authorities, the investment community, society, cultural organizations, environmental and international organizations, non-governmental organizations (NGOs), suppliers, mass media and insurance business partners.

These stakeholders are integral to Piraeus' operations, and the Group maintains systematic engagement with them to monitor changes in the external environment, better manage expectations, as well as to better identify material sustainability matters through the Double Materiality Assessment process. Feedback and outcomes from these engagements are regularly reviewed and integrated into Piraeus' business strategy, supporting its effective implementation and alignment with its strategic objectives. Piraeus presents details of its Stakeholder Dialogue on its website, including interaction methods, stakeholders' expectations and how the Group responds to those expectations.

The key messages regarding stakeholders' interests and views include among others the following:

Table 9: Piraeus' Stakeholder Engagement

Piraeus' Stakeholders	Means of Engagement	Stakeholders' Expectations

Pop-up table

The Group's strategic priority is to accomplish its short- and medium-term financial targets for the period 2026-2030, while maintaining its position as a leading, resilient, and socially responsible financial institution. It contributes to the development of the Greek economy by financing creditworthy investment plans and providing liquidity to businesses and households.

As part of its strategic plan, Piraeus continuously strives to meet key stakeholders' expectations. With regards to material sustainability topics, it seeks to adapt its practices to promote positive impacts and prevent negative ones. Environmental and climate-related issues are indicative of how Piraeus is currently adapting its strategy to meet expectations on sustainable products and services, thereby supporting the transition of the Greek economy.

Furthermore, Piraeus enhances its customers' proposition focusing on innovative and accessible services across the geographies it operates, while fostering a culture of Accountability, Meritocracy, and Transparency within the organization. Piraeus also supports local communities and vulnerable social groups, through its extended cultural and educational initiatives and the provision of products and services tailored to the needs of groups with specific characteristics. Details on the Group's updated strategy, regarding products and services are provided in the sub-section "Sustainability in Piraeus products and services", while actions and strategic initiatives related to Piraeus' Impacts are described in detail in the relevant topical standards.

Overall, Piraeus remains attentive to stakeholders' input and how this could contribute to the adaptation of its strategy and business model with regards to material sustainability matters, aiming to preserve and strengthen relationships of trust, in the areas that matter most.

The Double Materiality Assessment results, the respective material sustainability matters, and the stakeholder engagement process have been thoroughly communicated to the Audit Committee of Piraeus, as part of the governance process of the project.

1.3.3. Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]

Piraeus acknowledges the importance of identifying and addressing material impacts, risks, and opportunities resulting from the Double Materiality Assessment. The material sustainability matters identified for 2025 relate to areas such as climate change (adaptation and mitigation), biodiversity, energy transition, and responsible financing, as well as social factors such as working conditions, equal treatment and opportunities for all, and the support of affected communities, consumers, and end-users. Material impacts, risks and opportunities are identified both within Piraeus' own operations and across its value chain, encompassing suppliers, clients, and broader business relationships.

For the detailed list of material impacts, risks and opportunities, their brief description, and their time horizons when relevant, kindly refer to Table 10 of this section.

Piraeus' business model, strategy, and value chain are shaped by a series of initiatives to adapt the current economic model to a sustainable and resilient future. Climate change continues to influence sustainability goals, capital allocation, and client incentives, steering financing towards sustainable economic activities and supporting the decarbonization of the Greek economy. In this context, Piraeus prioritizes its decarbonization strategy, energy transition, and climate adaptation, while responsible financing practices are integrated to address both environmental and social considerations. Biodiversity is also an area that creates opportunities for the Group, through business relationships in the downstream value chain resulting from its lending and investing activities.

Ethical business practices, financial inclusion, and equal opportunities are crucial for both internal and external stakeholders, requiring robust governance structures. Technological advancements and evolving social perceptions also drive the continuous evolution of Piraeus' business model, with emphasis on innovation, accessibility, and digital transformation across its network and electronic channels. The Group's operations and business relationships both have direct and indirect impacts on local communities, as Piraeus supports and will continue to support society through extended corporate responsibility initiatives.

The Group's strategy and business model are shaped by the incorporation of sustainability goals and policies, which are disseminated across the organization. These initiatives aim to refine existing practices, direct capital towards sustainable activities, and incentivize clients to reduce their emissions. Details on these goals are provided in the "Sustainability in Piraeus' products and services" section and in the topical chapters, outlining the Group's policies, actions, and targets to promote a climate-neutral and sustainable future.

Piraeus integrates specific goals and implements policies for the management of material areas, such as those related to its own workforce, workers in the value chain, affected communities, consumers and end-users, and business conduct. The Group continuously monitors and assesses potential material impacts, risks, and opportunities as part of its commitment to responsible and sustainable business practices. Should any other factors arise, that may affect its strategy and business model, the Group is committed to evaluating their implications and taking appropriate actions, including making necessary adjustments to mitigate risks or capitalize opportunities.

Piraeus' material impacts include both positive and negative effects on people and the environment. Positive impacts include financing renewable energy projects, supporting green entrepreneurship, promoting financial inclusion and accessibility, fostering equal opportunities and diversity, and empowering communities and vulnerable groups through targeted initiatives. Negative impacts include, among others, the greenhouse gas emissions deriving from the organization's own operations, but also from the financing of projects, and its value chain activities.

The Group's strategy incorporates environmental responsibility by financing projects that support the transition to a low-carbon economy, promoting green financial products, integrating sustainable practices in its own operations, and supporting cultural and socially responsible activities. These actions reflect the Group's strategic focus on sustainability and responsible banking, generating positive impacts, both within its own operations and across its value chain. Piraeus capitalizes on related opportunities through internally established frameworks such as the Sustainable Financing Framework, the Sustainability-Linked Loans Framework, and the Green Bond Framework. These frameworks outline the criteria for the provision of sustainable solutions and use of proceeds in line with best market practices and regulations. In 2025, marking the second year of reporting under the ESRS, Piraeus updated its assessment of material impacts,

risks, and opportunities (IROs) compared to the previous reporting period. These updates reflect the outcomes of the annual materiality process, incorporating stakeholder feedback and evolving market practices.

As a result, adjustments have been made to the prioritization of certain sustainability topics and the identification of emerging impacts, risks and opportunities (IROs). Notably:

The topic S2 – Workers in the value chain has been newly identified as material, supplementing the previous year's Double Materiality Assessment (DMA).

Regarding topic S1 – Own Workforce, no negative impacts have been identified in 2025, while the topic has been assessed as material from the financial materiality dimension as well, underscoring the importance of talent management and employee well-being.

For the topic S4 – Consumers and end-users, both risks and opportunities are identified, reflecting increased exposure to issues such as data protection, and innovation in digital service delivery. Engagement with internal and external stakeholders highlighted material IROs related to cybersecurity, Information and Communication Technology (ICT), contact center operations, and debt collection practices.

For the topic S3 – Affected communities, the issue of Impact investing is also newly classified as material in 2025.

For the topic E1 – Climate change and the related IROs are now described with greater granularity, including recognition of negative impacts associated with climate change mitigation efforts.

For the topic E4 – Biodiversity, three risks and one opportunity are identified in 2025, reflecting the growing emphasis on ecosystem preservation and alignment with evolving regulatory and stakeholder expectations.

In the Governance area, G1 – Business Conduct introduced an opportunity for improvement, reinforcing the organization's commitment to ethical practices and transparency. These developments demonstrate a proactive approach to addressing emerging sustainability challenges and leveraging opportunities to create shared value.

Overall, the differences in the 2025 results of the Double Materiality Assessment reflect the most up-to-date perceptions and expectations of the stakeholders involved. It is also worth noting that the 2025 DMA process included more extensive engagement with internal stakeholders (e.g., Management and Business Units) and targeted outreach to the most relevant or affected external stakeholders for the assessment of pertinent matters.

Table 10: List of Material Impacts, Risks & Opportunities

ESRS topic	ESRS Sub - topic(s)	Description of Impacts, Risks and Opportunities (IROs)

Pop-up table

Maintaining a Resilient strategy

Piraeus systematically conducts comprehensive risk identification exercises to determine the material sustainability-related risks across its activities. Piraeus ensures that potential threats are thoroughly identified and assessed, demonstrating its commitment to responsible and sustainable business practices. In this context, the Group considers through a resilience analysis its capabilities to adapt to varying sustainability scenarios. This analysis enables Piraeus to understand its ability to maintain operational continuity and long-term value creation under challenges and uncertainties.

Regarding climate change (ESRS E1), Piraeus evaluates both transition and physical risks, considering, inter alia, regulatory changes, market shifts, and climate-related physical events which might have a negative impact on its operations and stakeholders. Similarly, regarding biodiversity and ecosystems (ESRS E4), Piraeus assesses risks related to dependencies and impacts including those arising from its counterparties' activities. More details on the analysis with regards to climate change and biodiversity and ecosystems are provided in the relevant topical chapter.

Piraeus also addresses social risks related to its own workforce (ESRS S1), and its consumers and end-users (ESRS S4) and aims to enhance alignment between its Double Materiality Assessment (DMA) processes and its Operational Risk Management framework. Through systematic internal control and self-assessment reviews, Piraeus identifies and evaluates areas of inherent risk. Where necessary, Piraeus and its subsidiaries implement additional controls to reduce residual risk to acceptable levels.

Piraeus considers its existing systems effective in managing risks related to:

Employee turnover and talent management: workforce attrition, attraction, and rejuvenation.

Cybersecurity: potential cybersecurity threats and data breaches.

Information and Communication Technology continuity: ICT service interruptions.

Customer experience: impact of contact centers' operations on customer satisfaction.

Further details on the management of these risks are provided in the relevant sections. Considering the transitional provisions under the CSRD and ESRS phased-in requirements, Piraeus makes use of the relevant relief. Furthermore, for the reporting period of 2025, there are no significant and/or quantifiable current financial effects to disclose in relation to material risks and opportunities.

Overall, Piraeus is integrating sustainability considerations into its decision-making processes, investing in sustainable technologies, and collaborating with stakeholders to promote environmental stewardship.

For further information on Piraeus' resilience analysis, please refer to section 2.1. "Climate Change [ESRS E1]" ⇔ *and section 2.2 "Biodiversity and Ecosystems [ESRS E4]".* ⇔

1.4. Impact, risk and opportunity management

1.4.1. Description of the process to Identify and Assess Material Impacts, Risks and Opportunities [IRO-1]

Piraeus Group conducted a "Double Materiality Assessment" (DMA) which considers how the Group's operations and value chain impact people and the environment (impact materiality, considered as an "inside-out" perspective), as well as how sustainability matters create risks and opportunities that may have (or could have) financial effects for the Group (financial materiality, considered an "outside-in" perspective). The outcome of this exercise determines the disclosures presented in this Sustainability Statement in line with the ESRS and provides a guide for the efficient and effective allocation of the efforts and resources towards material sustainability areas. More specifically:

1. Understanding phase	• Defining Piraeus' scope based on its own operations and value chain, overview of key activities and identifying the sustainability topics where impacts, risks and opportunities are likely to arise. • Developing the stakeholder engagement plan and identifying the impacts, risks, and opportunities connected with Piraeus' relevant sustainability topics, considering both its own operations and value chain.
2. Identification phase	• Implementing a structured research and analysis process to identify potential material sustainability matters. This process integrates insights from value chain mapping, prior materiality assessments, peer benchmarking, sustainability-related tools, engagement across business units, feedback from stakeholders, and alignment with supervisory expectations. • Engaging with the Board of Directors and Senior Management in the identification of areas that could result in significant impacts, risks, and opportunities.
3. Assessment phase	• Evaluating the impacts through targeted questionnaires from both internal and external stakeholders and assessing the sustainability risks and opportunities from the Board of Directors, Senior Management and the Steering Committee overseeing the preparation of the Piraeus Group Annual Consolidated Sustainability Report (CSRD Steering Committee) members.
4. Determination phase	• Compiling a detailed analysis of the input received to determine the material impacts, risks and opportunities, and sustainability topics.

Understanding phase

Definition of scope, value chain and key activities

In the understanding phase, Piraeus Group defined its reporting boundary which includes the parent company and its subsidiaries, and outlined the Group activities, its business relationships and key stakeholders. Piraeus Group identified segments covering all sectors in which it operates, and these were considered in the process of identifying the material sustainability-related impacts, risks, and opportunities. The aim is to ensure that the assessment is comprehensive, accurate, and reflects the views and interests of key stakeholders. In terms of geographical presence, Piraeus' activities are mainly concentrated in Greece.

Piraeus' activities are grouped into the following business segments:

- Retail Banking
- Corporate Banking
- Non-Performing Exposures (NPE) Management
- Piraeus Financial Market (PFM)
- Insurance
- Other segments such as Asset Management, securities & investment advisory services and Real Estate

Once Piraeus identified its main activities, it developed a value chain map. For the upstream portion, the analysis reviewed suppliers of goods and services, as well as relationships with depositors, investors, and supervisory authorities, aiming to determine which economic activities are most significant for the Group's operations based on the resources and services involved. For the downstream value chain, Piraeus examined its key products and services and the sectors where its financing and investing activities are concentrated.

Stakeholder Engagement Plan

Piraeus defines stakeholders as entities or individuals that can reasonably be expected to be significantly affected by the Group's operations, or whose actions can reasonably be expected to affect the Group's ability to successfully implement its strategies and achieve its objectives. In this context, their input is considered a key element of the Double Materiality Assessment.

Piraeus' stakeholder engagement plan aims to ensure transparent communication, address stakeholder needs and concerns, and respond promptly and effectively. The stakeholder engagement plan was developed based on the following key elements:

Identify stakeholders: Mapping potential stakeholders who are affected by or have an interest in the Group's activities**.**

Decide on methods of engagement: Such as surveys, interviews, focus groups, public consultations, or other methods.

Analyze feedback and integrate insights: Incorporating stakeholders' input into the materiality assessment to ensure that material topics reflect their interests, views and concerns.

Piraeus identified its key stakeholder groups through a detailed analysis of its value chain and by leveraging insights from the previous year's stakeholder engagement. The identification process was further informed through input from key internal Units participating in the materiality assessment that provided insights into their most relevant stakeholders. Regarding financial materiality, key stakeholders included executives from various departments, selected based on their roles, expertise, and relevance to the materiality process. All departments involved operated at a Group level, ensuring that considerations for all entities were adequately integrated in the process.

The key stakeholder groups involved in the impact and financial materiality assessment are outlined below:

Table 11: Key Stakeholders

Key Stakeholder Groups of Piraeus	
Impact materiality stakeholder groups	• Customers (Retail & Corporate) • Own Workforce (incl. Human Resources) • Investment Community • Experts (incl. Non-profit Organizations) • Suppliers
Financial Materiality Stakeholder groups: Board of Directors, Senior Management and the Steering Committee overseeing the preparation of the Piraeus Group Annual Consolidated Sustainability Report (CSRD Steering Committee)	Executives from: • Group Financial Management • Group Risk Management • Group Human Resources • Group Credit • Sustainability and Engagement • Corporate & Investment Banking • Retail Banking • Group Technology, Support & Operations • Group Compliance • Corporate Responsibility

The engagement with the above stakeholders enabled a comprehensive assessment of material impacts, risks and opportunities, while the Group level involvement considered the view and perspective of its subsidiaries.

For further details on the Group's overall approach to stakeholder engagement, refer to the section 1.3.2. "Interests and views of stakeholders [SBM-2]".

Identification of relevant sustainability matters

To identify relevant topics across its value chain and own operations, the Group conducted a comprehensive analysis across its value chain, by utilizing prior period material matters, industry-wide benchmarking and the UNEP FI Portfolio Impact analysis results. This process was complemented by the engagement and input of Piraeus' involved Units, the utilization of insights from surveys and complaints reports, the Climate & Environmental Risk Materiality assessment process and supervisory expectations. Additionally, the Board of Directors, Executive Committee, and Senior Management provided their perspectives on the alignment of key sustainability topics with Piraeus' strategic objectives and business model.

Identification phase

The identification phase aimed to specify the Group's sustainability-related Impacts, Risks, and Opportunities (IROs) based on the potentially material topics established during the understanding phase of the DMA. A long list of IROs was established covering all impacts -actual and potential impacts, including positive and negative ones, as well as all the associated risks and opportunities. The process recognizes that the impact materiality assessment forms the foundation for identifying risks and opportunities, a principle applied throughout the Double Materiality Assessment. Piraeus also examined key areas where operational and value chain dependencies could generate sustainability-related risks, leveraging internal workshops and targeted risk assessment exercises.

Impact Materiality Dimension

The identification of impacts, in line with the ESRS requirements, focused on the "inside-out" perspective, i.e., how the Group's activities and business relationships affect people and the environment. The process combined structured research and analysis following dedicated workshops with the key Units involved, including the following: Retail Banking, Corporate & Investment Banking, Corporate Responsibility, Human Resources, Piraeus Cultural Foundation, Investor Relations, Group Procurement, Compliance & Risk, and Customer Complaints.

The process identified sustainability-related impacts by analyzing connections between the Group's own operations, value chain practices and business relationships, and their environmental and social effects. Topics were contextualized for relevance through prior assessments, peer benchmarks, industry-specific standards, and ongoing communication with internal subject matter experts. Impacts were classified as actual or potential, positive or negative, and short-, medium-, or long-term, in accordance with ESRS requirements.

The approach was applied to both ESRS and Piraeus-specific matters and considered all inherent impacts before implementing any future mitigation measures (for negative impacts).

Financial Materiality Dimension

The starting point for the identification of sustainability-related risks and opportunities that Piraeus may face was based on analysis on key sector-specific issues, considering previous year's material risks and opportunities and workshops with the Risk Management, Retail Banking & Distribution Network, Corporate and Investment Banking and Human Resources. The list of risks and opportunities was developed through focused sessions led by Piraeus' Sustainability and Engagement Unit, with active involvement from senior management.

The result of the analysis was the identification of relevant financial effect pathways across short-, medium- and long-term horizons.

Assessment phase

After listing the identified sustainability matters in terms of impacts, risks and opportunities, a dedicated assessment takes place using specific scoring criteria, incorporating insights from internal and external stakeholders. The impacts were scored in terms of their severity, likelihood (applicable only for potential impacts) and irremediability (for the negative impacts), while risks and opportunities were scored in terms of their magnitude and likelihood.

Impact Materiality

Since severity is defined differently depending on whether the impact is positive or negative, its final score was calculated based on scale and scope for positive impacts, while for negative impacts the irremediable feature was added. For potential impacts, the likelihood was also assessed to determine the final score.

Piraeus utilized a 5-point scoring scale for consistent and comparable assessments. The impacts' scoring approach was based on stakeholders' feedback that was collected through an extensive online survey. The survey was disseminated through the utilization of online questionnaires, distributed via email, website, or available on the Group's intranet. Stakeholders were engaged based on their relevance to key sustainability topics. To strengthen the quality of the engagement, dedicated questionnaires were addressed to each stakeholder group. This process was reviewed internally and subsequently validated by the Steering Committee overseeing the preparation of the Piraeus Group Annual Consolidated Sustainability Report (CSRD Steering Committee), whose feedback refined the final list of material topics. For the Group's own workforce, the questionnaire was distributed to all employees.

Distinct thresholds were applied to assess positive and negative impacts. Notably, for potential negative social impacts related to human rights, severity took precedence over likelihood when assessing their final score, considering the relevant ESRS guide.

Financial Materiality

The aim of the financial materiality assessment is to provide primary users of the general-purpose financial reports with information on sustainability-related risks and opportunities. The materiality score of risks and opportunities was assessed based on the potential magnitude of the financial effects and the likelihood of occurrence. Similarly to the approach followed for impact materiality assessment, Piraeus applied a 5-point scoring scale for both assessment criteria related to financial materiality (i.e., magnitude and likelihood), based on dedicated questionnaires and workshops ensuring consistent and comparable assessment for all ROs.

Piraeus actively engaged key internal stakeholders in assessing the financial materiality of sustainability-related risks and opportunities. This process involved members of the Board of Directors, the Executive Committee and the Steering Committee overseeing the preparation of the Piraeus Group Annual Consolidated Sustainability Report (CSRD Steering Committee), whose insights prioritized issues with significant potential impact on the organization's long-term resilience and value creation.

Determination phase

Based on the input received from all stakeholders during the assessment phase, Piraeus determined its material Impacts, Risks, and Opportunities (IROs) by applying appropriate thresholds. Piraeus' approach accounted for the distribution of stakeholder responses across the scoring scale, ensuring that caution was exercised without compromising the integrity or reliability of the assessment framework.

As a result, a total of 52 IROs (28 Impacts and 24 Risks & Opportunities) and their corresponding sustainability matters were deemed material for the Group, reflecting its key sustainability-related considerations for the reporting year. The outcome of the Double Materiality Assessment was endorsed by the Steering Committee overseeing the preparation of the Piraeus Group Annual Consolidated Sustainability Report (CSRD Steering Committee) and presented to the Audit Committee.

Management of Sustainability Risks and Opportunities

The Group systematically conducts dedicated risk identification exercises, embedded within its enterprise risk management system and informs the evaluation of its operational risk profile.

Social risks linked to own workforce, and consumers and end-users are addressed by aligning Double Materiality Assessment outcomes with operational risk controls. Internal control mechanisms and self-assessment reviews enable the identification of inherent risks, while addition-

al mitigation measures are applied to maintain residual risk at acceptable levels. Details on the management process of climate-related risks are presented in Section "1.4.1. Description of the process to Identify and Assess Material Impacts, Risks and Opportunities (IRO-1)".

The Double Materiality Assessment and the identification of sustainability-related business opportunities are closely aligned, leveraging input from key stakeholders involved in the business planning process. Piraeus Group is embedding the identification, assessment, and management of sustainability-related opportunities into its core management processes by establishing procedures that promote awareness of sustainability issues and ensure accountability for actions taken to leverage their potential.

The Double Materiality Assessment covers the business activities of Piraeus Group integrating the latest available data at the time of its preparation (i.e., November 2025). No substantial changes to Group figures or activities have occurred that would require alterations or additional assessment. For Piraeus, the Double Materiality Assessment (DMA) is vital to its strategic framework.

The assessment of impacts (impact materiality) provides insight into how Piraeus affects society and the environment and forms the basis for designing actions and setting sustainability-related commitments. Simultaneously, the assessment of risks and opportunities (financial materiality) provides insights on how environmental and social issues could affect the Group's financial performance, enabling risk mitigation and capitalizing opportunities. Piraeus integrates insights from its due diligence processes, such as the complaints' mechanism and customer satisfaction surveys into its DMA, whereas the Risk Management Framework and the Business Planning process both inform and are informed by the assessment.

The Risk Identification Process

Piraeus has in place a comprehensive Risk Management Framework to identify, measure, control, and mitigate underlying risks, including climate-related and environmental risks. In this context, a materiality assessment is performed as part of the annual Risk Identification (RID) process to identify significant risks that could have a financial or strategic impact on the Group's business.

Climate Risk Identification

The Group defines climate risks as the potential negative impacts on an institution's financial health by climate change factors such as extreme weather events. The identification process considers both the downstream value chain and own operations (real estate assets) climate-related risks as follows:

Physical risks, which refer to the potential financial losses a counterparty may face due to the changing climate patterns. These changes may be due to long-term alterations in climate patterns, referred to as chronic, or an increase in the number and severity of extreme events, classified as acute.

Transition risks, which refer to the extra costs that a counterparty may encounter as it adapts to a carbon-neutral economic model. These risks are triggered by regulatory changes (policy and legal), the integration of new low-carbon technologies, shifts in market conditions, consumer preferences, and more.

The Group has conducted an analysis to determine the materiality of the impact of climate related risks on its main risk categories. The impact takes into account the cross-cutting nature of climate risk and its materialization through various transmission channels. The various transmission channels, through which climate risk drivers can materialize into the traditional risk categories, are summarized below.

Table 12: List of transition and physical risks

Transition Risks	Physical Risks
• Environmental taxation and subsidies • Regulatory requirements (e.g., sustainability certificates, disclosures) • Behavioral changes of consumers, suppliers, employees • Technological developments • Energy transport policies (e.g., reduction of CO_2 emissions)	• Heat waves and wildfires • Droughts • Floods • Storms • Changing rainfall patterns • Extreme precipitation • Storms and storm surges • Water stress

Table 13: Risk drivers, indicative transmission channels and potential financial impact

Climate & Environmental Risk Drivers	Indicative Transmission Channels	Potential Financial Impact

Pop-up table

Climate Risk Classification

The process identified the potential impact from climate-related risks on the Group's assets boundary considered in the evaluation. The analysis considered both own operations and downstream value chain across short-, medium- and long-term time horizons, focusing on the most relevant assets and activities. More specifically, the analyses focused on the effects that climate-related risks may have on traditional risk categories such as Credit risk, Market risk etc. Large Corporate, SME Small Businesses, as well as Commercial and Residential Real Estate exposures to collaterals were considered with regards to the lending portfolio. The effects on investments in bonds and equities and real estate assets (including own-used buildings) were also examined in the exercise. In terms of liquidity risk corporate deposits & secured funding-pledged loans were also examined.

The time horizons applied refer to: short-term (2026), medium-term (up to 2030) and long term (after 2030 and up to 2050) in line with the time horizons adopted in the context of sustainability reporting.

In the context of the assessment Piraeus leveraged the Shared Socioeconomic (SSP) and the Representative Concentration (RCP) Pathways adopted by the Intergovernmental Panel on Climate Change (IPCC), namely the SSP1-1.9 for transition risk (1.5°C aligned scenario) and RCP 8.5 for physical risk, as well as its proprietary tool for the quantification of climate risk "Climabiz". The SSP1-1.9 scenario assumes international cooperation with emphasis on the well-being associated with technological innovation for climate change mitigation. The RCP 8.5 is a high emissions scenario that assumes increases of 4°C or more above pre-industrial levels by the end of the century. The endpoint of the long-term horizon in the scenario analysis was set in 2050. The two scenarios capture the two different extremes in terms of climate change mitigation and thus provide a wide range of possible loss-making events.

Credit Risk

Business Portfolio: The Climabiz tool was used to assess the effects of the chronic physical risks and the transition risks on business borrowers, through a bottom-up approach and derive a climate risk score of the counterparty, which is then aggregated at a sectorial level. For acute physical risks, Piraeus performed an analysis under a high emissions scenario (RCP 8.5) utilizing data from Piraeus' proprietary "Geographical Information System" for the location of the companies assessed, regarding the relevant climate-related hazards. The results were combined with the Climabiz tool at a sectorial level. The GIS analysis was performed NUTS 3 level.

With regards to the immovable properties held as collateral, the transition risk analysis assessed the collaterals' Energy Performance Certificate (EPC) label distribution, while for the physical risk analysis, the impact of the following acute climate events on the Group's collaterals (immovable property) was assessed: Landslides, Fluvial Flood, Coastal Flood, Wildfire.

These events are deemed as most relevant, following the consideration of seven acute effects (namely fluvial floods, pluvial floods, landslides, wildfires, extreme heat, water scarcity, and coastal floods). The chronic aspect of physical risk was not analyzed due to the insignificant impact of this type of risk on buildings.

The consumer portfolio was excluded from this analysis due to its low materiality, stemming from its low exposures and short-term maturity.

Market Risk / Liquidity & Funding Risks

The materiality assessments for Market risk (for corporate bonds and equities) and Liquidity & Funding Risks (in particular for corporate deposits & secured funding-pledged loans) are aligned with the methodology followed for the materiality assessment of both transition & physical risks in terms of Credit risk.

Operational Risk

In line with the analysis conducted for the Group's immovable properties held as collateral, Piraeus performed a materiality assessment of the transition risk for its own-used real estate assets (at Piraeus Bank level), with regards to their energy efficiency. In terms of physical risks, the Bank conducted the analysis leveraging on the GIS outcomes for the six acute climate-related hazards (drought, heatwaves, landslides, wildfire, coastal & fluvial floods) in line with the methodology adopted for Credit risk.

Business & Strategic Risk

The materiality assessment methodology for Business & Strategic risk is aligned with the methodology followed for the materiality assessment of both transition & physical risks in the context of Credit risk. For the assessment of interest and fee & commission income from loans and bonds in the NFC portfolio, as well as revenues from Assets under Management (AuM), Piraeus leveraged the sectoral transition & physical risk materiality assessments performed for Credit risk (business portfolio), while for the inventory property and investment properties the methodology used for the immovable properties held as collateral was utilized.

Reputation & Litigation Risk

For the materiality assessment of Reputation & Litigation risk, Piraeus performed a qualitative assessment taking into consideration the following factors: greenwashing[2] risk (where the current & anticipated volume of sustainable financing was considered), laggards to transition risk (where the quantitative transition risk analysis performed for the Bank's business portfolio in the context of credit risk is utilized) and controversies identified.

Based on the aforementioned analysis, Piraeus classified its business portfolio sectors, collateral pool and real estate assets into three categories in terms of transition and physical risk (high, moderate, and low).

To assess the vulnerability of sectors and counterparties in acute events, the geographical location and nature of the counterparty's operations were examined. For this analysis Piraeus leveraged on the proprietary GIS platform that contains mapping applications consisting of multiple layers of geospatial data and sources such as: National Observatory of Athens, Ministry of Environment and Energy, European Commission, European Environment Agency, European Soil Data Centre, TU Delft. The tool allows the Group to assess climate risks/vulnerability across different time horizons and climate scenarios (IPCC RCPs). Other external data sources utilized are: Hellenic Statistical Authority, Eurostat, National Energy and Climate Plan, Network of Central Banks and Supervisors for Greening the Financial System (NGFS), Institute of Greek Tourism Confederation, Greek Payment Authority of Common Agricultural Policy.

Outcome and results

The outcome of the materiality assessment is summarized in the following table per risk type and is also distinguished per time horizon i.e., short, medium and long-term. It should be noted that both scenarios are based on certain extreme assumptions pertaining to either a very decisive and collaborative global intervention for the limitation of GHG emissions, or to no action taken for the mitigation of climate change leading to an increase of the average temperature by 4°C by the end of the century. These extreme opposites in terms of results are also accompanied by a series of assumptions relevant to economic, social and environmental factors that provide a large extent of uncertainty in the outcome but constitute a good basis for the organization to assess its adaptability within extreme climate-related effects.

2. The process of conveying a false impression or misleading information about how a company's products are environmentally sound.

Table 14: Climate Risk Materiality Assessment

Outcome of Climate Risk Materiality Assessment

Risk Categories	Transition risk			Physical risk		
	Short-term	Medium-term	Long-term	Short-term	Medium-term	Long-term
Credit Risk		✓	✓		✓	✓
Market Risk						
Liquidity and Funding Risk						
Operational Risk		✓	✓		✓	✓
Reputation & Litigation Risks		✓	✓		✓	✓
Business & Strategic Risk		✓	✓		✓	✓

Piraeus uses a five-year business plan time horizon and thus any effects embedded within the short- and medium-term time horizons of the climate risk assessment process are described above. The climate assumptions made in the financial statements are broadly aligned with these of the scenario analysis and they do not incur any financial effect in the short term. For the current reporting period, no material loss event arising from climate-related risk has been identified, recognized and reported.

Screening for Environmental Impacts, Risks and Opportunities

Regarding the Group's impact on climate change and particularly GHG emissions, Piraeus annually measures its Scope 1, Scope 2, and relevant Scope 3 emissions, including its Scope 3 – Category 15 emissions from financing and investments. It should be emphasized that Piraeus Bank implements an Environmental Management System in all its administration buildings and branches in Greece. The Environmental and Energy Management System is registered under the EU Eco-Management and Audit Scheme (EMAS) and is certified in accordance with ISO 14001:2015 and ISO 50001. With regards to the identification of potential or future GHG emissions sources, Piraeus is planning to incorporate within its business plan cycle projections about major clients, based on the relevant emissions pathways, enhancing the monitoring and decarbonization steering efforts by focusing on the highest emitting parts of its value chain.

Through interviews with internal stakeholders and desktop analysis, Piraeus assessed its business activities for potential impacts, risks and opportunities in its own operations and value chain, related to the topics of pollution, water- and marine resources, biodiversity and ecosystems and circular economy, in line with the process of the Double Materiality Assessment described within this chapter. Piraeus Bank also screened its assets and site locations for potential risks in its own operations related to pollution, water- and marine resources, biodiversity and ecosystems and circular economy.

No material sites at own operations located in or near biodiversity-sensitive areas were identified, considering that the Group's activities are primarily concentrated within urban boundaries. Piraeus did not conduct consultations with affected communities on environmental topics as no relevant impact towards specific communities was identified by the Double Materiality Assessment.

The Group assessed its risks related to biodiversity and ecosystems in its downstream value chain, in line with the expectation that nature related degradation and biodiversity loss will affect Piraeus' clients and customers that are dependent on natural resources, which in turn may result in their increased probability of default. Regarding biodiversity and ecosystem risks, dependencies, and opportunities, the Group utilized the UNEP FI Portfolio Impact Analysis Tool for Banks, the ENCORE tool and the Biodiversity Footprint for Financial Institutions (BFFI) framework footprint analysis. The analyses focused on the Group's downstream value chain counterparties and complemented the Double Materiality Assessment results. More details on the Risk Identification process of nature-related factors are provided in the sub-sub-section below.

Risk Identification and nature-related factors

Piraeus enhanced the relevant section included in the Climate and Environmental Risk Materiality Assessment document to explicitly address the identification of the potential risk drivers and related transmission channels of environmental risks. More specifically, the analysis pertained to the evaluation of the effects of nature-related risks into the Credit risk, Market risk, Liquidity risk, Business & Strategic risk, Operational risk and Reputation & Litigation risk on an inherent risk basis. The analysis introduced the assessment of impacts to Piraeus across different time horizons (in alignment with the horizons examined under climate risk) and the introduction of quantitative evaluation for both "outside-in" and "inside-out" perspectives, leveraging on both internal and external data and sources of information.

The impact areas that were assessed included the following four Environmental Factors: Biodiversity, Pollution, Water Usage, and Waste Production.

Credit Risk

The Bank has developed a detailed and comprehensive risk materiality assessment for nature-related risks affecting obligors within the Non-Financial Corporations perimeter. This assessment includes the following components: Impact Analysis and Dependency Analysis. The materiality assessment of nature-related risk is performed from an inherent risk perspective, examining both the "inside-out" and "outside-in" impacts:

- The "outside-in" perspective relates to the financial impact that nature-related factors may have on a company's performance – Dependency Analysis.
- The "inside-out" perspective relates to the impacts that a company's activities may have on the wider economy, society, and the natural environment – Impact Analysis.

Impact Analysis

The impact part has been assessed through a two-step analytical process aimed at evaluating the environmental impacts of the Bank's clients' activities, as well as associated environmental transition risks, across different time horizons. In the first step, environmental risk factors were evaluated in the short-term. The evaluation considered the potential impact of companies in terms of the following four Environmental Factors: Biodiversity, Pollution, Water Usage, and Waste Production. In the second step, impact scores were projected into the medium and long term through the application of a notching mechanism, which adjusted the short-term scores to account for potential environmental transition risk considerations.

Dependency Analysis

The Bank performed a dependency assessment to evaluate how its business portfolio relies on ecosystem services, integrating both sectoral and geographical dimensions. Using ENCORE as the primary framework, short-term dependencies were assessed at the country-sector level for each ecosystem service and refined with localized data from Aqueduct and ISRIC at the coordinate level.

Each counterparty was assigned a dependency score on a scale from 0 (Null Dependency) to 5 (Very High Dependency). Medium and long-term dependencies were then projected through scenario analysis aligned with ECB guidelines, leveraging the GLOBIO model and Mean Species Abundance (MSA) metric to quantify biodiversity shocks under SSP5-RCP8.5 scenarios. Piraeus has taken into consideration systemic risks posed by nature degradation to the financial system. Physical risks associated with nature degradation have been identified for the credit risk portfolio over the long-term.

Market Risk

The materiality assessment methodology for Market risk (in particular for corporate bonds) is aligned with the methodology followed for the materiality assessment of Credit risk. While a significant share of exposures falls under High impact categories for environmental factors across all time horizons, market risk remains immaterial due to the limited size of the corporate bond portfolio. Similarly for dependency analysis, although the high proportion of risk classification, this specific portfolio is not considered material.

Liquidity & Funding Risks

The Bank extended its nature-related risk assessment to Liquidity and Funding risks by applying the same methodology used for Credit risk. This approach evaluates the exposure of corporate deposits and pledged loans to sectors classified as High, Medium, or Low impact across short-, medium-, and long-term horizons. The analysis provides a synthetic impact score for each sector and aggregates deposit and loan amounts accordingly, enabling the Bank to identify potential vulnerabilities in its funding structure under evolving environmental transition scenarios. The nature-related dependencies have been also assessed for Liquidity and Funding risks by applying the methodology used for Credit risk.

A synthetic dependency score was calculated across 21 ecosystem services, focusing on the exposure of corporate deposits. Dependency levels were determined by analyzing the distribution of deposits across High and Very High ratings. Overall, the corporate deposit portfolio was deemed immaterial relative to the Bank's total funding. Similarly, the Bank evaluated dependencies for Pledged Loans using the same approach. The analysis indicates that the dependencies remain limited and do not materially affect the Bank's overall risk profile. Based on this assessment, no material nature-related risks were identified that will affect liquidity and funding.

Business & Strategic Risk

The nature-related risks for Business and Strategic risk were evaluated from both impact and dependency perspectives, focusing on interest and fees & commission income within its NFC portfolio. Using the methodology applied for Credit risk, sectors with significant negative impacts were assessed across short-, medium-, and long-term horizons. Pollution, Biodiversity, and Waste Production emerged as potentially material risks in the medium and long term. However, quantitative analysis confirmed the impact dimension as immaterial due to limited transmission channels and pollution costs already captured under climate risk. Similarly, for Asset Under Management, the Bank analyzed exposures based on synthetic impact scores, revealing that there is high impact in the short term, with Biodiversity representing the most significant risk driver. Biodiversity exposures under high impact categories reach or exceed 20% by 2030 and 2050, highlighting its potential materiality for long-term sustainability objectives.

Nature-related dependencies for Business and Strategic risk were assessed by analyzing interest income and fees & commission income within its NFC portfolio, as well as market capitalization for its AUM portfolio. While short-term exposures were deemed immaterial, medium- and long-term horizons revealed significant concentrations of dependency risk. These findings, supported by quantitative materiality assessments aligned with the Credit risk methodology, indicate that dependency risks may become material over time.

Reputation & Litigation Risk

The Bank assesses reputational and litigation risks arising from nature-related factors, with a primary focus on Greenwashing, defined as exposure to legal actions or regulatory sanctions for breaching transparency and disclosure obligations under frameworks such as EU Taxonomy, SFDR, and CSRD. Litigation risk may materialize when sustainability-labeled financial products are linked to counterparties misaligned with sustainability principles or operating in environmentally harmful sectors. Given the Bank's Strategic Plan to significantly expand sustainable investment offerings over the medium and long term, the potential for greenwashing incidents and associated reputational and litigation risks becomes material without robust due diligence and monitoring. To mitigate these risks, the Bank has embedded enhanced governance and control processes within its risk management framework.

Operational Risk

Operational risk is not materially affected by nature-related risks considering that Reputation & Litigation risks are covered above while the analysis of own-used assets indicates that no additional impact is expected. The Bank is in fact operating in activities that are inherently associated with intangible impacts and dependencies on the environment and are not located within biodiversity-sensitive areas.

The materiality assessment outcome for nature-related risks across the different time horizons (short, medium-, and long-term) is presented in the following table.

Table 15: Nature-Related Risks

Outcome of Materiality Assessment

Risk Categories	Nature-Related Risks – Materiality Assessment Outcome		
	Short-term horizon	Medium-term horizon	Long-term horizon
Credit Risk			✓
Market Risk			
Liquidity and Funding Risk			
Operational Risk			
Reputation & Litigation Risks		✓	✓
Business & Strategic Risk		✓	✓

1.4.2. Disclosure requirements in ESRS covered by Piraeus Group's Sustainability Statement [IRO-2]

The topics determined as material through the materiality assessment are included in the Appendices A and B.

Based on the materiality assessment, Piraeus has concluded that the following topics are not material and has not included the disclosure requirements related to the corresponding Topical Standards:

ESRS E2: Pollution

ESRS E3: Water and marine resources

ESRS E5: Resource use and circular economy.

Piraeus is committed to providing stakeholders with information that accurately reflects the Group's sustainability performance, its impacts, risks, and opportunities particularly in the context of its primary activities, such as lending and financing in Greece. By ensuring that these disclosures are meaningful, Piraeus helps stakeholders understand the tangible effects of its sustainability initiatives and practices, reinforcing transparency and accountability.

For each topic and in relation to each material impact, risk and opportunity, Piraeus has distinctly determined the material information to be disclosed, based on the significance of each disclosure and regarding the matter that it aims to depict or explain. For the assessment, Piraeus has considered the decision usefulness both for the primary users of the financial statements and for the users interested from an impact perspective. The consideration of the decision usefulness and the significance was performed by internal stakeholders with experience in the preparation of sustainability information through the exercise of expert judgement considering the activities of the Group.

For more information on the detailed list of the disclosure requirements, please refer to the Content Index.

1.5. Group Policies – Minimum Disclosure Requirements – Policies adopted to manage material sustainability matters (MDR-P)

The following table presents the key sustainability-related policies and frameworks that govern Piraeus Group. These policies define objectives, scope, governance in alignment with internationally recognized standards, and ensure consistency with the Group's sustainability strategy and regulatory obligations. They cover critical areas such as sustainable development, ESG investments, and sustainable financing, and are designed to embed environmental, social, and governance principles across the value chain. The table also specifies the senior roles accountable for implementation and the dissemination approach, demonstrating transparency and compliance with the ESRS 2 disclosure requirements.

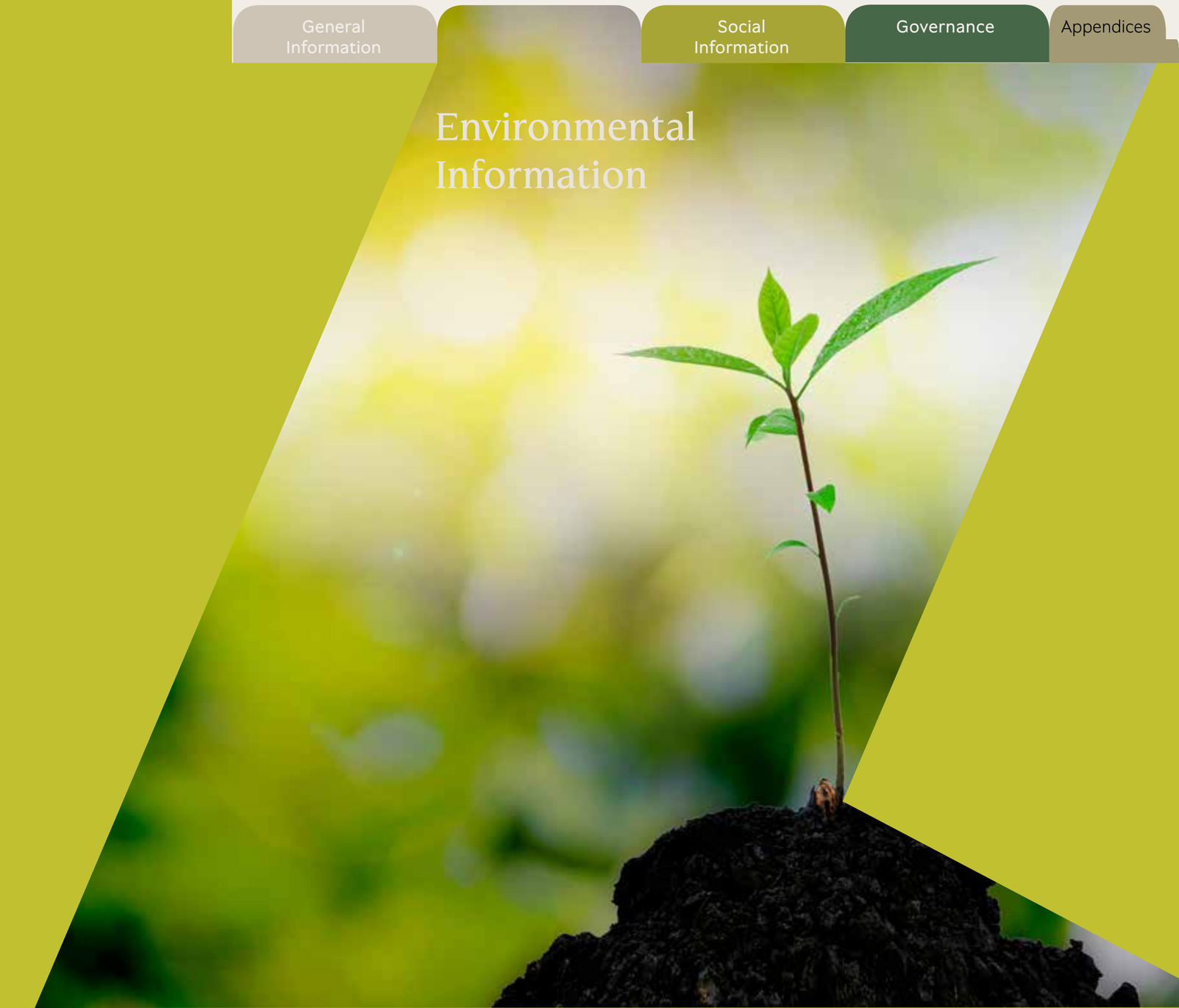
Table 16: Group Policies & Frameworks

Policies	Objective – Description	Process of monitoring	Scope

Pop-up table



Environmental Information



2. Environmental Information

2.1. Climate Change [ESRS E1]

2.1.1. Strategy

2.1.1.1. Transition Plan for Climate Change Mitigation [E1-1]

Piraeus' overall approach

In line with the provisions of the European Banking Authority (EBA) Guidelines on ESG risk management (EBA/GL/2025/01) and the requirements of the Corporate Sustainability Reporting Directive (CSRD), Piraeus Bank has developed a comprehensive Climate Transition Plan. This ambition is reflected in Piraeus Bank's long-term commitment to supporting Greece's transition to a resilient, low-carbon economy and positions the Bank as a key enabler of sustainable growth. The commitment is built around two strategic pillars that capture both the Bank's direct footprint and its broader influence through financing:

- Piraeus Bank Own Operations, reducing emissions generated by the Bank's buildings, fleet, energy consumption and internal processes, and
- Piraeus Bank Portfolio Emissions, progressively decarbonizing the lending and investment portfolio by steering capital towards low-carbon activities, and supporting clients in their transition journey.

Since 2022, Piraeus has also committed to a set of SBTi Targets, which the Group continues to monitor and report on. These targets are disclosed in the 2025 Sustainability Statement, while any updates will be assessed in the coming years, in line with the latest applicable standards and prevailing market practices among financial institutions and considering the first version of the Climate Transition Plan disclosed herein.

Net Zero in Own Operations

Piraeus Bank is committed to reducing its Scope 1 and Scope 2 carbon emissions combined by 73% by 2030 and reaching Net Zero by 2050. Piraeus Bank ensures continuous progress towards its 2030 target with the Environmental & Energy Management System (EEMS) which is deployed across all branches and administrative buildings, enabling the Bank to systematically monitor energy performance, manage environmental impacts, and identify efficiency opportunities. This commitment is supported through annual programmes focused on building upgrades, energy-saving initiatives, renewable electricity sourcing, and fleet improvements. The Bank's commitment to Net Zero in its own operations not only reduces environmental impact, but also strengthens resilience, operational efficiency, and alignment with emerging regulatory expectations. Most importantly, it signals to Piraeus' stakeholders that is actively transitioning its own footprint in parallel with supporting the transition of the wider economy.

Steering the Portfolio Emissions Toward Net Zero

Decarbonizing the lending and investment portfolio is a strategic priority for Piraeus Bank. While operational emissions represent only a small share of the Bank's overall footprint, financed emissions reflect the climate performance of the sectors and clients the Bank supports and therefore represent both the greatest challenge and the greatest opportunity for impact. The Bank aims to strengthen its long-term resilience, anticipate emerging regulatory expectations, and actively contribute to the transformation of the Greek economy. Piraeus Bank measures financed emissions across all sectors and client segments, enabling transparent and comparable monitoring of progress, towards a low-carbon economy. This analysis highlights the most carbon-intensive parts of the portfolio, including power generation, oil & gas, other heavy industries and real estate — and therefore informs the Bank's focus on its transition efforts.

Building on this foundation, the Bank applies sector-specific transition pathways to guide the alignment of its portfolio with Net Zero objectives. These pathways draw on internationally recognized scenarios, such as the IEA Net Zero outlook, while are complemented by the EU Climate Policy and the Greek National Energy and Climate Plan (NECP). By grounding its expectations in credible external trajectories, the Bank ensures that its targets reflect both scientific evidence and the actual pace of change in the real economy. For each priority sector, Piraeus Bank identifies key transition levers, defines medium-term decarbonization targets, and outlines actions to support clients in adopting low-carbon technologies and business models. As methodologies evolve, these pathways will expand progressively to additional sectors, ensuring increasing coverage of the Bank's wider portfolio. Climate-related goals are incorporated into forward-looking planning, capital allocation and sectoral priorities, ensuring that the Bank's strategic direction fully reflects the transition risks and opportunities ahead. Sustainable finance plays an essential role in this integration where the Bank is expanding green lending, green funding and sustainable assets under management to mobilize capital towards the transition, while supporting the competitiveness and resilience of its clients.

To ensure consistent implementation across both pillars, the Climate Transition Plan is organized around three key dimensions, which reflect the guiding principles:

1. Alignment with Global Climate Pathways	Ensuring that both operational and portfolio targets reflect credible, internationally recognized decarbonization scenarios aligned with the 1.5°C ambition enshrined in EU and national Climate Policy.
2. Integration with Business Planning and Credit Decisioning	Embedding climate considerations into strategic planning, credit allocation and client engagement. The Transition Plan is directly linked to the Bank's business plan, ensuring that climate objectives inform lending decisions and long-term positioning.
3. Integration with Internal Frameworks and Processes	Ensuring consistency across risk management, governance, monitoring frameworks and internal reporting mechanisms, enabling effective execution and oversight.

Building on these strategic foundations, the Bank developed its Climate Transition Plan, along with dedicated processes for its effective implementation and continuous monitoring. In this context, the Bank has established a robust governance and oversight framework that assigns clear roles and responsibilities across all three lines of defense (LoD) for the assessment, calculation, implementation, and monitoring of the Climate Transition Plan in alignment with regulatory expectations. Furthermore, management committees oversee the development, refinement, and monitoring of the Climate Transition Plan. This governance framework strengthens accountability, ensures consistent oversight at all levels, and enables systematic tracking and escalation of progress along the Bank's transition pathway. The ESG & Corporate Responsibility Committee reviewed and approved the Piraeus' Climate Transition Plan targets.

The implementation of the Climate Transition Plan is closely connected with Piraeus Bank's other core policies, including the Risk Management Policy, Credit Policy, Sustainable Finance Framework, Green Bond Framework and the Sustainability-Linked Loans Framework. These frameworks ensure consistent application of sustainability principles across financing decisions, product design and internal processes, creating an integrated approach to transition planning. For further information on Piraeus' sustainable financing performance and targets, please refer to sections "Actions and resources in relation to climate change policies [E1-3]" and "Targets related to climate change mitigation and adaptation [E1-4]".

To support the long-term portfolio decarbonization, Piraeus Bank has developed a structured internal methodology for preparing sectoral transition plans. This methodology reflects the Bank's strategic objective to proactively manage transition risks, identify opportunities, and support clients in aligning with the evolving low-carbon economy. It is designed by the Bank to ensure analytical rigor, transparency and consistency across all priority sectors.

The methodology is built around six interlinked steps, each serving a strategic purpose:

- Portfolio analysis, understanding where financed emissions, transition risks, and climate-related exposures are concentrated within the Bank's lending and investment activities. This provides the evidence base for prioritizing actions where they have the greatest impact.
- Sector prioritization, identifying the sectors that require transition plans based on risk materiality, transition sensitivity, and their importance to the Greek economy.
- Sectoral pathways, mapping externally recognized transition trajectories, including global, European, and national decarbonization scenarios. These pathways offer a forward-looking view of the ex-

pected pace, scale, and technological direction of change in each sector, providing the strategic context for the Bank's planning.

- Top-down analysis, translating external transition trajectories into high-level sectoral ambitions for the Bank. This ensures that the Bank's long-term direction is science-informed, aligned with broader policy signals, and consistent with the macroeconomic outlook.
- Bottom-up analysis, assessing counterparties' transition levers, investment plans, and sector-specific characteristics to transform the high-level ambition into client-aligned, feasible targets. This step bridges strategic intent with real-economy capabilities by aligning sectoral ambitions with the Bank's business plan and long-term strategic priorities.
- Sectoral transition approach, defining the concrete levers that the Bank will use in each sector, including tailored financing solutions, structured client engagement processes, and sector-specific risk-management practices. This turns analysis into action, enabling consistent and credible implementation.

Through this structured methodology, Piraeus Bank ensures that sectoral transition plans are forward-looking, robust, and operationally effective. Importantly, the combination of top-down pathway analysis and bottom-up assessment led the Bank to set sectoral targets. This reflects a deliberate strategic choice to align with the ambition of science-based trajectories while grounding targets in a realistic understanding of sector outlooks, counterparties' transition plans, and the Bank's business strategy. The result is a set of targets that balance credibility, ambition, and feasibility, enabling the Bank to support clients effectively, manage risks proactively, and steer the portfolio toward Net Zero in a coherent and transparent way. The Bank's portfolio analysis, climate and environmental risk materiality assessment, scenario analysis exercises and sector-prioritization process identified a set of significant impact sectors that concentrate the largest share of financed emissions and the highest exposure to transition risks.

To translate this prioritization into actionable plans, Piraeus Bank conducts sector-specific analyses to understand the underlying drivers of emissions, the transition levers available to each industry, and the realistic pace at which clients can decarbonize within the Greek economic context. Drawing on this evidence base, the Bank defines a set of targeted actions aimed at financing and enabling decarbonization projects across the prioritized sectors, ranging from renewable energy investments and clean industrial technologies to energy-efficient buildings and low-carbon infrastructure. Based on this analysis, the initial focus of the Climate Transition Plan is directed towards the sectors, where targeted actions can deliver the greatest decarbonization impact: Power Generation, Oil & Gas, Cement, Metals, Aluminum, and Commercial Real Estate (CRE). These sectors represent the core of the Bank's climate exposure and collectively account for the majority of its portfolio financed emissions as presented below:

Table 17: Piraeus Portfolios' Targets

Sector	Scope Emissions covered[3]	Unit	Scenario / Pathway	Base Year

Pop-up table

3. The target refers to Gross emissions and does not include any carbon credits, GHG removals or avoided emissions.

Power Generation

The Power Generation sector has been identified as a significant sector for Piraeus Bank's Climate Transition Plan. This classification reflects the sector's high contribution to climate change, accounting for over 30% of Greece's national CO_2 emissions, and its significant representation in the Bank's portfolio exposure. These factors, combined with the sector's strategic role in the national energy system, underscore its prioritization within the Bank's decarbonization strategy. The Bank's Power Generation portfolio consists of large corporate energy producers and a wide mixture of renewable energy (RES) projects. The sectoral boundary focuses on electricity generation activities and includes Scope 1 and 2 emissions, which account for the majority of sectoral emissions.

The baseline year for emissions intensity was set at 2024, with a measured intensity of 223 kg CO_2eq/MWh which serves as the baseline for setting the Bank's emission reduction target. Piraeus Bank's analysis was informed by a two-way analytical approach, combining top-down alignment with international and national climate targets, and bottom-up analysis based on granular, company-specific action plans and targets in conjunction with the Bank's sectoral business plan. This methodology enabled the Bank to define a realistic and credible emissions reduction pathway, aligned with counterparties' action plans and business outlook. The Bank has committed to reducing the financed emissions intensity of the Power Generation sector by 37% by 2030, targeting a level of 140 kg CO_2eq/MWh.

The achievement of this target will be supported by a set of key decarbonization levers, including the decommissioning of lignite and oil-fired power plants, the accelerated deployment of renewable energy projects, the rollout of Battery Energy Storage Systems (BESS), and the expansion of transitional fuels to support grid flexibility and reliability. These levers are further reinforced by the Bank's business strategy, which prioritizes financing investments on renewable energy projects.

Piraeus Bank actively engages with its clients by supporting the development and financing of renewable energy projects aligned with national decarbonization goals, and enabling access to capital for projects that align with the Bank's climate objectives. Through this approach, the Bank ensures that its portfolio remains resilient and aligned with the broader transition to a low-carbon economy.

Oil & Gas

The Oil & Gas sector represents a significant sector of Piraeus Bank's Climate Transition Plan reflecting its substantial greenhouse gas emissions, significant contribution to climate change, and considerable exposure within the Bank's portfolio.

The Bank's sectoral portfolio consists of large corporate clients involved in refining and production activities, as well as small and medium-sized enterprises (SMEs) operating in transportation, storage, and distribution. For the purposes of the climate transition plan, the target focuses on the refining and production segments of the value chain, accounting for over 95% of the sector's financed emissions, excluding at this stage, upstream oil and gas extraction and downstream distribution, storage, and retail operations.

Given the complexity of the sector and based on prevailing market practice, the target setting approach is based on sectoral absolute financed emissions. Financed scope 1 and 2 emissions were measured at 593 kt CO_2eq in 2024, serving as the baseline for the decarbonization target. The target setting approach was developed through a comprehensive assessment that combined alignment with key climate frameworks and a detailed review of actual emissions data and transition plans from the Bank's major counterparties. Based on this analysis, Piraeus Bank has set a target to reduce absolute Scope 1 and 2 financed emissions by 5% until 2030—bringing emissions down to 569 kt CO_2eq.

To achieve the 2030 decarbonization target, Piraeus Bank has identified a set of key levers that are broadly aligned with Greece's 2023 National Energy and Climate Plan (NECP) and Greek Climate Law, which outline 30% emissions reduction by 2030 for facilities with significant environmental impact (relative to 2019 levels). These decarbonization levers encompass financing energy efficiency upgrades in refining facilities, supporting fuel switching and the adoption of renewable alternatives, promoting electrification across industrial processes, and facilitating the deployment of Carbon Capture and Storage (CCS) technologies. Among these, CCS is expected to play a pivotal role in the long term, particularly in addressing residual emissions that are difficult to eliminate through conventional efficiency improvements or fuel substitution. However, its near-term deployment remains constrained by technological immaturity, high implementation costs, and the lack of a fully developed regulatory and infrastructure framework—factors that may delay its large-scale application.

In support of these objectives, the Bank emphasizes active client engagement, including the targeted financing of transition-aligned projects and sustained dialogue with Oil & Gas clients to support their transition roadmaps.

Cement

The cement industry is one of the most carbon-intensive sectors globally, responsible for approximately 7% of global CO_2 emissions, and plays a critical role in Greece's economy due to its importance in infrastructure and construction. Given the sector's high emissions and significant contribution to climate change, Piraeus Bank has identified the Cement sector as significant and includes it in the Bank's Climate Transition Plan.

The Bank's exposure in the Cement sector consists primarily of corporate clients engaged in cement production, concrete manufacturing, as well as the production of secondary cementitious products. The transition plan analysis focuses on Scope 1 and 2 emissions arising from primary cement production, excluding upstream and downstream activities. In 2024, the sector's financed emissions intensity was established at 672 kg CO_2eq per tonne of cement, forming the baseline for setting targets and monitoring progress. Building on this reference point, the Bank formulated its emissions' reduction strategy through a comprehensive assessment that integrated alignment with key climate frameworks and a detailed analysis of actual emissions and production data from its principal counterparties. As a result, the Bank committed to a 12% reduction in financed emissions intensity by 2030, aiming to reach approximately 591 kg CO_2eq per tonne of cement.

Achieving the 2030 target will rely on several key decarbonization levers that Piraeus Bank is actively promoting and supporting among its cement industry clients. These include upgrading equipment and optimizing processes at cement plants to reduce energy consumption and emissions per tonne of output; reducing the clinker-to-cement ratio through clinker substitution; increasing the use of alternative fuels; and sourcing carbon-free electricity for cement operations. As Greece's grid continues to decarbonize under the NECP, cement producers are expected to further benefit from cleaner energy inputs. Each of these measures aligns with the Greek National Climate Law that has set overarching requirements for emissions reductions from energy-intensive industries, including an indicative 30% reduction by 2030 from 2019 levels for major emitters. In parallel, EU initiatives such as the Fit-for-55 package and the upcoming Carbon Border Adjustment Mechanism (CBAM) place additional pressure on hard-to-abate sectors like cement to accelerate decarbonization.

Moreover, Piraeus Bank is actively engaging with counterparties across the sector to support the implementation of their transition plans including targeted financing for the development of ambitious corporate transition plans.

Metals

In the context of Piraeus Bank's Climate Transition Plan, the Metals sector is considered to comprise iron & steel and aluminum manufacturing, which is among the most carbon-intensive industries globally, accounting for approximately 7% of global CO_2 emissions and around 5% within the EU—representing over a quarter of the EU's total industrial emissions. As both a cornerstone of industrial development and a major source of greenhouse gas emissions, the sector has been classified as significant reflecting its notable emissions profile and exposure within the Bank's portfolio.

The Bank's exposure to the sector is primarily concentrated in large corporate clients engaged in the primary production of iron, steel, and aluminum as well as in a significant number of small and medium-sized enterprises involved in the manufacturing of secondary metallic products. The scope of the transition plan focuses on Scope 1 and 2 emissions from primary production activities, excluding upstream extraction and downstream processing. Given the distinct characteristics of the two subsectors, baseline emissions intensities were assessed separately in 2024: 460 kg CO_2eq per tonne of steel for iron & steel, and 9,616 kg CO_2eq per tonne of aluminum serving as reference points for target setting and progress tracking. The sectoral targets were defined following a comprehensive assessment that combined top-down alignment with key climate frameworks and bottom-up analysis of counterparties' environmental action plans, emissions reduction targets, and the Bank's own business planning projection. Based on this analysis, Piraeus Bank has set differentiated 2030 decarbonization targets for each subsector, reflecting their respective starting points and sectoral pathways:

- Iron & Steel: 15% reduction in financed emissions intensity by 2030, from 460 kg CO_2/tonne to approximately 391 kg CO_2eq/tonne.
- Aluminum: 46% reduction in financed emissions intensity by 2030, from 9,616 kg CO_2/tonne to approximately 5,177 kg CO_2eq/tonne.

To support the achievement of its 2030 targets, the Bank is promoting several key decarbonization levers across the Metals sector, including energy efficiency improvements in production processes; increased use of scrap steel and secondary (recycled) aluminum to reduce reliance on primary production; electrification of operations using renewable energy and process innovation and fuel switching to enable lower-carbon production methods.

These measures are largely mature or rapidly scaling and provide a credible pathway to achieving meaningful emissions reductions by

2030. They are also aligned with regulatory and policy frameworks, including the Greek National Climate Law (Law 4936/2022), which mandates a 30% reduction in industrial emissions by 2030 (relative to 2019), and EU-level initiatives such as the Fit-for-55 package, the EU Emissions Trading System (ETS), and the Carbon Border Adjustment Mechanism (CBAM).

Piraeus Bank is actively engaging with its iron & steel, and aluminum counterparties by financing transition-aligned projects that support emissions reduction, fostering partnerships on sustainability initiatives, and promoting the exchange of best practices and innovative solutions.

Commercial Real Estate (CRE)

The Commercial Real Estate (CRE) sector has been prioritized as significant for Piraeus Bank's Climate Transition Plan. This classification reflects the sector's high contribution to climate change, given that buildings account for approximately 36% of CO_2 emissions and 40% of energy use in the EU, and its significant representation in the Bank's portfolio exposure. In Greece, the challenge is amplified by an aging and inefficient building stock, which drives elevated emissions and energy demand. These factors, combined with the sector's strategic role in the national economy, underscore its prioritization within the Bank's decarbonization strategy.

The Commercial Real Estate (CRE) includes retail, industrial, office, hospitality, and mixed-use properties and is primarily managed through Corporate and Business Banking. The emissions analysis focused on Scope 1 and 2 emissions, primarily associated with energy consumption for heating, cooling, and appliances. The baseline year for the emissions' intensity was set at 2024, with measured intensities of 54.7 kg CO_2eq/m², which served as the reference points for setting the Bank's decarbonization targets.

Piraeus Bank's analysis was conducted through an extensive asset-level assessment, utilizing Carbon Risk Real Estate Monitor (CRREM) pathway data in alignment with the methodology of the Partnership for Carbon Accounting Financials (PCAF). This approach enabled the Bank to define credible emissions reduction pathways tailored to the specific characteristics of its real estate portfolio.

The Bank has committed to reducing the financed emissions intensity of the CRE sector by 51%, aiming to achieve 27 kg CO_2eq/m² by 2030. The target is fully aligned with CRREM decarbonization trajectories and the NECP objectives regarding the renovation of buildings, ensuring consistency with the EU's Fit-for-55 package and the Renovation Wave initiative. The achievement of the 2030 decarbonization targets for the real estate sector will be supported by three key levers:

- Integration of Renewable Energy Sources (RES) into the national energy mix: According to the NECP, RES penetration is expected to reach 75% by 2030, significantly reducing Scope 2 emissions impacting directly the real estate sector.
- Development of new, high-efficiency buildings through business growth: In line with the Greek Building Regulation, all new buildings constructed from 2021 onwards must comply with Energy Performance Certificate (EPC) A standards. Based on Piraeus Bank's Business Plan, growth in the CRE portfolio is expected to be driven by the addition of new high-efficiency buildings.
- Renovation of existing building stock: In accordance with regulatory requirements, part of the Bank's CRE portfolio is expected to undergo renovations by 2030, leading to relative performance improvement contributing to national residential energy efficiency targets. Piraeus Bank actively engages with its Real Estate clients by financing high-efficiency buildings certified with EPC A or A+, facilitating access to capital for deep renovation projects that enhance energy performance, and promoting portfolio growth aligned with national sustainability standards.

Through these actions, the Bank facilitates compliance with the Greek Building Regulation and the NECP objectives, ensuring that its real estate portfolio contributes to the broader transition to a low-carbon economy.

2.1.1.2. Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]

Resilience Analysis

Piraeus Group has identified through the performance of the Double Materiality Assessment the following risks.

Table 18: Piraeus' Material Climate Change Risks [ESRS E1]

Sub-topic	Climate-related risks	Transition / Physical Risk

Pop-up table

Piraeus Group assessed the resilience of its strategy and business model against climate-related physical and transition risks by combining scenario analysis and qualitative assessments, performed as part of the annual climate-related risk materiality assessment, as described in the General Information section. The analyses considered the upstream, own operations and downstream value chain across short-, medium- and long-term time horizons, focusing on the most relevant assets and activities.

More specifically, the analyses examined the effects that climate-related risks may have on the traditional risk categories such as Credit risk, Market risk, Liquidity and Funding risk, Operational risk, Reputational & Litigation risk, and Business & Strategic Risk. The consumer portfolio was excluded from this assessment due to its low materiality, stemming from its low exposures and short-term maturity. The analysis covered the key aspects of the downstream value chain and own operations that may have an impact on Piraeus, focusing on the financial related business relationships.

The time horizons applied refer to: short-term (2026), medium-term (up to 2030), and long term (after 2030 and up to 2050). When compared to the resilience analysis, the business planning time horizon (5-year horizon) is relevant to the short- and medium-term time periods, while the Group's emission reduction targets are placed at the endpoint of the medium-term time horizon. The medium-term time horizon applied with respect to climate-related risk materiality assessment extends up to 2030, which aligns with time horizons for sustainability reporting purposes as defined by ESRS.

The aim of this exercise was to identify the potential impacts on Piraeus' business model and strategy stemming from different climate-related scenarios. The scenarios refer to two extreme conditions regarding the adoption of climate policies and actions to mitigate climate change effects. Based on these scenarios, the impacts could lead to either increased costs related to the transition to a low-carbon economy or to higher losses because of chronic climate changes and acute climate-related events. The climate-related risk materiality assessment covers both physical and transition risk elements using the SSP1-1.9 for transition risk (1.5°C aligned scenario) and RCP 8.5 for physical risk.

For transition risk, the SSP1-1.9 scenario was utilized, which reflects a 1.5°C-aligned pathway characterized by ambitious climate policies, rapid decarbonization, and widespread adoption of sustainable technologies. Under this scenario, significant macroeconomic adjustments are assumed, including moderate short-term GDP slowdowns due to carbon pricing and regulatory shifts, followed by long-term stabilization driven by green investment and innovation. Energy system assumptions include a sharp decline in fossil fuel use, with renewables accounting for the majority of the global energy mix by 2050, alongside substantial improvements in energy efficiency. Technology deployment is assumed to accelerate rapidly, with large scale adoption of electric vehicles, renewable energy infrastructure, and carbon capture technologies becoming mainstream by mid-century. For physical risk, the RCP 8.5 scenario was utilized, which represents a high-emissions trajectory with limited climate mitigation efforts. This scenario assumes continued reliance on fossil fuels, leading to global warming exceeding 4°C by 2100. The resulting physical impacts include increased frequency and severity of extreme weather events, rising sea levels, and chronic climate stressors.

By employing these two extreme scenarios, Piraeus captures a wide range of potential outcomes. This approach ensures the maximum range of impacts on its strategy and business model is considered. The results of the materiality assessment indicate that both transition and physical risks intensify over medium- to long-term time horizons, with a potential of materially affecting Credit, Operational, Reputation & Litigation and Business & Strategic Risks.

More details on the process and the methodologies utilized are provided in the paragraph "The Risk Identification Process" of the chapter "Description of the process to Identify and Assess Material Impacts, Risks and Opportunities [IRO-1]".

Maintaining a resilient strategy

The outcomes of the scenario analysis are considered in several climate-related actions within Group's Business Plan, aiming to ensure that the future business model and portfolio remain diversified and aligned with the Group's net-zero commitment. Key initiatives include the development of sustainable products, enhanced risk monitoring through dedicated key risk indicators (KRIs) (e.g., Sustainable Financing, exposure to Taxonomy-eligible activities, exposure to High transition risk sectors) and target setting. In addition, Piraeus has integrated climate & environmental risks into the loan origination process and pricing approach.

Piraeus has incorporated scientific pathways into its strategy-setting process and has set intermediate emission reduction targets validated by SBTi (Science Based Targets initiative). The Group is dedicated to further exploring and applying portfolio alignment methods to expand coverage of specific asset classes, supporting its long-term strategic goals. Piraeus Bank is actively developing and offering innovative financial products that address climate change mitigation, energy efficiency and adaptation needs. These include green consumer loans for energy-efficient home appliances and renewable energy installations, sustainability-linked loans that incentivize corporate clients to achieve ESG targets and customized solutions aligned with the clients' ambitions in achieving climate-related performance. Piraeus Bank is also pursuing strategic partnerships and fostering innovation to further enhance its climate-related offerings.

More details on the sustainable products and initiatives related to client engagement are provided in the "Actions and resources in relation to climate change policies" chapter.

Piraeus Group has also incorporated climate transition and physical risks into its risk and capital management framework and processes.

More specifically:

- During loan origination, the potential impact of climate-related risks, is considered through a sensitivity analysis that leverages on the output of the Climabiz 2.0 tool (both at a sectoral level and with obligor-specific parameters). Depending on the outcome of this analysis (for High or Moderate risk), Piraeus Bank has prescribed in the Credit Policy specific actions, such as a mandatory action plan, pricing add-ons etc.
- In the context of the ICAAP, the Group has established methodologies to incorporate climate transition and physical risks in the credit risk parameters under both economic and normative perspectives. More specifically, the Group assesses the vulnerabilities of its business portfolio towards climate-related risks through a targeted scenario analysis exercise. Furthermore, the Group assesses the vulnerabilities of its collateral pool from physical events and utilizes the EPC ratings of its eligible collaterals to further stress their values in order to also account for the transition risk. A long-term scenario analysis has been carried out for the first time in ICAAP 2024 using macroeconomic climate model projections up to 2050. With regards to Operational Risk, C&E related risks are identifiable across all data types of Operational Risk and are mainly impacting capital via a set of Extreme Scenarios. The impact of ESG risks on Business & Strategic risk has also been quantified through dedicated scenarios.

Furthermore, the Group has set Risk Appetite Framework Key Risk Indicators (RAF KRIs), to monitor progress of Climate & Environmental risks towards its goals and commitments, establishing a robust risk management framework. The Group's Risk Appetite Framework unfolds through the following Risk Appetite taxonomy:

Level 1: Risk Appetite Statements (RAS) and aggregated metrics and limits which reflect the Group's Strategic Pillars (Capital Adequacy, Asset Quality, Liquidity and Earnings).

Level 2: Risk Appetite Statements addressing all material risks identified from the Risk Identification Process (if not already addressed by Level 1 RAS), supported by risk measurements and limits set at a more granular level.

Level 3: Risk Limits allocated to specific business lines, legal entities and major portfolios reflecting strategic objectives and goals.

More specifically, in relation to climate-related & environmental risks the following RAS and Risk Limits have been established:

Level 2 RAS

Sustainable Finance (New Disbursements in Corporate & Retail portfolios): Describes the proportion of sustainability-related new production of loans over total new production amount.

Exposures to Taxonomy-aligned activities (GAR): Describes the proportion of the Group's exposures to Taxonomy-aligned activities over total assets.

Exposure to High Transition Risk Sectors: Describes the ratio of the total exposures of borrowers in Group's high-risk sectors in terms of transition risk (as defined by the Group's internal classification methodology) excluding green, sustainable and sustainability-linked exposures over the total exposures of business loans.

Level 3 Risk Limits (indicative list)

Sustainable Finance (breakdown in different portfolios): Describes the proportion of sustainability-related new production over total new production amount.

Actual Energy Performance Certificate (EPC) Information: Describes the percentage of loans' exposure (corporate / retail) with actual EPC information and of own used assets respectively.

Financed Emissions (Scope 3): Describes the reduction in Financed Emissions (Scope 3 - cat.15) of corporate portfolio (i.e. non-financial corporations).

- Piraeus has also developed a Long-Term Incentive Plan (LTIP), approved by the Board of Directors, which has been incorporated in the Group's Remuneration Policy and embeds sustainability-related objectives as part of the compensation framework.
- These objectives include the reduction of carbon footprint, the increased provision of sustainable financing and products, as well as the achievement of a leadership position in climate change-related performance. The respective KPIs have been allocated across all business lines and portfolios to ensure accountability and alignment with strategic goals.
- In terms of upskilling its Relationship Managers (RMs), Piraeus is implementing targeted upskilling programs in relation to ESG, sustainable financing and climate-related risk, supported by the dedicated ESG-related Units. By enhancing RM's expertise in ESG-related aspects, Piraeus aims to further enhance its capacity to meet growing demand for sustainable financing solutions.

Overall outcomes of the resilience analysis

Overall, climate-related risks are expected to intensify over the medium- to long-term, as indicated by the results of the Climate and Environmental Risk Materiality Assessment incorporated into the Double Materiality Assessment. However, the scenario analysis is an exercise performed under conditions of uncertainty and may be influenced from multiple parameters, including among others national and international policy objectives, geopolitical developments the pace of green technology adoption.

To ensure that the Group's strategy and business model remain resilient across short-, medium- and long-term time horizons, Piraeus has already implemented a series of actions as outlined in the previous paragraphs and described in more detail in the following sub-sections. These actions provide the foundations for the achievement of the Group's commitment to carbon neutrality and adaptation to climate-related impacts.

At the same time, Piraeus acknowledges the need for flexibility in a rapidly developing international landscape and closely monitors global and regional trends, to ensure that its strategy and business model remain resilient. The Group's efforts are supported by a robust balance sheet and adequate capital and funding to execute planned actions, as demonstrated by the two recent issuances of € 500 million for each of the two Green Senior Preferred Bonds.

2.1.2. Impact, risks and opportunities management

2.1.2.1. Policies related to climate change mitigation and adaptation [E1-2]

Piraeus Group has adopted a series of policies and frameworks to manage material impacts, risks, and opportunities related to climate change mitigation, adaptation and energy covering its own operations and business portfolios. For the development of these policies and frameworks, Piraeus has taken into account the input / feedback received from its continuous engagement with investors, regulatory authorities, policy makers, and sustainability rating agencies.

Sustainability Policy

The Piraeus Group Sustainability Policy aims to support, promote, and finance sustainability with adherence to ESG criteria, and its purpose is to provide the principles for managing the material sustainability matters of the Group, i.e. to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities. The Policy focuses on the material impacts, risks and opportunities regarding the areas of corporate governance, economy, society, culture, employees, climate & environment. The Policy aligns with the Group's goal to substantially contribute to the United Nations Sustainable Development Goals (SDG's) and the Paris Agreement on climate.

Climate & Environmental (C&E) Risks Management Policy

The Group's Climate & Environmental (C&E) Risks Management Policy establishes a framework for identifying, assessing and managing climate-related and environmental risks. It integrates climate and environmental elements into the broader risk management and risk appetite framework, ensuring alignment with regulatory expectations and strategic planning. The Policy outlines the methodology for assessing materiality across the traditional risk categories (i.e. credit risk, market risk, liquidity & funding risk, operational risk, reputational & litigation risk, business & strategic risk) over the short-, medium- and long-term. Risk assessment methodologies include scenario analysis which evaluate the resilience of the Group's business model and the impact of climate and environmental risk drivers on its overall risk profile.

Credit Policy

The Group's Credit Policy embeds climate-related and environmental risk management into core lending origination processes. It includes screening out / restricting financing for certain high-risk activities (through dedicated exclusion lists), climate and environmental due diligence on corporate borrowers, as well as classification of borrowers through a risk score based on exposure and individual climate strategies. This approach strengthens Piraeus' ability to manage credit risks associated with climate vulnerability.

Sustainable Finance Framework

In order to support its sustainable finance and emissions reduction ambitions Piraeus has developed a dedicated Sustainable Finance Framework (SFF) that aims to establish a clear and comprehensive methodology for identifying sustainable financing solutions, facilitating the Group's strategic objectives and monitoring its performance against sustainability-related aspirations and targets.

In this context, the following three major categories of sustainable solutions are defined:

- Sustainable financing based on regulatory definitions (i.e., RRF Green Transition Pillar / Official Sector Programs that embed EU Taxonomy alignment criteria and EU Taxonomy-aligned financings).
- Transition finance based on the recommendations provided by the EU Commission on facilitating finance for the transition to a sustainable economy.
- Other types of sustainable financing based on internal definitions established by Piraeus (e.g., other official sector programs not aligned with EU Taxonomy, and financings with positive SDG contribution or financings towards ESG pure players).

The SFF aims to identify types of financing that address climate change mitigation, adaptation and energy transition. It provides an innovative framework that incorporates considerations such as the existence of transition plans or credible science-based targets from Piraeus customers. Concurrently, the SFF provides a methodology for identifying and capturing potential sustainable opportunities and can serve as a tool to fine tune the Groups exposures towards sustainability related risks. Currently, the SFF is used internally, pending publication.

The Framework covers a range of financing activities including corporate lending, trade finance and consumer lending and all clients of Piraeus Group as well as new clients are eligible for assessment against sustainable financing based on the relevant classification criteria. Piraeus will periodically assess the perimeter of products and solutions offered and in line with the latest developments in the sustainable finance domain (i.e., new products that might emerge, updates in supervisory guidelines etc.).

For the development of the SFF, Piraeus leveraged on already established internal frameworks (e.g., the Green Bond Framework and the Sustainability-Linked Loans Framework) and globally or regionally recognized initiatives, standards, guidelines and market practices such as:

- United Nations Sustainable Development Goals (UN SDGs)
- International Capital Markets Association (ICMA) Guidance
- Green Bond Principles (GBP) 2021
- Social Bond Principles (SBP) 2021
- Sustainability-Linked Bond Principles (SLBP) 2023
- EU Taxonomy Regulation and relevant delegated acts
- EC Recommendation 2023/1425 on facilitating finance for the transition to a sustainable economy.

Sustainability Linked Loans Framework

As part of its strategy for supporting the sustainable development of the Greek economy, Piraeus Bank established its Sustainability-Linked Loans (SLL) framework in 2024 with the aim of supporting borrowers in their transition to a low-carbon economy and advancing positive social impact. Sustainability-linked loans are financial instruments that incentivize corporate clients to achieve agreed targets that improve their ESG performance. These targets must be clear, measurable, material, and aligned with the client's overall sustainability strategy and action plan.

The framework promotes positive impacts and assists in capturing opportunities in relation to climate change mitigation, adaptation and energy sub-topics. Furthermore, the Sustainability-linked loans can be used as a method to advance the Bank's targets for transition financing and for managing potential negative impacts and risks related to Climate Change. The framework is structured along five key pillars:

- The approach of potentially eligible corporates
- Identification of Key Performance Indicators (KPIs)
- Calibration of Sustainability Performance Targets (SPTs)
- Verification
- Financial incentives

Green Bond Framework

In order to attract funding that will facilitate the direction of capital towards green activities, Piraeus published its inaugural Green Bond Framework in September 2021. In 2024 the Green Bond Framework was updated to reflect the latest market practices, Piraeus' sustainable strategy and regulatory developments such as the EU Taxonomy and the EU Green Bond Standard. The Green Bond Framework defines types of green financing that promote positive climate change mitigation and energy related impacts, as well as capturing potential opportunities. Furthermore, through the increase in green financing the Framework facilitates the mitigation of the relevant negative impacts and management of climate- related risks. Piraeus at its discretion will use an amount equal to a Green Bond's net proceeds to finance or refinance, in whole or in part, new or existing Eligible Green Assets, that have been specifically selected in accordance with the Eligibility Criteria as outlined in this Framework.[4]

ESG Investment Policy

Building on the Group's objectives for sustainable investing, the ESG Investment Policy integrates environmental, social, and governance factors into investment and financing decisions, ensuring that climate-related risks and opportunities are systematically evaluated when allocating capital or advising clients. This Policy ensures that climate-related risks, such as exposure to high emitting sectors and vulnerability to physical climate impacts, are assessed, while identifying opportunities to finance the energy transition and support client resilience.

4. *www.piraeusgroup.gr/-/jssmedia/Project/Piraeus/PiraeusBank/shared/Files/Holdings/esg/Piraeus-Green-Bond_May2024.pdf*

Sustainable Finance Disclosure Regulation (SFDR) – related Policy

The SFDR Policy outlines the integration of sustainability risks into investment decisions. Piraeus Group aligns with SFDR Article 4 by identifying and disclosing Principal Adverse Impacts (PAIs) and reporting annually on mandatory and selected indicators. The Policy relates to the promotion of positive impacts and the management of negative impacts related to climate change mitigation, adaptation and the relevant biodiversity risk.

More details on the abovementioned policies in line with the ESRS Minimum Disclosure Requirements on Policies can be found on section "1.5. Group Policies – Minimum Disclosure Requirements - Policies (MDR-P)" of the ESRS 2 chapter.

2.1.2.2. Actions and resources in relation to climate change policies [E1-3]

Piraeus' climate strategy focuses on reducing its own carbon footprint, while actively supporting Greece's transition to a low-carbon economy. This strategy involves two key priorities: reducing emissions across its own operations and portfolios, and channeling significant financing toward green and sustainable projects. Through initiatives such as promoting renewable energy investments and energy efficiency upgrades, the Group aims to help businesses and households to adapt to climate change.

In this context, Piraeus has committed up to € 7.1 billion in sustainable financing by 2030, reinforcing its role as a catalyst for decarbonization and resilience in the Greek economy. These plans are part of its regular business planning cycle.

Due to the nature of financial services activities, the Group's interventions mainly focus on actions related to the downstream value chain and its clients. Capital expenditures (CapEx) and operating expenses (OpEx) are related to the Bank's actions at achieving the goal of reducing its own activities' emissions. However, these are not considered material to the core financing and investing activities of the Group and therefore are not disclosed in detail in the 2025 Sustainability Statement.

The table below includes key actions taken by Piraeus regarding both own operations and value chain:

Table 19: Actions related to Climate Change | Decarbonization Actions

Area	Action	Scope	Achieved or/and expected outcome

Pop-up table

Environmental and Energy Management System (EEMS)

Regarding the reduction of Piraeus Bank's operational carbon footprint and improvement of the overall environmental performance in its own used facilities, an Environmental and Energy Management System (EEMS) is implemented across the Bank's administration buildings and branch network in Greece.

Bank's employees are appointed as Environmental Management Coordinators in each Branch and Administration Building to oversee the actual implementation of the EEMS and receive regular training. The EEMS provides an integrated framework to record, monitor, and ultimately reduce the environmental impacts and energy uses associated with the Bank's operations. Energy audits constitute an integral part of the Energy Consumption Monitoring Processes under the Bank's EEMS.

The EEMS is registered under the EU Eco-Management and Audit Scheme (EMAS), a voluntary management tool for evaluating, reporting, and improving Piraeus' environmental performance, and is certified in accordance with ISO 14001:2015 and ISO 50001:2018 international standards for environmental management and energy management, respectively. As part of this certification scheme, the Bank's Environmental Statement is compiled annually and in compliance with the EMAS regulation. The Environmental Statement is verified by an external auditor and submitted to the relevant department of the Ministry of Environment and Energy.

Key actions in the context of the Environmental and Energy Management System (EEMS)

In 2025, Piraeus Bank implemented a series of actions contributing to the effective management of its operational carbon footprint. Main energy-related and carbon saving actions undertaken are the following:

- 100% of electricity consumed in the Bank's facilities was sourced from Renewable Energy Sources through purchase of guarantees of origin.
- Targeted energy efficiency actions (led lighting, air-conditioning systems, high-performance aluminum frames) in 9 branches exceeding the annual energy consumption threshold of 150 kWh/m², with the aim being to ensure that by 2028, 96% of Piraeus' branch network will be qualified as low-carbon branches (annual energy consumption of up to 150 kWh/m²).
- Conversion of 125 branches to New Branch Models (NBM) with energy interventions implemented (LED lighting, air conditioning) in 5 branches.
- Energy-Efficient LED lighting upgrades across 7 branches.
- Improvement to air conditioning and heat recovery ventilation systems across 15 support function sites (branches and administration buildings), including the replacement of carbon-intensive sources (heating oil) in 6 branches.
- Actions for LEED and WELL Health & Safety certification for 2 Piraeus's buildings.
- Annual increase in the portion of hybrid, plug-in, and electric cars in the company fleet from 34 to 47%.
- Installation of additional chargers for electric vehicles in 2 central buildings.

Piraeus is committed to continue improving its energy efficiency across its own operations, in tandem with the aspiration to achieve net zero emissions concerning the operational footprint aspect.

Solid Waste Management

Solid waste management is directly linked to Scope 3 – Category 5 – Waste Generated in Operations. This category covers the indirect GHG emissions arising from the treatment and disposal of waste produced by the Group's own operational activities. Actions that reduce the volume of waste generated, affect the associated Scope 3 – Category 5 emissions.

Solid waste generated from the activities of Piraeus Bank mainly includes:

- Paper
- Ink and toner cartridges
- Materials from electrical and electronic equipment, which are managed through environmentally appropriate processes (including plastic, aluminium, heavy and other metals, and glass)
- Household waste

Recycling bins for paper, ink cartridges, batteries and light bulbs are installed across the Bank's buildings, and structured recycling programmes are implemented at all facilities. In addition, packaging recycling is applied in the cafeterias of selected large administrative buildings.

Within the framework of the "New Ways of Working" (NWoW) project, recycling infrastructure is being progressively expanded to include plastic, glass and metal, further strengthening waste segregation and recycling practices.

Piraeus Bank launched in 2025 a plastic reduction initiative, raising employee awareness, replacing single-use plastics, and upgrading water coolers with advanced purification systems. The estimated savings are 8.5 tonnes of plastics/year.

Paper/Toner Consumption

Paper and toner consumption is associated with Scope 3 – Category 1 – Purchased Goods and Services and Scope 3 – Category 5 – Waste Generated in Operations. Under Category 1, emissions arise from the upstream supply chain of paper and toner. Therefore, responsible procurement and reduced consumption affect the emissions reported in this category. Under Category 5, reduction of paper and toner leads to less waste generated, which in turn reduces the emissions associated with the treatment and disposal of this waste.

The environmental impact of paper consumption is second only to electricity consumption across the Bank's operations. Supplies of all paper consumables, newspaper subscriptions, and paper used for marketing purposes are systematically recorded on an annual basis. In particular:

- Printing paper (A3, A4 and A5 formats) needs were covered almost exclusively from environmentally certified paper, while all paper used for marketing purposes was FSC-certified.
- In 2025, total paper consumption amounted to 364 tonnes, of which 97% was environmentally certified or FSC-certified.
- Paper consumption decreased by approximately 14.4% compared to 2024, reflecting the implementation of paper-saving initiatives and the increased use of digital workflows across the branch network, including remote signing, e-signature services and the electronic delivery of contracts and offers.

In addition, in 2025, more than 2,800 items of printing consumables (toners, ink cartridges, etc.) consisted exclusively of refillable cartridges.

Paper and Ink Saving Initiatives

Piraeus Bank implements a range of initiatives to reduce paper and ink consumption and support resource efficiency across its operations:

Paperless cashier: The implementation of paperless cashier processes has enabled a share of front-desk transactions to be completed without printed documentation.

e-Signature: Electronic signature services for documents and contracts have been available across branches since 2016, significantly reducing the need for printed paperwork.

Managed Printing Services (MPS): With the installation of 420 MPS devices across 23 administrative buildings, the printing of a significant number of pages is prevented through controlled and optimized printing.

ATM transactions: Through the activation of the "no receipt printing" option on ATM screens, paper consumption associated with self-service banking is reduced.

Piraeus e-banking (former "winbank") services: The use of digital banking channels (Easypay machines, Internet, Phone and Mobile Banking) contributed to substantial paper savings by replacing paper-based transactions.

Paperless bank account statements: Since the introduction of electronic statements in 2021, it is estimated that approximately 22 tonnes of paper, equivalent to around 530 trees, are saved annually.

Water consumption

Water consumption is associated with Scope 3 – Category 1 – Purchased Goods and Services and Scope 3 – Category 5 – Waste Generated in Operations. Reducing water consumption leads to lower upstream emissions reported in this category. Under Category 5, water use influences the amount of wastewater generated, and consequently affects the indirect emissions linked to the treatment and disposal of operational wastewater.

In 2025, total water consumption decreased by 8% compared to 2024, while the water consumption intensity per employee declined by 6%, reflecting improved resource efficiency.

Environmental awareness and employee training

In 2025, Piraeus Bank strengthened environmental awareness and internal capacity through targeted training initiatives. In this framework, newly appointed Environmental Management Coordinators completed an interactive e-learning program on EMAS and the Environmental and Energy Management System. The training aimed to promote key environmental concepts, raise awareness of the Bank's environmental initiatives, and actively support Coordinators in fulfilling their role.

Annual environmental management competition

For 14 consecutive years, Piraeus Bank has implemented the annual environmental management competition "Green Behaviour Wins!", designed to enhance the Bank's environmental performance and foster a culture of sustainability among employees.

The initiative incentivizes reductions in the Bank's environmental footprint by promoting effective recycling practices—covering paper, batteries, and ink cartridges/toner—as well as energy-saving actions

across operations. Each year, Environmental Management Coordinators and employees from 12 branches and three administrative buildings demonstrating the strongest performance are recognized with symbolic, environmentally themed awards, reinforcing employee engagement and environmental awareness.

Transition to a Low Carbon Property Portfolio

Trastor systematically invests in energy efficient and environmentally responsible buildings that align with international sustainability standards. Since 2021, Trastor has achieved four (4) LEED certifications, three (3) of which at Gold level, as well as two (2) BREEAM certifications rated at least Very Good, demonstrating its strong commitment to reducing its environmental footprint and promoting sustainable operating models. These certifications reflect the application of high standards in key areas such as energy efficiency, responsible natural resource management, indoor environmental quality, and the well being of building occupants.

This strategy is reflected in measurable outcomes within the Company's portfolio composition. In 2025, green buildings represent 18% of total GAV, a share expected to double in 2026. This progression confirms the systematic integration of ESG criteria into Trastor's strategy and its shift toward a portfolio with higher energy performance, lower environmental impact, and long term value creation.

At the same time, Trastor continues to expand its green investment program, aiming to further increase the percentage of Green GAV and to obtain additional LEED and BREEAM certifications in the coming years. Through this targeted strategy, the Company strengthens the resilience of its portfolio, mitigates climate related and operational risks, and reinforces its position as a leader in sustainable real estate in Greece.

Climate Risk Management

Aligned with its Climate and Environmental Risks Management Policy, Risk Appetite Framework, Credit Policy and Sustainability Policy, Piraeus implements a series of ongoing actions to manage climate-related & environmental risks and mitigate actual and potential climate impacts. The actions outlined below primarily target the downstream value chain, having a focus on lending activities.

Environmental & Social Management System (ESMS)

Piraeus' climate and environmental risk assessment is embedded into its core lending processes through the Environmental & Social Management System (ESMS) for each transaction. The Bank evaluates every new financing for climate or environmental risks and classifies the exposure utilizing dedicated tools. Following the Exclusion List, ESMS evaluates the environmental and social risks of each proposed financing by deploying a structured due-diligence questionnaire. Based on borrowers' responses and supporting documentation, each transaction is classified into one of three risk categories: High, Moderate, or Low.

The outcomes of this assessment determine the depth of analysis and the level of risk mitigation required. Low-risk transactions require a basic verification of the client's environmental & social (E&S) behavior, including a review of any past environmental violations or controversies. Moderate risk cases require a more detailed assessment, while High risk transactions trigger enhanced due diligence, including third-party assessments, and development of corrective time-bound action plans.

Exclusion List

At the foundational level of its climate risk management framework, Piraeus Bank applies an Exclusion List screening process to ensure that financing is not extended to activities fundamentally misaligned with the Group's sustainability commitments and climate objectives. This process serves as the first line of defense in managing exposures that conflict with the Bank's decarbonization commitments, alongside other environmental and social objectives.

The Group does not provide credit facilities to companies operating in sectors included in the Exclusion List according to the ESMS, except for certain sectors (i.e., tobacco, alcohol) where the Group's cumulative exposure does not exceed 5% of the total loan portfolio. Piraeus has enhanced its exclusion list, committing to:

- Zero new investments in new coal mines or/and expansion of existing mines.
- Zero new investments in electricity production from coal.
- Zero financing to customers with income from the production of electricity by burning coal, unless there is a diversification strategy with a transition plan to sustainable fuels and a commitment to a reliable, time-bound exit plan from the production of electricity by burning coal.

In addition, for activities within environmentally protected areas (e.g., Natura 2000 Network), rigorous due diligence is applied.

Obligor Assessment

Furthermore, an assessment of climate risks is conducted at borrower level by incorporating ESG considerations into the credit evaluation process. This involves the use of internal climate risk rating tools identifying both physical and transition risks specific to the borrower's operations.

Piraeus uses Climabiz 2.0, an internal tool to quantify the effects of the physical-chronic and transition risks on business borrowers, through a bottom-up approach and derive a climate risk impact of the counterparty, which is then aggregated at a sectorial level. The Climabiz 2.0 tool takes into account the borrower's industry and geography (using sector-based Typical Units linked to NACE codes) to model both physical climate risks and transition risks. It then estimates the potential financial impact of these climate risks on turnover and sector resilience.

Client Engagement

Piraeus is actively engaging with high-emitting clients, in order to understand their decarbonization goals and facilitate the transition to a low-carbon economy. The Group aims to support its clients in the development of their transition plans and to provide sustainable financing solutions. The continuous engagement which Piraeus conducts is in line with the aspiration of the Group to align emissions from lending activity with a net zero trajectory.

Commitment to Sustainable Financing

As part of its sustainability strategy, Piraeus Group promotes responsible and sustainable banking by adopting ESG criteria and supporting its customers in transitioning to a low-carbon economy. In this context, specific products and solutions have been developed to support its clients' sustainability transition. Key actions of Piraeus Group are mentioned below:

Sustainable Financing for Businesses

As part of its strategic response to climate related risks and opportunities, Piraeus has developed sustainable financing solutions that directly support the decarbonization of the Greek economy. These actions are structured around two core pillars: Energy Efficiency & Renewable Energy Investments and Green Mobility & Equipment, both of which are aligned with the Group's climate transition objectives.

Piraeus Bank offers a diverse portfolio of financing products designed to accelerate the deployment of renewable energy technologies and improve energy performance across business operations. Piraeus Business Photovoltaic and Net Metering/Net Billing loans provide long-term financing for the installation of photovoltaic systems, while the Repowering and Business Energy Upgrade loans support the modernization of existing infrastructure. To ensure liquidity and project continuity, the Bank also offers working capital solutions for photovoltaic operations and grant discounting mechanisms for RES projects under ESPA (Partnership Agreement for Regional Development) and similar programs. Strategic collaborations with the European Investment Fund, InvestEU Sustainability Loan and the European Investment Bank (EIB Green Loan) further enhance access to capital for green investments. Additionally, the issuance of Letters of Guarantee for green investments facilitates the contractual and financial execution of renewable energy ventures. Complementary leasing solutions for energy efficient equipment and photovoltaic systems allow businesses to preserve liquidity, while advancing their sustainability goals.

Green Mobility & Equipment financing addresses the transition to low emission transport and energy efficient operations. Through the Piraeus Business e-Car loan, the Bank finances the acquisition of electric and hybrid vehicles, including charging infrastructure, enabling businesses to align with evolving regulatory standards.

Furthermore, Piraeus in line with its Sustainability-Linked Loans Framework enables the origination of sustainability-linked loans, which as of December 31, 2025, amounted to c. € 1.1 billion.

For more details on the SLL framework refer to "Policies related to climate change mitigation and adaptation" section.

Recovery and Resilience Facility

Greece's overall Recovery and Resilience Plan budget amounts to € 35.95 billion split into: (a) € 18.22 billion grants allocated to four (4) thematic pillars (Green Transition, Digital Transformation, Employment and Social Cohesion, Private Investment and Transformation) and (b) € 17.73 billion commercial loans to finance investment plans in five (5) thematic pillars (Green Transition, Digital Transformation, Extroversion, Economies of Scale, Innovation). In December 2021, Piraeus Bank entered into an Operational Agreement with the Hellenic Republic to participate in the Recovery and Resilience Facility program, managing the funds and providing co-financed commercial loans to support eligible investments included in the five (5) thematic pillars.

Through this framework, Piraeus has actively supported projects in energy efficiency, renewable energy, and sustainable infrastructure by combining RRF loans with its own commercial lending. The Bank's RRF participation enabled borrowers to access low interest financing with favorable terms. By the end of 2025, Piraeus Bank received more than 404 loan applications, of which 367 can be considered active, representing a total investment expenditure of approximately € 12.8 billion. Piraeus Bank successfully allocated all received financing tranches, and as the terms of the Operating Agreement continue to be met, the Bank aims to secure an additional tranche to expedite the execution of the submitted investment projects.

Agri-Food Center of Excellence

Piraeus holds a leading position in Greece's agricultural lending market, reinforcing its commitment to farmers and agri-food enterprises. To enhance this focus, the Bank established the Agri-Food Center of Excellence, a dedicated team for sector analysis, market monitoring, and the development of innovative, tailored solutions. These include consulting, financing, and guarantee programs that support the agri-food value chain through two flagship initiatives: protected cultivations (greenhouses) and livestock & dairy modernization, delivered through the following pillars: installation of new greenhouse units, modernization and upgrading of existing greenhouse units with new equipment, better genetics lift yield with recording, ID, parentage and elite stock, use of renewable energy sources in greenhouse units, through specialized products for energy autonomy, stronger structures and biosecurity cut disease with climate-controlled barns, fencing and disinfection, and automation and the use of data enhance operational efficiency, optimise production processes, and improve the unit's overall performance.

Another initiative is the "My Agro Greenhouse" insurance product, which provides insurance coverage for greenhouse structure equipment & crops and protects operations against fire, natural events & extreme weather. Additionally, the "Active Protection of Crops" loan support modern irrigation systems and sustainable water management, addressing both physical climate risks and resource efficiency.

"Exoikonomo" and Green Mortgages

In the context of the initiatives undertaken by the Recovery and Resilience Fund, Piraeus Bank was the leading choice for beneficiaries in terms of loan financing under the "Exoikonomo 2021" product, achieving an overall market share of 37%. Furthermore, Piraeus launched within 2025 the "Exoikonomo 2025" and "Energy Exoikonomo-Anakainizo" products.

The aim of the "Exoikonomo" products is to enhance the energy efficiency of Greek householder residences, focusing on financially disadvantaged households through targeted financial criteria. The programs are ongoing and are planned to continue in line with the Recovery and Resilience Fund time plans. In 2025, Piraeus also secured a 39% share in new disbursements of the newly launched "Anavathmizo" energy upgrade program, which finances broader residential renovations. These initiatives not only reduce household energy consumption and emissions but also promote social inclusion by prioritizing low-income beneficiaries. Furthermore, Piraeus offers both fixed and floating mortgages for the purchase, construction or repair of residences.

Piraeus Eco Check

Piraeus Eco Check is a client-centric, digital-first solution that offers Piraeus' customers a free assessment of their property's energy performance directly through the Bank's e-banking platform—an industry first for the Greek retail banking market. By delivering tailored energy-upgrade proposals supported by clear cost-benefit analysis, the tool provides actionable insights at zero cost, enabling customers to make informed decisions about improving energy efficiency of their properties. As it is fully embedded into Piraeus' digital environment, it enhances user engagement while reinforcing the Bank's commitment to ESG-aligned services. As a strategic differentiator, Piraeus Eco Check positions the Bank as a pioneer in combining green advisory with digital banking convenience, strengthening thus both brand equity and investor confidence.

Carbon Footprint Calculator

Piraeus Group offers an innovative tool "Carbon Footprint Calculator" via e-banking and app, which enables its customers to track, compare, and reduce the carbon footprint of their purchases. This tool empowers consumers to understand the carbon footprint associated with their everyday activities. By raising energy consumption awareness, the tool promotes the adoption of more sustainable behaviors, contributing to the reduction of environmental impact.

Issuance of Green Bonds

Piraeus Bank has completed four Green Bond issuances (of which two were completed in 2025 with nominal value of € 500 million each) to date of € 2.15 billion in total, attracting strong investor demand and reinforcing its ESG commitment. The proceeds are directed toward financing and refinancing Eligible Green Assets that contribute to Greece's energy transition and carbon neutrality objectives by 2025, in line with the Bank's Green Bond Framework and the EU Taxonomy.

For more details on the framework refer to "Policies related to climate change mitigation and adaptation" section.

The main green areas eligible for financing are the following:

- Renewable energy power generation
- Green Buildings
- Energy Storage
- Energy Efficiency
- Clean Transportation

"ESG - Do It Yourself" Time Deposit

Piraeus has introduced the "ESG – Do It Yourself" time deposit to support the sustainable economy by channeling client savings into sustainable financing. In this context, the Bank commits to finance, with an equivalent amount, investment projects of small and medium sized enterprises that are expected to deliver a positive environmental and social footprint. The use of proceeds and methodology follows the criteria set out in the Group's Sustainability Linked Loans Framework. This time deposit is designed to promote sustainable development, and offer flexibility and transparency to depositors, thereby enhancing accessibility and customer experience in line with the Group's sustainability ambition.

ESG Data Strategy

Piraeus Group has conducted a comprehensive assessment to identify data & systems areas for improvement related to Climate & Environmental (C&E) risks including areas of data quality, automation and reporting. The assessment was performed by applying a multi-dimensional analysis across processes, systems, use cases and data. A bottom-up approach was followed by initially defining key data pillars and data families and subsequently performing deep-dive workshops for each data family.

For each identified area, Piraeus has determined respective targeted actions, including tactical and strategic solutions. The respective gaps and targeted actions have provided input to the ESG Data Strategy, which has been updated to include additional domains, use-cases and data, as well as a front-loaded 2-year implementation roadmap (2025-2026) with specific initiatives. These have been prioritized based on Piraeus' C&E risks priorities, alignment with its business strategy and with overall market and regulatory developments. Key milestones include the creation and completion of reporting templates, enhancement of the data warehouse (DWH) and datamarts / data repositories (MTII), gap analyses for both properties and counterparties, automation initiatives etc.

The Piraeus Bank Data Governance Framework (DGF), in alignment with the Data Quality Strategy and Data Management ICT Risk Policy, aims to enhance data quality, risk management, and reporting standards, supporting informed decision-making. The DGF sets policies and guidelines, defines the governance structure and responsibilities, and establishes the principles and scope governing data management and reporting across the Group.

2.1.3. Metrics and targets related to Climate Change

2.1.3.1. Targets related to climate change mitigation and adaptation [E1-4]

Own Operations – SBTi Targets

With regards to its own operations, Piraeus Bank has submitted validated SBTi decarbonization targets for the emissions associated with its branches and administration buildings. The target refers to Scope 1 and 2 emissions and is aligned with a 1.5˚C emissions reduction pathway. Its definition was performed in line with the SBTi methodology based on conclusive scientific evidence using the Absolute Contraction Approach. The target refers to Gross emissions and does not include any carbon credits, GHG removals or avoided emissions. The Scope 2 emissions target was measured and set in line with the market-based method.

The target aims to meet the objective of the Group to align its business strategy with the UN Sustainable Development Goals and the Paris Agreement, as outlined in the Sustainability Policy and consider EU's policies for decarbonizing the Union's economy. Internal and external stakeholders were engaged in the process of the target setting, through discussions between different Units including the submission of the target for approval in the context of the business plan process. In setting its targets, Piraeus has taken into account the potential to transition its electricity consumption from non-renewable to renewable sources within its operations.

The KPIs are measured and monitored by the internal Performance & Value Management Unit (PVM), while the governance of the process is managed by Group Financial Management.

As outlined in the table below, the target for 2030 is on track, as the total Scope 1 and 2 emissions from branches and administration buildings amounted to 2,007 metric tonnes CO_{2eq} compared to the 2030 target 2,136 metric tonnes CO_{2eq}. Nonetheless, the Group continues to monitor the relevant target and its performance. The combined target includes scope 2 market-based emissions which were equal to 0 for both 2024 and 2025. Thus, the amounts of emissions for both periods refers to scope 1 emissions.

Table 20: Targets related to Climate Change | Own Operations Targets

Target	Scope of Piraeus Target	Base Year	Baseline Value
Pop-up table			

5. Targets are market-based.

Piraeus Bank Group has also set decarbonization targets for its investments in Real Estate properties, which are incorporated in Scope 1 and 2 emissions. The targets were set and validated in line with SBTi's methodology following a well-below 2˚C pathway and are presented in the form of intensity metrics. They refer to gross emissions and do not include any carbon credits, GHG removals or avoided emissions. The same process regarding their approval and monitoring is applied as in the case of the emissions reduction targets for branches and administrative buildings.

For more details on the methodology, you may refer to the following Portfolio Decarbonization sub-section.

Table 21: Targets related to Climate Change | CRE Investments Targets

Target	Scope of Piraeus Target	Base Year	Baseline Value
Pop-up table			

SBTi Targets

In the context of steering the portfolio's decarbonization, the Group committed to SBTi and submitted 2030 portfolio decarbonization targets which were validated in December 2022. The emissions targets are in line with limiting temperature increase to well-below 2˚C and refer to nine asset classes (including the targets related to Commercial Real Estate Investments presented in table 22). Two distinct methodologies were used, namely the Sector Decarbonization Approach and the Temperature Rating Method, as prescribed by SBTi. The latter estimates portfolio temperature scores based on the Scope 1, Scope 2 and Scope 3 emissions of borrowers and/or investees. It also considers their greenhouse gas (GHG) near or long-term emissions reduction targets, enterprise values, and Piraeus' outstanding amount.

The targets aim to reduce by 2030 (with 2019 as the base year) emissions from lending and investment portfolios, as part of Piraeus' journey to become net-zero by 2050. Piraeus adopted the SBTi methodology as science-based targets provide a clearly defined pathway for financial institutions to reduce greenhouse gas (GHG) emissions, helping prevent the worst impacts of climate change and future-proof business growth.

Internal and external stakeholders were engaged in the process of the target setting, through discussions between different Units and the provision of feedback from the Science-Based Targets initiative. Furthermore, Piraeus engages with large corporates from high-emitting economic sectors to encourage to adopt / emissions reduction targets, where necessary. The KPIs are measured and monitored by the internal Performance & Value Management Unit (PVM), while the governance of the process is managed by Group Financial Management.

The targets set are affected by the ability of the Group's clients to set and implement credible and ambitious decarbonization plans. For that purpose, Piraeus through its wide range of sustainable financial solutions supports businesses and individuals to reduce their carbon footprint. The Group also acknowledges that its access to adequate capital is also an important factor in promoting its climate aspirations. The access to adequate capital is safeguarded by Piraeus' initiatives to issue dedicated Green Bonds and its robust financial performance as highlighted in the 2025 financial results.

Table 22: Targets related to Climate Change | Portfolio Emissions Targets

Description	Scope of Piraeus Target	Base Year	Baseline Value
Pop-up table			

Table 23: Targets related to Climate Change | Portfolio targets TRM

Description	Scope of Piraeus Target	Base Year	Baseline Value
Pop-up table			

It should be noted that the GHG emissions reduction targets have been set with baseline year 2019, considering the context of the reduced economic activities that existed between the years 2020 and 2021 due to the restrictions imposed by the Covid-19 pandemic.

In FY 2025, Piraeus had total GHG emissions (Location-Based) of 24.5 Mt CO_{2eq} of which 42% are covered by the Sectoral Decarbonization Approach and Temperature Rating Method SBTi targets (10.3 Mt CO_{2eq}). With regards to the total financed emissions (Scope 3 – Category 15), the SBTi portfolio targets (c. € 7 billion) correspond to 12% of the total Gross Carrying Amount (€ 58 billion).

Further to the emission reduction targets and in line with the ambition to steer the energy transition of businesses and households Piraeus has set a Green Asset Ratio target. The target refers to the share of

environmentally sustainable activities over the Group's total assets as per the EU Taxonomy Regulation and the relevant delegated acts. Since most of these aligned activities focus on climate change mitigation and renewable energy financing, Piraeus uses this target to track its progress with regards to green transition. Additionally, under its Sustainable Financing Framework for classifying sustainable financing, Piraeus has established a dedicated sustainable financing target. Both of these targets have also been set as Risk Appetite Statements and are managed based on the Group's Risk Appetite Framework.

The definition of targets was a result of internal stakeholder engagement, considering also the feedback received across the interactions of Piraeus Group with the regulatory authorities and investors community and while integrating the overall assumptions of the Business Plan.

Table 24: Targets related to Climate Change | Other Climate-related targets

Description	Scope of Target	Base Year	Baseline Value
Pop-up table			

2.1.3.2. Energy consumption and mix [E1-5]

The energy consumed in the Group's operations primarily comes from electricity, natural gas, district heating, heating fuel and employee business travel. Specifically, Piraeus Bank Group uses electricity across its buildings for lighting, powering electrical and electronic devices, and air conditioning, and in many cases, it is also used for heating. All figures regarding energy consumption are expressed in MWh, utilizing appropriate conversion factors sourced from official references, including the 2006 IPCC Guidelines and the Greek Ministry of Environment and Energy.

The Group's commitment to reduce emissions from energy use is further reflected in how Piraeus Bank sources 100% of its electricity in its branches and administration buildings from renewable sources (purchase of Certificates of Origin).

As the Group has operations in high climate-impact sectors, namely in the real estate sector, a disaggregation is presented in the tables below of the total energy consumption from renewable and fossil sources. It should be noted that Piraeus in FY 2024 and consequently in FY 2025 proceeded with the inclusion of the energy consumed from its investment properties within its own operations.

More details on the calculation of investment properties energy consumption and GHG emissions are provided on "Methodology for estimating the Scope 1 & 2 emissions" sub-section.

Piraeus Bank Group purchased Guarantees of Origin (GOs) from Heron Thermoelectric SA, PPC SA, NRG SA and GBG SNABDEVANJE D.O.O leading to reduced Scope 2 emissions as per market-based methodology. Specifically, a recall was made for 51,717 MWh, confirming that for the specific amount of electricity consumed, the same amount of energy was generated from RES.

Table 25: E1-5: Energy consumption and mix

Metric (MWh)	2025	2024
Pop-up table		

Table 26: Energy Intensity associated with the undertaking's activities in high climate impact sectors

Metric	Unit	2025	2024
Net revenue from activities in high climate impact sectors	Euro (€) million	109	109
Total energy consumption from activities in high climate impact sectors	MWh	255,116	296,913
Energy Intensity	MWh/ Euro (€)	0.00234	0.00272

The energy intensity in high climate impact sectors is based on the net revenue from real estate operations. Net Revenue from real estate operations is presented as part of the Income from Non-Banking Activities and Other Income, which correspond to Notes 9 and 11 of the Annual Financial Statements.

Table 27: Financial statements lines related to net revenue of high climate impact sectors

Financial Statements Line	Amounts in € million 2025	Amounts in €million 2024
Income from non-banking and non-insurance business (Note 9)	95	87
Net other income / (expenses) (Note 11)	(12)	(48)
Total	**83**	**39**
Of which net revenue related to activities in high climate impact sectors	109	109
Of which other net income / (loss)	(26)	(70)

2.1.3.3. Gross Scope 1, 2, 3 and Total GHG emissions [E1-6]

For the calculation of Piraeus Group's total CO_2 equivalent emissions, the following sources of emissions are taken into consideration:

Direct GHG emissions (Scope 1 – S1)

- Consumption of heating oil and natural gas, fuel consumption by company-owned cars, and total of refrigerants replaced/added in the air-conditioning and cooling units, and heat pumps.

Indirect GHG emissions (Scope 2 – S2)

- Consumption of electricity and purchased heat in all buildings and Branches, as well as in the Group's investment properties.
- Piraeus secured Guarantees of Origin (GOs), certifying that specific amounts of electricity consumed in own premises and within the investment properties portfolio was sourced from renewable energy, resulting to reduced Scope 2 market-based emissions. Piraeus Bank sources 100% of electricity in its branches and administration buildings from renewable sources (purchase of Certificates of Origin).
- Furthermore, Piraeus' real estate subsidiary in Serbia, Robne Kuce Beograd (RKB), has secured Guarantees of Origin (GOs) for the total purchased electricity amount.

Other indirect GHG emissions (Scope 3 – S3)

- Purchased Goods and Services (e.g., fixed equipment, courier services, security services, etc.) – Category 1
- Fuel and Energy related Activities (emissions not included in Scope 1 and 2) – Category 3
- Upstream Transportation and Distribution (e.g., furniture, electrical and electronic equipment, archive, etc.) – Category 4
- Waste Generated in Operations (including management/transport) – Category 5
- Business Travel (rental or privately- owned car, air travel, sea travel) – Category 6
- Employee Commuting – Category 7
- Equity Investments (listed equity and unlisted equity) – Category 15
- Mortgages – Category 15
- Commercial Real Estate (loans) – Category 15
- Project Finance – Category 15
- Corporate Loans – Category 15
- Sovereign Debt (sovereign bonds and sovereign loans) – Category 15
- Motor Vehicle Loans – Category 15
- Corporate Bonds – Category 15

No other assurance or verification, other than the assurance received for the Sustainability Statement, has been received for the amounts of total GHG emissions.

Table 28: Total GHG Emissions Breakdown

Retrospective			
Metric	2025	Comparative 2024	% 2025 / 2024
Pop-up table			

Table 29: Scope 1 Emissions Disaggregation

Metric	2025	2024
Direct CO_2 emissions (t) - Scope 1	8,564	10,449
Stationary combustion	6,440	9,057
Mobile combustion	1,372	1,065
Fugitive emissions (Refrigerants)	752	327

Table 30: Contractual instruments (in MWh)

Metric	2025	2024
Contractual instruments used for the purchase of bundled energy with attributes about energy generation in relation to Scope 2 GHG emissions	51,717	48,532
Contractual instruments used for the sale of bundled energy with attributes about energy generation in relation to Scope 2 GHG emissions		
Contractual instruments used for the purchase of unbundled energy in relation to Scope 2 GHG emissions		
Contractual instruments used for the sale of unbundled energy in relation to Scope 2 GHG emissions		

Piraeus Bank Group's PCAF quality score (1 – Best Score, 5 – Lowest Score on Data Quality) stood at 2.7 for the Scope 1 and Scope 2 financed emissions, while for Scope 3 financed emissions the same score is estimated at 2.3. The corresponding shares of financed emissions with PCAF quality scores 1 and 2 are 65% for Scope 1 and Scope 2 financed emissions, and 61% for Scope 3 financed emissions respectively. Piraeus defines PCAF quality scores 1 and 2 as primary data.

Table 31: Categories of financed emissions

Metric	Gross carrying Amount (€ million) 2024	Gross carrying Amount (€ million) 2025
Pop-up table		

For Sovereign Debt Asset Class, the contribution of HAPS exposure in the financed emissions amount is at 27%.

Table 32: Total GHG emissions - GHG emissions intensity

Metric	Unit	2025	2024
Total GHG emissions (location-based)	tCO_2	24,492,566	21,971,972
Total GHG emissions (market-based)	tCO_2	24,495,521	22,008,926
Total net revenue (Total net income as reported in the Financial Statements)	Euro (€) million	€ 2,713	€ 2,757
Intensity (location-based)	tCO_2/Euro (€)	0.00903	0.00797
Intensity (market-based)	tCO_2/Euro (€)	0.00903	0.00798

The GHG intensity is based on the net revenue which is included within the amounts presented below:

Table 33: Net revenue used for calculating GHG intensity

Financial Statements Line	Amounts in € million (2025)	Amounts in € million (2024)

Pop-up table

Piraeus Bank's carbon footprint and key environmental indicators

Within the framework of the SBTi, Piraeus Bank S.A. has established distinct targets for monitoring the carbon footprint associated with its own operations. In addition, the Bank represents the most significant part of the Group's value chain. As a result, it monitors a series of metrics to support actions aimed at controlling and reducing its operational carbon footprint (Scope 1 & Scope 2), as well as tracking emissions across the value chain (Scope 3 – Categories 1–14). The carbon footprint of Piraeus Bank S.A., as well as key environmental indicators associated with Scope 1, Scope 2 and Scope 3 (1-14) categories, are being presented in the table below:

Table 34: Piraeus Bank Carbon Footprint	2025	2024	% 2025/2024
GHG Emissions			

Pop-up table

Intensity metrics involving surface area and employees for Piraeus Bank have been calculated as following:

Surface area (m²): Square meters are the basic unit of surface area measurement and are derived from the average square meters (per month and per year) of all self occupied building facilities of Piraeus Bank.

Employees (#): Refers to the number of staff and other actively employed across all self occupied facilities of Piraeus Bank and is derived from their average number (per month and per year).

Methodology for estimating the Scope 1 & 2 emissions

The Group's Scope 1 GHG emissions derive from stationery and mobile combustion sources, including diesel consumption for heating, natural gas, diesel/gasoline and LPG fuel consumption for business travel by owned/leased vehicles, and refrigerants added to the air-conditioning equipment and heat/cooling pumps. Furthermore, Scope 1 GHG emissions include a significant part of emissions from energy consumption originating from the investment property portfolio of Piraeus.

For the calculation of the Group's Scope 2 GHG emissions, the following sources of emissions are taken into consideration: consumption of electricity in all buildings and branches of Piraeus Bank, owned used properties of Piraeus Bank Group's subsidiaries and all investment properties. The Scope 2 GHG emissions are calculated both under the location and market-based methods, and according to the GHG protocol. Furthermore, under the market-based approach, the existence of Guarantees of Origin (GOs) is considered in the emissions calculation and the most recent publicly available residual mix values are applied (European Residual Mix 2024).

The GHGs included in the calculation of the Group's Scope 1 & 2 emissions are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The following coefficients are used for the calculation of the equivalent CO_2 emissions: 1 for CO_2, 28 for CH_4 and 265 for N_2O (Greece – National Inventory Report 2024).

Regarding other Group subsidiaries, carbon footprint from own operations was calculated centrally by Piraeus Bank's ESG unit based on the relevant consumption data received through dedicated templates.

With respect to Piraeus Bank's operational emissions (Scope 1 & 2), the Ecotracker database was utilized. With the use of the carbon footprint calculation database, Piraeus Bank is intensively monitoring its environmental impact. Other supporting applications applied at Piraeus Bank level include the Energy Office, which, through BMS, measures in real time the energy and water consumption in the Bank's Branches and Administration Buildings, and the Bill Management that feeds EcoTracker with energy data from power providers.

In the absence of actual consumption data for the investment properties and specifically for cases which the data provided from the subsidiaries through the carbon footprint templates was incomplete (not covering all the investment properties), the Group estimated the energy consumption based on an average intensity per square meter derived from the actual data. The conversion to CO_2 equivalent emissions was performed by applying the appropriate emission factors on the estimated energy consumption.

Furthermore, for all other investment properties for which actual data collection was not feasible, Piraeus Group estimated the corresponding emissions using the PCAF methodology and emission factors from the PCAF Building Database. National emission factors for the most recent year have been also used and they are expressed per surface unit (tCO_2/m^2). When the property's square meter (m^2) data were unavailable Emission factors per building category (tCO_2/unit) have been used.

The total calculated emissions have been disaggregated into Scope 1 and Scope 2 location-based emissions based on emission ratios as they estimated from the energy balances for the Residential and Tertiary sectors in the JRC-IDEES 2021—Integrated Database of the European Energy System. Since the IDEES database provides data only for Greece and Romania, the Scope 1 and Scope 2 emission ratios of the aforementioned countries were utilized as proxies for countries not included in the database (Romania for Ukraine and Albania).

Electricity consumption has been estimated based on Scope 2 location-based emissions and the relevant production mix emission factor from DAPEEP for Greece and AIB for Romania. Scope 2 market-based emissions were calculated using electricity consumption and the corresponding residual mix emission factor for each country. Scope 2 emissions are assumed to originate almost entirely from electricity consumption, as most investment properties are located in Greece, where district heating usage is negligible.

Fuel consumption was determined based on the share of each fuel type (LPG, diesel, gasoline and natural gas) in Scope 1 emissions, as derived from the IDEES database energy balances. The corresponding emission factors for each fuel type were sourced from the 2006 IPCC Guidelines and the Greek Ministry of Environment and Energy.

The resulting level of accuracy is lower compared to emissions' calculations utilizing primary data and Piraeus aims to consider alternatives for increasing the data accuracy in the upcoming reporting periods.

Methodology for measuring Scope 3 (1-14) emissions

Piraeus Bank tracks and reports its carbon footprint on an annual basis, using the methodology set out by the GHG Protocol Corporate Accounting and Reporting Standard of the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD).

The necessary data for the calculation of the Scope 3 (1-14) emissions of the Piraeus Bank Group subsidiaries was collected through dedicated templates. For Piraeus Bank, data was collected directly from the responsible Units.

The GHGs included in the calculations of the Group's Scope 3 operational footprint (Scope 3 Cat. 1-14) are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and hydrofluorocarbons (HFCs).

According to a study carried out in 2018 to capture Piraeus' Scope 3 indirect gas emissions, Categories 1, 3, 4, 5, 6 and 7 of Scope 3 (1-14) GHG emissions were assessed as the most related to the Bank's activities and therefore calculated annually.

More specifically:

Category 1 – Purchased goods and services

The calculation of GHG emissions in this category was done in accordance with the GHG Protocol as guidance. To be more specific, the Group used cradle-to-gate emissions factors (DEFRA 2025 conversion factors for specific commodities), as well as GHG emission factors resulting from input-output (Environmentally Extended Input-Output Tables – EEIO) tables at a 2-digit level that provide data on emissions per turnover for countries in scope at a sectoral level. Purchased goods included commodities such as paper, toner and water, whereas purchased services comprised cleaning, health, security, legal and other consulting services, postal and education services, telecommunications, warehousing, printing, as well as supply of furniture and supply / repair of electric equipment. For the calculations, Piraeus leveraged activity data (quantities or expenses) provided through bills, invoices or internal tracking systems (namely Eco Tracker- Environmental / Carbon Footprint Database), that were multiplied by the corresponding emission factors according to relevant LCA for materials or input-output tables (EEIO) for supplied services.

Category 3 - Fuel-and-energy-related activities (not included in Scope 1 or 2)

This category includes emissions resulting from transmission and distribution losses for electricity and the indirect losses from the extraction, production and transportation of other fuels and energy sources, including vehicle fuels purchased and used by Piraeus in the reporting period. To calculate emissions from this activity, Piraeus used LCA emission factors that exclude emissions from combustion, since emissions from combustion were accounted for in Scope 1 (fossil fuels) or Scope 2 (electricity consumption). The upstream emissions of diesel, petrol and LPG were calculated by multiplying the respective quantities by the emission factors from DEFRA 2025. In case of electricity, given that the Bank's and RKB's electricity consumption is fully covered by guarantees of origin, the LCA factor for hydropower provided by Eurostat for Greece (CoM Default Emission Factors for the Member States of the European Union - Version 2022) was used and multiplied by the electricity consumed. For subsidiaries of Piraeus Bank Group that don't use guarantees of origin, upstream EF by country from the IEA (2023), Life Cycle Upstream Emission Factors database were applied. For "T&D losses" subcategory, which is related to emissions from the losses of the electricity transmission and distribution network, the emission factors used were based on the International Energy Agency (IEA) (2023), Life Cycle Upstream Emission Factors database.

Category 4 - Upstream transportation and distribution

In this category, the Group's estimated emissions related to road transportation services provided by suppliers and/or companies collecting and transporting consumables and equipment, such as IT and specific commodities. The methodology used for the calculation of GHG emissions required the determination of the amount of money spent on road transport and the application of secondary environmentally extended input-output (EEIO) emission factors for land transport services sector.

Category 5 - Waste generated in operations

This category includes emissions associated with wastewater treatment, solid waste disposed of via landfilling (except for paper) and recycling (paper), as well as recycled materials. The activity data for wastewater was an estimate (by applying a loss factor to water consumption), and solid waste quantities were calculated based on a typical production per employee in tertiary sector (Eurostat data), by taking into account the avoided waste load due to a reduction in mobility because of working from home which was applied in 2025 among employees. Emissions from wastewater were calculated using estimated activity data, as well as the appropriate emission factor from DEFRA 2025. For solid waste, a weighted emission factor was estimated by assuming a typical solid waste mixture composition for employees in the tertiary sector based on a case study and by applying the respective DEFRA 2025 emission factor per type of material wasted (e.g., plastic, paper, organic etc.) and treated (recycling or landfill). Spent data concerning the transportation of recycled materials were derived through invoices issued by each transportation company. In case of recycled materials, input-output (EEIO) emission factor for land transportation was multiplied by the spend data. The resulting level of accuracy is lower compared to emissions' calculations utilizing activity data, which are currently unavailable for the estimation of the Scope 3 – Category 5 emissions. Uncertainty in measurement arises due to the use of a sector wide average for the amount of waste per employee.

Category 6 - Business travel

Business travel includes air and sea travel, private vehicles and hotel stays (in some cases travel by bus or train also included). Accommodation, air and sea travel activity data (expenses) were obtained by the collaborating travel agency and through the templates received from the Group Subsidiaries. For private vehicles, spend data concerning fuel consumption by type of fuel were extracted by the internal tracking systems of Piraeus Bank (EcoTracker and SAP Concur) and data was collected from the Subsidiaries through templates as well. Piraeus Bank Group "translated" the aforementioned expenses into fuel quantities by applying monthly fuel prices in Greece. Emissions were calcu-

lated based on input-output (EEIO) emission factors for air, water, land transport and accommodation sectors. In addition, emissions from private vehicles were estimated using emission factors by type of fuel according to the latest National Inventory Report for Greece.

Category 7 - Employee commuting

For the calculation of GHG emissions in this category, the results of the latest field survey (2025) among Piraeus Bank's employees at a national level were exploited, in order to determine a typical travel profile for the personnel, by also taking into consideration the reduction in mobility because of teleworking which was applied in 2025. Based on the detailed information available through the field survey regarding the type of vehicle used, its capacity, the distance travelled, as well as the avoided transportation load due to teleworking, a distance-based approach was used for the estimation of Scope 3 emissions in this category. Emissions from all means of transport were calculated using DEFRA 2025 emission factors.

With regards to the categories excluded from the calculations:

Category 2 - Capital goods

Piraeus Group, as a financial services provider, is not a significant purchaser of capital goods with a long lifespan (such as buildings, vehicles, machinery, equipment etc.). It leases many of the capital goods it uses, such as vehicles (corporate vehicle fleet) and photocopiers (Managed Printing Services) and as such, the GHG emissions arising from their use, are generally accounted for in the calculation of Scope 1 emissions or Scope 3 – Category 1 (printing services).

Category 8 - Upstream leased assets

Under the financial control approach of defining our inventory boundary, emissions from all upstream leased assets are included in Scope 1 and Scope 2 emissions.

Category 9 - Downstream transportation and distribution

Due to the intangible nature of financial products and services, we do not require downstream transportation and distribution of a physical product. For this reason, this set of emissions is considered as non-relevant.

Category 10 - Processing of sold products

The Group provides services (and not products), which implies that there is no product that leaves the bank or its subsidiaries requiring processing. For this reason, this set of emissions is considered as non- relevant.

Category 11 - Use of sold products

The reason to consider this category non- material is that Piraeus Bank Group is a financial services provider, and therefore it does not have any manufacturing operations.

Category 12 - End of life treatment of sold products

This category is not relevant to financial institutions. Piraeus group does not sell products that have significant life treatment emissions.

Category 13 - Downstream leased assets

Piraeus Bank Group does not have any material downstream leased assets in the reporting year, so this category is not relevant.

Methodology for estimating financed emissions (Scope 3 – Category 15)

The financed Scope 1, 2, and 3 emissions attributed to the exposures of the Group were estimated based on the Partnership for Carbon Accounting Financials (PCAF) methodology. The methodology comprises two main steps: first the assessment of the Scope 1, 2, and 3 emissions of the counterparties and then the attribution to the Group's financed activities.

Due to data availability, different methodological approaches were applied to estimate Scope 1, 2, and 3 emissions of the Group's counterparties, namely:

Method 1

Published emissions were used, where verified or unverified emissions were collected from the counterparty directly (e.g., through the company's sustainability report) or indirectly via verified third-party data providers (e.g., CDP, EU-ETS Registry, Thetis database). Particularly for the sector H.50 (maritime transport) the Thetis database was utilized, through which each counterparty was linked with its owned vessels based on the respective IMO.

Method 2

GHG emissions were calculated based on primary physical activity data collected from the borrower, applying appropriate emission factors. The method was implemented only for cases where energy consumption data was directly retrieved from the borrower, and for sector D.35.11 regarding power generation companies using renewables (basically included in the Project Finance portfolio). The emissions of all counterparties in D.35.11 that use fossil fuels were estimated under Method 1.

Method 3

GHG emissions were calculated based on economic activity data of the counterparty in question (e.g., total revenues or total assets) and appropriate emission factors expressed per economic activity (e.g., tonnes of CO_2 equivalent per million EUR output of the corresponding sector). To this end, a multiregional input-output analysis was implemented for estimating emission factors per economic activity by utilizing the set of input-output (Environmentally Extended Input-Output Tables – EEIO) tables published by the Organization for Economic Cooperation and Development (OECD). Furthermore, for companies included in the business portfolio of Piraeus (Scope 3 – Category 15 – Corporate Loans) and their activity relates to renewable energy, average emissions factors per euro of assets value were applied, which were derived from statistical data concerning Capital Expenditure (CapEx) and emissions per technology type.

While Methods 1 and 2 are based on company-specific reported emissions or energy data and / or physical activity data provided by the borrower or third-party data providers, Method 3 is based on total output in monetary terms and region - and sector-specific average emission factors, estimated using public data sources such as statistics or data from other third-party providers. Methods 1 and 2 are preferred over Method 3 from a data quality perspective and provide a more accurate emissions view. For Piraeus Bank Group, the use of Method 1 (and Method 2 for D.35.11) was a priority for calculating the Scope 1, 2, and 3 emissions of its counterparties. Consequently, Method 3 was used in cases where no information was available for estimating the counterparties' emissions through the other two methods.

Details on assumptions used in the calculation of the Financed Emissions

Piraeus Group estimated its portfolio emissions in 8 asset classes based on the 2nd version of PCAF standard (2022). At the time when Piraeus Group publishes the Sustainability Statement, the availability of data of the portfolio is limited and this usually creates a 1-year time lag for counterparty data compared to Piraeus reporting period.

Corporate bonds

The calculation was based on either the disclosed emissions of investees or on input-output analysis framework based on input-output (EEIO) tables derived from OECD where companies' published data was not available.

Equity investments

Published emissions of investees were used, or the emissions were calculated based on economic activity data of each company and sector-specific average emission factors expressed per economic activity and based on input-output (EEIO) tables derived from OECD.

Real Estate - CRE (loans)

Two samples were defined in each portfolio, concerning residential and tertiary buildings. The emission factors by building type (tertiary or residential sector) and area for 2023 and Greece or other countries provided in the PCAF Building Database were exploited and the final emissions for this portfolio were calculated by using the area by type of building financed by the Bank.

Mortgages

The methodology approach was the one used in CRE portfolio for residential buildings.

Corporate loans

Published emissions were used for the counterparty directly or indirectly via verified third-party data providers. Particularly, for maritime transport the Thetis database was utilized. For the rest of companies, GHG emissions were calculated based on energy consumption data collected from the borrowers, or economic activity data of each counterparty by utilizing input-output (EEIO) tables derived from OECD. Moreover, for companies with renewable energy activities, customized emissions factors per monetary value were utilized.

Concerning the sovereign debt (bonds and loans) class

Piraeus estimated financed emissions based on the Scope 1 and Scope 2 absolute emissions of the Sovereigns for which exposure exists. The Scope 1 emissions of the countries were derived from the EDGAR (Emissions Database for Global Atmospheric Research) database, which provides globally consistent and independent estimates of GHG emissions for all countries, using a uniform methodology based on IPCC guidelines. It has been developed by the European Commission's Joint Research Centre (JRC) and it provides more timely updated information on national GHG emissions (t-1) compared to the UNFCCC database which includes emissions data reported by countries through their National Inventory Reports. Scope 2 emissions of the countries are linked to domestic consumption of electricity, heat, and steam imported from third countries. These emissions were sourced from the relevant OECD database. Absolute emissions of Sovereigns were proportionally shared to the bank based on the size of its exposure to the country's total value which is related to the value of its output and expressed in Purchase Power Parity-adjusted GDP.

Motor vehicle loans

Emissions were estimated based on vehicle efficiency and fuel type from an average vehicle and vehicle distance travelled derived from national statistical data (JRC-IDEES).

Project finance (regarding projects in operation)

Emissions were estimated for each project based on its capacity, typical load factors and emission factors by type of technology. These emissions were proportionally allocated to the Bank based on its exposure to the project and the nominal CapEx cost per installed KW, according to the technology used.

Sustainable Financing

In alignment with its strategic commitment to sustainable development and climate action, Piraeus Bank continues to scale up its sustainable financing activities, embedding ESG considerations across its lending portfolio.

Table 35: Sustainable financing volumes[6]

Metric	KPIs in 2025	KPIs in 2024
Sustainable Financing volumes (Outstanding Balance)	€ 4.7 billion	€ 3.8 billion
New Sustainable Financing – Total	€ 1.1 billion	€ 1.4 billion
New sustainable financing – Retail	€ 0.3 billion or 27% of Total financing volume	€ 0.1 billion or 7% of Total financing volume
New sustainable financing – Business	€ 0.8 billion or 73% of Total financing volume	€ 1.3 billion or 93% of Total financing volume
Green asset ratio (GAR)	2.46%	2.57%

6. The following metrics are based on the GRI-Financial Services Supplement, FS8: Value of products and services designed to deliver a specific environmental benefit.

2.2. Biodiversity and Ecosystems [ESRS E4]

Nature is crucial to human wellbeing and provides essential ecosystem services that support economic activity. Nature encompasses all living and non-living elements on our planet, forming ecosystems such as forests, lakes and wetlands. These ecosystems provide habitats for numerous species and tangible goods like food, freshwater, timber and medicinal resources. These also maintain environmental balance, for example by regulating air quality, controlling climate and mitigating floods.

In this context, nature-related services are essential for human survival and economic prosperity, constituting the basis upon which human societies thrive. Piraeus Group recognizes the importance of contributing to the preservation of natural capital and aims to take concrete steps to promote responsible practices for its own operations and value chain, with focus on its relationships with clients that are highly dependent on ecosystem services and operate in sectors with nature-related impacts. It acknowledges that Piraeus' counterparties dependencies on ecosystem services and their effects on nature can lead to financial risks over the long term, as climate change and other pressures intensify leading

to ecosystem degradation and biodiversity loss. Furthermore, Piraeus acknowledges the nexus of climate and nature and aspires to connect biodiversity strategy with existing climate strategy.

Piraeus remains committed to solidifying its understanding and advancing the identification and management of the relevant nature-related risks, as market practices and methodologies evolve, data processes are streamlined and tools for financial institutions are improved.

In order to enhance its capabilities and exchange practical considerations, Piraeus Group participates in global initiatives as follows:

- UNEP FI PRB Nature Working Group
- Finance for Biodiversity Foundation (FfB)
- Partnership for Biodiversity Accounting Financials (PBAF)
- European Business and Biodiversity Platform

Based on the results of the Double Materiality Assessment (DMA), Piraeus Group has not identified any material negative impacts related to biodiversity and ecosystems, including impacts related to land degradation, desertification or soil sealing or own operations that intentionally affect threatened species.

2.2.1. Strategy

2.2.1.1. Consideration of Biodiversity and Ecosystems in Strategy and Business Model [E4-1]

Table 36: Biodiversity and Nature-related risks [ESRS E4]

Description	Time horizon

Pop-up table

Piraeus is committed to incorporating nature-related considerations into its risk management processes and business activities, acknowledging the interconnection between nature-related impacts, dependencies and financial risks. This commitment involves implementing measures to systematically monitor both impact and risk perspectives, while enabling sectors in their transition toward sustainable and resilient business models. Guided by its Sustainability Policy, the Group seeks to support the Kunming-Montreal Global Biodiversity Framework for halting biodiversity loss by 2030. The assessment of Impacts, Dependencies and Risks has been conducted for 2025, using corporate exposures data covering the first two quarters of the year.[7]

Building on the foundation established in the previous year through the identification and evaluation of biodiversity and ecosystems related dependencies and risks, Piraeus in 2025 proceeded with the identification and assessment of nature-related dependencies, risks, and opportunities, following TNFD[8] recommendations and best practices by:

- Enhancing the approach for the evaluation of both outside-in and inside-out risks across the short-, medium- and long-term horizons, through the integration of quantitative data, including among others the consideration of geo-spatial factors for the evaluation of transition risks.
- Updating Piraeus' portfolio-wide impact and dependency assessments, leveraging tools and datasets such as the ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure), Aqueduct, ISRIC, GLOBIO, and Exiobase.
- Performing a dedicated analysis of Piraeus' agricultural portfolios, incorporating qualitative scenario assessments of nature-related risks across short-, medium-, and long-term horizons.

The analysis covered the Non-Financial Corporates loan portfolio, the Corporate Bonds portfolio and equity investments (Liquidity and Funding risk), Pledged Loans (Liquidity and Funding risk) and Assets Under Management (Business and Strategic risks). The risk identification process focused on mapping transmission channels through which nature-related risks could affect the Group. In line with priority areas for financial institutions, the assessment of nature-related risks and opportunities concentrated on business relationships across the downstream value chain.

Based on the analysis performed, no material current (short-term) financial effects were identified.

For more details on the nature-related risk identification approach, refer to "1.4. Impact, risk and opportunity management" according to the concept of "Double Materiality [ESRS 2]".

Assessment of Ecosystems' dependency in Relation to Credit, Market, Liquidity & Funding, and Business & Strategic Risks

To evaluate Piraeus' dependencies on biodiversity and ecosystem services, a structured methodology was applied combining sectoral and geographical dimensions. The assessment utilized authoritative sources, including ENCORE (UNEP-WCMC), Aqueduct 4.0 (WRI), ISRIC – World Soil Information, and the GLOBIO model. ENCORE served as the primary framework for mapping economic activities against 21 ecosystem services, excluding cultural services due to their limited relevance and quantification challenges.

Short-term dependency scores were calculated at counterparty level by integrating ENCORE sectoral ratings with localized water and soil data from Aqueduct and ISRIC, aggregated using a quadratic mean on a scale from 0 (Null) to 5 (Very High Dependency). The short-term dependency score for each counterparty was adjusted based on the projected biodiversity shock, assessed through scenario analysis aligned with ECB guidelines. This analysis applied biodiversity intactness projections from the GLOBIO model under an adverse climate scenario (SSP5-RCP8.5). This approach enabled the estimation of biodiversity shocks and their potential impact on financial exposures.

The resulting dependency scores informed the materiality analysis and were complemented by a credit risk quantification methodology based on the guidelines detailed in the ECB's Occasional Paper on Nature-related Financial Risks, ensuring alignment with emerging best practices in biodiversity risk management. This approach was applied consistently across the assessment of the different traditional risk categories.

The results indicate a potential material risk emerging in the long term for Piraeus' credit risk, while exposures related to market, and liquidity & funding risks are not considered material by the Group. Business & Strategic Risk, referring to the potential adverse impact on Piraeus Bank's income streams (interest, fees, commissions) and overall business model due to external changes, is expected to be materially influenced by nature-related dependencies in the medium and long term, as Piraeus Bank's risk profile is projected to include a higher proportion of income exposed to such dependencies.

Assessment of Impacts on Biodiversity and Ecosystems in Relation to Credit, Market, Liquidity & Funding, and Business & Strategic Risks

The impact dimension was evaluated through a two-step analytical process designed to measure the environmental footprint of clients' activities and associated transition risks across short-, medium-, and long-term horizons.

In the first step, short-term impacts were assessed against four key environmental factors (Biodiversity, Pollution, Water Usage, and Waste Production) using a set of KPIs sourced from recognized databases such as the Exiobase, Eurostat, GLOBIO, CDDA[9] Natura 2000, and ESIF. Each KPI was analyzed at counterparty level and classified into impact classes ranging from 1 (Very Low) to 5 (Very High), with thresholds determined through expert judgment and sector benchmarks. In the second step, these scores were projected into medium- and long-term horizons through a notching mechanism that incorporates environmental transition risk considerations. Transition risks include anticipated changes in environmental regulations e.g., stricter EU directives, circular economy targets and biodiversity restoration laws. Transition risks were then translated into potential investment costs (e.g., for waste management, biodiversity) as a percentage of counterparties' revenues. The results indicate that the potential transmission of transition risks (i.e., the effect on counterparties' ability to repay or remain viable) is not material across all time horizons.

Assessment of Impacts and Dependencies in Relation to Operational, Reputational & Litigation Risks

Regarding Operational Risk, given the nature of banking activities, no material dependencies or transition risks were identified. For Reputational & Litigation Risk, Piraeus evaluated potential risks related to greenwashing, regulatory compliance, and litigation. Particular focus was placed on the risk of offering financial products with sustainability labels to counterparties not aligned with sustainability principles, as well as exposure to legal actions or regulatory sanctions for breaching disclosure obligations (e.g., definitions of EU Taxonomy, or transparency and disclosure as per the SFDR, CSRD).

The Bank evaluates litigation risk when offering financial products labeled as sustainable, especially if linked to counterparties not aligned with sustainability principles or involved in sectors causing environmental harm. For greenwashing concerns, both climate-related and non-climate-related factors —such as water use, biodiversity impact, non-GHG emissions, and waste— are considered, since these aspects are typically included in the criteria for defining the Bank's sustainable financial products.

Piraeus made a perspective evaluation of its own Strategic Plan, which foresees an increase in sustainable investment offerings in the medium-to-long-term horizons. The expected increase in volumes amplifies the relevance of this transmission channel with respect to short-term situation and, without robust due diligence and monitoring processes, expanding ESG products portfolios of the Bank can heighten the inherent likelihood of greenwashing incidents, making this risk material. Hence, following the analyses for Greenwashing risk, Reputational and Litigation risk is considered to be materially affected by Nature-Related risks in the medium- and long-term horizon.

To mitigate Reputational risk, the Bank has integrated several processes and controls into its risk management and governance framework.

LEAP (TNFD) Analysis of agricultural portfolio

Furthermore, in 2025, as part of the gradual adoption of the TNFD recommendations, Piraeus undertook a nature related risk assessment applying advanced analytical tools and the LEAP (Locate, Evaluate, Assess, Prepare) approach. The assessment focused mainly on counterparties involved in crop and animal production. More specifically, the assessment highlighted agriculture as a sector with critical dependencies on nature, primarily due to water and land use. Livestock farming, and cereal cultivation were identified as significant contributors due to water use, fertilizers, pesticides, and waste discharge. Soil degradation also emerged as a significant concern, especially for cotton producers whose yields are closely tied to soil nutrient levels. The dependency analysis indicated that agriculture is not only a driver of environmental degradation but also highly vulnerable to nature-related changes. Piraeus' risk assessment for its agricultural portfolio identified four physical risks and nine transition risks, across mainly medium-term (2030), and long-term (2050) horizons. The physical risks identified referred to reduced water availability, soil fertility decline, soil erosion, and a reduced number of pollinators. Transition risks included four regulatory changes (stricter rules on water use, pesticide and fertilizer application, land restoration, and activities near protected areas), two market risks (declining demand for non-organic products and meat/dairy), two liability risks (lawsuits related to water use and pollution), and one technology risk (emergence of lab-grown food products).

Overall, the exercise is a first step of gaining sector specific insights, which Piraeus aspires to incorporate into its plans for monitoring and managing nature-related risks.

7. Interest and fees & commission income as well as corporate deposits are also part of the analysis.
8. Taskforce on Nature-related Financial Disclosures.
9. Common Database on Designated Areas.

Managing Risks and Overall outcomes

Piraeus is well positioned to remain resilient against biodiversity and ecosystem-related risks through the application of a robust risk management framework, diversification of its lending and investment activities, and the implementation of actions to mitigate key risk drivers. The Group has expanded its risk identification process to incorporate environmental and nature-related risk factors, ensuring that issues such as ecosystem degradation are considered in credit risk assessments and long-term scenario analyses.

Additionally, Piraeus has established processes, as outlined in its Credit Policy, that prohibit financing of activities such as those related to:

- companies whose operations impact the UNESCO World Heritage Sites in Greece,
- companies that operate within nature protected areas (e.g. Natura 2000, Ramsar Convention wetlands) without verifying their compliance with all legal and regulatory restrictions,
- fishers that use drift nets over 2.5 km,
- companies producing or trading wood or other forest products that are not included in the Timber Merchants Registry of the competent Chamber of Commerce,
- new investments in energy production from coal/lignite,
- companies with revenues from energy production from coal/lignite unless they have credible and time bound transition plans to sustainable fuels and managed phaseout plans from coal/lignite production.

To minimize their negative effects on the environment and align with the European Union's strategies such as the EU Biodiversity Strategy for 2030, key sectors in Europe, including Greece, must reassess their activities and their environmental footprint. This shift towards sustainable practices poses risks for companies due to new regulations, technological advancements, market dynamics, and reputation concerns. Internal risk metrics and governance structures ensure early identification of potential vulnerabilities, while litigation and reporting risks are managed through established compliance and control mechanisms. As environmental regulations become more stringent, clients operating in sectors with significant biodiversity and ecosystem effects may face reputational pressures and adaptation challenges. To remain resilient, Piraeus integrates sustainability into its business strategy, proactively managing these risks through a combination of governance, financing, and innovation initiatives, including the expansion of sustainable financing (e.g., renewable energy, agri-food transformation, and sustainability-linked loans). By aligning with international standards Piraeus ensures its strategy anticipates regulatory shifts and market expectations, thereby supporting its clients in transitioning to sustainable business models.

2.2.2. Impact, risk and opportunity management

2.2.2.1. Policies Related to Biodiversity and Ecosystems [E4-2]

Through Piraeus Group Sustainability Policy, the Group sets the principles for promoting the protection of biodiversity and ecosystems by financing business activities, in compliance with EU strategic objectives. Piraeus evaluates relevant risks and seeks to develop products and services that promote and strengthen biodiversity and ecosystem services.

In order to practically apply the goal for promoting the protection of biodiversity and ecosystems, Piraeus' Sustainable Finance Framework (SFF) incorporates the criteria that must be complied with, either as per the EU Taxonomy or in line with market practices, when providing financing for sustainable activities. The Framework incorporates both dedicated-purpose and pure players financing for counterparties whose core businesses refer to eligible activities. Additionally, as the SFF aims to promote the funding of EU Taxonomy aligned activities, which in turn incorporate the "Do No Significant Harm" for biodiversity and ecosystems, the sustainable lending provided safeguards the Group against the pertinent risks. This framework relates to the contribution to direct impacts of drivers on biodiversity loss, climate change, and other environmental challenges.

By addressing these areas, Piraeus aims not only to comply with regulatory requirements but to contribute positively to environmental sustainability. The utilization of the SFF is part of the Group's strategy to prevent and mitigate any relevant risks. Furthermore, the Group has incorporated into its Credit Policy an exclusion list, which among others, refers to activities related to trawlers and to protected areas, i.e., Natura 2000 and wetlands listed as per the Ramsar convention. Additionally, Piraeus established its SLL (Sustainability-Linked Loans) framework in 2024 with the aim of supporting borrowers in their transition to a low-carbon economy and advancing positive social impact. The SLL framework links the interest rate of a loan to the client's achievement of specific sustainability targets, such as reducing water usage, improving waste management, or obtaining environmental certifications. The provision of such targets into the loan agreements promotes, among others, environmental stewardship and contributes to the preservation of natural ecosystems.

As Piraeus has not identified any operational sites owned, leased, or managed in or near a biodiversity sensitive area, it has not adopted a specific to own operations biodiversity and ecosystem protection policy. Regarding sustainable land and agriculture, sustainable oceans / seas practices and deforestation, Piraeus Group has no further policies in place than the ones described above.

Details about the policies can be also found in section "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)".

2.2.2.2. Actions and resources related to Biodiversity and Ecosystems [E4-3]

Piraeus Group participates in a wide variety of global initiatives for nature- and biodiversity-related risks. Piraeus has launched specific initiatives and products to address nature-related challenges and opportunities. It is a signatory to the UNEP FI Principles for Responsible Banking and the Finance for Biodiversity Pledge, underlining its public commitment to protect and restore biodiversity. The Group participates in leading coalitions and working groups, such as the UNEP FI PRB Nature Working Group, and Finance for Biodiversity working streams. Through these, Piraeus is actively collaborating on methodologies and future target-setting developments for nature.

As part of its commitment to biodiversity preservation and sustainable agri-food practices, Piraeus Bank has established the Agri-Food Center of Excellence in 2023, which promotes innovative solutions across the agricultural value chain. The initiatives focus, among others, on reducing environmental footprint, enhancing resource efficiency, and supporting climate resilience. Key actions related to biodiversity include:

Installation of New Greenhouse Units: Deployment of controlled-environment agriculture systems to optimize land use, reduce soil degradation, and minimize pesticide application, thereby protecting surrounding ecosystems.

Modernization and Upgrading of Existing Greenhouses: Integration of advanced equipment and technologies to improve energy efficiency and water management, reducing pressure on natural resources and enhancing sustainable production.

Improved Genetic Practices for Livestock: Adoption of better genetics and traceability systems to increase productivity while reducing the need for extensive land conversion, supporting biodiversity conservation.

Enhanced Biosecurity and Disease Control: Implementation of climate-controlled barns and robust biosecurity measures to prevent disease outbreaks, reducing risks of biodiversity loss and contamination of natural habitats.

Automation and Data-Driven Efficiency: Application of robotics, auto-feeding systems, and sensors to optimize resource use, minimize waste, and monitor environmental conditions, supporting sustainable farming practices.

To enable practices in line with its nature-related aspirations, Piraeus Bank (in consultation with the Agri-Food Center of Excellence) has launched collaborative programs and financing solutions that promote sustainable practices and resource efficiency in the agri-food sector. Key initiatives include:

Piraeus Greenhouse (established in 2024): A specialized and integrated financial program tailored to the needs of greenhouse farmers/ investors.

My Agro Greenhouse Program (established in 2020): Provision of insurance coverage for greenhouse structures and crops against fire, natural hazards, and extreme weather events, reducing vulnerability to climate-related risks and safeguarding agricultural ecosystems.

AgriFlex (established in 2025): Service offered to existing and new loan agreements aiming to protect farmers' loan cash flows, by automatically extending loan undertakings, under adverse commodities prices.

In addition, Piraeus Bank offers targeted microfinance programs that enable farmers and agri-entrepreneurs to adopt practices aligned with environmental and biodiversity objectives.

Farmer's Microfinance

This program provides flexible financing for agricultural operations, including livestock units, crop installation, and equipment maintenance. This initiative supports: Immediate liquidity for emergencies, Streamlined application with minimal paperwork, Flexible repayment terms.

By improving financial access, this program helps farmers implement climate resilient and biodiversity friendly measures, reducing pressure on ecosystems and supporting sustainable land use.

Micro-Agri Loans Fund for Agricultural Entrepreneurship

Co-financing in partnership with the Hellenic Development Bank (HDB) for SMEs in agriculture and processing sectors. This initiative promotes nature positive entrepreneurship, supporting projects that integrate renewable energy, efficient water use, and ecosystem protection into agricultural operations.

Key benefits include:

- 100% interest subsidy for the first two years, enabling affordable investment in sustainable technologies.
- Consulting and technical support, fostering knowledge transfer for biodiversity-conscious practices.
- 50% interest rate reduction for the remaining loan duration, incentivizing long-term sustainability.

The activities are ongoing, with no specified time period for their completion. Piraeus plans to further develop detailed actions to manage and mitigate the biodiversity related risks, in line with enhanced insights gained through its sustainability related materiality assessment processes.

Managing risks

The Environmental and Social Management System (ESMS) embeds environmental and social considerations into the core business processes. This framework plays a critical role in managing transition risks linked to biodiversity loss by enabling systematic identification and mitigation of exposures to counterparties whose activities adversely affect ecosystems. Through this approach, Piraeus Bank reduces potential vulnerabilities related to reputational damage, arising from evolving regulations and market expectations. At the same time, the ESMS supports Piraeus Bank in capturing opportunities by channeling financing toward nature positive practices, supporting clients adopt sustainable models while meeting growing demand for responsible lending and strengthening portfolio resilience.

2.2.3. Metrics and targets related to Biodiversity and Ecosystems

2.2.3.1. Targets related to Biodiversity and Ecosystems [E4-4]

Piraeus holds a leading position in Greece's agricultural lending market. To support actions beneficial to nature Piraeus will engage with government, local authorities and businesses in the agricultural sector.

Specifically, Piraeus targets approximately €0.4 billion in total disbursements by 2028 to finance Protected Cultivations (Hi-tech Greenhouses). In 2024 (base year) total disbursements amounted to c. € 15 million (baseline value), while in 2025 the new production amounted to c. € 39 million, in line with the Group's commitment to promote efficiency and innovation in the Agri-Food sector. To deliver this ambition, Piraeus supports investments, including:

- the installation of new greenhouse units,
- the modernization and upgrading of existing greenhouse units through new equipment, and
- the integration of renewable energy solutions through specialized products that can strengthen energy autonomy.

Through these actions, Piraeus aims to support the expansion of greenhouse cultivation in Greece, where the greenhouse base is currently estimated at approximately 8.300 greenhouse units and to contribute to improved resource efficiency and operational resilience in protected cultivations.

The target is monitored by the Performance & Value Management Unit. Its scope covers operations in Greece and the downstream value chain, and it is directly linked to the material opportunity that has been identified.

2.3. Disclosures required pursuant to Article 8 of EU Regulation 2020/852 ("EU Taxonomy Regulation")

Regulatory Framework

In 2020, the European Parliament adopted the EU Taxonomy Regulation, setting out an EU-wide framework -a classification system- that allows investors and undertakings to determine whether certain economic activities are environmentally sustainable. On 4 June 2021 the EC adopted the Commission Delegated Regulation (EU) 2021/2139, establishing the technical screening criteria for the climate change mitigation and climate change adaptation objectives, and on 6 July 2021 the Commission Delegated Regulation (EU) 2021/2178 ("the Disclosures Delegated Act"), which supplements Article 8 of the EU Taxonomy Regulation and specifies the content, methodology and presentation of information to be disclosed by financial and non-financial undertakings concerning the proportion of environmentally sustainable economic activities in their business, investments or lending activities. On 15 July 2022, a Complementary Climate Delegated Act was released in the Official Journal of the EU, including, under strict conditions, specific nuclear and gas energy activities in the list of economic activities covered by the EU Taxonomy. Sequentially, in November 2023, the Delegated Act for economic activities was published in the Official Journal of the EU contributing to the four additional environmental objectives for: sustainable use and protection of water, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. Further amendments were incorporated to add economic activities to the list of those substantially contributing to the objectives of climate change mitigation and adaptation, and to clarify the reporting obligations for the additional four environmental objectives.

On 8 January 2026 the Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 was published in the Official Journal of the European Union, which amended the Disclosures Delegated Act, as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives. According to the latest amendments, new simplified EU Taxonomy Templates were introduced together with amended criteria regarding the applicable perimeter of financings and investments.

Although the Commission Delegated Regulation (EU) 2026/73 is applicable from 1st January 2026, to avoid undue costs of compliance with the amendments laid down in this Regulation as per paragraph 23, Piraeus Group, opted to apply Delegated Regulations (EU) 2021/2178, (EU) 2021/2139 and (EU) 2023/2486 as applicable on 31 December 2025 for the 2025 financial year. In the Financial Year 2026 disclosures, Piraeus Group will apply the amended templates and criteria as appropriate.

The EU Taxonomy is a cornerstone of the EU's sustainable finance framework and an important market transparency tool. It helps direct investments to economic activities most needed to meet the European Green Deal objectives. Taxonomy is a classification system that defines criteria for economic activities that are aligned with a net zero trajectory by 2050 and broader environmental goals over and above climate change.

A key indicator of alignment is the Green Asset Ratio ("GAR") which enterprises must disclose from 2024 onwards. For credit institutions specifically, GAR is defined as the proportion of its assets invested in Taxonomy-aligned economic activities over its total covered assets. An economic activity is considered as Taxonomy-aligned when it satisfies all three conditions below:

- makes a substantial contribution to at least one of the six environmental objectives,
- avoids negative effects on the other five objectives (Do No Significant Harm, "DNSH"), and
- respects minimum social safeguards.

On the other hand, an economic activity is considered Taxonomy-eligible, if it is described in the EU Taxonomy Regulation, regardless of whether it satisfies the above conditions.

Basis for GAR Calculation, Data Sources & Limitations

The GAR is calculated based on the on-balance sheet exposures (total covered assets) according to the prudential scope of consolidation for the types of assets and accounting portfolios specified in the Disclosures Delegated Act. Credit institutions are required to disclose the aggregate GAR for on-balance sheet covered assets, a breakdown for the environmental objective pursued by environmentally sustainable assets, the type of counterparty, and the subset of transitional and enabling activities.

The disclosure requirements commenced in 2021 and initially focused on Taxonomy eligibility and respective ratios. Starting from the financial year 2023, the disclosures included information and respective KPIs on Taxonomy alignment, over and above eligibility. From financial year 2024 and onwards, financial institutions shall disclose information on:

- the eligibility & alignment of economic activities with the environmental objectives of Climate Change Mitigation and Climate Change Adaptation,
- the eligibility & alignment of activities related to Nuclear Energy and Gas,
- the eligibility of economic activities with the following environmental objectives: sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and the protection and restoration of biodiversity and ecosystems.

It is noted that, under the applicable regulatory framework, exposures to counterparties not subject to the Non-Financial Reporting Directive (NFRD)—including companies based outside the EU and most SMEs within the EU—are currently excluded from the numerator of GAR KPIs. This structural aspect of the GAR results in significant variations depending on each bank's business model, customer base, and geographic presence.

In line with the applicable regulatory framework, Piraeus Bank Group followed an adequately conservative approach, refraining from recognizing Taxonomy alignment in cases where all regulatory requirements (including technical screening criteria and DNSH) were not fully met. In particular:

- For financings with unknown use of proceeds, the disclosures of the Group's clients subject to the NFRD were utilized to assess the eligibility & alignment of relevant exposures. Non-financial corporations were required to disclose KPIs—in terms of turnover, capital expenditure (CapEx), and operating expenses (OpEx)—in their management reports for the first time at the end of the 2022 fiscal year. As of 2025, counterparties' disclosures included information on the alignment of their activities with other environmental objectives as well (i.e., beyond Climate Change Mitigation & Climate Change Adaptation).
- For financings with known use of proceeds, alignment with the EU taxonomy is assessed considering all the requirements established by the technical screening criteria of EU Taxonomy regulation.

The Group is committed to continuously improving its processes and enhance the availability of data and its frameworks and processes to upgrade its reporting scope according to the EU Taxonomy.

The following table presents summary of the key ratios related to the EU taxonomy as of the end of 2025. It should be noted that in November 2025 Piraeus Bank fully acquired Ethniki Insurance. The new entity was fully consolidated in the Sustainability Statement for December 2025. For the purposes of the EU Taxonomy templates, Piraeus Bank treated Ethniki Insurance and its subsidiaries prudentially and consolidated them under the accounting equity method. In order to identify the eligibility and alignment ratio of Ethniki Insurance investments:

- A thorough review was conducted across the subsidiary's Amortised Cost, OCI (Other Comprehensive Income), and FVTPL (Fair Value Through Profit or Loss) portfolios to identify investments relevant to the EU Taxonomy.
- For the application of the EU Taxonomy disclosures of the instruments deemed as relevant for the EU taxonomy templates, data was retrieved either directly from the official disclosures of the entities or from third party providers.
- Applying the EU Taxonomy eligibility and alignment disclosures on the balances of the applicable investments, the absolute eligibility and alignment amounts were calculated.
- Subsequently, a proxy of Ethniki Insurance covered assets was calculated by excluding investments to sovereigns. This proxy was used to derive implied eligibility and alignment ratios.
- Finally, these implied ratios were applied to the Gross Carrying Amount of Ethniki Insurance and its subsidiaries, aligning with the prudential consolidation approach.

Table 37: Summary of KPIs

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

Pop-up table

The Group's total GAR based on turnover amounted to 2.46% of total covered assets, and total GAR based on CapEx was 3.87% of total covered assets as at year-end 2025. Both ratios reflect the alignment of the Group's exposures referring mainly to the two climate-related objectives (climate change mitigation and climate change adaptation) of the EU Taxonomy.

The Group's aim is to gradually align its objectives to be consistent with the EU Taxonomy. Our sustainable finance proposition will be to support our customers' transition, incorporating in the relevant processes the definitions and criteria of the EU Taxonomy.

Appendix C (which is included in the 2025 Annual Financial Report) presents the reporting templates in accordance with Delegated Regulation (EU) 2021/2178, Annexes VI and XII.

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Social Information



3. Social Information

3.1. Own Workforce [ESRS S1]

3.1.1. Strategy

Piraeus Group places its workforce at the center of its sustainability strategy, recognizing that employee well-being, engagement, and development are critical to long-term resilience and value creation. In line with international standards and stakeholder expectations, the Group is committed to fostering secure, fair, and inclusive working conditions, ensuring respect for human and labor rights across all employment types. Through comprehensive policies and effective initiatives, Piraeus promotes health and safety, work-life balance, continuous learning, and equal opportunities, while actively engaging employees in dialogue and decision making. In this way, the Group works to cultivate a sustainable and supportive workplace that strengthens both people and organizational adaptability.

3.1.1.1. Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model [SBM-3]

The Group's overall approach revolves around developing an ethical culture, first and foremost through the alignment of its activities and its people behavior with the applicable Code of Conduct. Furthermore, the commitment to an ethical working environment is promoted by the adoption of policies that integrate the principles of accountability, meritocracy and transparency. Indicatively, such policies refer to the selection and promotion practices, inclusion and diversity principles and measures against discrimination, violence and harassment. Piraeus also offers the necessary communication channels for its people to raise their concerns and communicate matters in line with the Group's anti-retaliatory framework.

Table 38: Piraeus' Positive Impacts to its Own Workforce [ESRS S1]

Positive Impact	Activities that result in the positive impact

Pop-up table

The scope of actions and activities related to the positive impacts applies to all employees of Piraeus, encompassing permanent, temporary, full-time, and part-time staff.

Regarding the potential financial impacts of sustainability-related workforce matters on Piraeus, these stem from the organization's inherent dependency on its workforce and the importance of implementing effective policies and practices that support talent retention, workforce rejuvenation, and employee well-being. Ensuring the consistent application of these frameworks is key to maintaining organizational continuity, adaptability, and productivity. While retaining high-potential employees relies on the effectiveness of existing policies across the entire workforce, attracting younger professionals is essential for sustaining a diverse and future-ready talent pool. Additionally, meeting growing expectations around well-being, job satisfaction, and competitive remuneration supports engagement and helps Piraeus remain aligned with market standards.

Addressing these dependencies is essential for building resilience and creating long-term value for customers, investors, and society. Further details are described in section "1.3.3. Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]". Concurrently, Piraeus has identified strategic opportunities related to own workforce. By investing in new ways of working & digital adoption, Piraeus seizes the opportunity to embed digital innovation and continuous learning into the employee experience. This empowers the organization to leverage digital technologies more effectively in serving its customers and responding to evolving expectations in a cost-efficient and productive manner.

To leverage this opportunity and address workforce-related dependencies, Piraeus has implemented a comprehensive set of initiatives:

Modernization of Work Practices: The Group supports flexible and hybrid work models, including teleworking, enabled by secure digital infrastructure and collaboration platforms.

Continuous Learning and Upskilling: Employees are provided with access to a wide range of digital learning and development programs, including e-learning platforms, targeted training for digital skills, and specialized upskilling for new technologies. The Group emphasizes continuous learning as a core part of the employee experience, ensuring staff are equipped to adapt to technological change.

Leadership development: A major learning initiative is the Leaders Excellence Hub program, started in 2024 and continued throughout 2025, designed to empower leaders across all organizational levels with the mindset and toolset needed to navigate complexity, embrace change, inspire teams, foster a culture of trust and innovation and deliver sustainable impact for the organization. It offers a structured, top-down approach that combines advanced leadership frameworks and experiential learning featuring modules on growth mindset, psychological safety, inclusivity and modern leadership practices.

Promotion of Digital Adoption in Daily Work: Employees are encouraged to use digital tools for collaboration, communication, and project management, fostering a culture of digital fluency and adaptability. Towards this purpose, the Digital Core training program was designed and launched in 2025 for all employees of the Bank. This strategic initiative aims at advancing the organization towards digital literacy and fostering a unified digital culture. Aligned with the EU DigComp framework, the program delivers a comprehensive curriculum over 14 hours through a blended learning model that combines micro-learning, e-learning, and instructor-led sessions. Its objectives include enhancing proficiency in Microsoft 365 collaboration tools, improving data management practices, and embedding cyber-safety and responsible AI principles to ensure secure and ethical technology adoption. Completion is validated through formal assessment and certification. The 1st cycle of the program was delivered in November 2025 to 953 participants who completed the programs and accounted for 20,631 training hours.

Alignment to new frameworks and regulations to meet governance and compliance standards: To fulfill this requirement, a new program has been developed and assigned to all employees within the framework of the Digital Operational Resilience Act (DORA), a European regulatory act established for the financial sector within the European Union. The program aims to ensure a comprehensive understanding of the Regulation's requirements and the Bank's obligations, while promoting familiarity with processes and tools for managing digital threats and crises. It also focuses on developing skills for identifying and mitigating digital and operational risks and fostering effective collaboration with the Bank's responsible Units. The e-learning program was completed by 5,532 employees of Piraeus Bank up to 31 December 2025 and is still available to all employees to study and refer to.

Furthermore, by enhancing health & safety and promoting work-life balance initiatives, Piraeus aims to boost employee well-being, increase productivity and enhance effectiveness. These initiatives fully support the creation of a sustainable workplace, aligned with stakeholder expectations and its commitments.

With regards to the Group's own activities, no types of operations or countries at significant risk of incidents of forced labor, child labor, or human trafficking exist. The concentration of the Group's activities within the European Union, which is highly and strictly regulated in the relevant areas, as well as the Groups' commitment to respect Human Rights through internal processes and policies, safeguard its workforce against the aforementioned impacts, and up to date the Group has not identified the need to explicitly incorporate provisions for human trafficking, forced labor and child labor into its existing policies.

Piraeus Group obtains an understanding through the continuous interaction of the Group Human Resources with the Group's own workforce that in its own operations there are no employee categories that may be at greater risk of harm. The understanding is reinforced by the Group's current human capital practices and policies that do not exclude any employee, irrespective of their individual attributes, responsibility level or Unit. Furthermore, Piraeus Group has not identified any particular activities or working context that would lead to a greater risk of harm for individuals with certain characteristics.

3.1.2. Impacts, risks and opportunities management

3.1.2.1. Processes for engaging with own workforce and workers' representatives about impacts [S1-2]

Piraeus Group conducts employee satisfaction & engagement surveys, as well as smaller scale ad hoc surveys, in order to enhance interactive communication and get useful data that can help improve workplace culture. Survey insights help us understand exactly how the Group's employees are feeling, where to direct efforts according to their feedback, and whether those efforts to increase engagement and productivity are effective.

Surveys are used as a means of identifying the areas, regarding the working environment, mostly of interest for Piraeus Group's workforce, and receiving input on matters where further improvement needs to be achieved. Surveys run in the form of online questionnaires and/or personal interviews.

In 2025, the "Together Employee Survey" was conducted, building on last year's extensive satisfaction and engagement survey. Implemented with the support of a third-party provider, the survey provided valuable and actionable insights into employees' experience, engagement, and perceptions. Compared to 2024, the results allow for a more meaningful trend analysis, highlighting areas of progress as well as opportunities for further improvement, and enabling a more focused and data-driven approach to action planning.

The survey highlighted the following areas:

- Overall evaluation
- Engagement
- Alignment
- Management
- Direct managers
- Teamwork
- Recognition/Benefits
- Work conditions
- Diversity, Equity & Inclusion (DEI) & Whistleblowing

The Group Human Resources is responsible for the performance of the surveys and the considerations of their results in Piraeus initiatives. Following the collection and analysis of the survey data, the results were shared with the top management. Subsequently, each unit management are engaged in discussions to ensure alignment on key strengths and areas of improvement.

The participation rate was 82% (vs 75% in 2024), while the engagement rate reached 63% (vs 61% in 2024).

The Group assesses the engagement of its workforce through the response rate of the annual questionnaire as well as by implementing other employee engagement practices and initiatives, such as strategy and team alignment meetings, regular all bank events, monthly activities and utilizing communication touchpoints referring to intranet views, townhalls, 1:1 meetings. In this context, HRBPs (Human Resources Business Partners) play a pivotal role in fostering a culture of engagement, by acting as strategic advisors, bridging the gap between management and employees, ensuring that both parties are aligned with corporate values.

Furthermore, "Breakfast with leaders" initiative creates an open and friendly space for employees to connect directly with the CEO and members of the Executive Committee, strengthen communication, share strategic priorities, and exchange ideas that inspire collaboration and continuous improvement. It also fosters engagement, mutual understanding, and a sense of pride in teams' achievements, while encouraging dialogue on challenges and opportunities for a better workplace.

The "New Ways of Working" (NWoW) project was launched last year to enhance collaboration and flexibility in the workplace. More than 700 employees in Attica buildings have already moved to redesigned spaces enjoying a modern environment that fosters creativity and productivity. The initiative aims to improve employee satisfaction, attract new talent, and reduce our environmental footprint, while ensuring equal access to information and development opportunities regardless of work location. NWoW integrates international best practices and clear guidelines for hybrid work, cultivating a culture of trust and teamwork.

As part of the project, a survey was conducted at the end of 2025 to evaluate the experience of employees in the redesigned workspaces. The survey targeted employees who had moved into the updated spaces by August and was carried out in collaboration with external partner, giving useful insights into improvements.

Employee engagement is also enabled through other channels, which provide alternative direct approaches for communication between Piraeus and its people, enabling the provision of relevant information. For this purpose, the internal intranet offers all employees 24/7 access from any device to operational and business news, articles on the Group's strategy and culture.

The Head of Workplace Culture & Employee Communication is operationally responsible for the level of engagement.

Regarding the engagement with employee unions, Piraeus in line with respect to the legislative framework, continuously seeks to strengthen dialogue with the employee representatives, as this supports the continuous improvement of the working environment. The engagement incorporates both proactive discussions for the identification of areas that could negatively affect the Bank's employees, as well as discussions regarding the evaluation of actions taken and implemented and those to be implemented in the future. In 2025, 31 meetings were performed with the presence of the management team, as part of the regular ongoing consultation to improve communication and collaboration. There are regular monthly meetings with unions where issues, as well as topics that arise from the unions, are discussed proactively and openly.

The responsibility for the level of engagement with the unions lies with the CHRO.

3.1.2.2. Processes to remediate negative impacts and channels for own workforce to raise concerns [S1-3]

Based on the 2025 Double Materiality Assessment no material negative impact has been identified by Piraeus. However, Grievance and complaints handling mechanisms are actively used, with oversights from Human Resources and relevant committees. Employees can raise concerns through dedicated internal channels, including anonymous reporting mechanisms.

In this context, Piraeus has established a comprehensive Whistleblowing Policy, as well as structured processes to address and remedy any negative effects on its own workforce. When incidents such as inappropriate behavior, intimidation, or harassment occur, the Group ensures that they are investigated objectively and resolved through appropriate disciplinary actions. Effectiveness is assessed through case closure oversight and follow-up actions. A formal mechanism, the Whistleblowing Committee, is established to evaluate the received named or anonymous reports. The Committee decides on their reliability and investigation potential, as well as the possible undertaking of further actions.

In 2025, a total of twenty-two (22) complaints were submitted, including one (1) complaint concerning a Group subsidiary abroad and twenty-one (21) reports addressed to the Bank. These reports were submitted through the aforementioned reporting channels [ten (10) of which were anonymous] and were handled by the competent Committees. Eighteen (18) reports were investigated and resolved within the reporting year, while three (3) are expected to be concluded in 2026. Twenty-one (21) of the reported cases concerned inappropriate behaviour, bullying, verbal or physical violence, and abuse of authority, while one (1) case also related to sexual harassment. Appropriate disciplinary actions were assigned to the individuals concerned, with HR Business Partners ensuring diligent oversight of the case resolution process.

Furthermore, Piraeus provides additional channels for its workforce to express its' opinion or communicate specific needs:

Employee Satisfaction & Engagement Survey & pulse checks: Regular or ad hoc surveys (e.g., the "together employee survey" in 2025) allow employees to express their opinion about workplace culture, DEI, and other issues.

Culture & Engagement activities: Initiatives such as "Breakfast with leaders" allow employees to share their ideas and input about working environment and other issues.

Direct Engagement with HR Business Partners: Employees can approach HRBPs for support or to raise concerns, which are then escalated as appropriate.

Employee Unions: Regular monthly meetings with unions provide a formal channel for collective concerns to be raised.

These channels are established by Piraeus and are available to all employees, regardless of employment type or location. The Group supports the availability of these channels through continuous communication, and their integration into the daily practices.

Issues raised are tracked and monitored, with regular reporting and evaluation to ensure the effectiveness of the mechanisms. Stakeholder feedback, including open comments from surveys, contributes to ongoing improvements.

To foster awareness and trust in these mechanisms, the Group provides mandatory training and leverages multiple internal communication channels. Protection against retaliation is a core principle of the Whistleblowing Policy and an integral part of Piraeus' culture, safeguarding all individuals who use these channels, including workers' representatives.

3.1.2.3. Policies related to own workforce - Equal treatment and opportunities for all [S1-1]

For details as per the Minimum Disclosure Requirements for Policies (MDR-P) please refer to section "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)". section.

Human Rights in the workplace

Piraeus is committed to safeguarding and promoting Human Rights by continuously raising awareness, providing training to its people, and establishing the policies, mechanisms and processes necessary to provide a safe and respectful working environment. The Human Rights Policy reflects this longstanding commitment, embedded within and implemented through policies and procedures that ensure its effective application. With that regard, respect for Human Rights is instilled in the organization's policies, such as the Policy on Preventing and Fighting Workplace Discrimination, Violence and Harassment in the Workplace and the Whistleblowing Policy. Channels for raising concerns and processes for remediating any potential negative impacts on employees are also in place.

The Human Rights Policy provides the overarching principles for human resources policies and procedures, incorporating the following:

- Equal opportunities for all employees regardless of sex, race, color, religion, sexual orientation, nationality, physical ability etc.
- Right to collective representation
- Zero tolerance of violence and harassment
- Promoting open communication at work
- Grievance reporting and resolution mechanisms connected with the Whistleblowing Policy
- Confidentiality principle

The Group is committed to upholding international Human Rights standards in its business operations and has been an active participant in the UN Global Compact since 2004, promoting its ten principles regarding human and labor rights, environmental protection, and anti-corruption. Piraeus is guided by the UN Guiding Principles on Business and Human Rights, the ILO Declaration, and the OECD Guidelines for Multinational Enterprises, which are reflected in the implementation of policies and employment practices that are regularly monitored through internal control mechanisms. By integrating these principles into its operations, the Group aims to achieve positive societal and environmental impacts.

Piraeus aims to continuously raise awareness and provide training to its people, ensuring a safe and respectful working environment. Through dedicated agreements, both at the enterprise and sectoral level, with its own workforce, it commits to promoting basic entitlements such as:

- Adequate wages (salary upgrades and allowances)
- Disability allowances
- Parenting benefits and special leaves
- Reskilling and upskilling actions

Policy on Preventing and Fighting Workplace Discrimination, Violence and Harassment

Piraeus acknowledges the responsibility to provide a working environment free from any type of violence or discrimination and thus has established the Policy on Preventing and Fighting Workplace Discrimination, Violence and Harassment to further clarify the relevant definitions, procedures and communication channels.

The Policy has been formally endorsed by the Bank's Union Representatives, reflecting a joint commitment to incorporating the employee voice into its implementation. A representative of the Union also actively participates in the Violence and Harassment Committee, further strengthening employees' representation. The application of the Policy is ensured through systematic awareness and training initiatives for all employees.

Any breach of the principles outlined in the Policy can be reported through Piraeus' Whistleblowing channel. HR Business Partners also play a pivotal role in identifying, investigating, and validating potential misconduct within their areas of responsibility.

The Group is committed to providing a safe, respectful, and inclusive workplace, with zero tolerance for any form of discrimination, and the policy violence, or harassment, including gender-based and sexual harassment. This commitment is reinforced through dedicated training, clear reporting channels, and preventive measures that safeguard employee well-being. By embedding these principles into its culture and operations, Piraeus ensures that fairness, dignity, and respect remain at the core of its employment practices.

3.1.2.4. Policies related to own workforce - Working Conditions [S1-1]

For details as per the Minimum Disclosure Requirements for Policies (MDR-P) please refer to section "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" section.

Code of Conduct & Ethics

The Code of Conduct & Ethics sets the key principles and directions of ethical behavior and integrity. The Code applies to all Piraeus stakeholders and aims at enhancing transparency, open communication and meritocracy, while encouraging actions and behaviors that instill an ethical culture throughout the organization. Its content is directly connected with the Bank's main Policies & Regulations. In addition, it aligns with the Banking Code of Conduct (issued by the Hellenic Banking Association) and the Group Compliance Policy. The Code is accessible to all through the internal communication channels and through Piraeus corporate website.

The Code of Conduct & Ethics is updated whenever required and at least every three (3) years, and it is approved by Piraeus Boards of Directors.

Group Remuneration Policy

The Group's Remuneration Policy is consistent with the Group's corporate strategy, aiming to align the organization's objectives with those of its stakeholders: employees, management and shareholders. The review on a tactical basis of the Policy aims to comply with the current local and European regulatory framework and to ensure Group's regular operation without excessive risk-taking.

The key principles of the Remuneration Policy reflect the most recent regulations in terms of remuneration, including the adherence of variable remuneration schemes to the Group's risk appetite and their alignment with the Group's long-term strategies that incorporate environmental, social and governance (ESG) risk-related objectives. These are linked with the Group's agenda for adding value to all stakeholders, the establishment of a risk-adjusted culture aiming to increase efficiency and simplification, being compliant with internal policies and controls by seeking to avoid conflicts of interest, while promoting at the same time the equal treatment of employees not considering gender, age, ethnicity, disability, or any other characteristic.

The Policy is updated whenever required and at least every three years and it is approved by Piraeus Boards of Directors. For the implementation, responsible is the Head of Total Rewards and People Operations and monitored by the Chief HR and Group Change Officer.

External Employment Regulation

In order to eliminate conflict of interest, the Bank has in place an External Employment Policy for its employees. According to the Policy, each employee of the Group who seeks parallel employment, in the private or public sector, under any employment relationship, either directly or indirectly, either on his/her own behalf or on behalf of any other individual or legal entity, either on pay or not, and pursue any business activity (as employee, member of the management/Board of Directors, shareholder/partner) should get the necessary approvals.

The Regulation is approved and monitored by the Chief HR and Group Change Officer and responsible for the implementation is the Head of Total Rewards and People Operations.

Employment of Relatives Regulation

The regulation on Employment of Relatives defines the stance of Piraeus Group regarding the co-employment of employees who are related by first- or second-degree kinship (by blood or by marriage), in order to avoid conflicts of interest and ensure that no co-employment occurs which could affect the smooth operation of the organization and its principles of responsibility, transparency, and meritocracy.

The Regulation is approved and monitored by the Chief HR and Group Change Officer and responsible for the implementation is the Head of Total Rewards and People Operations

Job Family Model Regulation

The Job Family Model (JFM) is a strategic enabler for the effective development and management of human capital, providing a clear link between roles, organizational capabilities and strategic priorities. Implemented in 2020, the JFM is governed through a dedicated governance framework that ensures alignment with the Group's strategic objectives, consistent and proper implementation, and continuous review and enhancement.

The governance framework defines clear roles and responsibilities and supports informed decision-making in relation to role design, evaluation and evolution across the Group. Through this structured approach, the JFM contributes to fair and consistent people management practices, including career development, internal mobility and reward governance, while fostering transparency, equality and objectivity.

The Regulation is approved and monitored by the Chief HR and Group Change Officer and responsible for the implementation is the Head of Total Rewards and People Operations.

Staffing Policy

When addressing staffing needs, Piraeus applies its new Staffing Policy, which was approved in December 2025. It defines the steps for an objective, fair, transparent, and merit-based recruitment process. The Policy aims to optimize human resources and attract high-potential candidates from the job market. It prioritizes internal mobility and promotes continuous development and a performance-oriented culture, in line with Piraeus' goal to provide a transparent and compliant employment framework rewarding high performance.

Through an online platform, Piraeus ensures compliance with the Staffing Policy by obtaining the necessary approvals based on role level and by monitoring all stages of the recruitment process. Additionally, using extracted reports, the Bank monitors key performance indicators such as "time to fill" and "internal-to-external" hiring ratio. These KPIs are tracked by the Talent Acquisition & Workforce Planning team to ensure timely fulfillment of staffing needs and drive continuous improvement.

By embedding transparency, objectivity, and equal opportunities into its staffing practices, Piraeus seeks to create positive outcomes for its people while mitigating risks related to attrition, talent attraction, and capability gaps, thereby supporting organizational continuity and adaptability.

The Policy is approved by the Executive Committee and responsible for the implementation is the Head of Talent Acquisition & People Development monitored by the Chief HR and Group Change Officer.

Performance Management Policy

The Performance Management policy aligns performance management with the Banks' strategic priorities, reinforces corporate values and contributes to the cultivation of a cohesive organizational culture.

It is founded on three core principles: high performance, managerial accountability and individual responsibility, and mutual trust. It clearly links day-to-day activities with the Banks' strategy, recognizes individual contributions to shared team objectives, and creates continuous development opportunities for all employees.

The Policy is approved by the Executive Committee and responsible for the implementation is the Head of Talent Acquisition and People Development monitored by the Chief HR and Group Change Officer.

Talent Management Regulation

The primary objective of the Talent Management Regulation is to design and implement targeted initiatives for the effective management of high-performing and high-potential talent, fostering development, ensuring retention, supporting business continuity, and cultivating future leaders.

To this end, it provides a structured framework for the identification, development, recognition and retention of talent across the Organization.

The Regulation is approved and monitored by the Chief HR and Group Change Officer and responsible for the implementation is the Head of Talent Acquisition and People Development.

Succession Planning Policy

Succession planning is a critical component of the Group's long-term sustainability and organizational resilience. It ensures that leadership continuity and operational stability are maintained by proactively identifying and developing successors for critical positions. It establishes a structured approach to preparing future leaders and safeguarding the Group against potential disruptions caused by vacancies in critical roles.

The primary objective of the Succession Planning Policy is to systematically identify potential successors for all critical positions within the Group. Through appropriate development and readiness, these individuals will be equipped to step into these roles when the need for coverage arises. This Policy ensures:

The operational continuity of the Group and its smooth functioning. The retention and systematic, targeted professional development of the most capable and high-performing executives. The Policy is approved by the Executive Committee and responsible for the implementation is the Head of Talent Acquisition and People Development monitored by the Chief HR and Group Change Officer.

Learning & Development Regulation

In 2025 the new Learning and Development regulation was published. The regulation establishes the framework for all training and development activities within Piraeus Bank Group. It aims to ensure continuous employee growth through personalized skills development, alignment with corporate values and strategy and adherence to equality, accessibility and sustainability principles. It aims to support performance, strengthen employee capability, and enable upskilling and reskilling in response to changing business needs. The Learning & Knowledge Sharing team oversees all planning, design, and coordination activities.

The Regulation is approved and monitored by the Chief HR and Group Change Officer and responsible for the implementation is the Head of Talent Acquisition and People Development.

Promotion Policy

The new Promotions Policy, which was approved in December 2025, aims to foster the development and career progression of the Bank's employees, while also supporting succession planning and ensuring operational continuity across the organization.

Furthermore, it contributes to the achievement of the Bank's business objectives by ensuring the timely and effective staffing of positions of responsibility and critical roles, leveraging suitable talents from within the Group.

The Policy is approved by the Executive Committee and responsible for the implementation is the Head of Talent Acquisition and People Development monitored by the Chief HR and Group Change Officer.

3.1.2.5. Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions [S1-4]

The prevention of potential material negative impacts arising from the Bank's practices toward its employees, as well as the avoidance of their exposure to risks, is ensured through a robust governance structure governed by regulations and policies. This framework defines clear standards of conduct, accountability, and compliance across the organization.

Indicatively, it includes the Code of Conduct & Ethics, policies and procedures as well as sectoral frameworks such as the Code of Banking Ethics issued by the Bank of Greece. Piraeus protects employees' privacy and personal data through GDPR-compliant practices, ensuring lawful and transparent processing, strict confidentiality, and robust technical and organizational safeguards under the oversight of its Data Protection Officer.

In addition, employees are fully equipped through continuous training and appropriate certifications, enabling them to perform their duties responsibly, serve customers effectively, and deliver optimal value and service quality, while minimizing operational, compliance, and conduct-related risks.

Furthermore, through the established representation framework and the Job Family Model, roles, responsibilities, and decision-making authorities are clearly defined according to each level of responsibility. This clarity supports sound decision-making, prevents role ambiguity, and further reduces the risk of adverse impacts on employees.

Piraeus Group allocates resources, among others, toward initiatives that promote well-being, diversity, employee engagement and continuous development of its staff. Key actions include women-in-leadership programs, violence and harassment awareness training, and fair staffing and promotion practices. Health and safety are supported through occupational health services, clinics, and employee assistance programs, while parental leaves and nursery allowances strengthen work life balance. Engagement is encouraged through surveys, pulse checks, and team or innovation events. These efforts require funding by Piraeus, Human Resources and management support, digital tools, and aim to enhance inclusion, safety, transparency, and overall employee satisfaction.

3.1.2.5.1. Equal Treatment and Opportunities for all

Promoting diversity in own operations

In Piraeus Group, the representation of women over the total number of employees is over 58%, reflecting the results of the ongoing efforts to establish a diverse and inclusive workforce. To further strengthen the representation of women in senior management levels the Group undertakes initiatives for their professional development and to raise awareness across the Group. The goal is to ensure that there are female candidates for positions in senior and top management, where possible.

Piraeus Group continued and further expanded the "Empowering Women in Leadership" training initiatives in 2025 for women across levels and managerial executives, separated in customized modular programs addressing the needs of each level:

- Women in senior management program, based on Coaching Physiology Neuroscience, Mindfulness, Journaling Guided Reflection and Self Assessments tests.
- Empowering Women in Leadership Program is designed through targeted training sessions that tackle systemic barriers, build confidence, and guide participants in creating a personalized action plan for their development.

By expanding the programs across levels, the initiative aims at creating a culture of inclusion, innovation, and resilience across the organization.

Initiatives against discrimination, violence and harassment

An e-learning program was designed and assigned to all employees to clarify and highlight the concept and key points of the Group's policy, fostering a common understanding on issues of violence and harassment and raising awareness of the zero-tolerance approach.

The training program was completed by 4,509 employees of Piraeus Group up to 31 December 2025 and is still available to all employees to study and refer to.

Attracting and Retaining Diverse, Skilled Talent

Piraeus is committed to becoming an organization that attracts and retains a diverse high-caliber talent through the implementation of targeted actions focused on:

Identifying young talent in the market: During the 2025–2028 period, Piraeus aims to ensure that two-thirds of new hires are under the age of 35. In this context, Piraeus systematically identifies and attracts young talents through the implementation of the Management Trainee Program, targeted graduate and internship programs, partnerships with universities and participation in career events.

Deploying new initiatives that enhance the employees' experience and feeling of inclusivity: More specifically the onboarding process aims to ensure a smooth, organized, and efficient integration of new employees into the Group. Through this process, comprehensive support, training, and guidance are provided so that employees can fully familiarize themselves with the working environment, the corporate culture, and the requirements of the position they undertake. The effective implementation of the process contributes to reducing the adaptation period, strengthening engagement, and increasing em-

ployee productivity. At the same time, it promotes a positive employee experience, reinforces the sense of belonging, and supports the sustained alignment with the Group's strategic objectives.

Investing in new ways of working: Through the provision of modern and employee-centric work environments, including ergonomic workstations, optimized lighting, and dedicated well-being spaces, which enhance collaboration and foster a modern, comfortable workplace that supports employees' physical and mental health, inclusivity, and productivity.

Promoting digital adoption: Through a structured, organization-wide digital upskilling program aligned. Towards this purpose, the Digital Core training program was designed and launched in 2025 for all employees of the Bank. This strategic initiative aims at advancing the organization towards digital literacy and fostering a unified digital culture. Aligned with the EU DigComp framework, the program delivers a comprehensive curriculum over 14 hours through a blended learning model that combines micro-learning, e-learning, and instructor-led sessions. Its objectives include enhancing proficiency in Microsoft 365 collaboration tools, improving data management practices, and embedding cyber-safety and responsible AI principles to ensure secure and ethical technology adoption.

Piraeus Bank's ICB Initiative to Support Women's Potential and Leadership Development

Piraeus Bank ICB in Ukraine introduced a program designed to strengthen equal opportunities for all employees, with focus on supporting women's career progress and their involvement in decision making. The initiative, launched under the bank's ESG framework, aims to ensure that individual progress is based on merit. Its first session took place in Kyiv in 2025, where female employees met with writer Slava Svitova to discuss confidence, creativity, and professional challenges. The program's objective is to develop the necessary conditions that allow every woman in the bank to progress on equal terms. The program will continue through meetings, training activities, and experience-sharing initiatives supporting the development of an inclusive working environment.

3.1.2.5.2. Working conditions

Meritocracy in Staff Selection and Promotions

Ensuring transparency, meritocracy, and objectivity in the selection of suitable candidates for staffing needs and for promotions are among Piraeus' priorities. This is achieved through the implementation of the Staffing Policy and the Promotion Policy. In 2025, internal transfers covered 20% of total Bank's staffing needs. A total of 275 positions were filled, 55 of which were filled by internal candidates and 220 by external candidates. This process ensures that Piraeus assigns the right people to the right roles, aligning career interests and aspirations, strengthening business continuity, and maximizing the potential of the available talent pool.

Health & Safety and Employee Well-being

The Group implements comprehensive measures, policies, and procedures to manage and eliminate risks concerning employee health, safety and well-being, ensuring full compliance with current health and safety legislation (Law 3850/10).

The Group offers to all its employees in Greece the following benefits:

Medical Program: As of January 1st, 2025, Piraeus Bank significantly enhanced its group medical plan, extending comprehensive health coverage and additional benefits to all employees and their families. The improvements were designed in response to employee feedback and in alignment with the Group's commitment to well-being.

Annual Check-ups: Essential for maintaining overall well-being, as they enable the prevention of potential health issues and support timely medical intervention. By encouraging preventive care, regular check-ups help reduce health risks and contribute to a healthier, more resilient workforce.

Pension Plan: It ensures financial security after retirement, reducing employees' financial and psychological stress and promoting their long-term well-being.

Well, Being Program "Ev zin": Built on three interconnected pillars — Mind, Body and Relationships — the program consolidates well-being, cultural and engagement initiatives into a single, cohesive approach. Through a structured mix of in-person, digital and hybrid activities, the monthly program promotes well-being initiatives, strengthens organizational culture and fosters connection, collaboration and a sense of belonging among employees.

Volunteering actions: Mobilize employees and generate measurable social and environmental value.

Occupational Health and Safety services: Complete coverage for all staff through.

Access to professional clinical services: Offering preventive care, basic healthcare, and counseling at the Group's First Aid Points.

A series of informational sessions: To support awareness and encourage preventive care, the Bank organized a series of informational sessions in 2025, where specialized doctors delivered speeches to employees, highlighting the importance of regular medical check-ups and early detection. These initiatives aimed to foster a culture of health consciousness and proactive well-being among employees.

Availability of Employee Assistance Programs (EAPs): Featuring a 24/7 hotline and counseling sessions for employees and their families.

Targeted health prevention initiatives: Such as the Holistic Health Week with up to 1,700 beneficiaries.

Fire Safety and Protection teams: Formation of 250 Fire Safety and Protection teams, along with the completion of evacuation drills and provision of training sessions conducted by the Fire Service. For 2025 a total of 1,450 evacuation drills and 315 facilities valid training by Fire Department.

e-learning program: Access to an engaging e-learning program that serves as a complete first aid guide, offering necessary knowledge and skills to provide first aid effectively and safely in most common emergencies. The e-learning program was assigned to all employees and was successfully completed by 5,058 employees.

Automated External Defibrillators (AEDs): During 2025, Piraeus successfully implemented a strategic program for the installation of 15 Automated External Defibrillators (AEDs) in its 24/7 branches (Piraeus AED Spots), increasing the total number of AEDs across its nationwide facilities to 26. Furthermore, comprehensive training on the proper use of AEDs was delivered to 382 employees, reinforcing the Bank's commitment to health and safety.

Occupational Physician stays: Piraeus demonstrates its steady commitment to the physical and mental well-being of its employees by incorporating a dedicated section on psychosocial risks in the Occupational Risk Assessment Study. Through regular visits, the Occupational Physician stays in direct contact with employees, identifies possible risk factors, and recommends in advance the use of specialised support services provided through the Hellas EAP program.

These initiatives are expected to remain in effect for the coming years, since their benefits play a crucial role in enhancing employee well-being and ensuring organizational safety on an ongoing basis. The complete coverage through Occupational Health services ensures that all employees have access to necessary healthcare resources. Combined with the professional services available at the Group's nine (9) health clinics, those services contribute to maintaining employees' physical and mental health while the Employee Assistance Programs (EAPs) offer additional support, benefiting employees and their families.

Family related Well-being

Piraeus Group supports employees in balancing their work and parental responsibilities through various family-friendly provisions, as it considers that its people family well-being is a pivotal element in developing a healthy work environment. These benefits refer to:

Parental Leave: Piraeus Bank offers special leaves for parents concerning health issues, fully paid primary parental leave for a minimum of 19 weeks, and cumulative maternity leave options.

Nursery Allowance: All employees have the option to use the nursery allowance benefit, either as an extra payroll allowance or as a benefit paid directly to the nursery school.

Support for New Parents: New mothers have the option to use 39 weeks of cumulative maternity leave, and new fathers are entitled to 3 weeks of paternity leave. In 2025, 93% of new mothers used cumulative leave immediately after maternity leave, with 81% taking leave for a period longer than 6 months.

Support Initiatives to Reverse Low Fertility and Birth Rates: The Bank supports the institution of the family by providing assisted reproduction allowance, recognizing the challenges employees may face in starting or growing a family and reaffirming its commitment to well-being and equality.

Fostering a culture of Openness (Social Dialogue)

Piraeus actively fosters social dialogue, encouraging open communication and collaboration among employees. This commitment is further reflected in the use of regular employee meetings, surveys and pulse checks, which serve as vital tools for alignment, capturing feedback, identifying emerging issues, and reinforcing a culture of transparency and mutual trust.

Regular Employee Surveys

In 2025, Piraeus Group conducted the annual "Together Employee Survey" to assess key dimensions of the employee experience, including satisfaction, engagement, alignment with corporate values, management effectiveness, teamwork, recognition, working conditions, diversity, equity and inclusion (DEI), and whistleblowing awareness.

Employee Engagement Activities

To further strengthen employee engagement, Piraeus Group implemented a variety of initiatives throughout 2025, including off-site meetings, innovation competitions, monthly team-building activities, intranet communications, townhall sessions, and 1:1 meetings. These activities aim to foster collaboration, creativity, and a sense of belonging among employees.

In this context, alignment meetings are implemented, which are structured team sessions aimed at establishing a shared direction, fostering motivation, and strengthening commitment to the Bank's strategic objectives. These meetings form part of the annual engagement plan and are addressed to all employees, regardless of level. They are held in the first quarter to align on goals and priorities, and mid year and/or towards the end of the year to review progress and define next steps.

At the same time, events and celebratory gatherings—such as the Christmas celebration and thematic events—are organized to mark important moments and recognize collective achievements, thereby enhancing employees' sense of connection and belonging.

In addition, wellbeing initiatives foster the creation of employee communities around shared interests, enhancing connection, interaction, and engagement beyond the work environment. Through these initiatives, a sense of belonging is cultivated, and the development of meaningful relationships and networks among employees is supported.

The engagement activities are implemented across Piraeus Bank, with tailored formats for different departments and locations. The time horizon for these actions is continuous, with monthly and annual milestones guiding their implementation.

Piraeus upholds a culture of mutual respect and inclusivity, regardless of gender, disability status, identity, or background. It maintains a strong focus on occupational health and safety, implementing preventive measures and continuous monitoring to safeguard the physical and mental well-being of its workforce.

Adequate Wages

The Group is committed to promoting workforce stability and fair pay through responsible remuneration practices. Adequate wages are safeguarded through a structured fixed remuneration framework that sets pay on transparent and objective criteria (e.g., role size and responsibility, education, professional experience and skills) and supports an appropriate standard of living.

In alignment with applicable national legislation, the Group ensures that employees' fixed remuneration does not fall below the relevant statutory and/or collectively agreed minimum standards. The Group also takes into account local economic and social conditions in each country of operation, with a view to providing suitable working and living conditions for employees and their families. In Greece, this includes compliance with the sectoral Collective Bargaining Agreement (and, where applicable, enterprise-level collective arrangements), which define the minimum lawful wage level (base salary plus any applicable allowances), reflecting factors such as qualifications, seniority and family status.

In that regard, the Group provides remuneration that meets or exceeds the minimum wage defined by applicable national legislation, and, accordingly, for the year ended in 2025 all employees were paid an adequate wage.

To monitor and safeguard adequate wages in practice, the Group applies the following controls and governance actions:

Minimum-pay baseline and updates: Minimum fixed pay thresholds are defined based on applicable collective agreements and labour law requirements. When new national labour law or collective / enterprise agreements terms enter into force (including changes in allowances), remuneration levels are reviewed and adjusted accordingly to maintain compliance.

Role-based pay architecture: The Group applies a job grading / job evaluation framework and relevant pay levels to support internal equity and consistent pay decisions, while also taking into account external market benchmarks.

Periodic review of fixed pay competitiveness: Fixed remuneration is reviewed within a structured annual framework, considering internal equity, competitiveness vis a vis market, cost-of-living considerations and other workforce-related factors, subject to defined approval governance.

Independent oversight and assurance: The design and implementation of the Remuneration Policy are subject to a regular and independent internal review by Group Internal Audit (GIA) at least once a year. In addition, the Remuneration Committee (RemCo) provides ongoing guidance and advice on the remuneration framework and is informed of planned actions in the context of reviewing the Bank's remuneration strategy.

3.1.2.5.3. Monitoring of Actions and Performance

The impact of initiatives is monitored through the continuous tracking of key HR metrics and systematic feedback mechanisms. For training, wellbeing and volunteering actions, feedback is collected from beneficiaries and participants via structured questionnaires focusing on content, perceived usefulness and overall impact. In addition, comprehensive feedback across all HR areas is captured annually through the Group's employee engagement survey, supporting the ongoing assessment of effectiveness and the continuous improvement of actions.

3.1.3. Metrics and targets related to Own Workforce

3.1.3.1. Metrics related to Own Workforce

Characteristics of Piraeus' employees [S1-6]

The total number of employees as of December 31, 2025, is 8,482, while on average 8,126 people were employed in Piraeus Group in 2025. As of December 31, 2025, the Group's workforce is characterized by a diverse composition in terms of gender and employment type. Employees are categorized into male and female, while permanent and temporary roles are distinct. Additionally, the workforce is divided into full-time and part-time employees which as at the end of the year were 8,460 and 22, respectively.

Table 39: Own workforce metrics | Employee head count by gender

	31/12/2025	31/12/2024
Gender	Number of employees	
Male	3,541	3,228
Female	4,941	4,542
Total Employees	8,482	7,770

Table 40: Own workforce metrics | Total number of employees in head count by contract type

	31/12/2025			31/12/2024		
	Male	Female	Total	Male	Female	Total
Number of employees	3,541	4,941	8,482	3,228	4,542	7,770
Number of permanent employees	3,503	4,906	8,409	3,212	4,526	7,738
Number of temporary employees	38	35	73	16	16	32
Number of full-time employees	3,531	4,929	8,460	3,220	4,529	7,749
Number of part-time employees	10	12	22	8	13	21
Average number of employees	3,384.5	4,741.5	8,126	3,305	4,624	7,929

The Group's labor capacity is also measured in full-time equivalent (FTE) terms. The total number of employees as of 31 December 2025, is 8,482, which is distributed among 8,409 permanent and 73 temporary employees respectively, highlighting the emphasis that the Group gives in the stability and working security for its people.

Permanent and temporary employees are defined as follows, calculated on a headcount basis as of December 31, 2025:

- Permanent employees are defined as the employees with an employment contract without a fixed end date.
- Temporary employees are defined as the employees whose employment contract has a specific time period.

The significant increase in employee headcount compared to 2024 is explained by the inclusion of the Ethniki Insurance Group, which comprises 706 employees and was integrated at the end of November 2025.

This fact impacts all the breakdown metrics below.

Table 41: Own workforce metrics | Total number of employees in Full time equivalent

	31/12/2025			31/12/2024		
	Male	Female	Total	Male	Female	Total
Number of employees	3,536	4,936	8,472	3,225	4,536	7,761
Number of permanent employees	3,498	4,901	8,399	3,209	4,521	7,730
Number of temporary employees	38	35	73	16	16	32

Note: This can be cross-referenced to Group FTEs in Note 12 – Staff Costs in the Financial Statements.

Full-time equivalent, or FTE is defined as the number of employees with full-time positions in the Group according to the applicable national legislation.

The Group's employees are distributed across various regions, including Attica Greece, other regions in Greece, Capital cities except for Greece (Internationally) and other regions (International). The majority of Piraeus Group's employees are concentrated in Greece, Attica and are in total 5,385.

Table 42: Own workforce metrics | Total number of employees by employment type and region

31/12/2025		
Attica	Other Greece	Capital city (International)

Pop-up table

Table 43: Own workforce metrics | Total number of employees by employment type and region

31/12/2024		
Attica	Other Greece	Capital city (International)

Pop-up table

A total of 375 of the Group's employees left during the reporting period. However, it should be noted that 169 of them have left Piraeus Group through the Voluntary Exit Scheme. The employee turnover rate for the reporting period was 4.82% (excluding Ethniki Insurance Group).

Table 44a: Own workforce metrics | Piraeus Group employees' turnover rate

	31/12/2025			31/12/2024		
Unit	Male	Female	Total	Male	Female	Total

Pop-up table

Table 44b: Own workforce metrics | Piraeus Group employees' turnover rate – Ethniki Insurance Group Excluded

	31/12/2025			31/12/2024		
Unit	Male	Female	Total	Male	Female	Total

Pop-up table

Piraeus' Group turnover comprises of employees who left the entity for the following reasons: dismissals, retirement, death in service and voluntary exits which include resignations and voluntary exit schemes. The denominator of the rate of employee turnover includes the average head count of employees for the period 2025.

It is important to note that the turnover data for Ethniki Insurance Group is comprised only for December 2025 where it was integrated.

The Voluntary Exit Scheme (VES) is a program designed to be socially responsible with attractive terms, substantial incentives and benefits, even after the departure of employees.

This year a limited number of employees participated in the VES program.

Collective bargaining coverage and social dialogue [S1-8]

As of December 31, 2025, all employees of the Group are covered by collective bargaining agreements. Piraeus recognizes the importance of social dialogue and ensures the Unions have adequate representation, aiming to foster good working conditions and a compliant employment framework. As of December 31, 2025, all of Piraeus Group employees were working on establishments in which employees are represented. The Management team governing the relationship with the Unions continuously seeks to strengthen social dialogue and ensure alignment with the existent legislative framework. In 2025, 31 meetings were performed with the presence of the management team, as part of the regular and ongoing consultation to improve communication and collaboration.

Table 45: Own workforce metrics | Piraeus Group employees covered by Collective Bargaining Coverage and social dialogue

31/12/2025 & 31/12/2024	
Collective Bargaining Coverage	Social Dialogue

Pop-up table

Workers' representatives are defined as employee-elected individuals who represent the workforce in all Piraeus Bank specific locations concerning employee-related topics, such as the work environment and working conditions.

The number of employees is based on the head count figure as at the end of the 2025 reporting period. The Group has presence in non-EEA countries. Although there is no significant employment in any of them, i.e., above 50 employees and representing at least 10% of total employees.

The Group has presence in EEA countries in Greece and Germany (Frankfurt branch), while for non-EEA countries it is present in Ukraine & in Serbia.

Diversity metrics [S1-9]

The table on gender distribution at the top management level provides insights into the diversity composition within Piraeus Group's leadership. It describes the percentage distribution of males and females in top management positions as of December 31, 2025. As of that date, 67% of the positions are held by males, while 33% are held by females. This equates to a headcount of 174 males and 84 females, out of a total of 258 employees in top management. The data provides useful insights into Piraeus' current state in terms of leadership roles and diversity. The data suggests that there is room for improvement in the gender representation in top management and the Group is committed to continually monitor the metrics' evolution and promote initiatives that empower female leadership, in line with the principles of transparency, meritocracy and accountability.

Table 46: Own workforce metrics | Gender distribution at Piraeus Group top management level

31/12/2025 & 31/12/2024		
Unit	Number of employees	% Distribution at top management level

Pop-up table

The top management level includes: Executive General Managers, General Managers, Senior Directors and Directors with reporting line to Executive GM and General Managers.

The age distribution of the Group's workforce as of December 31, 2025, is categorized into three groups: 3% of employees are under 30 years old, 59% are between 30 and 50 years old, and 38% are over 50 years old. This corresponds to a head count of 245 for the under 30 age group, 5,016 for those aged 30-50, and 3,221 for those over 50. This diverse age range fosters a combination of experience and innovation, which is essential for the Group's growth and sustainability.

A structured set of actions is in place to support workforce rejuvenation, with a gradual impact on the workforce mix over time.

Table 47: Own workforce metrics | Age distribution amongst Piraeus Group employees

31/12/2025 & 31/12/2024				
Unit	Under 30 years old	30-50	Over 50 years old	Total

Pop-up table

Adequate Wages [S1-10]

The Group is committed to fostering a secure working environment and promoting workforce stability. In alignment with the legally mandated minimum wage, the Group systematically takes into account the needs of employees and their families, along with the national economic and social conditions in each country of operation, to provide suitable working and living conditions for all. In that regard, the Group offers to all its people remuneration that exceeds the minimum wage defined by the applicable national legislation and for the year ended in 2025 all employees are paid an adequate wage.

Social Protection [S1-11]

All Piraeus Group employees benefit from social protection, through the applicable national provisions safeguarding them against income loss during sickness, unemployment, employment injuries and acquired disabilities, parental leave and retirement. In addition, for employees choosing to leave the Bank through the Voluntary exit scheme or retire, Piraeus offers extra health and employment benefits. Furthermore, additional private health insurance is offered to the majority of employees according to each Group's entity's practices. In 2025, the Bank's group medical plan was further ameliorated, offering expanded benefits and greater coverage for employees and their dependents. These enhancements reflect the Bank's ongoing commitment to supporting the health and security of its workforce and their families.

Persons with disabilities [S1-12]

In Piraeus Group, the proportion of the employees with disabilities currently stands at 2.1%.

Table 48: Own workforce metrics | Persons with disabilities

	31/12/2025			31/12/2024		
Unit	Male	Female	Total	Male	Female	Total

Pop-up table

For Piraeus Group, persons with disabilities reported include all employees that voluntarily deliver a certified disability document of equal and over 50% disability and from which acquire privileges from Piraeus (special leaves and disability allowance). The number of persons with disabilities refers to head count as of December 31, 2025.

The proportional increase in persons with disabilities, compared to 2024, reflects the inclusion of the Ethniki Insurance Group, that was integrated at the end of November 2025.

Training and skills development for own workforce [S1-13]

Piraeus Group provides its employees with training and skills development programs as part of its commitment to continuous professional growth, aiming at enhancing employees' skills and ensuring ongoing employability. To deepen this focus, Piraeus Bank and its subsidiaries also conduct regular performance development reviews, which are crucial for assessing and guiding employee growth. In this direction, the Group has implemented a new process of identifying talent across the Organization in an organized and systematic way, based on common and specific criteria, resulting to the enrollment of all employees in customized Talent Development Programs. Following the performance assessment, potentiality to grow and readiness to undertake a more complex role, all employees are given the opportunity to create their Individual Development Plan, setting a clear target for their professional growth and the actions to achieve it.

Piraeus Group monitors the participation rate of employees in performance reviews to ensure inclusiveness of all in the performance management system. In 2025, 91% of employees received performance feedback, with only a 2% difference between males and females. The percentage of employees receiving feedback also varied slightly by level of accountability. Middle management had the highest feedback rate at 92%.

Table 49: Own workforce metrics | Piraeus Group performance and career development reviews

	31/12/2025			31/12/2024		
Unit	Male	Female	Total	Male	Female	Total

Pop-up table

Note: Ethniki Insurance group is excluded from this metric as the data reflects the performance data for the year 2024.

Table 50: Own workforce metrics | Performance and career development reviews per Piraeus Group employee category

31/12/2025	31/12/2024
Category	

Pop-up table

Note: Ethniki Insurance Group is excluded from this metric as the data reflects the performance data for the year 2024.

Performance Review Assumption:

In the annual performance cycle, all full-time permanent employees as of end of year, who have completed at least 5 months of work time, are evaluated. Categories have been defined as per the Level of Responsibility of employees. More specifically:

- Category 1 stands for Top Management (see above)
- Category 2 stands for Middle Management (Directors with reporting line to Senior Directors), Senior Managers, Managers)
- Category 3 stands for Professionals (Senior Officers, Officers)

As the metric reflects 2024 performance evaluation cycle, the increase in employee hires across the Group from August 2024 onwards, who are excluded from the performance appraisal process of year 2024 affected the overall percentage.

With regards to professional development, Piraeus Group tracks the number and accessibility of training provided to various groups within the organization. In 2025, male employees received a total of 38.9 training hours per person, while female employees received training hours of 45.3 per person, resulting in an overall average of 43 training hours per person (excluding 1 month data of Ethniki Insurance Group).

Table 51a: Own workforce metrics | Training hours per Piraeus Group employee and gender

	31/12/2025			31/12/2024		
Unit	Male	Female	Total	Male	Female	Total

Pop-up table

Table 51b: Own workforce metrics | Training hours per employee and gender - Ethniki Insurance Group excluded

	31/12/2025			31/12/2024		
Unit	Male	Female	Total	Male	Female	Total

Pop-up table

Table 52a: Own workforce metrics | Training hours per Piraeus Group employee category

	31/12/2025			31/12/2024
Unit	Category 1	Category 2	Category 3	Category 1

Pop-up table

Table 52b: Own workforce metrics | Training hours per Piraeus Group employee category - Ethniki Insurance Group excluded

31/12/2025				31/12/2024
Unit	Category 1	Category 2	Category 3	Category 1

Pop-up table

Training hours are based on information registered in the dedicated HR Learning platform (.edu) for a 12-month period in the reporting year. The denominator of the number of training hours per employee includes the average head count of Piraeus Group throughout 2025.

It is important to note that the training data for Ethniki Insurance Group is comprised only for December 2025 where it was integrated.

The increase in training hours recorded in Category 1 reflects investments in leadership development delivered through learning initiatives for top management.

Health and Safety Management system [S1-14]

Piraeus Group has adopted a comprehensive health and safety management system in line with the Greek legislation for Piraeus Bank while it applies all the relevant legislative and regulatory requirements for all the activities of the Group.

The system includes detailed processes for activities such as the performance of annual site visits from occupational physicians and safety technicians on the Bank's facilities, the establishment of partnerships with private companies specialized in health and safety management, communication of findings from public authorities' inspections etc.

As of December 31, 2025, 100% of the Group's employees were protected under this robust system. This coverage ensures that all of the Group's employees have access to the necessary resources to maintain their safety and well-being at work.

Safety performance is a key indicator of Piraeus Group 's commitment to employee well-being. For the year 2025, a total of 9 work-related accidents were recorded. Each incident is thoroughly investigated to identify root causes and implement corrective actions to prevent recurrence. Piraeus Group's goal is to minimize these incidents through proactive safety measures and a culture of safety awareness.

The H&S HR Manager, Organizational Health, is responsible for the implementation of the relevant processes entailed, whilst the process is also monitored by the Head of HR Operations & Labor Relations. The system is reviewed on a yearly basis according to the legal framework.

The Group includes the following additional information on the health and safety coverage: the percentage of its own employees, covered by Piraeus Group's health and safety management system, is based on legal requirements and/or recognized standards.

Table 53: Own workforce metrics | Piraeus Group health and safety management system coverage

Unit	31/12/2025	31/12/2024

Pop-up table

Table 54: Own workforce metrics | Piraeus Group work-related accidents

	Unit	31/12/2025	31/12/2024
Number of recordable work-related accidents	Number	18	10
Number of total hours worked	Hours	14,445,800	14,336,944
Recordable work-related accidents ratio	Number / Hours 1,000,000	1.2 accidents per 1 million hours worked	0.7 accidents per 1 million hours worked

Only a very limited number of accidents was recorded in 2025, 18 in total, with zero (0) fatalities occurring altogether.

From the current reporting period onward, Piraeus discloses labor accidents in accordance with local regulatory requirements, including incidents occurring off Group premises during employees' commuting to and from work. For comparability, the 2024 disclosure has been restated to reflect this revised reporting scope. Accordingly, the total number of days lost due to the aforementioned accidents amounts to 202 days for 2024 and 673 days for 2025.

Table 55: Own workforce metrics | Piraeus Group work-related fatalities

	Unit	31/12/2025	31/12/2024
Number of fatalities as a result of work-related injuries	Number	0	0

Number of cases of recordable work-related ill-health

No work-related ill-health cases were recorded by Piraeus, for the reporting period ended 31 December 2025. As a result, the relevant metric includes details about the 9 accidents recorded within 2025.

Work-life balance metrics [S1-15]

Piraeus recognizes the importance of work-life balance and the role it plays in employee well-being and satisfaction and is committed to supporting its employees in managing their personal and family commitments. The percentage of the Group's employees eligible for family-related leave is 100%. During the reporting period, 42% of entitled employees at Piraeus exercised their right to family-related leave. This demonstrates the employees' awareness and utilization of the benefits available to them, reflecting the Group's commitment to fostering an inclusive and supportive workplace environment.

Table 56a: Own workforce metrics | Work-life balance

31/12/2025				31/12/2024		
Unit	Male	Female	Total	Male	Female	Total

Pop-up table

Table 56b: Own workforce metrics | Work-life balance - Ethniki Insurance Group excluded

31/12/2025				31/12/2024		
Unit	Male	Female	Total	Male	Female	Total

Pop-up table

All employees in Piraeus Group are entitled to family-related leaves which indicatively includes: Maternity leave, accumulated maternity, paternity leave, single-parent family leave, parental unpaid leave for special needs, bereavement leave for a first-degree relative, child & spouse hospitalization leave, prenatal examination leave, force majeure leave, assisted reproduction leave.

It is important to note that the family related leaves data for Ethniki Insurance Group is comprised only for December 2025 where it was integrated.

Remuneration metrics (pay gap and total remuneration) [S1-16]

The Group is dedicated to ensuring pay equality at every job seniority level, guaranteeing that women and men performing the same role or roles of equal value receive equal compensation. The gender pay gap figures provide insights into gender representation at various levels within the organization. These figures do not only reflect the overall remuneration of male and female employees but also highlight the underlying structural challenges that influence pay disparities, such as the representation of women in senior and leadership positions.

This year, the gender pay gap at Piraeus Group stands at 24.52%. This has been calculated as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees. The gender pay gap ratio has demonstrated a favorable improvement of 1.67 percentage points compared to 2024 (26.19%). This positive trajectory is mainly attributable to: (i) targeted fixed salary adjustments for female employees, present in both reporting years, implemented under the Group's commitment to invest € 2.5 million in targeted annual salary adjustments to eliminate gender disparities in average salaries across all roles within the same level of its internal job architecture model by 2027. For employees who remained in the organization throughout both years, the total remuneration pay gap narrowed from 26.48% in 2024 to 24.99% in 2025—an organic improvement of approximately 1.48 percentage points — indicating that the fixed salary adjustment program is delivering the intended outcomes; (ii) improved female representation in leadership positions (23.7% in 2025 from 21.6% in 2024), alongside an improvement in the leadership pay gap, which decreased by 0.3 percentage points (25.7% in 2024 to 25.3% in 2025). This development supports the Group's ongoing efforts to strengthen gender balance in senior roles and reduce pay disparities driven by under-representation at higher levels.

At Piraeus Group, transparency in its compensation practices is essential to maintaining trust and ensuring equity across the organization. One key measure of its compensation structure is the annual total remuneration ratio, which compares the total remuneration of the highest-paid individual to the median annual total remuneration of all other employees.

For the current reporting period, the total remuneration ratio stood at 27.4: 1. This figure indicates that the total annual remuneration of the highest-paid individual is 27.4 times greater than the median annual total remuneration of all other employees (excluding the highest-paid individual) at Piraeus. Compared to the prior reporting period (29.8:1), the decrease reflects a narrowing driven primarily by an increase in the median annual total remuneration of employees (excluding the top paid) year-on-year, while the total remuneration of the highest-paid individual remained broadly stable.

By regularly reviewing and disclosing the remuneration ratios, Piraeus Group aims to uphold transparency and foster a culture of fairness. This commitment helps Piraeus Group to attract and retain talent while ensuring that all employees feel valued and recognized for their contributions.

Regarding the gender pay-gap analysis is based on a standardized methodology to ensure accuracy and comparability.

Total Remuneration: The sum of total fixed and total variable remuneration per individual.

Pay Level: Derived by dividing total remuneration by annual working hours per individual.

Incidents, complaints and severe human rights impacts [S1-17]

Piraeus Group is committed to ensuring transparency in its actions and, as such, presents the total number of all incidents of discrimination, including harassment, reported in the reporting period, the number of complaints filed through channels for people in the Group's own workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises related to the matters defined. For the reporting year 2025, these incidents reached a total amount of twenty-one (21).

The Group also discloses the total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints mentioned above. Such fines, penalties and compensation are connected to reported incidents of Violence and Harassment which for the period 2025 amounted to zero (0) incidents.

Table 57: Own workforce metrics | Piraeus Group's incidents and complaints

Piraeus' incidents and complaints:	31/12/2025	31/12/2024

Pop-up table

3.1.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S1-5]

In the context of developing the Business Plan for 2026-2030, Piraeus developed, through the engagement of internal stakeholders, the pertinent Own workforce targets. The relevant targets were also presented and approved in the context of the overall business planning process and the KPIs are measured and monitored by the internal Performance & Value Management Unit (PVM), while the governance of the process is managed by Group Financial Management.

Promoting Employees' satisfaction

Piraeus Group always aims to implement a reliable HR strategy fully aligned with ESG criteria in order to attract, retain, reward, and motivate employees. Its strategy for 2025 included conducting an internal employee satisfaction survey in the form of an anonymous questionnaire as outlined in the previous paragraphs. In this context Piraeus Group aims to improve the satisfaction rate of its employees, highlighting the positive impacts created by its own operations and promoted by a series of actions and policies.

Group's employee satisfaction target

Table 58: Piraeus Group's employee satisfaction target

Target	Unit	Scope	Base year	Baseline value	2025 Value

Pop-up table

The implementation of the action plan contributed positively to the outcomes reflected in this year's employee engagement survey, which showed an increase of 2 percentage points.

Employee trainings

The Group aims to continuously enhance employees' skills and knowledge by designing and effectively deploying training and development programs. To support this, it sets specific goals to increase the number of training hours each employee receives, reflecting its commitment to employees continuous upskilling and reskilling for personal and professional development.

Table 59: Piraeus employee training target

Target	Unit	Scope	Base year	Baseline value	2025 Value

Pop-up table

It is noted that the Bank's respective value for 2025 was 45 training hours per employee. The difference between Group and Bank lies to the fact that each subsidiary manages its own training budget and actions to meet their employees' specific training needs. In due time, this metric will incorporate all subsidiaries to provide a more comprehensive and unified view of the specific metric.

3.2. Workers in the value chain [ESRS S2]

3.2.1. Strategy

3.2.1.1. Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model [SBM-3]

Piraeus promotes responsible financing and strengthens the working conditions beyond its own operations, particularly within its business lending portfolio, through its Environmental and Social Management System (ESMS). Nevertheless, potential adverse impacts may arise from suppliers or financed entities outside the ESMS scope. To prevent these impacts and uphold international labor standards, Piraeus periodically reviews its practices and reinforces due diligence and supplier engagement.

The table below presents the identified positive impact along with their corresponding interconnected activities.

Table 60: Piraeus' Positive Impact on the Workers in the Value Chain [ESRS S2]

Positive impact	Activities that result in the positive impact	Type of workers in the value chain positively affected
Through its Environmental and Social Management System (ESMS), Piraeus promotes responsible financing by incorporating labour related considerations in the assessment of clients, in areas such as health and safety standards and social protection. Piraeus supports clients committed to decent work, non-discrimination, and occupational safety, contributing to improved working conditions beyond its direct operations.	Piraeus acknowledges that its business financing may lead to environmental and social impacts beyond financial ones. Thus, Piraeus implements the Environmental & Social Risk Management System (ESMS), since 2017, and applies environmental and social criteria in the evaluation process of business financing, in order to limit and manage these risks.	Workers in downstream value chain (financed companies).

The identified potential negative impacts, as determined through the Double Materiality Assessment, are outlined below:

Workers in the Upstream value chain: Piraeus' collaboration with suppliers that may lack robust labour standards can potentially pose risks to employment conditions, particularly in the areas of work-life balance and health and safety.

Workers in the Downstream value chain: Piraeus acknowledges that financing companies not covered by Piraeus Environmental and Social Management System (ESMS) may potentially lead to exposures towards organizations with varying levels of labour standards and may introduce risks to working conditions, particularly in areas such as health and safety and social protection.

The identified material negative impacts are potential and cannot currently be linked to isolated incidents, specific business relationships, or widespread systemic issues. Furthermore, the Group has not identified any geographies or activities financed that pose a significant risk of child labor, forced labor, or compulsory labor. Such risks are generally more prevalent in certain emerging markets and commodity-related sectors, where systemic vulnerabilities may exist. Piraeus' activities and value chain are primarily concentrated within the European Union, where these vulnerabilities are expected to be limited.

3.2.2. Impact, risk and opportunity management

3.2.2.1. Policies related to value chain workers [S2-1]

Procurement Policy

Piraeus Group Procurement Policy defines the governance framework of the procurement cycle, by specifying the rules and responsibilities for the purchasing of goods and services, to cover the operational needs of the organizational units of Piraeus, as well as the management of the relationship with existing or potential suppliers.

The Policy requires suppliers that meet specific thresholds in procurement tenders (Requests For Proposal - RFP) to confirm their compliance with terms regarding labor legislation and health and safety requirements, aiming to prevent any negative impact that could affect upstream value chain workers.

The Policy is applied uniformly across the Group. Subsidiaries may adjust their own procedures, always adhering to the Policy's principles. The Head of the Group Procurement Unit is responsible for the implementation of the Policy and reports to the Group Chief Operating Officer.

For further information about the Policy please refer to section "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" of the ESRS 2 General Information chapter.

Quality and Sustainable Procurement Regulation

The Quality and Sustainable Procurement Regulation is aligned with the Bank's policies and procedures, which define the framework for procurement activities and describe how they are managed by Group Procurement. Its implementation is based on the principles of ISO 9001:2015 and ISO 20400:2017 standards, as well as the applicable legislative and regulatory framework. The Bank is committed to the continuous improvement of the effectiveness and efficiency of its quality and sustainable procurement management processes, aiming to promote and strengthen sustainable development and ethical practices throughout the supply chain.

Sustainability Policy

The Group's Sustainability Policy establishes the overarching framework for responsible business practices, including collaboration with suppliers and the implementation of the Environmental and Social Management System (ESMS) for its borrowers. Suppliers are assessed regarding their performance as collaborators for the duration of the contract, as well as their compliance with ESG principles during the procurement tenders. Similarly, borrowers are evaluated for social risks, particularly those affecting workers in the value chain, such as employment conditions, employee health and safety, and human rights considerations.

The Bank has adopted a centralized procurement model that manages the sourcing of goods and services and the governance of suppliers, aiming to strengthen transparency, identify cost saving opportunities, and ensure the high quality of supplied goods and services. In this context, suppliers' performance is evaluated on an annual basis, recognizing and managing potential supplier risks for the Bank.

Piraeus is gradually integrating ESG criteria into its procurement processes. In cases where it is both technically and financially feasible specific environmental criteria are considered (e.g., environmental certifications). Especially for Piraeus Bank's activities with material environmental impact (according to the Bank's Environmental and Energy Management System assessment), environmental criteria are already incorporated.

Piraeus also applies green procurement principles, by opting for environmentally certified products, aiming not only to reduce the Group's environmental impact, but also to assist in developing a green procurement market. In terms of social criteria, Piraeus requests its suppliers to provide gender-related information for their business, i.e., the ownership status, the governance structure of the company, and the share of women in managerial positions, as well as their workforce gender breakdown.

Piraeus requires its suppliers to comply fully with labor legislation, including prohibitions on child labor and forced or compulsory labor, as well as environmental and corporate governance laws in the countries where they are registered and operate. Suppliers must also not be irrevocably sentenced for offences such as embezzlement, fraud, extortion, forgery, perjury, bribery and corruption, fraudulent bankruptcy, and money laundering, in accordance with applicable legislation. Based on national legislation and the nature of Piraeus' activities, human trafficking is not considered a relevant risk for the Group. These measures aim to prevent any negative impact on upstream value chain workers.

For further information please refer to section "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" of the ESRS 2 General Information chapter.

Code of Conduct & Ethics

The Code of Conduct & Ethics applies to all individuals who have an employment relationship or act as representatives or associates of Piraeus Group, including suppliers and among others it expects that they commit to:

- Not judge, comment, criticize, marginalize, threat, bully colleagues/associates.
- Show zero tolerance to any type of violence and harassment, including violence and harassment because of gender, as well as sexual harassment.
- Keep a healthy working environment.

The code of conduct provisions is relevant to both impacts arising from lending activities and the impact related to suppliers.

For further details on Piraeus Group's approach to human rights, please refer to the ESRS S1 "Own Workforce" section.

Human rights in the value chain

The established mechanisms and due diligence processes of the Group are also utilized in cases where potential negative impacts may emerge on the environment and society, including local communities, either through the organization's own operations, its clients' activities or its value chain.

Piraeus Group due diligence aims to be in line with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, through the implementation of a series of policies and processes, which are regularly monitored as part of the established internal control mechanisms. It should also be noted that the EU Regulatory Framework and Greek legislation provide a stringent framework that requires the performance of extended procedures when considering the effects of projects that may be financed with regards to environment and society.

In accordance with Piraeus' Code of Conduct and Ethics and applicable legislation, behaviors and actions related to trafficking, forced or compulsory labour, and child labour are not acceptable and not tolerated. No cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational have been identified by Piraeus.

3.2.2.2. Processes for engaging with value chain workers about impacts [S2-2]

Engagement with workers in the value chain

Through the Double Materiality Assessment process, the Group considers the perspectives of suppliers and business clients when assessing whether material impacts related to workers in the value chain arise. Relevant Units are in continuous communication and engagement with the organization's business partners, in case there is an emerging issue related to the workers in the value chain, since this engagement plays a key role in enhancing the positive impacts and preventing negative ones.

Engagement with Suppliers

The Group has adopted a centralized procurement model that manages the sourcing of goods and services and the relationship with suppliers. A single electronic platform for procurement and supplier management is already being used by Piraeus Bank, for the automation and improvement of actions in the procurement cycle. The platform is the main channel of communication and collaboration with the suppliers, as well as the core infrastructure for the management of suppliers' contracts, purchase requisitions' approvals, purchase orders and invoices. The operational responsibility for this engagement rests with the Group Procurement Unit, overseeing supplier relationships.

In this context, during procurement tenders (Request for Proposal - RFP) candidate suppliers are required to submit their offers through the procurement platform, including additional documentation and information regarding their viability and sustainability and the quality of their services, such as any special certifications. The additional information requested may vary depending on the subject of the tender.

Furthermore, on an annual basis, suppliers which are classified as "significant" based on predefined criteria are monitored with the aim of proactively identifying and addressing potential risks related to sustainability or business continuity.

In 2025, the activities of Piraeus Bank centralized procurement sourcing model were certified in accordance with ISO 9001:2015 (Quality Management System) and ISO 20400:2017 (Sustainable Procurement), enhancing the due diligence framework in suppliers' assessment and onboarding procedures, aligned with the requirements of the ESRS S2.

Engagement with business borrowers

In the context of the Environmental and Social Management System (ESMS), Piraeus engages business borrowers with respect to potential social impacts, including working conditions of their employees.

For more details on the process refer to the "Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action [S2-4]" sub-section on the next page.

Overall, Piraeus indirectly considers the perspectives of workers across the value chain when initiating relationships with suppliers and granting credit to borrowers, as well as during the renewal of collaborations or the renewal of credit agreements. The operational responsibility for the engagement with business borrowers rests with the ESMS Officer, overseeing borrower relationships.

3.2.2.3. Processes to remediate negative impacts and channels for value chain workers to raise concerns [S2-3]

Whistleblowing channels and Complaints Mechanism

Currently, no actual negative impact has been identified by Piraeus with respect to workers in the value chain. However, the Group fosters open communication, dialogue, and inclusion, and expects all partners to adhere to the same standards of accountability, transparency, and meritocracy. Mechanisms such as whistleblowing channels and complaints mechanisms are available online for reporting concerns or breaches. The mechanisms are communicated through the Annual Financial Report, the Piraeus website and the Bank's Branches and provide protection against retaliation to any submitter. The Bank makes every effort to settle the complaint as soon as possible and in the best possible way. At this stage and taking into account prevailing market practices, the fact that the identified negative impact is potential, as well as current operational requirements, Piraeus has not implemented a standalone process specifically dedicated to communication with workers in the value chain. Nevertheless, the existing mechanisms described above provide an adequate and appropriate framework for addressing such communication needs under the current circumstances.

More details on the whistleblowing mechanism can be found on the "S1-Own Workforce" chapter.

This mechanism, along with the complaints process, applies to both the Group's own workforce and workers across the value chain.

3.2.2.4. Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action [S2-4]

The ESMS supports Piraeus Bank ongoing efforts to embed sustainability principles in the lending practices, promoting respect for value chain workers' rights, in line with the Sustainability Policy objectives for supporting Responsible Entrepreneurship. The ESMS is applicable to Piraeus Bank for all business lending (Small Business, Small Medium Enterprises and Large Corporate Clients Project and Structure Finance). Piraeus monitors ESMS performance by tracking and disclosing the number of clients assessed within the reporting period. The ESMS also includes a dedicated process for identifying and overseeing Corrective Action Plans from borrowers whenever such plans are deemed necessary based on the relevant evaluation. In addition, the Procurement Unit ensures that all suppliers meeting the applicable financial criteria acknowledge compliance with the Bank's terms.

To manage material impacts related to value chain workers and sustainability in lending practices, the Group allocates resources through dedicated governance structures and specialized teams. The Environmental and Social Management System (ESMS) is implemented by the Sustainable Banking Unit, the ESMS – Technoeconomic Evaluation team, in particular. These teams are responsible for applying ESMS procedures during credit assessments, monitoring compliance, and conducting client reviews. Operational resources include trained staff within Procurement and ESG functions, the centralized procurement platform for supplier engagement, and annual monitoring processes for significant suppliers. Oversight is provided by senior management, ensuring that sustainability principles and human rights considerations are integrated into lending and procurement decisions. Overall, Human resources from the Development & Sustainable Banking Unit and the Procurement Unit are engaged in implementing and executing the relevant actions, supported as needed by appropriate technical infrastructure.

Environmental & Social Management System (ESMS)

In its Risk and Capital Strategy, Piraeus Group identifies, assesses, categorizes and manages environmental and social risks, i.e. negative impacts on the environment and society deriving from its borrowers' business activity.

Social risk refers to issues related to human rights, employment, employees' health and safety, as well as the health and safety of the community where the business operates or it can affect.

During the financing process for businesses, the Environmental and Social Management System organizes the assessment and management of environmental and social risks that may result from the business activities of Piraeus Bank and more specifically from financing directed to business customers. The overall steps followed include the following:

Risk Identification & Categorization: Identification of activities excluded from financing and assessment of applications for environmental and social risks. Categorization of projects into A (high risk), B (medium risk), or C (low risk) tiers.

Due Diligence: Economic, environmental, and social assessments for all financing cases through review of customer background for any serious environmental or social violations.

Corrective Action Plan: If unmanaged risks are identified during site visit, a monitor and corrective plan aligned with the Bank's Credit Policy is developed and applied in collaboration with the business borrower.

Contractual Integration: Clauses granting the Bank rights to audit facilities, to propose corrective measures, and to lay down specific terms if necessary (as environmental and social covenants) are added in the loan documentation.

Ongoing Monitoring: Regular reassessment of borrowers' environmental and social performance is performed. Customers are obliged to inform the Bank in the event of accident or other environmental and social events, within reasonable days.

The enhancement of ESMS is assessed annually, according to Piraeus Risk Appetite Framework. The significance of environmental and social risks inherent to each financing case depends on the customer's activities, the monetary value, duration, and objective of the financing, as well as the potential environmental and social impact of the project and its extent.

Actions to Prevent Negative Impacts

By embedding risk assessment, exclusion lists, due diligence, contractual safeguards, and monitoring into financing and procurement practices, Piraeus identifies and progressively phases out actions that could cause or contribute to material negative impacts on value chain workers.

Suppliers' commitment to labour legislation

Suppliers participating in procurement tenders (RFP) through the procurement platform are required to fully comply with the Bank's rules and regulations. Furthermore, they are requested to declare, by signing a legally binding declaration for ESG compliance, that they fully comply with the labour law, they will take all necessary safety measures and precautions in relation to their own staff during the execution of the supply. In addition, for suppliers awarded through RFPs, provisions related to labour law compliance are embedded within the contractual terms.

To date, no severe human rights issues or incidents have been reported in connection with the Bank's value chain.

3.2.3. Metrics and Targets related to value chain workers

3.2.3.1.Metrics related to Workers in the value chain

To monitor compliance with labor legislation and health & safety requirements in its downstream value chain, Piraeus monitors the following metric.

Table 61: Metrics related to Workers in the Value Chain | ESMS assessments

	2025	2024
Number of clients assessed within the year in line with the ESMS process	2,367	579

This metric underscores the Group's commitment to proactive oversight of its business relationships, through alignment with the principles and processes of its Environmental & Social Management System (ESMS), safeguarding environmental integrity and social well-being in Piraeus' value chain. The assessment concerns requests for new medium to long-term - investment financing, and for borrowers with a turnover of over € 2.5 million.

3.2.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S2-5]

The Group commits to the protection of labor standards and working conditions across its value chain. For 2025, Piraeus has not established specific quantitative targets related to workers in its value chain, as these impacts were identified as material for the first time in the 2025 Sustainability Statement.

3.3. Affected Communities [ESRS S3]

3.3.1. Strategy

3.3.1.1. Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model [SBM-3]

Communities' Economic, Social and Cultural Rights

Piraeus Group embeds corporate responsibility and sustainable development principles into its business model and operations, ensuring a positive contribution to society and the creation of long-term value. These practices stem from and align with the Group's strategic priorities, enabling its business model to adapt continuously to evolving societal needs and expectations. By integrating these considerations into decision-making, Piraeus ensures its strategy remains consistent with its commitment to sustainable development, social cohesion and shared prosperity, as outlined in its Sustainability Policy.

The Group implements a structured process for the identification and assessment of material impacts, risks, and opportunities, as described in detail in the section "IRO-1 - Description of the process to Identify and Assess Material Impacts, Risks and Opportunities". Drawing on the outcomes of this process, Piraeus prioritizes the areas of greatest significance to its stakeholders' interests.

In this context and based on the available information, the activities that contribute to the positive impacts determined as material, are outlined in the table below. Through these initiatives, Piraeus Group continues to build trust with its stakeholders, while supporting the communities and local economies where it operates.

Table 62: Piraeus' Positive Impacts and Opportunity related to Affected Communities [ESRS S3]

Positive Impacts and Opportunities related to Affected Communities	Activities that result in the positive impacts and opportunities related to Affected Communities

Pop-up table

3.3.2. Impact, risk and opportunity management

3.3.2.1. Policies related to Affected Communities [S3-1]

Piraeus Group Sustainability Policy

Piraeus Group's Sustainability Policy provides the overarching principles guiding its commitment to strengthening society and maintaining harmonious relationships with stakeholders. Through this Policy, the Group actively promotes social progress, equal opportunities, and solidarity.

The Policy also reflects Piraeus' dedication to reinforcing social cohesion by cooperating with non-governmental organizations, providing financial aid and donations, and supporting initiatives in education, health, environment, culture, fair play, and entrepreneurship. In addition, Piraeus seeks to highlight the country's cultural heritage through the Piraeus Cultural Foundation and contributes to the achievement of the UN Sustainable Development Goals, including SDG 4: "Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all."

Guided by these principles, the Group aims to create positive social impact and foster sustainable development across Greek society. Piraeus plans to further strengthen its commitments by updating the Sustainability Policy in the near future.

For additional information about the Policy, please refer to section "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" of the ESRS 2 Chapter.

Sustainable Finance Framework

As outlined in section "2.1.2.1. Policies related to climate change mitigation and adaptation [E1-2]", Piraeus has established a comprehensive framework for identifying and classifying sustainable financing. This Framework enables Piraeus to systematically capture opportunities arising from lending activities that support the development of the communities. It also provides a reference point for identifying opportunities in the context of Impact Investing in the form of prospective equity participation that the Group intends to pursue.

Human Rights and Affected Communities

The established mechanisms and due diligence processes of the Group are also utilized in cases where potential negative impacts may emerge on the environment and society, including local communities, either through the organization's own operations, its clients' activities or its value chain. Moreover, Piraeus has not identified specific marginalized or indigenous communities affected by its material impacts.

Piraeus Group due diligence aims to be in line with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, through the implementation of a series of policies and processes, which are regularly monitored as part of the established internal control mechanisms. It should also be noted that the EU Regulatory Framework and Greek legislation provide a stringent framework that requires the performance of extended procedures when considering the effects of projects that may be financed with regards to environment and society.

For further input about established policies and the Code of conduct and Ethics of Piraeus, please refer to section "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" of the ESRS 2 Chapter.

For additional details on Piraeus' efforts to respect and promote Human Rights, please also refer to section "Policies related to own workforce – Equal treatment and opportunities for all [S1-1]".

3.3.2.2. Processes for engaging with Affected Communities about impacts [S3-2]

Piraeus recognizes the importance and the added value of engaging with local communities by understanding societal needs and promoting initiatives that deliver positive impact.

Engagement is systematically conducted as part of the annual Double Materiality Assessment, during which stakeholders are invited to complete a publicly available impact assessment questionnaire. Responsibility for this engagement lies with the Sustainability & Engagement team and the General Manager of Strategic Planning & Sustainability.

Engagement also occurs through other channels such as Piraeus Bank's network, through daily interaction with people and through the activities of Piraeus Cultural Foundation (PCF) Museum Network. In addition, the Bank's Corporate Responsibility Unit engages stakeholders through a structured, ongoing process of dialogue, consultation and co-creation, ensuring that their expectations and societal needs are systematically integrated into Piraeus' CSR strategy and programs. Through continuous communication channels, targeted workshops, public opinion surveys and formal stakeholder forums, Piraeus captures insights that guide the design, implementation and evaluation of its social impact initiatives. Considering that no material negative impacts have been identified through the Double Materiality Assessment, no marginalized or indigenous communities were identified as affected by the Group's operations and value chain. The Group acknowledges that the engagement with Affected Communities can be further enhanced, through the development of dedicated formal processes and aims to evaluate the necessity for the development of such a process.

3.3.2.3. Processes to remediate Negative Impacts and Channels for Affected Communities to raise concerns [S3-3]

Piraeus utilizes the pre-established channels such as the Whistleblowing and the Complaints mechanisms, as means to receive any complaints and concerns from Affected Communities. More specifically, the interested stakeholders may communicate their views and concerns through the:

- Complaints mechanism regarding grievances that may be relevant to Piraeus Bank products and services, as well as for other matters related to their activities.
- Whistleblowing mechanism, which provides the means for communicating matters that could be in breach of Piraeus Code of Conduct and Ethics.

  For more details about complaints and whistleblowing mechanism, please refer to ESRS S4 "Processes to remediate negative impacts and channels for consumers and end-users to raise concerns [S4-3]".

- The standardized processes of employee engagement (e.g., employee satisfaction surveys, communication with HR Business Partners, etc.).

  For more details, please refer to ESRS S1 "Processes for engaging with own workforce and workers' representatives about impacts [S1-2]".

Further details on the Whistleblowing Policy and Code of Conduct and Ethics can be found on the "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" section. The relevant sections referenced above also include information on how Piraeus evaluates the users' awareness of, and trust in, these mechanisms, along with an explanation of the Group's non retaliation principle.

Piraeus has not yet identified any material negative impact on the affected communities. In this context, the aforementioned mechanisms provide a framework for receiving and addressing any grievances that could lead to negative impacts arising from the Group's activities, value chain and business relationships.

The Emergency Humanitarian Relief Committee

Piraeus' Executive Committee has established a standard internal mechanism to address humanitarian crises in Greece, particularly those exacerbated by climate change and extreme natural phenomena, regardless of their connection to Piraeus' activities. This initiative involves the creation of an Emergency Humanitarian Relief Committee, led by Piraeus CEO, tasked with coordinating its response to such crises. The Committee is responsible for approving and determining all matters, measures, and actions related to the Bank's charitable initiatives, aimed at alleviating the adverse impact of humanitarian crises on society, employees, and customers.

The Emergency Humanitarian Relief Committee is dedicated to addressing humanitarian crises by implementing a range of strategic responsibilities. It initiates immediate relief efforts by distributing essential items such as equipment, supplies, food, and medicine to those affected. The Committee also proposes support measures for impacted customers, including financial arrangements and credit relief, to the Executive Committee.

By collaborating with other organizational units and Bank executives, the Committee effectively utilizes human resources and logistics to fulfill its mission of comprehensive crisis response.

3.3.2.4. Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions [S3-4]

During the reporting year, Piraeus implemented programs and actions that benefited the communities of Greece, while planning to expand several of those programs. The Corporate Responsibility Unit develops and implements these initiatives by assessing society's current needs and prioritizing the areas where Piraeus should focus its efforts. In addition, the Unit incorporates insights from the Double Materiality Assessment, which directly reflects stakeholders' priorities and areas of interest. In addition, no severe human rights issues or incidents connected to affected communities have been reported in the reporting year within Group.

In the context of strengthening the positive impacts regarding the Affected Communities, in 2025 Piraeus proceeded to and completed the following programs and actions:

EQU**ALL** Program

In line with the Sustainability Policy of the Group and its Corporate Responsibility Strategy, Piraeus has created the EQU**ALL** program in Greece, aiming to eliminate social inequalities, discrimination, social exclusion, and gender bias experienced by women and other social groups, such as disabled people, vulnerable young people, children, students in remote areas of the country, and refugees. In addition, the program invests in empowering the younger generation with the necessary skills to achieve their personal and professional goals.

EQU**ALL** initiatives are developed across 4 pillars:

1. Gender Equality
2. Children Welfare
3. New Genration
4. Vulnerable Social Groups

and focus on education, training, acquisition, and enhancement of skills, creating equal opportunities for all men and women to evolve, develop, and become self-sufficient.

Gender Equality

The Group considers the GRI FS7 (Financial Services supplement) guidance in disclosing details regarding the Piraeus EQU**ALL** initiatives, when offering financial products and services to support women-led businesses in enhancing their competitiveness and quality.

Table 63: Actions related to Affected Communities | Gender Equality

Initiative - Action	Description

Pop-up table

Safeguarding Children's Well-being through Actions

Piraeus Group safeguards the well-being of children by ensuring their safety, health, and developmental needs are met in a caring environment. The Group is committed to upholding children's rights by strengthening the systems that protect them from neglect and abuse, aiming to create an environment in which children can live safely and securely.

Piraeus Bank's commitment to safeguarding children's well-being is embedded in its social responsibility strategy. The actual impact originates from the Bank's focus on protecting vulnerable groups and promoting equality under its EQU**ALL** framework. These initiatives strengthen child protection systems and ensure safe environments for children, aligning with the Bank's broader goal of fostering social cohesion and resilience. Programs like "Recognize – Protect" and SafeKids Alliance demonstrate how partnerships with specialized organizations (e.g., Eliza, UNICEF) enhance institutional capacity and community trust.

"Recognize – Protect" Program

Piraeus Bank, in strategic partnership with Eliza – Society Against Child Abuse, launched the Kindergarten Teachers Program for the Prevention of Child Neglect and Abuse. The initiative aims to equip preschool educators with the knowledge and tools to identify and manage suspected cases of child abuse, supporting early intervention as the most effective way to prevent severe consequences.

The program aligns with Piraeus Bank's EQU**ALL** framework, promoting equality and protection for vulnerable groups. It includes a pilot phase followed by nationwide training through blended learning (online and in-person), ensuring sustainability via digital resources.

In 2025:

- 3,400 kindergarten teachers trained in child protection,
- 110 calls made to the ELIZA hotline by trained teachers to report suspected child abuse cases (mainly boys under 5 years old).

By empowering educators, Piraeus Bank contributes to safeguarding children and fostering a safer, more inclusive society.

SafeKids Alliance

SafeKids Alliance is an initiative by Piraeus Bank to strengthen the child protection system and safeguard families from exposure to risks and the consequences of all forms of violence. The program is implemented under the Memorandum of Understanding between Piraeus Bank and UNICEF.

Key results of the initiative:

- the National Protocol for children at risk was established,
- a new, unified system for recording incidents was implemented in the Prosecutors' Offices, and
- 788 child-protection professionals were trained in handling cases involving children at risk under a uniform protocol of collaboration, reinforcing Piraeus Bank's commitment to child protection and social welfare.

Supporting the New Generation

Piraeus' Corporate Responsibility strategy, guided by the Group's commitment to acting as a responsible social partner, aims to empower the new generation to achieve self-sufficiency under respectful and dignified conditions. These initiatives involve collaboration with non-governmental organizations, charities, and other stakeholders across Piraeus' value chain and align with the objectives of the Bank's Sustainability Policy.

Table 64: Actions related to Affected Communities | Supporting the New Generation

Initiative - Action	Description

Pop-up table

These initiatives are aligned with the organization's culture and values and are integrated into Piraeus' Business Plan. They receive dedicated oversight from key units, including Corporate Responsibility and Group Human Resources. The Director of Workplace Culture and Employee Communication Unit is directly reporting to the Group Chief Human Resources Officer and is responsible for coordinating Diversity, Equity, and Inclusion (DEI) initiatives in alignment with the overall ESG strategy.

Enhancing the Quality of Life for Vulnerable Social Groups

Piraeus Group is committed to enhancing the quality of life for vulnerable people, including people with disabilities, low-income individuals, refugees, and other marginalized groups. Through targeted empowerment and access to resources, these initiatives contribute to the elimination of social discrimination and create equal opportunities for all.

Piraeus' commitment to improving the quality of life for vulnerable groups, including people with disabilities, refugees, and low-income individuals, originates from its Sustainability Policy and its strategic focus is on reinforcing social cohesion. Programs such as Refugee Women Academy, Skills 4 All, Brave In – Back to Productivity, and EQU**ALL** Hoops demonstrate how partnerships with specialized organizations and tailored training solutions enhance employability, social integration, and accessibility. This alignment strengthens Piraeus Bank's role as a responsible financial institution.

Refugee Women Academy

Refugee Women Academy is an initiative by Piraeus Bank focused on the professional training and integration of refugee women into the labor market. The program was launched in collaboration with the UNHCR in Greece, formalized through a Memorandum of Understanding signed on April 20, 2023.

Its scope is to support vulnerable social groups by creating programs that promote inclusion and well-being for refugees in Greece. The Academy offers specialized knowledge and practical skills to help refugee women secure employment in the growing tourism sector and integrate into society. In 2025, 90 refugee women have been trained.

EQUALL Hoops

EQU**ALL** Hoops is an inclusive basketball academy created by Piraeus Bank in partnership with Eurohoops, designed for children and young people on the autism spectrum. Now in its second year in Athens, the program expanded for the first time to Volos, offering free, specially designed basketball training sessions for boys and girls aged 12 to 22 at Eurohoops Academy facilities.

The initiative aims to improve accessibility to team sports for neurodiverse youth and foster social inclusion through sports. In 2025, 40 young people within the autism spectrum participated in two basketball academies, reinforcing Piraeus Bank's commitment to equality and inclusion.

Brave In – Back to Productivity

Brave In is an innovative program by Piraeus Bank, implemented in collaboration with the Hellenic Society for the Protection and Rehabilitation of Disabled Persons (ELEPAP), now in its third year. The initiative focuses on the social and professional reintegration of people with disabilities who have acquired brain injuries.

The program combines holistic neuropsychological intervention with career counseling and includes:

- Empowerment sessions
- Self-awareness workshops
- Counseling support
- Redefining professional profiles
- Career planning and next steps
- Job matching
- Personalized training
- Support for workplace adaptation.

In 2025, 18 people with acquired brain damage benefited and improved their employability readiness, reinforcing Piraeus Bank's commitment to inclusion and equal opportunities.

Leros Cycling Academy EQU**ALL**

Piraeus is launching the "Leros Bike Academy – EQU**ALL**" in collaboration with Leros Bike & Fun Academy. Starting in the 2025–2026 school year, the Academy will offer cycling lessons and inclusive activities to 27 children from vulnerable groups—including children with disabilities, on the autism spectrum, and from low-income families—supported by a specialized psychologist. The initiative promotes equal opportunities in sports and education, social inclusion, environmental awareness, and local community engagement.

Skills 4 All

Skills 4 All is an annual initiative by Piraeus Bank that provides professional training and job market integration for young people over 17 from vulnerable social groups, including the unemployed, low-income individuals, illiterate persons, single parents, migrants, refugees, and people with disabilities.

Developed in collaboration with Odyssea, the program aims to ensure equal opportunities for young people by leveraging knowledge for employment and personal development. It focuses on two key pillars:

- Professional training in tourism and construction sectors, covering specialties such as Electrician, Plumber, CNC Operator, Automation Technician, HVAC Technician, IT Support Technician, Bartender, Barista, and Digital Marketing in Hospitality.
- Job placement support to facilitate professional integration.

In 2025, 100 young people from vulnerable groups have been trained.

Assessment of the effectiveness of actions and initiatives in delivering intended outcomes for affected communities

Piraeus is the first Bank which, in collaboration with external experts, developed a standardized methodology for the quantification of Piraeus'

Corporate Responsibility initiatives. This methodology is "Social Return on Investment" (SROI) which is based on an international framework that quantifies and monetizes the value of social benefits generated by an organization's CSR activities. The ratio is being measured on an annual basis. Furthermore, the effectiveness of Piraeus' actions is assessed by tracking progress against established targets with respect to the number of beneficiaries of its Corporate and Social Responsibility initiatives.

Piraeus Cultural Foundation

Museum Network | Creation and Management of a network of thematic Museums of technology throughout Greece

Highlighting the development potential of the country's cultural reserve

Piraeus is deeply committed to its vision and values, actively promoting culture in line with the objectives of its Sustainability Policy. The Bank focuses on preserving and enhancing Greek cultural heritage, disseminating historical knowledge, and fostering intellectual creativity. These objectives are pursued through the initiatives of the and operations of the Piraeus Cultural Foundation, as culture plays a crucial role in achieving sustainability, by strengthening social cohesion, protecting the environment, fostering educational development, and promoting both national and international cooperation.

Piraeus preserves Greek cultural heritage and aligns its operations with the United Nations Sustainable Development Goals and the Principles for Responsible Banking. The Bank allocates resources to fund the Piraeus Cultural Foundation, which in turn operates a Network of Museums and organizes initiatives that support social and cultural goals.

The Piraeus Cultural Foundation is a public-benefit non-profit foundation that supports the preservation and showcasing of Greece's cultural heritage, with an emphasis on artisanal and industrial technology, while promoting the connection between culture and the environment.

The Foundation's work is carried out through the following:

- Thematic Museum Network in the Greek provinces
- Historical Archives
- Library
- Research work
- Educational Programmes
- Publications

Piraeus Cultural Foundation has created and is operating a network of nine (9) thematic museums in various regions of Greece, contributing to the economic growth and prosperity of the local communities. It promotes the tangible and intangible cultural heritage of the country and undertakes initiatives towards creating jobs and business opportunities for local stakeholders.

The Thematic Museums of Piraeus Cultural Foundation welcome approximately 300,000 visitors each year and are staffed by members of the local society. For the creation and operation of its Museums, PCF collaborates effectively with the Hellenic Ministry of Culture, local and regional self-government authorities, local societies, as well as with a broad network of specialists on cultural and environmental issues.

In accordance with its statutes, all operational costs of the Foundation, including those of its museums, are covered by Piraeus Bank. At the same time, PCF pursues the co-financing of certain projects through national co-financed and European programs.

Table 65: Actions related to Affected Communities | Piraeus Cultural Foundation Museums

Museum	Region
Silk Museum	Soufli
Museum of the Olive and Greek Olive Oil	Sparta
Rooftile & Brickworks Museum N. & S. Tsalapatas	Volos
Museum of Industrial Olive-Oil Production of Lesvos	Lesvos
Open-Air Waterpower Museum	Dimitsana
Environment Museum of Stymphalia	Stymphalia
Chios Mastic Museum	Chios
Silversmithing Museum	Ioannina
Museum of Marble Crafts	Tinos

The Piraeus Cultural Foundation has established a well-structured, long-term strategy focused on cultural and educational initiatives, reinforcing both the organization's enduring mission and the Bank's commitment to preserving Greek cultural heritage. Every year, as part of this ongoing plan, a series of carefully designed actions are carried out in the Foundation's Museum Network across the Greek provinces. This annual implementation underscores the foundation's sustained dedication to fostering cultural awareness and education throughout the country.

Piraeus Cultural Foundation tracks the effectiveness and measures and analyses the impact of its actions on audience groups through the following:

- Systematic collection of data / visits concerning the Museums of its Network.
- Visitors' comment books in the Museums of its Network.
- Systematic registration of requests, comments, and complaints, through relevant processes of the Foundation's Quality Management and Event Sustainability Management Systems (certified under ISO 9001:2015 and 20121:2012).
- Response to written requests and constant communication with all stakeholders.
- Ongoing satisfaction survey on the visitors to the Museums of its Network.

Impact Investing

Planned Action to Pursue Material Opportunities for Affected Communities

As part of its Business Plan, Piraeus Bank is aiming to allocate dedicated impact investment funds to support activities that deliver measurable environmental and social benefits. In line with its efforts to foster impact-driven investments in Greece, the Bank has embedded this objective within the Group's functions. The first disbursement is targeted for 2026, followed by the gradual identification and support of additional startups and entrepreneurial ventures focused on areas with sustainability impact. These initiatives align with the Group's business planning horizon of 2026–2030 and reinforce the broader goal of financing sustainable entrepreneurship, as outlined in the Sustainability Policy. The activities are focusing on potential Piraeus investees, i.e., towards its downstream value chain.

Upgrade of educational infrastructure

To support the Greek government's initiative to upgrade schools nationwide and enhance educational facilities, the Group has pledged a significant contribution of € 25 million. This amount refers to the line of Financial Statements "Other provision (charges) / releases", Note 15 of the Financial Statements.

The "Marietta Giannakou" Program is an ambitious project that contributed to the renovation of 431 public Kindergarten and Elementary, Middle and High School buildings throughout Greece and demonstrates the strength and the effectiveness of public-private partnerships for the benefit of society. Piraeus' partnership in such an important project for the educational community of Greece serves as the starting point for expanding the social responsibility activities of Piraeus multifaceted EQU**ALL** Program, which consistently meets the needs of the Greek society.

The related work commenced in 2025 and contributed to creating a better learning environment for all students, both in large urban centers and in the provinces. This contribution aligns with the Group's commitment to providing financial aid and donations to institutions that support education, health, the environment, and culture as outlined in the Group's Sustainability Policy. These initiatives, including the Project Future program and the substantial contribution to upgrading educational infrastructure, reflect Piraeus' commitment to creating significant indirect economic impacts and their reporting considers the guidance of GRI 203-2.

3.3.3. Metrics and targets

3.3.3.1. Metrics related to Affected communities

Highlighting the Development potential of the Country's Cultural Reserve through the Piraeus Cultural Foundation

Table 66: Metrics related to Affected Communities | Piraeus Cultural Foundation Museums Network[10]

	31/12/2025	31/12/2024
Total number of visitors of Piraeus Cultural Foundation Museums	281,275	295,571
Total number of cultural actions	242	222
Total number of educational programs and educational actions	492	607
Total number of students that participated in educational programs and educational actions	25,494	27,609
Total number of cultural actions co-organized with local stakeholders	120	100

10. Piraeus considers GRI 203-2 guidance for these metrics.

EQU**ALL** Pillars in numbers[11]

Table 67: Metrics related to Affected Communities | EQUALL Program

	31/12/2025	31/12/2024
Number of Beneficiaries regarding initiatives that empower women	4,879	2,186
Number of Beneficiaries for initiatives regarding the well-being of children	4,188	5,995
Number of beneficiaries empowering the new generation	6,006	5,995
Number of beneficiaries for initiatives enhancing the quality of life of vulnerable people	158	135

Table 68: Metrics related to Affected Communities | EQUALL 360° program

	31/12/2025	31/12/2024
Number and amount of loans disbursed via the EQUALL 360° program, to promote women entrepreneurship and community growth		
Number of loans disbursed via the EQU**ALL** 360°	177	129
Amount in € million of loans disbursed via the EQU**ALL** 360°	€ 10.5 million	€ 6.3 million

Economic Value Creation

Furthermore, Piraeus monitors the positive impact it has on communities and societies where it operates, assessing its contribution to the overall economy through expenses, wages, taxes paid, and the economic value created and distributed. The following table, prepared in accordance with GRI 201-1 guidance on "Direct economic value generated and distributed," summarizes Piraeus' key financial metrics and illustrates the Group's contribution to society.

Table 69: Metrics related to Affected Communities | Economic Value Creation

Direct Economic Value Generated and Distributed and Amounts Spent on Corporate Social Responsibility Actions and Initiatives	2025	2024

Pop-up table

11. The metrics refer to the annual performance in terms of number of beneficiaries within 2025. Piraeus considers GRI FS 7 (Financial Services supplement) and GRI 203-2 guidance in reporting details regarding the Piraeus EQU**ALL** initiatives.

3.3.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S3-5]

As Piraeus Group advances its commitment to sustainable development, the target related to the number of people benefiting from its initiatives is on track to be achieved. This objective focuses on expanding the reach of programs, underscoring the Group's dedication to creating lasting positive change and contributing to a fairer society for all.

The target presented below is aligned with the objective of the Sustainability Policy to reinforce social cohesion, providing financial aid and donations to institutions, cooperating with non-governmental organizations, supporting family, education, health, the environment, culture, fair play and entrepreneurship.

The KPIs are measured and monitored by the internal Performance & Value Management Unit (PVM), while the governance of the process is managed by Group Financial Management.

Table 70: Target related to Affected Communities | Corporate Social Responsibility Supported Beneficiaries

Target	Unit	Scope	Base Year	Baseline value (2024)	2025 Value

Pop-up table

In 2025, Piraeus Bank achieved an overperformance compared to planned target due to the execution of additional initiatives such as "Recognize-Protect", "Eco-Schools" and "Gen AI Empowered Educators". The outlined target of 2030 reflects the minimum commitment of Piraeus towards activities with positive impact to the society. Depending on the opportunities and prevailing circumstances, Piraeus Bank will continue to explore opportunities in order to expand its impact beyond the commitment reflected in the described targets.

Piraeus has not established a specific target regarding Piraeus Cultural Foundation's activities and their associated positive impact, as these impacts primarily reflect the beneficial effects of the Group's practices on society. In addition, for Impact Investments, a dedicated target will be considered.

3.4. Consumers and End-users [ESRS S4]

3.4.1. Strategy

3.4.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]

The Group delivers a comprehensive range of financial products and high-quality services to both individuals and business customers[12] through Piraeus Bank and its subsidiaries. Among Piraeus' business segments, Retail Banking, Corporate Banking, and Piraeus Financial Markets cover the core banking activities of the Group. In this context, the Double Materiality Assessment highlights that Piraeus' actual and potential impacts, risks and opportunities are primarily related to its customers through the suite of financial products and services it provides.

Piraeus' business clients and individual customers are both included within the scope of the Double Materiality Assessment, underscoring customers' expectations for secure access to transactional services and financial products, ensuring the protection of their privacy and personal data, and maintaining transparency through clear terms and conditions across the entire customer experience.

Through ongoing engagement, risk assessments, and targeted initiatives, Piraeus maintains a clear understanding of how individuals and businesses, and especially those with characteristics and needs, may be more exposed to the impacts of its activities and business relationships. These insights are integrated into both its operational and strategic decisions. Various channels are utilized to gain insights, including the grievance mechanism, customer satisfaction services, and the Double Materiality Assessment.

It should be noted that Piraeus' impacts on customers can be both positive and negative, actual and potential. The following tables provide descriptions of the positive and negative impacts identified, as well as their connection to Piraeus' key activities.

Table 71: Piraeus' Positive Impacts to Consumers and End-users [ESRS S4]

Positive Impacts	Related Activities	Consumers and end-users positively affected

Pop-up table

In addition to the identified opportunity regarding digital solutions, the Group has also identified the following material opportunity:

- Piraeus aims to strengthen resilience and customer trust by implementing robust data security policies and by offering cyber insurance products, through its insurance segment.

The relevant solutions safeguard individuals and businesses from digital threats while also unlocking new commercial opportunities in the growing cyber risk market. These offerings are especially significant for businesses and individuals with high exposure to digital threats.

Table 72: Piraeus' Negative Impacts on Consumers and End-users[13] [ESRS S4]

Negative Impacts related to Piraeus' Consumers and End-users	Impact Category	Risks linked to the negative impacts

Pop-up table

13. Regarding negative impacts, all consumers and end-users from banking activities are considered as relevant type of consumers.

12. The terms customers, clients, and consumers and end-users are used interchangeably within the chapter unless otherwise specified.

Piraeus' risks and opportunities arise either from current or potential impacts on consumers and end-users, or from dependencies linked to the ability to provide service accessibility, data security, trust, and customer experience. These factors are integral to Piraeus' business model, which is built on delivering inclusive, secure, and innovative banking solutions, and to its strategy of digital transformation and customer-centric growth.

Piraeus' positive impacts stem from its strategy to expand and diversify products, emphasizing digital solutions and insurance while maintaining customer accessibility. The only negative impact directly linked to Piraeus' strategy is the shift from physical to digital and self-service channels. While this transition aims to improve accessibility through digital offerings, it may initially affect client perceptions. Other impacts stem either from isolated incidents that Piraeus actively addresses or from systemic sector challenges that are acknowledged by the Group and are appropriately treated.

3.4.2. Impact, risk and opportunities management

3.4.2.1. Policies related to Consumers and End-users [S4-1]

Piraeus Group Sustainability Policy

Fair Advertising Principles: Providing adequate and appropriate information and responsible marketing

Building trust and driving sustainable growth are core priorities for Piraeus as reflected on the updated Sustainability Policy, guided by the UN Principles for Responsible Banking (United Nations Environment Programme Finance Initiative). In this regard, Piraeus is committed to promptly, clearly, and fully informing all customers about the terms governing the provision of its services.

To further protect its customers from the potential risks of ignorance or misunderstanding of the terms of its products and services, the Bank:

- provides complete and accurate description,
- takes care to systematically familiarize its customers with banking terminology,
- provides easier access to information by means of new technologies,
- accurately defines the terms without exaggeration, inaccurate or misleading statements,
- avoids the excessive promotion of its products,
- does not take advantage of the public's ignorance, inexperience or fears.

Advertising aims to provide honest and transparent communication about its products and services, without misleading the recipient. Fully compliant with the current legal and regulatory framework, Piraeus Group has established and strictly adheres to corporate principles for advertising the financial products and services it provides.

Piraeus places particular importance on individualized products and services for its customers, examining individually the needs of each customer, who is perceived as a unique individual with their own particularity and dynamics.

Data Protection: Protecting Piraeus Customers' Privacy

Piraeus has taken all measures required by the legal framework and has implemented appropriate technical and organizational measures and necessary safeguards for the lawful collection, processing, and retention of personal data. Piraeus is committed to protecting personal data against disclosure, loss, alteration, misuse, or any other unauthorized access. Piraeus has a defined procedure for the transparent, timely and optimal management of data subject requests, under the supervision of the Data Protection Officer and in compliance with the provisions of the legal and regulatory framework. Specifically, all subjects whose personal data is processed and retained by the Bank are entitled to exercise their rights under GDPR (General Data Protection Regulation).

IT Security

Piraeus Bank has designed and documented a detailed incident management procedure, to deal with IT security incidents. The procedure depicts all the planned actions that will be performed by Piraeus Bank's authorized personnel reacting to any IT security incident (including cybersecurity incident and data breach incidents). The incident response plan is tested annually using real life scenarios (including data security incidents), incorporating lessons learned and updated accordingly.

According to the Information Assets (including Data) Security Policy, Piraeus Bank performs annual assessment reviews to verify compliance with regulatory standards. Information Assets Security Policy governs the whole Group, i.e., all business lines as well as all the Bank's subsidiaries.

Code of Conduct and Ethics of Piraeus Group

The revised Code of Conduct and Ethics, aligned with Environmental, Social, and Governance (ESG) criteria, underscores the commitment of strengthening sustainable development by incorporating human, social and environmental aspects in Piraeus activities. A unified approach guides the Group's interactions with customers, employees, shareholders, and society, positioning the Group as a pillar of stability for the Greek economy. Furthermore, Piraeus is committed to retaining and growing the largest base of primary corporate and retail customers, building customer loyalty and creating value. Key principles include transparent communication, handling complaints effectively, protecting personal data, and offering timely support. This way Piraeus goes beyond expectations to engage with customers, ensuring they are treated with care and respect.

The Code of Conduct and Ethics is applicable for all interactions with consumers and end-users.

More details about the Code of Conduct and Ethics can be found in section 1.5 "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" in Chapter ESRS 2 "General information".

Code of Banking Ethics of the Bank of Greece

Piraeus Bank adheres to the Bank of Greece Codes and guidelines, including the Code of Banking Ethics and the Code of Conduct of Law 4224/2013 issued by the Bank of Greece, ensuring fair communication, transparency, and collaborative evaluation of restructuring options for overdue loans. The Code applies to individuals and micro-enterprises (turnover up to € 1 million), promoting sustainable repayment solutions over aggressive collection tactics.

The Code of Banking Ethics establishes the fundamental principles and rules that govern the conduct of banking institutions and their staff, aiming to ensure transparency, integrity, and trust in banking operations. It sets out the obligations of banks towards their clients, society, and the financial system, promoting responsible banking practices and compliance with legal and regulatory frameworks.

Central to the purpose of the Code is the commitment to transparency and the provision of complete and accurate information to customers and investors, the proper management of banking risks, and the continuous improvement of internal processes and controls.

The leadership of credit institutions must demonstrate integrity and responsibility in performing their duties, while the management of credit, market, operational, and other risks must be carried out within the framework of the institution's approved internal rules and procedures.

The Code forms an integral part of the broader regulatory and supervisory framework of the Greek banking system.

Piraeus Group respects the Human Rights of its clients and customers

Piraeus is dedicated to responsible business practices, in line with its commitment to the UN Global Compact, the provisions included within the Sustainability Policy and the Code of Conduct and Ethics, as well as the Code of Banking Ethics of Bank of Greece. By following the guided principles included within these policies, the Group seeks to build relationships of trust with customers by ensuring transparency in its everyday interactions, providing clear, honest information about its products and services and in general by promoting an ethical framework, respecting human rights when doing business.

Piraeus Group has developed an integrated system of policies and processes designed to identify, minimize, and manage any material impacts on its customers and safeguard a seamless experience. Key components include policies to prioritize a trusted relationship (refer to Code of Conduct for more details), the Credit Policy, and the overall ESG risk assessment process (refer to Chapter ESRS 2 "General Information" for more details). These elements form the foundation for identifying and managing any adverse environmental and social impacts through financing. Additionally, the whistleblowing policy (also detailed in Chapter ESRS 2 "General Information") establishes a secure system for reporting unethical and illegal behavior.

Piraeus prioritizes the prevention of potential negative impacts and provides essential tools to address them when they arise. The organization has established regular engagement processes, grievance channels, and, as noted above, a dedicated whistleblowing mechanism.

Overall, Piraeus' existing framework for addressing consumers and end-users' relevant matters, aligns with the core principles of due diligence outlined in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Piraeus has not identified any incidents involving consumers in the downstream value chain indicating non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises.

UN Commitment for Financial Health and Inclusion

Piraeus has signed the Commitment for Financial Health and Inclusion, in the context of the UN Principles for Responsible Banking. The purpose is to allow the most vulnerable clients, both individuals and businesses, to have opportunities to secure and maintain their standard of living and take steps to improve their financial health, such as long-term financial planning and access to credit and insurance. Through its participation in national and international initiatives, Piraeus aims to expand access to financing for individuals and small businesses with alternative funding options.

3.4.2.2. Processes for engaging with Consumers and End-users about impacts [S4-2]

Piraeus Bank engages with its customers through the Relationship Net Promoter Score (r-NPS) survey, conducted quarterly to monitor satisfaction, detect emerging issues, and identify opportunities to enhance customer experience. As of 2025, over 2.2 million retail (Individual and Small Business) customers have been surveyed, resulting in over 61 thousand responses and over 7 thousand corporate customers, with ~1.9 thousand responses. The Customer Experience Center of Excellence (CX CoE) manages the program for Retail customers via web-based email surveys, while CIB (Corporate and Investment Banking) clients participate in structured phone interviews conducted by an external vendor. Overall responsibility lies with the Customer Experience Center of Excellence, led by the Head of CX. This unit operates under the Transformation Strategy and CX division of the Bank, which is headed by the Chief Transformation Officer, reporting to the Chief Human Resources & Group Change Officer (Executive General Manager).

Insights from r-NPS show that customers value the Bank for service quality, ease of use, security, and responsive support, while also expecting faster branch service, clearer charging policies, and consistent channel availability. These insights guide ongoing improvements across physical and digital channels and help prioritize initiatives that strengthen trust, convenience, and overall customer relationships. The effectiveness of which is monitored through the ongoing monitoring of the NPS score for specific customer episodes, and the impact that the improvement actions taken have had.

Customer Contact Center satisfaction (CSAT) is also measured through Viber post-call surveys sent shortly after eligible mobile calls. CSAT, calculated as the proportion of positive ratings, supports real-time monitoring of service quality. Plans are underway to introduce Transactional NPS (t-NPS) for the Contact Center to further enhance customer experience insights and guide actionable improvements.

In the latest survey, Piraeus included dedicated questions in order to understand the extent to which Piraeus Bank enables its retail and small business customers to have control over their finances, both on a day-to-day basis and in the long term, under its commitment to the UNEP FI initiative "Financial Health & Inclusion". The goal is to map customers' perception regarding their financial health and to identify and assess specific areas for improvement and further actions to be taken.

3.4.2.3. Processes to remediate negative impacts and channels for consumers and end-users to raise concerns [S4-3]

The Group recognizes that operational and technological changes may affect customer experience, including delays in contact center support, concerns over credit collection practices, ICT disruptions, cybersecurity risks and varying perceptions regarding services accessibility for certain groups.

When Piraeus identifies a material negative impact, it applies a structured remediation process involving prompt investigation, consideration of the interests of affected customers, and remedies such as service restoration or compensation. Effectiveness is monitored through feedback and resolution metrics.

Piraeus Bank has established the Artificial Intelligence Committee (AI Committee), chaired by the Group Chief Operating Officer, with the aim of systematically contributing to the coordination, acceleration of implementation and effective monitoring of all initiatives related to Artificial Intelligence. The Committee's key role is to provide strategic guidance, oversight and coordination of relevant projects, so that the implemented solutions create value for the Group, enhance customer experience and competitiveness and are linked to the Group's strategic objectives.

To prevent and address such issues, the Group maintains robust complaint and Whistleblowing mechanisms and continuously strengthens ICT resilience, cybersecurity, and information security controls, reaffirming commitment to customer trust and service continuity.

Customer Complaints mechanism

Adhering to its corporate values, Piraeus Group consistently seeks open, honest, and two-way communication, while fostering trust-based relationships with its customers. In this context, the Group's executives are committed to making every reasonable effort to resolve issues arising throughout transactional relationships. However, in the event that the consumers and end-users are not satisfied with the proposed solutions, Piraeus has established the Complaints Management Mechanism, a simple and transparent process that enables customers to submit their complaints, seek the best solution for their settlement and express any dissatisfaction regarding the quality of service. Other stakeholders may also use the complaints management mechanism, such as Out-of-Court Dispute Resolution Bodies, Public Authorities and Consumer Organizations within their responsibilities. Additionally, this mechanism facilitates the submission of reports related to the Group's Corporate Responsibility and ESG matters.

Information regarding the established process is publicly available to consumers, either through the Group's website or at its physical branches. Transacting parties may choose to receive information about the relevant procedure in either electronic or paper form, submit complaints through multiple channels, and receive updates on the investigation's progress at every stage of the process. Piraeus Group handles complaints with genuine care, guided by the principles of good faith, respect, and transparency. The Group strives to reach fair solutions and makes every effort to respond promptly within the institutionally defined time frame. In all cases, appropriate technical and organizational measures are implemented to safeguard the personal data of all parties involved, ensuring protection against loss, leakage, falsification, or any form of unauthorized processing.

The Bank has instituted a formal Customer Complaints Management Policy, ensuring full compliance with the applicable regulatory framework (Executive Committee Act of Bank of Greece 157/2.4.2019), which is derived from the guidelines established by the European Banking Authority (EBA). It also fosters a unified culture among staff for consistent complaint handling and promotes continuous service improvement through customer feedback. The Complaints Management Policy is approved by the Board of Directors, which is responsible for its implementation, monitoring, and compliance. The "Customer Complaints Handling" Unit (C.C.H.) has been designated as the custodian of the Complaints Management Mechanism and the Complaints Officer Leader is responsible for its proper operation. It is noted that the Complaints Management Process is certified under ISO 9001:2015[14] & ISO 10002:2018[15] standards, demonstrating the Management's and employees' commitment to delivering high-quality services to Piraeus' customers. The Bank systematically monitors predefined Key Performance Indicators (KPIs) to assess the effectiveness of all stages of the complaints handling process. Additionally, a structured customer satisfaction survey is conducted upon the completion of each complaint resolution, and the results are thoroughly evaluated to identify and implement corrective and improvement measures. Furthermore, periodic reports are prepared that include both quantitative and qualitative statistical data based on the complaints submitted, with the aim of informing the relevant Units and the Bank's Management.

In 2025, a total of 5,022 cases were received, 7% of which concerned grievances forwarded to Piraeus by Out-of-Court Redress Bodies or the General Directorate for Consumer Protection of the Ministry of Development and Investments, which is responsible for monitoring compliance with the applicable institutional framework.

To identify root causes, complaints are first categorized based on common characteristics (e.g., product/service, customer segment) to detect recurring themes. At the same time, issues that occur infrequently but indicate potential procedural gaps or system malfunctions are also examined. If data analysis reveals deficiencies or opportunities for improvement in existing processes or in their supporting systems, targeted corrective actions are designed and implemented.

In this context, in 2025, the following were analyzed:

- A total of 2,476 complaint cases were examined within the thematic areas and complaint causes that demonstrated increased concentration.
- The objective of this analysis is to identify common or standalone issues of dissatisfaction potentially associated with shortcomings in existing processes or system malfunctions.
- In this context, 15 thematic areas were reviewed during the year, while the corresponding causes, linked to the analyzed complaint cases, amounted to 16.

14. Quality management systems — Requirements

15. Quality management — Customer satisfaction — Guidelines for complaints handling in organizations

- Overall, in 2025, 46 improvements were identified, and corresponding actions were proposed.
- During the same year, 32 actions were implemented, 18 of which had also been identified within the year.[16]

Table 73: Customer complaints and grievances

	2025			2024	
	Number	%	Variation	Number	%
Complaints	**4,648**	**93%**	**-26%**	**6,322**	**94%**
New Cases	4,322	93%	-28%	5,971	94%
Reinstatements[17]	326	7%	-7%	351	6%
Grievances	374	7%	-11%	420	6%
New Cases	292	78%	-14%	341	81%
Reinstatements	82	22%	4%	79	19%
Total of Complaints	**5,022**	**100%**	**-26%**	**6,742**	**100%**
Total of Subjects[18]	**6,310**			**8,731**	

17. Resubmission, due to dissatisfaction with the outcome of the initial report or due to the submission of new information for the purpose of reassessment
18. Each submitted complaint may involve more than one issue or cause (referred to as "subjects"). Consequently, the number of subjects typically exceeds the number of cases.

Emphasis is placed on complaints where it is determined that customer dissatisfaction is well-founded and documented and there is a need for redress. In cases involving a financial claim, settlement is carried out in collaboration with the competent business Units.

Table 74a: Number of Subjects with monetary or non-monetary relief[19] - Piraeus Bank

	2025			2024	
	Number	%	Variation	Number	%
Subjects with monetary relief	**968**	**15%**	**-17%**	**1,171**	**13%**
Acceptance of Monetary Relief	498	51%	-18%	609	52%
Rejection of Monetary Relief	470	49%	-16%	562	48%
Subjects with non-monetary Relief	**5,342**	**85%**	**-29%**	**7,560**	**87%**
Number of customer complaints filed with monetary or non-monetary relief	**6,310**	**100%**		**8,731**	**100%**

19. It is noted that any financial claim that may exist is recorded and evaluated for each Subject separately.

Table 74b: Number of Subjects with monetary or non-monetary relief - Subsidiaries

	Snappi[20]		Piraeus Bank ICB	
	2025	2024	2025	2024
Number of customer complaints filed with monetary or non-monetary relief	Number	Number	Number	Number
	15	N/A	13	33

20. Snappi did not conduct commercial activity in 2024, and as a result all metrics concerning consumers and end users in 2024 are not applicable.

In cases where no financial claim exists, remediation typically involves corrective actions related to the services provided, with the objective of restoring customer satisfaction.

3.4.2.4. Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]

Piraeus Group manages actual or potential negative impacts on consumers and end-users considering its strategic objectives, the established stakeholder engagement through surveys and reports, and the complaints management process, where applicable. In this context, Piraeus categorizes cases by shared characteristics and applies analysis to identify consumer needs. When such needs are confirmed, actions are designed and implemented in accordance with the relevant Business Units' priorities and goals. Overall, actions are designed and prioritized by the pertinent Business Units in line with the Bank's Business Plan and overarching strategic objectives. Each Business Unit is responsible for monitoring the effectiveness of these actions by utilizing means such as the complaints' mechanism, customer satisfaction etc. Customer feedback is also systematically captured through quarterly r-NPS surveys and Voice of Customer surveys, providing insights into customers' perceptions of Piraeus Bank's products and services. Lastly, the uptake of new products and services, as well as the efficiencies generated in customer interactions are considered in the assessment of actions.

All actions are considered ongoing, and the information provided applies to all actions described below. It should be noted that no severe human rights issues and incidents have been reported to Piraeus with regards to consumers and end-users.

Social inclusion of consumers and/or end-users

Equal and Unobstructed Access for all

Piraeus Bank actively advances financial inclusion by maintaining the largest banking network in Greece, comprising 368 branches and 1,641 ATMs. The Bank's commitment to accessibility is reflected in ongoing investments in physical and digital infrastructure, such as Braille cards, voice-guided ATMs, and sign-language-trained staff, alongside innovative solutions such as Video Teller Systems and Digital Kiosks. These initiatives, which are being scaled through 2025 and beyond, ensure that all individuals, including those with disabilities, the elderly, and customers with limited digital literacy, can independently access essential financial services. This broad scope underscores Piraeus' dedication to removing barriers and fostering equal opportunities for every customer.

These initiatives reflect Piraeus' commitment to improving access to financial services for disadvantaged people, and their reporting considers the guidance of GRI FS14.

Table 75: Actions related to Consumers and End-users | Equal opportunities for all customers

Type of customer	Description

Pop-up table

All processes and innovative projects that the Bank implemented had a positive impact and improved the banking experience and customer service of people with disabilities. Both the letters of appreciation that the Bank received from the relevant federations and the feedback posted on the websites of these federations confirm customer satisfaction regarding the Bank's actions. Furthermore, positive customer feedback published on social media emphasizes the necessity of inclusive customer service and verifies that Piraeus is on the right path, while announcements by Piraeus and the federations & unions, confirm the approval and effectiveness of such innovative adjustments.

In this context, Snappi as a fully digital bank, promotes digital literacy through a range of targeted initiatives. Snappi participates in university and corporate panels, sharing practical digital and financial knowledge with students and the wider public in Greece and internationally. The activity is led by the Commercial, Technology, and Management teams, supported by Snappi's digital platforms. Participation is monitored through event records, employee involvement, and audience engagement, with feedback used to assess outreach. The initiative was developed following assessments that indicated gaps in digital and financial literacy, and it now serves as a structured approach to support digital inclusion and improve public awareness.

In parallel, Piraeus Bank ICB in Ukraine promotes financial empowerment through targeted educational initiatives. In cooperation with the financial portal Minfin, the Bank has launched a family oriented financial literacy program designed to help households strengthen their financial awareness and improve everyday decision making. The project explains, in simple terms and through practical examples, how families can discuss money with children, manage a household budget responsibly, and plan for long term financial security. By sharing its expertise, the Bank aims to support Ukrainian families in building confidence, avoiding common financial pitfalls, and cultivating financial skills that can be passed on across generations.

Leveraging Innovative and Digital Technologies

Piraeus leverages innovative and digital technologies, such as developing remote personal banking services and utilizing artificial intelligence (AI), to enhance customer experience across its products and services.

Using new technologies to upgrade customer service and growing demand for digital solutions

As part of its new technologies and customer service upgrade, Piraeus Bank continued strongly and committed to the implementation of its strategic digital transformation plan.

More specifically, Piraeus Bank implements a multi-year modernization initiative significantly strengthening its technological infrastructure. Through this ongoing effort, the Bank has expanded its digital and data capabilities, enabling more advanced analytics and customer engagement tools. In parallel, cybersecurity measures have been reinforced to safeguard operations and protect client information in an increasingly digital landscape.

As part of its transformation journey, the Bank is focused on several key objectives. These include advancing channel capabilities to improve service delivery across all customer touchpoints, introducing new products and enterprise platforms to support evolving business needs, and implementing foundational interventions that optimize core operations. Additionally, the adoption of artificial intelligence technologies is accelerating innovation and efficiency throughout the organization.

The Bank prioritizes a product operating model, targeting areas that demonstrate higher levels of maturity and readiness, as well as those expected to yield the most significant benefits. This strategic approach is designed to accelerate delivery, reinforce operational discipline, and ensure that solutions are tailored to meet evolving market needs. The Bank's ongoing technology investment strategy continues to facilitate its transformation journey. These investments are positioning Piraeus to deliver highly personalized customer experiences, leverage the capabilities of artificial intelligence, and utilize composable architecture. This approach ensures that Piraeus remains competitive with neobanks and other market innovators.

The commitment to advancing digital experience and boosting digital sales is also reflected in the adoption of marketing technologies, embedded banking solutions, and intelligent banking features. Innovations such as the GenAI assistant and Automated Investment Advisor are being introduced to provide customers with smarter, more intuitive financial guidance and support.

The key initiatives as part of Piraeus' commitment to innovation and efficiency for 2025, with a time horizon spanning of up to 2 years, are presented in more detail below.

16. It is noted that the above data refer to Q1–Q3 2025, as the Q4 analysis is conducted after year end, at the beginning of the following year.

Table 76: Actions related to Consumers and End-users | Innovation & Efficiency

Innovation & Efficiency Actions	Description	Progress Status

Pop-up table

21. International Swaps and Derivatives Association
22. Global Master Repurchase Agreement
23. Next Best Move refers to an advanced customer-centric decisioning concept that determines the optimal next action or interaction with a customer, based on data, behavior, and business objectives.

In 2024, Piraeus' IT service management was certified under ISO 20000:2018,[24] ensuring high-quality IT services by defining and implementing consistent processes. Additionally, Piraeus' e-banking (former "winbank") is certified under ISO 9001:2015[25] for another consecutive year, committing to improving its services.

In an ever-evolving environment, Piraeus will continue to invest in technology and foster a modern work environment that promotes collaboration and innovation. Piraeus Bank's objective is to lead in sustainable development and return value to society.

Overall, the increasing preference for digital banking presents Piraeus with a significant opportunity to expand its market presence and profitability. By targeting ambitious goals, such as achieving 87% of products and 96% of services accessed via e-banking by 2030, the Bank is accelerating its digital transformation leveraging opportunities emerging in the digital banking space. These efforts, which include the rollout of online applications and digital tools like Eco Check and the Carbon Footprint Calculator, are designed to benefit all customers of Piraeus Bank, with a particular emphasis on younger and digitally savvy segments. The time horizon for these initiatives spans up to the medium-term, supporting Piraeus' strategy to lead in digital innovation.

Financial Inclusion: Promoting access to finance through dedicated solutions

Piraeus has signed the Commitment for Financial Health and Inclusion, in the context of the UN Principles for Responsible Banking. The purpose is to allow the most vulnerable clients -both individuals and businesses- to have opportunities to secure and maintain their standard of living and take steps to improve their financial health, such as long-term financial planning and access to credit and insurance. Through its participation in national and international initiatives, Piraeus aims to expand access to financing for individuals and small businesses with limited alternative funding options.

Under the Commitment, Piraeus Bank has announced in 2023 its target to provide at least 3,000 young farmers with effective access to loans, to start or continue their own farmer business and remain in rural areas. The Bank has disbursed more than € 255 million in funding to more than 11,000 young farmers in Greek rural areas (2023-2025). Funding enabled young farmers to benefit from competitive financing terms in order to address their specific needs. It covered investment plans (subsidized or not) and liquidity needs with a range of products and services that helped young farmers grow their farm business.

Similarly, Piraeus Bank ICB in Ukraine advances financial inclusion through strategic partnerships that enhance access to digital financial services for agricultural communities. In cooperation with the fintech company Activitis, the Piraeus Bank ICB developed a digital solution within the WEAGRO ecosystem, aiming to offer small farmers faster and more accessible banking services. The partnership supported the wider effort to reinforce the agricultural economy and ensure that farmers operate in a fully digital environment, reducing barriers and creating new opportunities for sustainable growth.

Products and services contributing to the Financial Inclusion of Piraeus' consumers and end-users

Piraeus currently offers a range of products designed to promote financial inclusion. These programs are ongoing and may evolve in line with the Bank's business priorities and customer needs; therefore, no predefined completion timeline has been set. The products target Piraeus Bank customers within the downstream value chain in Greece:

Table 77: Actions related to Consumers and End-users | Products and services strengthening Financial Inclusion

Product	Description

Pop-up table

Managing Dependencies on ICT Systems

Recognizing the critical role of ICT systems in service delivery, Piraeus has established strong ICT Risk Management practices, supported by a comprehensive ICT risk management framework, thorough ICT risk assessment, risk-based mitigation actions and a centralized controls library for consistent and thorough testing. These actions, integrated into the Bank's operational risk management and reviewed annually, are designed to ensure business continuity and minimize disruptions. The scope encompasses all customers, with particular attention to those who rely heavily on digital channels. By proactively addressing ICT risks, Piraeus safeguards its reputation and market share, supporting long-term operational resilience.

Mitigating Cybersecurity Risks

In response to the growing complexity of digital operations, Piraeus continuously upgrades its cybersecurity controls, conducts security and penetration testing, remediation of vulnerabilities and threat intelligence services and maintains documented incident response procedures. The Bank's employee training programs strengthen organizational awareness of data protection and cybersecurity, equipping staff to safeguard against continuously evolving threats. These actions are ongoing and are relevant for all customers of Piraeus banking activities. Through vigilant risk management and proactive security measures, Piraeus seeks to minimize legal liabilities, financial losses, and reputational damage.

Cyber Security Awareness training courses address a variety of cyber security topics such as data security and data privacy. The courses are performed throughout the year either in person or online, while cyber security e-learning courses are available and accessible to the employees from the internal network. All the above training courses are provided to all Bank's employees, including contractors.

Moreover, the Group Cyber & Information Security Office performs phishing simulation campaigns to all employees on a monthly basis to maintain a high level of security culture. The results of the campaigns are measured via specific Key Risk Indicators (KRIs) and presented to the Management.

In December 2025, the Bank's Group Cyber and Information Security Office renewed its certification under ISO/IEC 27001:2022 (Information Security Management System),[26] following the necessary external audit procedures. This is an ongoing commitment since 2009, confirming the Bank's firm efforts to information security and the protection of customers, partners and employee data, operating with consistency, reliability and fully aligned with best international standards and practices.

In parallel with Piraeus Bank's actions, Snappi, as a neo bank, gives high priority to cybersecurity prevention. The organization has adopted measures such as the following:

Snappi Technical Demo Corner: Monthly demos by the Technology team on new tools and data protection for all employees in Greece. Sessions are recorded and tracked through attendance and demo records to confirm progress in internal governance and system readiness.

Cyber Security Awareness Month (Oct 2025): Annual campaign run by Information Security to explain cyber threats, phishing risks, and safe digital banking to employees and customers. Its reach is monitored through engagement data and awareness checks.

KnowBe4 Security Awareness Training: Annual mandatory cyber training for all employees, tracked through completion rates and phishing simulation results, introduced to address behavioral risks identified in internal assessments.

Simulated Phishing Emails: Recurring internal phishing tests to check employee reactions to social engineering attempts, monitored through click rates, credential submissions, and reporting behavior.

Cyber Security Content Online: Ongoing posts on Snappi's website and social media to help the public understand cyber risks and safe online behavior, reviewed through website and engagement analytics.

Piraeus Bank has significantly strengthened its digital fraud prevention framework, achieving high levels of operational resilience and customer protection. The specialized Online Fraud Monitoring Department, under the Retail Banking Fraud Management (RBFM) Unit, implements 24/7/365 supervision of all card and Internet Banking transactions, leading to the prevention of fraud of € 33 million.

In addition, Piraeus Bank implemented significant upgrade projects in its fraud detection systems, using artificial intelligence and improving the rules framework. These improvements contributed to the prevention of an additional € 43 million in fraudulent transactions, bringing the total amount of fraud prevention to € 76 million. At the same time, 11 information campaigns were carried out to customers through newsletters, banners and the website, improving their digital readiness and reducing fraud incidents from social engineering, vishing (voice phishing), etc.

Overall, Piraeus Bank's fraud prevention framework strengthens trust in the digital ecosystem, protects customers and supports the Bank's digital transformation strategy.

Personal safety of consumers and/or end-users

Supporting Customer Resilience via Insurance

Piraeus Bank and Ethniki Insurance, the newly acquired subsidiary of Piraeus Group, strengthen the households' and businesses' resilience by offering comprehensive insurance products that protect against natural disasters such as floods, earthquakes, and wildfires. These solutions provide financial security and facilitate recovery in the face of severe physical events. Through its Bancassurance practice, the Bank offers specialized insurance solutions for farmers and agri-food enterprises. Ethniki's comprehensive portfolio, spanning health and life coverage to property and casualty, further strengthens and diversifies the Bank's insurance offering. Those products are available on an ongoing basis and are tailored to the needs of both individual and corporate clients across Greece. This approach ensures that financial protection is accessible to those most vulnerable to climate-related risks.

Ethniki Insurance monitors the effectiveness of these actions and initiatives through a structured framework that combines quantitative indicators, qualitative assessments, and continuous feedback loops.

More specifically:

- Product Performance & Claims Analytics
- Customer Outcomes Monitoring
- Customer Satisfaction and Feedback Mechanisms
- Product Uptake and Coverage Adequacy
- Internal Audits and Performance Reporting
- ESG and Sustainability Metrics Integration
- Developing Strategy for Consumer and/or End-User Outcomes

Information-related impacts for consumers and/or end-users

Providing Clear, Direct, and Non-Misleading Information

As outlined in the Policy section of the current chapter, Piraeus Group

24. Information technology — Service management
25. Quality management systems — Requirements

26. ISO/IEC 27001 is the internationally recognized standard for information security management, defining requirements for the development, implementation and improvement of an integrated Information Security Management System (ISMS). Compliance with the standard ensures that Piraeus implements documented and effective procedures to protect confidentiality, integrity and availability of information.

places particular importance on personalized products and services for its customers, examining individually the needs of each customer.

Advertising aims to provide honest and transparent communication about products and services, without misleading the recipient. Fully compliant with the current legal and regulatory framework,[27] the Group has established and strictly adheres to corporate principles for advertising the financial products and services it provides.

Piraeus also follows the principles and code of ethics and behavior regarding its clients and customers (consumers and end-users) outlined by the competent bodies (indicative: Hellenic Bank Association, Hellenic Advertisers Association, Communication Control Council).

Piraeus follows a carefully structured governance model to ensure that every advertising campaign reflects our principles of fairness, accuracy, and responsible communication. Before any message reaches the public, it is examined through a sequence of internal checkpoints designed to safeguard compliance and ethical standards. Multiple specialised teams review each stage to verify that the content is clear, balanced, and aligned with our commitments to customers and regulators for fair advertising.

This multi-layered approach functions as a strong control system, minimizing the risk of misleading statements and ensuring that each campaign material meets both internal policies and industry expectations. Our process incorporates placing emphasis on transparency, clear decision points, and documented approvals from all relevant stakeholders. Through this disciplined review structure, which is continuous, Piraeus ensures that advertising activities support responsible marketing, contribute to a fair marketplace, and reinforce the credibility and integrity on which our customer relationships rely.

Credit Collection Practices

Certain credit collection practices carried out by Piraeus' business partners may, at times, raise concerns or complaints and may negatively affect customers' ability to repay their debt. The Bank works in strategic partnership with an experienced provider of loan servicing solutions, a licensed and supervised, to manage non-performing exposures under strict regulatory oversight. The servicer applies ethical debt management standards and safeguards consumer rights through transparent processes, extending these principles to relevant affiliates, while subsidiaries such as Snappi remain subject to compliance requirements. These practices are established and ongoing, with effectiveness monitored through KPIs such as Non-Performing Loans reduction, restructuring success, and customer satisfaction, supported by Early Warning Systems that track delinquency indicators.

Financial distress, when and if it occurs, is detected through automated systems and qualitative assessments, followed by tailored solutions such as forbearance, interest adjustments, and temporary payment suspensions, with collaboration ensuring consistency across the industry. Remedy mechanisms include comprehensive complaints management by both the Bank and the servicer, supported by the servicer's Treating Customers Fairly framework, which is audited annually by Compliance to maintain transparency and fairness. Additional safeguards such as Know Your Customer (KYC) procedures, equal treatment of all customers, and customized solutions reinforce fairness and regulatory compliance. The overall mitigation of this risk though, is achieved through portfolio segmentation, predictive analytics, dedicated NPE (Non-performing Exposures) Management Units, governance partnerships with the servicer, and strict adherence to legal requirements, while effectiveness is monitored through stress tests and supervisory reporting.

Additionally, within the framework of implementing the provisions of the Code of Conduct under Law 4224/2013, general principles of behavior are established, and best practices are adopted, aiming to strengthen trust, mutual commitment, and the exchange of necessary information between the borrower/obligor and the Bank. This ensures that each party can assess the benefits or consequences of alternative servicing solutions (restructuring solutions) or final settlement solutions (definitive arrangements) for loans in arrears, with the goal of selecting the most appropriate solution following case-by-case evaluation.

Regarding the handling of borrowers belonging to socially vulnerable groups (e.g., borrowers with health issues such as vision, hearing, cognitive impairments), based on the provisions of the Code of Conduct under Law 4224/2013, as in force, the Bank officers must adapt their communication methods to the specific needs of each borrower at all stages of interaction, as explicitly stated in the Annex "Conditions for Transactions with Specific Categories of Natural Persons" of the relevant "Identity Verification Regulation".

The Bank of Greece has provided guidelines to supervised credit institutions for designing and evaluating sustainable restructuring types. These guidelines require consideration of the borrower's current and conservatively estimated future repayment capacity until the end of the new repayment program, ensuring that restructuring does not merely conceal actual risk levels, which could lead to greater over-indebtedness and increased potential losses for the Bank.

Therefore, an "appropriate solution" is one that ensures the Bank's compliance with supervisory obligations while also considering the borrower's overall financial situation (income, liquid assets, other debts, and remaining income) to cover the minimum level of "reasonable living expenses" for natural persons.

3.4.3. Metrics and targets related to Consumers and End-users

3.4.3.1. Metrics related to Consumers and End-users

In accordance with the identified Impacts, Risks and Opportunities, the disclosed metrics are related with the banking activity of Piraeus Group. The banking activity can be further distinguished by scope (universal bank vs digital bank) and by market of operation (Greece vs abroad) as represented by Piraeus Bank S.A., Snappi Bank S.A. and JSC Piraeus Bank ICB. The metrics are presented at entity level aiming to provide more accurate information, depending on the scope and market of activity of each entity. When information for certain entities is omitted, it is because they have not been assessed as relevant during the reporting period, either due to unavailability of data or due to different jurisdictional requirements.

Social inclusion of consumers and/or end-users

Piraeus emphasizes continuing use of state-of-the-art technologies to improve quality in its operations, thus contributing to upgrading customer service. To understand its performance against the enhancement of customer experience Piraeus evaluates the metrics below.

Table 78a: Metrics related to Consumers and End-users | Innovation and Efficiency – Piraeus Bank

Innovation & Efficiency Metrics	2025	2024
CapEx[28] on new IT solutions related to customer services[29] in € million	€ 50.4 million	€ 50.5 million
Percentage (%) of IT CapEx vs Gartner capital IT expenses	75% vs 22%	77% vs 24%
Percentage (%) of IT OpEx[30] vs Gartner[31] operational IT expenses[32]	25% vs 78%	23% vs 76%
Percentage (%) increase in digital banking[33] active users[34] compared to previous year	6%	7%
Percentage (%) increase in mobile active users compared to previous year	13%	15%
e-banking digital index[35]	99%	99%

28. Capital spending - CapEx: Spending related to Software acquisition / implementation and Hardware (Telecoms, ATMs, Personal Computers and related devices, Core systems etc.). This metric refers to the sum of the CapEx consumed within 2025 for the 270 selected projects (ESG related) and the capital consumed in the Factories that participated in these projects. Capital expenditure (CapEx) pertains to the funding utilized by the Bank for the acquisition, enhancement, and maintenance of IT assets, such as infrastructure and software. These expenditures are typically aimed at long-term investments, bolstering the Group's operations, and providing future economic benefits. The specific measure reflects the total investment amount (CapEx) by the Group in 2025 on customer-centric ESG related Technology investments.
29. The IT solutions related to customer services include processes, systems, and tools that the Group uses to improve customer management and support in a targeted, timely, and more effective manner. All these solutions are implemented through projects, contributing to the holistic improvement of customer experience (CX).
30. Operational spending - OpEx: Expenses such as IT services, Software maintenance, Licenses, Hardware repairs & maintenance, Telecoms, Consumables etc. Technology investment: The investments in automation, cloud computing, virtualization, mobile solutions, outsourcing and Generative AI aim to reduce costs, enhance customer satisfaction, and allocate resources strategically, showcasing the Group's dedication to growth and innovation.
Total expenditure on technology: CapEx & OpEx to change and run the Group. It includes the ordinary budget of the year plus spending & expenses for project implementations & support (development, project management, IT services, subscriptions. Telecommunication costs etc.).
31. Gartner Index: Ratio of operating costs versus investment IT expenditure.
32. The percentage (%) of about 300 financial institutions, according to the specialized technology research and consulting agency Gartner. This percentage metric compares the organization's IT capital expenditure against the industry standard set by Gartner. It indicates how the company's investment in IT assets aligns with or deviates from typical industry spending patterns.
33. Digital Banking encompasses the range of digital channel services, both web and mobile, available to individual and corporate customers, accessible via web banking or mobile app.
34. A user is considered active in Piraeus Bank e-banking when they are registered with the Piraeus Bank e-banking service and have logged in at least once to Piraeus Bank e-banking or the Piraeus app since 01/01/– 31/12 of each year.
35. Percentage of the number of transactions (bill & credit card payments, transfers, remittances & prepaid cards) executed through Piraeus e-banking (web banking & mobile banking app) on the total number of corresponding total transactions (web/app and through branches), from the beginning of the year.

Table 78b: Metrics related to Consumers and End-users | Innovation and Efficiency - Subsidiaries

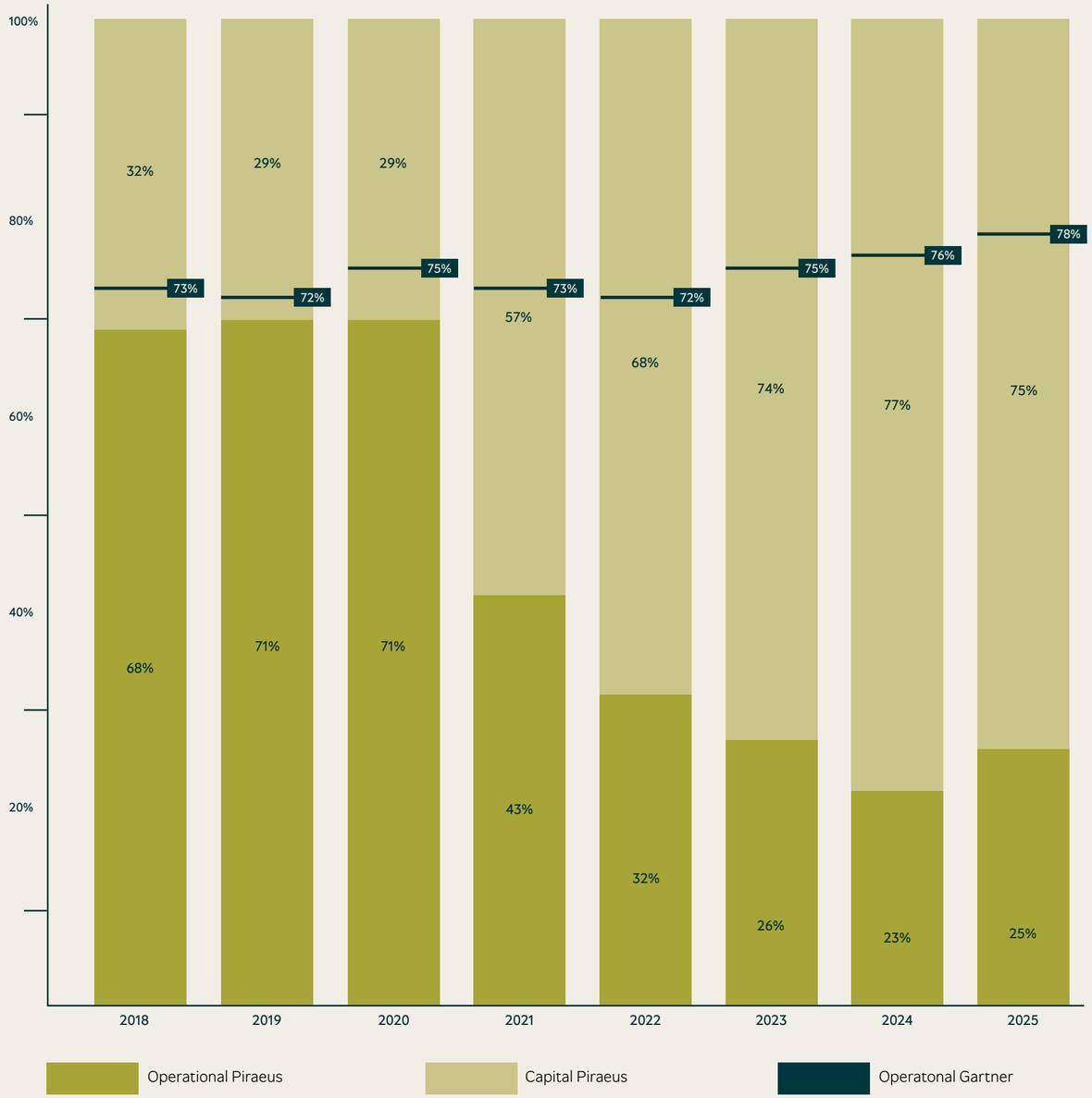
Innovation & Efficiency Metrics	Snappi	Piraeus Bank ICB
	2025	2025
Percentage (%) increase in digital banking[36] active users[37] compared to previous year	N/A	PI[38]: 3.5% increase LE[39]: 19% increase
Percentage (%) increase in mobile active users compared to previous year	N/A	PI: 3.5% increase LE: N/A
e-banking digital index[40]	100%[41]	PI: p2p[42] - 100% in digital, 96.8% in iban transfer LE: 99.9%

36. Digital Banking encompasses the range of digital channel services, both web and mobile, available to individual and corporate customers, accessible via web banking or mobile app.
37. A user is considered active in Piraeus Bank ICB e-banking when they are registered with the Piraeus Bank ICB e-banking service and have logged in at least once to e-banking or the app since 01/01/– 31/12 of each year.
38. PI refers to Private Individuals.
39. LE refers to Legal Entities.
40. Percentage of the number of transactions (bill & credit card payments, transfers, remittances & prepaid cards) executed through Piraeus e-banking (web banking & mobile banking app) on the total number of corresponding total transactions (web/app and through branches), from the beginning of the year.
41. Snappi operates exclusively through its mobile application and does not provide web-based banking services. Mobile active users include individual customers who are registered on the Snappi app and have logged in at least once during the reporting period (01/01–31/12). As Snappi does not offer web banking, digital banking active users are fully represented by mobile active users.
42. p2p: Person to Person transactions (cards operations).

The chart below illustrates the proportion of technology investments relative to Piraeus's total technology expenditure, in comparison with the average value from approximately 300 financial institutions worldwide, as reported by Gartner Inc., a specialized technology research and consulting firm. The data indicates that Piraeus' IT capital expenditure percentage is 75%, which significantly exceeds the average percentage of 22% observed among the financial institutions surveyed.

27. Greek Law 4374/2016 on the transparency in relations of credit institutions with media companies and sponsored persons

(IT) Operational vs Capital Spending



Transaction migration at digital channels

Increasing adoption and customer engagement in digital channels is an ongoing target of Piraeus, and to meet this target, the organization is committed to increase its product and features offering through Piraeus e-banking (web & mobile).[43] In addition, the following metrics highlight the migration towards digital channels both for financial transactions and services offered in comparison to 2024. Specifically:

Table 79: Metrics related to Consumers and End-users | Digital Channels

Digital Channels metrics	2025	2024
Financial transactions conducted through digital channels	16.5% increase vs 2024	15% increase vs 2023
Self-service actions[44] Actions which customers can perform on their own, without contacting the call center or visiting a Branch	17% increase vs 2024	36% increase vs 2023
Digital sales though Piraeus e-banking[45] Digital sales and the number of new products acquired though Piraeus e-banking	27%	19%

44. Self-service actions that customers can perform independently, without contacting the call center or visiting a Piraeus Bank branch, such as reissuing a debit card or a personal identification number (PIN), scheduling an online appointment, producing or uploading documents to Piraeus Bank in order to verify personal information, closing accounts, blocking online banking access.
45. Digital sales though Piraeus Bank e-banking generally include opening savings or sight accounts, applying for debit or credit cards, requesting consumer loans, or business loans.

The increase in the indices presented in the above table is calculated as the percentage increase of the price at the end of the year, compared to the price at the end of the previous year.

ATMs

Piraeus Bank's ATM network of 1,641 ATMs covers the entire country, not only urban centers, but also smaller towns and geographically remote locations, providing 24/7 customer service. Of the total of 1,641 ATMs, the 1,197 ATMs offer deposit service with immediate cash availability (online deposit) (1,201 in 2024).

Additionally, by the end of 2025, 1,172 ATMs had the special voice–guidance software installed and operating (1,097 in 2024). This software promotes accessibility and autonomy to customers with visual impairments.

Table 80: Metrics related to Consumers and End-users | ATMs & Branches

ATMs & Branches Metrics	2025	2024
ATMs of Piraeus Group in Greece[46]	1,641	2,092
ATMs of Piraeus Group outside of Greece	19	20
(of which in Ukraine)	18	19
Branches of Piraeus Group in Greece	368	368
Branches of Piraeus Group outside of Greece[47]	16	17
(of which in Ukraine)	15	16

46. The metric refers to ATMs in Ukraine and Germany.
47. The metric refers to Branches in Ukraine and Germany (Frankfurt Branch).

The above metrics are calculated with data provided to the Hellenic Bank Association, and which are publicly available on their website.

Piraeus Bank intends to safeguard unimpeded access to its products and services by maintaining its level of available branches above 300 units in the next four (4) years. More specifically, albeit with increased offering of digital channels, physical networks are planned to be reduced by 2% Compound Annual Growth Rate (CAGR) for the 4-year period.

Service Continuity

Failures in ICT systems can significantly impact customer experience by limiting access to digital platforms and branch services. Ensuring uninterrupted service is critical for maintaining trust, which is why resilient systems and rapid recovery protocols are in place to minimize disruptions. Continuous monitoring and infrastructure enhancements further strengthen reliability, supporting a seamless banking experience.

43. Mobile banking includes all available and new services that will be developed, and will be made available to customers, natural persons (Piraeus Bank app) or legal persons (Piraeus Bank business app) who are registered with the Piraeus Bank e-banking service.

Table 81a: Metrics related to Consumers and End-users | ICT incidents – Piraeus Bank

Metrics	2025	2024
Major and High ICT incidents[48]	8	9
Percentage (%) of employees trained annually on ICT and security risks[49]	91%[50]	9%

48. ICT incidents occurred during the period 01.01-31.12.2025 assessed under 3 pillars (i.e. Customers / Counterparties Satisfaction, Regulatory / Compliance implications (non-financial) and Operating Efficiency), meeting specific classification criteria per pillar and thresholds per criterion (e.g. impacts on Bank's reputation, Bank's critical functions, volume of customers, financial transactions, regulatory fines, incident's duration, geographical spread).
49. Percentage of employees trained in ICT and security risks topics (e.g., DORA, cyber security essentials, GDPR).
50. During 2025, the e-learning training programs "DORA Regulation: Digital Operational Resilience in the Financial Sector" and "Cybersecurity Essentials" were assigned to all employees, achieving very high completion rates, whereas no corresponding initiative was implemented in 2024.

Table 81b: Metrics related to Consumers and End-users | ICT incidents - Subsidiary

Metrics	Snappi	
	2025	2024
Major and High ICT incidents[51]	13	N/A
Percentage (%) of employees trained annually on ICT and security risks[52]	95%	N/A

51. ICT incidents occurred during the period 01.01-31.12.2025 assessed under 3 pillars (i.e. Customers / Counterparties Satisfaction, Regulatory / Compliance implications (non-financial) and Operating Efficiency), meeting specific classification criteria per pillar and thresholds per criterion (e.g. impacts on Bank's reputation, Bank's critical functions, volume of customers, financial transactions, regulatory fines, incident's duration, geographical spread).
52. Percentage of employees trained in ICT and security risks topics (e.g., DORA, cyber security essentials, GDPR).

Contact Center Performance

Customer accessibility and responsiveness are fundamental to delivering a positive experience. Timely interaction with customers through phone, chat, and email channels reflects the Group's commitment to service excellence. By ensuring that inquiries are addressed promptly, the approach reduces barriers and fosters trust in every interaction. Continuous investment in technology and process improvements supports faster response times, creating a seamless and inclusive experience for all customers. This focus on responsiveness not only enhances satisfaction but also demonstrates a broader responsibility to provide reliable and accessible banking services in an increasingly digital environment.

Table 82a: Metrics related to Consumers and End-users | Contact Centres Response Time - Piraeus Bank

Metrics	2025	2024
Average time (in seconds) it takes for a contact center agent to respond to a customer inquiry by Phone	Mass: 113 sec Private: 23 sec Personal: 24sec Small Business (SB): 24sec	Mass: 308 sec Private: 56 sec Personal: 71 sec SB: 70 sec
Average time (in seconds) it takes for a contact center agent to respond to a customer inquiry by Chat	Personal: 23 sec	Personal: 185 sec
Percentage of emails answered by a contact center representative within a predetermined period of time (in days)	Service Level Agreement (SLA) 1 working day = 78% SLA 30 days = 100%	SLA 1 working day = 44% SLA 30 days = 100%

Table 82b: Metrics related to Consumers and End-users | Contact Centres Response Time - Subsidiaries

Metrics	Piraeus Bank ICB	
	2025	2024
Average time (in seconds) it takes for a contact center agent to respond to a customer inquiry by Phone	Private Individuals: 17 sec Legal Entities: 22 sec	Private Individuals: 20 sec Legal Entities: 21 sec
Average time (in seconds) it takes for a contact center agent to respond to a customer inquiry by Chat	38 sec	50 sec
Percentage of emails answered by a contact center representative within a predetermined period of time (in days)	N/A	N/A

Information-related impacts for consumers and/or end-users

Information Security

Protecting personal data and ensuring uninterrupted access to banking services are essential elements of responsible operations. Strong safeguards are in place to prevent unauthorized access and minimize the risk of breaches, while continuous monitoring helps identify and address vulnerabilities promptly. Training schemes on information security are being delivered to the Group's employees, highlighting a percentage of 91% coverage. In addition to data protection, maintaining reliable digital and branch services is a priority, supported by resilient systems and proactive measures to reduce technology-related disruptions. These efforts reflect a commitment to security and trust, ensuring that customers can interact with confidence in an increasingly digital environment.

Table 83a: Metrics related to Consumers and End-users | Data Breaches[53] – Piraeus Bank

Metrics	2025	2024
Total number of data breaches	0	0
Number of personal data breaches	0	0
Percentage of personal data breaches	0	0
Total number of unique account holders affected by personal data breaches	0	0

53. The metrics are based on the SASB Commercial Banks, Metric FN-CB-230a.1.

Table 83b: Metrics related to Consumers and End-users | Data Breaches[54] - Subsidiaries

Metrics	Snappi		Piraeus Bank ICB	
	2025	2024	2025	2024
Total number of data breaches	0	N/A	0	0
Number of personal data breaches	0	N/A	0	0
Percentage of personal data breaches	0	N/A	0	0
Total number of unique account holders affected by personal data breaches	0	N/A	0	0

54. The metrics are based on the SASB Commercial Banks, Metric FN-CB-230a.1

Responsible Marketing and Customer Communication

Employees throughout the Branch Network who interact directly with clients receive regular training to promote responsible marketing practices and prevent misselling, ensuring that products and services are presented accurately and ethically. This approach fosters trust and protects customer interests, while reinforcing the organization's dedication to integrity and accountability. By embedding these principles into interactions, the Group supports long-term relationships and contributes to customers' positive experience.

Table 84a: Metrics related to Consumers and End-users | Responsible Marketing & Customer Communication – Piraeus Bank

Responsible Marketing & Customer Communication Metrics	2025	2024
Number of hours of employee training annually on responsible marketing, customer communication, and misselling prevention[55]	170,341	183,419
Relationship Net Promoter Score (NPS)[56]	14	13

55. Included are training programs aimed at all roles within the Branch Network, relating to: Offered products and services, Certifications and Recertifications for Insurance and Investment services, Internal certifications, Sales skills development seminars (effective communication, sales techniques, customer management, negotiations, etc.).
56. Net promoter score (NPS) is a market research metric that is based on a single survey question asking respondents to rate the likelihood (on a 0-10 scale) that they would recommend a company, product, or a service to a friend or colleague. The NPS assumes a subdivision of respondents into "promoters" who provide ratings of 9 or 10, "passives" who provide ratings of 7 or 8, and "detractors" who provide ratings of 6 or lower. Calculating the net promoter score involves subtracting the percentage of detractors from the percentage of promoters collected by the survey item. Piraeus is using Relationship NPS (r-NPS) as a survey method asking customers how likely they are to recommend the company to a friend or colleague, but done periodically (quarterly) for a general assessment of the overall relationship, distinct from transactional NPS (after specific events) or competitive benchmarks, used to track long-term loyalty, segment customers (Promoters, Passives, Detractors), and understand the economics of customer loyalty. The survey is performed for Piraeus Bank S.A. customers.

Table 84b: Metrics related to Consumers and End-users | Responsible Marketing & Customer Communication - Subsidiaries

Metrics	Piraeus Bank ICB	
	2025	2024
Number of hours of employee training annually on responsible marketing, customer communication, and misselling prevention[57]	8	127

57. Included are training programs aimed at all roles within the Branch Network, relating to: Offered products and services, Certifications and Recertifications for Insurance and Investment services, Internal certifications, Sales skills development seminars (effective communication, sales techniques, customer management, negotiations, etc.).

3.4.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]

Social inclusion of consumers and/or end-users

Targets for e-banking products accessibility

In the context of increasing the accessibility of its products and services across its channels, Piraeus Bank has proceeded to the establishment of the below targets. The targets refer to the availability of financial products and other services through the website or mobile application of Piraeus Bank compared to the total number of financial products and services offered. The target is aligned with the Sustainability Policy, the UN Principles for Responsible Banking and the enhancement of Business Innovation, Rural Development, and Development Programs Piraeus promotes.

The 2025 performance, which also constitutes the baseline of the target, stood at 77% for financial products, with an aspiration of reaching 87% by 2030. In parallel, the self-services accessed through the e-banking channels stood at 91% in 2025, with an aspiration of reaching 96% by 2030.

In this manner Piraeus aims to provide promote financial inclusion, through innovative and technologically advanced means. Through the process of developing the Business Plan of 2026-2030, internal stakeholders were engaged for the target setting, and the relevant goals were consequently approved. The KPIs are measured and monitored by the internal Performance & Value Management Unit (PVM), while the governance of the process is managed by Group Financial Management.

Table 85: Targets related to Consumers and End-users | e-banking products accessibility

Description	Scope of Target	Base Year	Baseline Value

Pop-up table

58. Self-service actions that customers can perform independently, without contacting the call center or visiting a Piraeus Bank branch, such as reissuing a debit card or a personal identification number (PIN), scheduling an online appointment, producing or uploading documents to Piraeus Bank in order to verify personal information, closing accounts, blocking online banking access.

During the reporting year, the Bank conducted a DMA exercise for the impacts, risks, and opportunities associated with the areas relating to credit collection practices and the insurance activities identified as sources of positive impact and opportunity.

These topics remain under internal assessment to ensure that any future metrics or targets are developed in a manner that is methodologically aligned with regulatory and industry expectations, and reflective of the Group's strategic priorities.



Governance



4. Governance

4.1. Business Conduct [ESRS G1]

4.1.1. Governance

Piraeus embeds Responsibility, Meritocracy, and Transparency into its operations through established standards and systems. A robust whistleblowing framework reinforces ethical conduct and accountability, with zero tolerance for value breaches and prompt, appropriate handling of all reports to ensure a safe and transparent workplace.

The Group commits to the highest level of ethics and business conduct, in line with the applicable regulations and the overarching purpose and values included in the Code of Conduct and Ethics. It applies robust governance systems and a series of policies and procedures that ensure the creation of value for its clients, people, shareholders and society promoting ethical behaviors and respect to all stakeholders.

Group's protection of whistleblowers encourages and enables all stakeholders to speak up, actively supporting business ethics principles. The robust Whistleblowing framework developed from the Group in line with the applicable regulation and legislation enables all employees to report on any misconduct and potential ethical issues without fear of retaliation, protecting the Group and its stakeholders from matters that could compromise its fundamental values and purpose.

By embedding sustainability principles into corporate culture, the Group can enhance the alignment of the organization's purpose and values with its business and profit objectives, bringing significant opportunities to the Group via improved employee satisfaction, brand image and attraction of customers.

4.1.1.1. The Role of the Administrative, Management and Supervisory Bodies [GOV-1]

Piraeus Group has in place a sound governance system which ensures the adequate supervision of an organization's operational and strategic decisions considering, inter alia, the ethical principles that the Group commits to ensure across its activities. In this context, the Board of Directors (BoD) is the body overall accountable for the supervision of the organization, supported by Committees dedicated to the matters related to business conduct -as outlined below.

Board of Directors

The Board of Directors (BoD) ensures that the Group operates in accordance with the applicable regulatory framework, internal regulations and policies and principles of corporate governance, the approved risk management strategy and the risk profile of the Group and provides management with all the necessary means to implement their duties. It supervises Piraeus Group's compliance with information and communication procedures, approves important corporate governance policies and other important policies of the Group and is responsible for the establishment of the Code of Conduct & Ethics, which governs all the Group's activities.

Audit Committee

The Audit Committee ensures that the Group has established appropriate procedures and mechanisms for the management of named and anonymous reports and complaints (Whistleblowing), and that those procedures include measures to protect the employees who make the reports on significant irregularities, omissions, or criminal offences that they become aware of.

In the context of its responsibilities, the Audit Committee pre-approves and monitors the implementation of activities, such as the Compliance Annual Action Plan, reviews the Annual Report of the Money Laundering Responsible Officer (MLRO), and in the case of modifications of the Group Compliance Policy reviews the relevant updates.

ESG & Corporate Responsibility Committee

The purpose of this Committee is to promote and oversee Responsible and Sustainable Banking, by adopting Environmental, Social, and Governance (ESG) criteria that combine growth and financial performance with culture, social well-being, and environmental sustainability.

Within this framework, the Committee monitors Corporate Responsibility matters and informs and/or makes recommendations to the Board of Directors. The Committee evaluates, approves, recommends, and monitors:

- The Group's Corporate Responsibility Policy and Strategy (Environment, Society & Governance - ESG), aligning governance and business decisions with the UN Sustainable Development Goals and the Group's ESG Principles and Values Framework.
- Actions and initiatives that contribute to managing and adapting to supervisory requirements concerning climate and environmental risk while reducing the environmental footprint of both the Group and its clients/partners.
- The implementation of the Group's values and the creation of a culture that strengthens the role of employees in achieving Corporate Responsibility Principles.
- The strategic plan for developing programs and initiatives that enhance social cohesion and promote culture.
- Actions that reinforce transparency, meritocracy, and corporate responsibility while strengthening the Group's outward-looking approach.

The Board of Directors and its Committees' members are expected and acknowledged to acquire sufficient knowledge, experience, and expertise to fulfil their role. Nevertheless, they are not necessarily experts in all disciplines, business areas, or governance aspects. Therefore, training is a key driver of continued Board and Executive effectiveness and an ongoing commitment of the Group.

The Group HR, in accordance with the Nomination Committee's guidance, is responsible for producing and implementing the annual BoD awareness and development schedule. The Nomination Committee sponsors and oversees the aforementioned schedule on an ongoing basis. In addition, regular presentations by the Management and staff to the Board and Committees are performed to educate or keep them informed on changes within the Group or on legal, regulatory, market and industry requirements and standards. Personalized educational programs may be designed and implemented where needed.

In addition, once a year, Board members attend "Strategy Day" in which Top Executive Management presents the results, goals, and challenges faced by the organization.

During 2025, taking into consideration the market trends and needs as well as the previous Board self-assessment outcomes, the awareness and development initiatives for the BoD members were focused on topics related, inter alia, to ESG/sustainability, strategic planning, legal / regulatory / compliance matters, digital and information technology, banking governance and banking business. In addition, dedicated sessions took place regarding insurance matters, given the acquisition of Ethniki Insurance. These seminars were conducted by subject matter experts from international and Greek companies.

4.1.2. Impact, risk and opportunity management

4.1.2.1. Business Conduct Policies and Corporate Culture [G1-1]

Piraeus Bank Group establishes, develops, promotes and evaluates its corporate culture by implementing policies and procedures ensuring ethical behavior across its own operations and to the best extent possible across its value chain relationships. In this regard, the Group maintains policies, mechanisms and procedures for identifying, reporting and investigating unlawful behavior.

Code of Conduct and Ethics

The Group's Code of Conduct and Ethics ensures that business ethics guide all activities in alignment with corporate values, transforming principles into expected behaviors and outlining the regulations, policies, and procedures that employees must follow. It applies to all stakeholders, emphasizes responsibility, meritocracy, and transparency, and is regularly updated to reflect ESG principles and regulatory changes. All employees are required to adhere to the Code, disclose misconduct through established channels, and complete mandatory training on updates.

For further information please refer to the section 1.5 "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" in Chapter "ESRS 2 General Information".

Whistleblowing Policy

As already described in the Own Workforce section of the Sustainability Statement, the Piraeus Group has in place a Whistleblowing Policy, as well as the relevant mechanisms and procedures for identifying, reporting, investigating and managing unlawful behavior or behavior in contradiction of its code of conduct or similar internal rules.

The Policy has been established in line with the regulatory framework, including the Law 4990/2022 regarding "Protection of persons reporting Union Law breaches", which transposes the Directive (EU) 2019/1937 of the European Parliament and of the Council into the Greek legislation.

The Group is committed to protecting any person that makes a disclosure in good faith, from any retaliatory actions against their current position and their future professional development. Recognizing that there are employees who are reluctant to report or disclose suspected wrongdoing (Whistleblowing) in fear of possible retaliation, the Group has developed a framework, compliant with the provisions of Law 4990/2022 on the "Protection of persons reporting Union law breaches", which ensures that the Group is a safe environment that protects and encourages employees to make disclosures necessary to safeguard its employment framework.

The Group has established a procedure for receiving and managing Whistleblowing reports. According to this procedure, all reports are received by the Officer Responsible for the Acceptance and Monitoring of Reporting (RAMR), who is the Chief Audit Executive of Piraeus Group and Chair of the Whistleblowing Committee. The Officer RAMR delivers the report to the Whistleblowing (WB) Committee Secretariat,[59] who is authorized to handle the reports, ensuring the protection of the confidentiality of the reporter's identity and of any third party mentioned in the report, or the Violence and Harassment Committee,[60] as mentioned in Chapter S1 "Own workforce". All reports are archived electronically in a file accessed only by the RAMR and the Secretariat. The WB Secretariat proceeds with the pseudonymization of reports by removing all data that could possibly reveal the whistleblowers' identity when the case is submitted to the Whistleblowing Committee for evaluation.

Disclosures are made without promise of payment or any consideration, with the scope of embedding the need to safeguard the image and assets of the Bank and the Group companies, shareholders and clients from irregularities performed by the staff and / or Executives which can affect the Group's reputation.

The Group has established a procedure for receiving and managing reports. In this context, Piraeus Group makes available to the whistleblower alternative ways of making a disclosure via:

- mail to a post office box (Piraeus Bank PO Box 13614, Hellenic Post (ELTA) of Syntagma Sq),
- mail to a specific e-mail address of the Bank (Whistleblowing@piraeusbank.gr) and whistleblowingpbgroup@piraeusbank.gr for the subsidiaries Piraeus Financial Leases S.A., Piraeus Factoring S.A., Piraeus AEPEY, Piraeus Asset Management AEDAK and Iolcus Investments),
- letter to the attention of the Responsible Officer for the Acceptance and Monitoring of Reporting (RAMR), 37 Kritis Street, P.O. Box 10438 Athens or meeting, upon request of the Whistleblower, with physical or remote presence with the RAMR for Whistleblowers falling within the scope of Law 4990/2022.

59. WB Committee Secretariat members are Certified Internal Auditors and must follow the IIA Code of Ethics, which requires integrity and confidentiality. They must also complete at least 40 training hours per year, including 2 hours on ethics. In June 2024, the Secretariat attended the "Whistleblowing Management" program of the Hellenic IIA.

60. In November 2024, Group HR assigned to all Piraeus Group employees an educational seminar regarding "Violence and Harassment in the Workplace," and the framework developed by the Group to manage incidents of violence and harassment. During 2025, no new actions were implemented, as the aforementioned training program remains active.

The dedicated Whistleblowing Committee is responsible for the assessment and management of named or anonymous confidential claims made by employees or third parties regarding Piraeus Bank Group. Both Committees (the Whistleblowing Committee and the Violence & Harassment Committee) operate under the authorization of the Audit Committee, that ensures that the Group has established appropriate procedures and mechanisms for the management of named and anonymous reports and complaints.

Beyond the procedures to follow-up reports by whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937, Piraeus investigates procedures on business conduct incidents, including incidents of corruption and bribery, promptly, independently and objectively.

The Whistleblowing Policy and Framework are also referenced within the Code of Conduct and Ethics and the Policy on Preventing and Fighting Workplace Discrimination, Violence and Harassment.

For more details on the policies please refer to the section 1.5 "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)".

Conflict of Interest

Piraeus Group provides a wide range of products and services including banking, investment and ancillary services. Conflicts of interest may arise either in providing a particular service or transaction, or on a recurring basis. Also, conflicts of interest may arise from external professional activities of employees (i.e., secondary activity outside the Group), or from transactions of the Group companies with its suppliers. In situations where conflicts of interest are likely to be detrimental to the interests of clients or the Group itself, the Group's main and principal objective is to identify and manage these situations in accordance with the provisions of the current regulatory framework.

The Group identifies and manages existing and potential conflicts of interest, through the Conflicts of Interest Policy which is part of the Group Compliance Policy and relevant administrative procedures and control mechanisms. Through the relevant Policy, it provides guidance to the members of the Board of Directors, the Senior Executives and Employees of the Group companies on how conflicts of interest are defined, how they can be identified and what procedures should be followed when they take place to protect the clients' and the Group's interests. Specifically, the Group:

- Identifies and defines situations that constitute or may give rise to conflicts of interest which may involve a material risk of damage to the interests of its clients, including the sustainability-related preferences of the clients, or of the Group itself.
- Develops and applies procedures and systems to prevent any conflict of interest that adversely affects the interests of its clients.
- Adopts appropriate procedures, mechanisms, and systems to manage these conflicts.

Compliance monitors changes in the relevant regulatory and legislative framework and updates in a timely manner all relevant documentation, which ensures maintaining in a prominent and easily accessible way the policies for all staff. All updates to the Conflict-of-interest Policy are approved by the Board of Directors.

The Policy applies to all transactions of the Group companies with their customers or employees or associates or suppliers.

For more details on this Policy please refer to section 1.5 "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" in Chapter "ESRS 2 General Information."

Anti-Bribery and Anti-Corruption

Piraeus Group has adopted the "Anti-Bribery and Corruption Policy" for the prevention and confrontation of bribery and corruption incidents between its officials and any third party. Piraeus makes clear that such practices are completely unacceptable with regard to business integrity and damage its reputation and interests. It further declares that it takes the necessary measures to prevent incidents of bribery and corruption among its staff, its executives and any third party, but also proceeds to the direct accountability of responsibilities, if any, to those involved and takes the necessary legal measures. The Policy is available on the Group's website and the internal network (intranet).

Furthermore, the Group takes the necessary measures to prevent occurrences of bribery and corruption among staff, managers and any third parties by:

- Notification of the adoption and application of a policy against bribery and development of appropriate procedures for its implementation.
- Training all employees and managers for the recognition and avoidance of any such involvement in bribery.
- Encouragement of all employees and directors for the awareness and prompt reporting of any case in which bribery or bribe-taking is suspected within the administration of the Group, while ensuring that any confidential information is treated with due confidentiality and care through the implementation of the Whistleblowing Policy.
- Undertaking immediate legal action against those involved in documented cases of bribery or bribe-taking.
- Implementation of an outsourcing policy and procedures for third party agreements.
- Implements a Policy of Transactions Transparency and Management of Customer Complaints.

Areas most at risk in respect of corruption and bribery

Through its internal processes for identifying areas of potential risk for corruption and bribery Piraeus has identified activities where it could be argued that a higher risk of the occurrence of such cases exists. More specifically those activities include:

- Any activity pertaining to government officials or people associated with government officials. Such activities involve not only reputation risk but also increases risk of compliance with the regulatory framework in force.
- Any collaboration of the Group with third parties in the context of its activities.
- Activities related to the conduct of acquisitions, mergers, investments to third-party legal entities or/and sale of Piraeus' fixed assets (divestment, loan portfolios etc.).

Anti-bribery Policy

Piraeus Bank Group enforces a strict anti-bribery policy that prohibits any form of bribery and outlines acceptable gifts and hospitality. All employees and Management share responsibility for preventing, detecting, and reporting bribery, supported by confidential communication channels and a Whistleblowing Committee for reporting bribery, corruption, and fraud.

For further information please refer to the section 1.5 "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" in Chapter "ESRS 2 General Information".

Anti-Fraud

Piraeus Group considers Fraud Risk a significant risk for its operations, as fraud incidents can cause significant damage, not only in terms of direct financial losses, but also in terms of reputation, reliability, loss of morale, turnover reduction, and other indirect costs. It could also lead to regulatory penalties and restrictions, as well as to significant misallocation of resources required for the investigation and management of fraud incidents.

The Group aims at the continuous improvement of fraud risk management through the implementation and the ongoing development of an integrated and adequate fraud risk management framework. The fraud risk management framework, documented through the Anti-Fraud Policy as well as other various and specialized policies and processes, is part and fully aligned with the overall risk management framework of the Group. It covers the identification, assessment, mitigation, control, and monitoring of fraud risk, across all business activities and supporting functions of the Group's entities and ensures the diffusion of a common and comprehensible perception of management for this type of risk to all involved parties.

In this context, the Anti-Fraud Policy integrates and presents in a concise manner Group's fraud risk management framework, which includes:

- Group's risk appetite, attitude, and stance against fraud,
- key principles in relation to fraud risk management, intending to protect the Group's reputation and minimize potential losses,
- governance, roles and responsibilities regarding fraud risk management,
- related and specialized policies and procedures aiming at effective prevention, detection, and response to fraud risk.

For further information about the Anti-Fraud Policy, please refer to section 1.5 "Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P)" in Chapter "ESRS 2 General Information".

Training in Business Conduct matters

Training in business conduct matters is considered a significant part of the Group's efforts in promoting a culture of ethics and transparency. In this context, a series of training courses related to areas such as the Code of Conduct and Ethics, Conflicts of Interest, Anti-bribery & Anti-corruption, and Prevention against violence, discrimination & harassment at work were developed in alignment with regulatory developments and business needs of the Group.

This training was delivered through "Analyze This", a dedicated curriculum, containing a complete series of e-Learning courses that covers all relevant topics and is being assigned as a mandatory training initiative to the Group main subsidiaries employees through the Piraeus.edu educational platform, thus ensuring 24/7 availability of the content. In addition, after its initial launch "Analyze This" curriculum is automatically assigned to all newcomers within the eligible Piraeus Bank Group entities. Training content is being reviewed together with business experts from relevant Units, whenever new updates occur.

4.1.3. Metrics and targets related to Business Conduct

4.1.3.1. Metrics related to Business Conduct

In order to measure the progress Piraeus has on the robust whistleblowing framework, the Group outlines the total number of whistleblowing reports submitted regarding business conduct and compliance with the Piraeus Code of Ethics. Reports are received through the Whistleblowing channel, which handles allegations of policy and procedure violations (managed by the Whistleblowing Committee).

Table 86: Metrics related to Business Conduct | Whistleblowing reports

	2025	2024
Total number of whistleblowing reports submitted, related to Business Conduct[61]	30	56

61. The number of cases violating policies and procedures related to Whistleblowing and Violence and Harassment, as applicable by Group Policies and local regulations.

Following the commitment to ethical business conduct, Piraeus places strong emphasis on sustainability education as an integral component of its strategy. The following metric details the total number of training hours dedicated to sustainability-related topics for employees across levels, thereby creating significant opportunities for enhanced employee engagement, strengthened brand reputation, and increased customer trust.

Table 87: Metrics related to Business Conduct | Sustainability training - Piraeus Bank

	2025	2024
Training hours on sustainability-related matters[62]	3,009[63]	1,724

62. Number of training hours (=volume) for executives on levels L1, L2, L3, and L4 reporting to executives of L1 (=Category 1 employees, as reported in S1-Own Workforce section) per category of relevant educational program. It includes programs that enhance awareness and ESG practices, relevant for Piraeus Bank S.A., due to the existence and monitoring of targeted programs for Category 1 employees, at Piraeus Bank level.
63. The increased training hours in 2025 compared to 2024 lies on the fact that the Bank strategically invested in initiatives that develop people managers on critical leadership skills that strengthen employee wellbeing, inclusion, trust and psychological safety within teams. The scope is to promote sustainable team performance, align leadership behaviors with ESG driven people priorities and enhance long term organizational resilience.

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Appendix B – LIST OF DATAPOINTS THAT DERIVE FROM OTHER EU LEGISLATION

Independent Auditor's Limited Assurance Report

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	Standard	Cross-cutting / Topic	Number	Reporting Area	Disclosure Requirement	Sub-section in the report
1	ESRS 2	General disclosures	BP-1	General	General basis for preparation of the sustainability statement	1.1.1 General basis for preparation of Sustainability Statements [BP-1]
2	ESRS 2	General disclosures	BP-2	General	Disclosures in relation to specific circumstances	1.1.2. Disclosures in relation to Specific Circumstances [BP-2]
3	ESRS 2	General disclosures	GOV-1	Governance (GOV)	The role of the administrative, management and supervisory bodies	1.2.1. The role of the administrative, management and supervisory bodies [GOV-1]
4	ESRS 2	General disclosures	GOV-2	Governance (GOV)	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	1.2.2. Information provided to, and sustainability matters addressed by the administrative, management and supervisory bodies [GOV-2]
5	ESRS 2	General disclosures	GOV-3	Governance (GOV)	Integration of sustainability-related performance in incentive schemes	1.2.3. Integration of sustainability-related performance in incentive schemes [GOV-3]
6	ESRS 2	General disclosures	GOV-4	Governance (GOV)	Statement on due diligence	1.2.4. Statement on due diligence [GOV-4]
7	ESRS 2	General disclosures	GOV-5	Governance (GOV)	Risk management and internal controls over sustainability reporting	1.2.5. Risk management and internal controls over sustainability reporting [GOV-5]
8	ESRS 2	General disclosures	SBM-1	Strategy (SBM)	Strategy, business model and value chain	1.3.1. Strategy, business model and value chain [SBM-1]
9	ESRS 2	General disclosures	SBM-2	Strategy (SBM)	Interests and views of stakeholders	1.3.2. Interests and views of stakeholders [SBM-2]
10	ESRS 2	General disclosures	SBM-3	Strategy (SBM)	Material impacts, risks and opportunities and their interaction with strategy and business model	1.3.3. Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]
11	ESRS 2	General disclosures	IRO-1	Impact, risk, and opportunity management (IRO)	Description of the processes to identify and assess material impacts, risks and opportunities	1.4.1. Description of the process to Identify and Assess Material Impacts, Risks and Opportunities [IRO-1]
12	ESRS 2	General disclosures	IRO-2	Impact, risk and opportunity management (IRO)	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	1.4.2. Disclosure requirements in ESRS covered by Piraeus' Sustainability Statement [IRO-2]
14	ESRS 2	General disclosures	MDR-P	Impact, risk and opportunity management (IRO)	Policies adopted to manage material sustainability matters	1.5 Group Policies – Minimum Disclosure Requirements - Policies adopted to manage material sustainability matters (MDR-P) 2.1.2.1. Policies related to climate change mitigation and adaptation [E1-2] 2.2.2.1. Policies related to Biodiversity and Ecosystems [E4-2] 3.1.2.3 Policies related to Own Workforce – Equal treatment and opportunities for all [S1-1] 3.1.2.4. Policies related to Own Workforce – Working Conditions [S1-1] 3.2.2.1. Policies related to value chain workers [S2-1] 3.3.2.1. Policies related to affected communities [S3-1] 3.4.2.1. Policies related to Consumers and End-users [S4-1] 4.1.2.1. Business Conduct Policies and Corporate Culture [G1-1]
15	ESRS 2	General disclosures	MDR-A	Impact, risk and opportunity management (IRO)	Actions and resources in relation to material sustainability matters	2.1.2.2. Actions and resources in relation to climate change policies [E1-3] 2.2.2.2. Actions and resources related to Biodiversity and Ecosystems [E4-3] 3.1.2.5. Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions [S1-4]

	Standard	Cross-cutting / Topic	Number	Reporting Area	Disclosure Requirement	Sub-section in the report
						3.2.2.4. Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action [S2-4] 3.3.2.4. Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions [S3-4] 3.4.2.4. Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]
16	ESRS 2	General disclosures	MDR-M	Metrics and targets (MT)	Metrics in relation to material sustainability matters	2.1.3.2. Energy consumption and mix [E1-5] 2.1.3.3. Gross Scope 1, 2, 3 and Total GHG emissions [E1-6] 3.1.3.1. Metrics related to Own Workforce 3.2.3.1. Metrics related to Workers in the value chain 3.3.3.1. Metrics related to Affected communities 3.4.3.1. Metrics related to Consumers and End-users 4.1.3.1. Metrics related to Business Conduct
17	ESRS 2	General disclosures	MDR-T	Metrics and targets (MT)	Tracking effectiveness of policies and actions through targets	2.1.1.1. Transition Plan for Climate Change Mitigation [E1-1] 2.1.3.1. Targets related to climate change mitigation and adaptation [E1-4] 2.2.3.1. Targets related to Biodiversity and Ecosystems [E4-4] 3.1.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S1-5] 3.2.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S2-5] 3.3.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S3-5] 3.4.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]
18	ESRS E1	Climate change	GOV-3	Governance (GOV)	Integration of sustainability-related performance in incentive schemes	1.2.3. Integration of sustainability-related performance in incentive schemes [GOV-3]
19	ESRS E1	Climate change	E1-1	Strategy (SBM)	Transition plan for climate change mitigation	2.1.1.1. Transition Plan for Climate Change Mitigation [E1-1]
20	ESRS E1	Climate change	SBM-3	Strategy (SBM)	Material impacts, risks and opportunities and their interaction with strategy and business model	2.1.1.2. Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]
21	ESRS E1	Climate change	IRO-1	Impact, risk and opportunity management (IRO)	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	1.4.1. Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]
22	ESRS E1	Climate change	E1-2	Impact, risk and opportunity management (IRO)	Policies related to climate change mitigation and adaptation	2.1.2.1. Policies related to climate change mitigation and adaptation [E1-2]
23	ESRS E1	Climate change	E1-3	Impact, risk and opportunity management (IRO)	Actions and resources in relation to climate change policies	2.1.2.2. Actions and resources in relation to climate change policies [E1-3]
24	ESRS E1	Climate change	E1-4	Metrics and targets (MT)	Targets related to climate change mitigation and adaptation	2.1.1.1. Transition Plan for Climate Change Mitigation [E1-1] 2.1.3.1. Targets related to climate change mitigation and adaptation [E1-4]

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	Standard	Cross-cutting / Topic	Number	Reporting Area	Disclosure Requirement	Sub-section in the report
25	ESRS E1	Climate change	E1-5	Metrics and targets (MT)	Energy consumption and mix Energy consumption and mix - Energy intensity based on net revenue	2.1.3.2. Energy consumption and mix [E1-5]
26	ESRS E1	Climate change	E1-6	Metrics and targets (MT)	Gross Scopes 1, 2, 3 and Total GHG emissions GHG Intensity based on net revenue	2.1.3.3. Gross Scope 1, 2, 3 and Total GHG emissions [E1-6]
27	ESRS E2	Pollution	IRO-1	Impact, risk and opportunity management (IRO)	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	1.4.1. Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]
28	ESRS E3	Water and marine resources	IRO-1	Impact, risk and opportunity management (IRO)	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	1.4.1. Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]
29	ESRS E4	Biodiversity and ecosystems	E4-1	Strategy (SBM)	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	2.2.1.1. Consideration of Biodiversity and Ecosystems in Strategy and Business Model [E4-1]
30	ESRS E4	Biodiversity and ecosystems	SBM-3	Strategy (SBM)	Material impacts, risks and opportunities and their interaction with strategy and business model	2.2.1.1. Consideration of Biodiversity and Ecosystems in Strategy and Business Model [E4-1]
31	ESRS E4	Biodiversity and ecosystems	IRO-1	Impact, risk and opportunity management (IRO)	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities	1.4.1. Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]
32	ESRS E4	Biodiversity and ecosystems	E4-2	Impact, risk and opportunity management (IRO)	Policies related to biodiversity and ecosystems	2.2.2.1. Polices related to Biodiversity and Ecosystems [E4-2]
33	ESRS E4	Biodiversity and ecosystems	E4-3	Impact, risk and opportunity management (IR O)	Actions and resources related to biodiversity and ecosystems	2.2.2.2. Actions and resources related to Biodiversity and Ecosystems [E4-3]
34	ESRS E4	Biodiversity and ecosystems	E4-4	Metrics and targets (MT)	Targets related to biodiversity and ecosystems	2.2.3.1. Targets related to Biodiversity and Ecosystems [E4-4]
35	ESRS E5	Resource use and circular economy	IRO-1	Impact, risk and opportunity management (IRO)	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	1.4.1. Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]
36	ESRS S1	Own Workforce	SBM-2	Strategy (SBM)	Interests and views of stakeholders	1.3.2. Interests and views of stakeholders [SBM-2]
37	ESRS S1	Own Workforce	SBM-3	Strategy (SBM)	Material impacts, risks and opportunities and their interaction with strategy and business model	3.1.1.1. Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model [SBM-3]
38	ESRS S1	Own Workforce	S1-1	Impact, risk and opportunity management (IRO)	Policies related to own workforce	3.1.2.3 Policies related to Own Workforce – Equal treatment and opportunities for all [S1-1] 3.1.2.4. Policies related to Own Workforce – Working Conditions [S1-1]
39	ESRS S1	Own Workforce	S1-2	Impact, risk and opportunity management (IRO)	Processes for engaging with own workforce and workers' representatives about impacts	3.1.2.1. Processes for engaging with own workforce and workers' representatives about impacts [S1-2]
40	ESRS S1	Own Workforce	S1-3	Impact, risk and opportunity management (IRO)	Processes to remediate negative impacts and channels for own workers to raise concerns	3.1.2.2. Processes to remediate negative impacts and channels for own workforce to raise concerns [S1-3]
41	ESRS S1	Own Workforce	S1-4	Impact, risk and opportunity management (IRO)	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities	3.1.2.5. Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to

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	Standard	Cross-cutting / Topic	Number	Reporting Area	Disclosure Requirement	Sub-section in the report
					related to own workforce, and effectiveness of those actions	own workforce, and effectiveness of those actions [S1-4] 3.1.2.5.1. Equal Treatment and Opportunities for all 3.1.2.5.2. Working Conditions 3.1.2.5.3. Monitoring of actions and performance
42	ESRS S1	Own Workforce	S1-5	Metrics and targets (MT)	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.1.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S1-5]
43	ESRS S1	Own Workforce	S1-6	Metrics and targets (MT)	Characteristics of the undertaking's employees	3.1.3.1. Metrics related to Own Workforce Characteristics of Piraeus' employees [S1-6]
44	ESRS S1	Own Workforce	S1-8	Metrics and targets (MT)	Collective bargaining coverage and social dialogue	3.1.3.1. Metrics related to Own Workforce Collective bargaining coverage and social dialogue [S1-8]
45	ESRS S1	Own Workforce	S1-9	Metrics and targets (MT)	Diversity metrics	3.1.3.1. Metrics related to Own Workforce Diversity metrics [S1-9]
46	ESRS S1	Own Workforce	S1-10	Metrics and targets (MT)	Adequate wages	3.1.3.1. Metrics related to Own Workforce Adequate wages [S1-10]
47	ESRS S1	Own Workforce	S1-11	Metrics and targets (MT)	Social protection	3.1.3.1. Metrics related to Own Workforce Social protection [S1-11]
48	ESRS S1	Own Workforce	S1-12	Metrics and targets (MT)	Persons with disabilities	3.1.3.1. Metrics related to Own Workforce Persons with disabilities [S1-12]
49	ESRS S1	Own Workforce	S1-13	Metrics and targets (MT)	Training and skills development metrics	3.1.3.1. Metrics related to Own Workforce Training and skills development for own workforce [S1-13]
50	ESRS S1	Own Workforce	S1-14	Metrics and targets (MT)	Health and safety metrics	3.1.3.1. Metrics related to Own Workforce Health and Safety Management system [S1-14]
51	ESRS S1	Own Workforce	S1-15	Metrics and targets (MT)	Work-life balance metrics	3.1.3.1. Metrics related to Own Workforce Work-life balance metrics [S1-15]
52	ESRS S1	Own Workforce	S1-16	Metrics and targets (MT)	Remuneration metrics (pay gap and total remuneration)	3.1.3.1. Metrics related to Own Workforce Remuneration metrics (pay gap and total remuneration) [S1-16]
53	ESRS S1	Own Workforce	S1-17	Metrics and targets (MT)	Incidents, complaints and severe human rights impacts	3.1.3.1. Metrics related to Own Workforce Incidents, complaints and severe human rights impacts [S1-17]
54	ESRS S2	Workers in the value chain	SBM-2	Strategy (SBM)	Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model	1.3.2. Interests and views of stakeholders [SBM-2]

	Standard	Cross-cutting / Topic	Number	Reporting Area	Disclosure Requirement	Sub-section in the report
55	ESRS S2	Workers in the value chain	SBM-3	Strategy (SBM)	Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model	3.2.1.1. Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model [SBM-3]
56	ESRS S2	Workers in the value chain	S2-1	Impact, risk and opportunity management (IRO)	Policies in place	3.2.2.1. Policies related to value chain workers [S2-1]
57	ESRS S2	Workers in the value chain	S2-2	Impact, risk and opportunity management (IRO)	Processes for engaging with value chain workers about impacts	3.2.2.2. Processes for engaging with the value chain workers about impacts [S2-2]
58	ESRS S2	Workers in the value chain	S2-3	Impact, risk and opportunity management (IRO)	Processes to remediate negative impacts and channels for value chain workers to raise concerns	3.2.2.3. Processes to remediate negative impacts and channels for value chain workers to raise concerns [S2-3]
59	ESRS S2	Workers in the value chain	S2-4	Impact, risk and opportunity management (IRO)	Actions related to value chain workers	3.2.2.4. Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action [S2-4]
60	ESRS S2	Workers in the value chain	S2-5	Metrics and targets (MT)	Metrics and Targets	3.2.3.1. Metrics related to workers in the value chain 3.2.3.2. Targets related to managing material negative impacts advancing positive impacts and managing material risks and opportunities. [S2-5]
61	ESRS S3	Affected communities	SBM-2	Strategy (SBM)	Interests and views of stakeholders	1.3.2. Interests and views of stakeholders [SBM-2]
62	ESRS S3	Affected communities	SBM-3	Strategy (SBM)	Material impacts, risks and opportunities and their interaction with strategy and business model	3.3.1.1. Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model [SBM-3]
63	ESRS S3	Affected communities	S3-1	Impact, risk and opportunity management (IRO)	Policies related to affected communities	3.3.2.1. Policies related to affected communities [S3-1]
64	ESRS S3	Affected communities	S3-2	Impact, risk and opportunity management (IRO)	Processes for engaging with affected communities about impacts	3.3.2.2. Processes for engaging with Affected Communities about impacts [S3-2]
65	ESRS S3	Affected communities	S3-3	Impact, risk and opportunity management (IRO)	Processes to remediate negative impacts and channels for affected communities to raise concerns	3.3.2.3. Processes to remediate Negative Impacts and Channels for Affected Communities to raise concerns [S3-3]
61	ESRS S3	Affected communities	SBM-2	Strategy (SBM)	Interests and views of stakeholders	1.3.2. Interests and views of stakeholders [SBM-2]
62	ESRS S3	Affected communities	SBM-3	Strategy (SBM)	Material impacts, risks and opportunities and their interaction with strategy and business model	3.3.1.1. Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model [SBM-3]
63	ESRS S3	Affected communities	S3-1	Impact, risk and opportunity management (IRO)	Policies related to affected communities	3.3.2.1. Policies related to affected communities [S3-1]
64	ESRS S3	Affected communities	S3-2	Impact, risk and opportunity management (IRO)	Processes for engaging with affected communities about impacts	3.3.2.2. Processes for engaging with Affected Communities about impacts [S3-2]
65	ESRS S3	Affected communities	S3-3	Impact, risk and opportunity management (IRO)	Processes to remediate negative impacts and channels for affected communities to raise concerns	3.3.2.3. Processes to remediate Negative Impacts and Channels for Affected Communities to raise concerns [S3-3]

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	Standard	Cross-cutting / Topic	Number	Reporting Area	Disclosure Requirement	Sub-section in the report
66	ESRS S3	Affected communities	S3-4	Impact, risk and opportunity management (IRO)	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	3.3.2.4. Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions [S3-4]
67	ESRS S3	Affected communities	S3-5	Metrics and targets (MT)	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.3.3.1. Metrics related to affected communities 3.3.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S3-5]
68	ESRS S4	Consumers and end-users	SBM-2	Strategy (SBM)	Interests and views of stakeholders	1.3.2. Interests and views of stakeholders [SBM-2]
69	ESRS S4	Consumers and end-users	SBM-3	Strategy (SBM)	Material impacts, risks and opportunities and their interaction with strategy and business model	3.4.1.1. Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]
70	ESRS S4	Consumers and end-users	S4-1	Impact, risk and opportunity management (IRO)	Policies related to consumers and end-users	3.4.2.1. Policies related to Consumers and End-users [S4-1]
71	ESRS S4	Consumers and end-users	S4-2	Impact, risk and opportunity management (IRO)	Processes for engaging with consumers and end-users about impacts	3.4.2.2. Processes for engaging with Consumers and End-users about impacts [S4-2]
72	ESRS S4	Consumers and end-users	S4-3	Impact, risk and opportunity management (IRO)	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	3.4.2.3. Processes to remediate negative impacts and channels for consumers and end-users to raise concerns [S4-3]
73	ESRS S4	Consumers and end-users	S4-4	Impact, risk and opportunity management (IRO)	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	3.4.2.4. Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]
74	ESRS S4	Consumers and end-users	S4-5	Metrics and targets (MT)	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.4.3.1. Metrics related to consumers and end-users 3.4.3.2. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]
75	ESRS G1	Business Conduct	GOV-1	Governance (GOV)	The role of the administrative, management and supervisory bodies	4.1.1.1. The Role of the Administrative, Management and Supervisory Bodies [GOV-1]
76	ESRS G1	Business Conduct	IRO-1	Impact, risk and opportunity management (IRO)	Description of the processes to identify and assess material impacts, risks and opportunities	1.4.1. Description of the process to Identify and Assess Material Impacts, Risks and Opportunities [IRO-1]
77	ESRS G1	Business Conduct	G1-1	Impact, risk and opportunity management (IRO)	Business conduct policies and corporate culture	4.1.2.1. Business conduct policies and corporate culture [G1-1]
78	ESRS G1	Business Conduct	G1-1	Metrics and targets (MT)	Metrics and targets	4.1.3.1. Metrics related to Business Conduct

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Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability Statement	Not material datapoints
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		1.2.1. The role of the administrative, management and supervisory bodies [GOV-1]	
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		1.2.1. The role of the administrative, management and supervisory bodies [GOV-1]	
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				1.2.4. Statement on due diligence [GOV-4]	
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	2.1.1.1. Transition Plan for Climate Change Mitigation [E1-1]	
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2			Not material
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		2.1.3.1. Targets related to climate change mitigation and adaptation [E1-4]	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				2.1.3.2. Energy consumption and mix [E1-5]	Coal and coal products not material
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				2.1.3.2. Energy consumption and mix [E1-5]	Nuclear energy not material
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				2.1.3.2. Energy consumption and mix [E1-5]	
ESRS E1-6 Gross Scope 1, 2, 3, and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		2.1.3.3. Gross Scope 1, 2, 3 and Total GHG emissions [E1-6]	

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Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability Statement	Not material datapoints
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		2.1.3.3. Gross Scope 1, 2, 3 and Total GHG emissions [E1-6]	
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)		Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II			Not material
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.				Not material
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral				Not material
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II			Not material
ESRS E2-4 Amount of each pollutant listed in Annex II of the E- PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1					Not material
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1					Not material
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1					Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1					Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1					Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1					Not material
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1					Not material
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				2.2.1.1. Consideration of Biodiversity and Ecosystems in Strategy and Business Model [E4-1]	
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1					Not material

APPENDIX B – LIST OF DATAPOINTS THAT DERIVE FROM OTHER EU LEGISLATION

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability Statement	Not material datapoints
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1					Not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1					Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15Table #2 of Annex 1					Not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1					Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1					Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labor paragraph 14 (f)	Indicator number 13 Table #3 of Annex I					Not material
ESRS 2- SBM3 - S1 Risk of incidents of child labor paragraph 14 (g)	Indicator number 12 Table #3 of Annex I					Not material
ESRS S1-1 Human rights Framework commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				3.1.2.3. Policies related to Own Workforce - Equal treatment and opportunities for all [S1-1]	
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		3.1.2.3. Policies related to Own Workforce - Equal treatment and opportunities for all [S1-1]	
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				3.1.1.1. Material Impacts, Risks and Opportunities and their interaction with Strategy and Business Model [SBM-3]	
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	Indicator number 11 Table #3 of Annex I				3.1.3.1. Metrics related to Own Workforce, Health and Safety Management system [S1-14]	
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				3.1.2.2. Processes to remediate negative impacts and channels for own workforce to raise concerns [S1-3]	
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		3.1.3.1. Metrics related to Own Workforce, Health and Safety Management system [S1-14]	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				3.1.3.1. Metrics related to Own Workforce, Health and Safety Management system [S1-14]	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		3.1.3.1. Metrics related to Own Workforce Remuneration metrics (pay gap and total remuneration) [S1-16]	
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				3.1.3.1. Metrics related to Own Workforce Remuneration metrics (pay gap and total remuneration) [S1-16]	

APPENDIX B – LIST OF DATAPOINTS THAT DERIVE FROM OTHER EU LEGISLATION

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability Statement	Not material datapoints
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				3.1.3.1. Metrics related to Own Workforce, Incidents, complaints and severe human rights impacts [S1-17]	
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)			3.1.3.1. Metrics related to Own Workforce, Incidents, complaints and severe human rights impacts [S1-17]	
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I					Not material
ESRS S2-1 Human rights Framework commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1					Not material
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				3.2.2.1. Policies related to value chain workers [S2-1]	
ESRS S2-1 Non- respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		3.2.2.1. Policies related to value chain workers [S2-1]	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		3.2.2.1. Policies related to value chain workers [S2-1]	-
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				3.2.2.4. Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action [S2-4]	
ESRS S3-1 Human rights Framework commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				3.3.2.1. Policies related to Affected Communities [S3-1]	
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		3.3.2.1. Policies related to Affected Communities [S3-1]	
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				3.3.2.4. Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions [S3-4]	
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				3.4.2.1. Policies related to Consumers and End-users [S4-1]	

APPENDIX B – LIST OF DATAPOINTS THAT DERIVE FROM OTHER EU LEGISLATION

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Sustainability Statement	Not material datapoints
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		3.4.2.1. Policies related to Consumers and End-users [S4-1]	
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				3.4.2.4. Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]	
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1					Not material
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				4.1.2.1. Business Conduct Policies and Corporate Culture [G1-1]	
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)			Not material
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1					Not material

INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT

Translation from the original in Greek
Independent Auditor's Limited Assurance Report on Piraeus Bank S.A.'s Sustainability Statement

To the Shareholders of Piraeus Bank S.A.

We have conducted a limited assurance engagement on the consolidated Sustainability Statement of Piraeus Bank S.A. (henceforth the "Bank") and its subsidiaries (collectively the "Group"), included in section "Piraeus Group Sustainability Statement" of the consolidated Board of Directors' Annual Report (the "Sustainability Statement"), for the period from 01/01/2025 to 31/12/2025.

Limited assurance conclusion

Based on the procedures we have performed, as described below in the "Scope of Work Performed" paragraph, and the evidence we have obtained, nothing has come to our attention that causes us to believe that:

- the Sustainability Statement has not been prepared in all material respects, in accordance with Article 154 of Law 4548/2018, as amended by Law 5164/2024 and currently in force, based on which, Article 29(a) of EU Directive 2013/34 was transposed into Greek legislation,
- the Sustainability Statement does not comply with the European Sustainability Reporting Standards (hereinafter "ESRS"), in accordance with EU Regulation 2023/2772 of the Commission of 31 July 2023, and EU Directive 2022/2464 of the European Parliament and the Council of 14 December 2022,
- the process carried out by the Group to identify and assess material impacts, risks and opportunities (the "Process"), as set out in Note 1.4.1. "Description of the process to Identify and Assess Material Impacts, Risks and Opportunities" of the Sustainability Statement, does not comply with the "Disclosure Requirement IRO-1-Description of the process to identify and assess material impacts, risks and opportunities" of ESRS 2 "General Disclosures",
- the disclosures included in sections 2.3. "Disclosures required pursuant to Article 8 of EU Regulation 2020/852 ("EU Taxonomy Regulation")" and "APPENDIX C – EU TAXONOMY" of the Sustainability Statement, do not comply with Article 8 of EU Regulation 2020/852.

Basis for conclusion

We conducted a limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised), "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" ("ISAE 3000").

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities are further described in the "Auditor's Responsibilities" section of our report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Professional Ethics and Quality Management

We are independent of the Bank and the Group, during the whole period of this engagement and we have complied with the requirements of the International Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code), the ethical and independence requirements of Law 4449/2017 and EU Regulation 537/2014.

Our audit firm applies the International Standard on Quality Management 1 (ISQM 1), "Quality Management for firms that perform audits or reviews of financial statements, or other assurance or related services engagements" and accordingly, maintains a comprehensive system of quality management, including documented policies and procedures regarding compliance and ethical requirements, professional standards and applicable legal and regulatory requirements.

Management's responsibilities regarding the Sustainability Statement

Management of the Bank is responsible for designing and implementing a process to identify the information reported in the Sustainability Statement, in accordance with ESRS, and for disclosing this Process in Note 1.4.1 "Description of the process to Identify and Assess Material Impacts, Risks and Opportunities" of the Sustainability Statement.

This responsibility includes:

- Understanding the context in which the Bank's and the Group's activities and business relationships take place and developing an understanding of its affected stakeholders.
- The identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Bank's and the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium, or long-term.
- The assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds, and
- Making assumptions that are reasonable in the circumstances.

Management of the Bank is further responsible for the preparation of the Sustainability Statement, in accordance with Article 154 of Law 4548/2018 as amended by Law 5164/2024 and currently in force, based on which, Article 29(a) of EU Directive 2013/34 was transposed into Greek legislation.

In this context, Management's responsibility includes:

- Compliance of the Sustainability Statement with ESRS.
- Preparing the disclosures in sections 2.3. "Disclosures required pursuant to Article 8 of EU Regulation 2020/852 ("EU Taxonomy Regulation")" and "APPENDIX C – EU TAXONOMY" of the Sustainability Statement, in compliance with Article 8 of EU Regulation 2020/852.
- Designing implementing and maintaining such internal controls that management determines are necessary to enable the preparation of the Sustainability Statement is free from material misstatement, whether due to fraud or error, and
- The selection and application of appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

The Audit Committee of the Bank is responsible for overseeing the sustainability reporting process of the Group.

Inherent limitations in preparing the Sustainability Statement

As discussed in Notes 2.1.3.3 "Gross Scope 1, 2, 3 and Total GHG emissions", 3.2.3.1. "Metrics related to Workers in the value chain", 3.3.3.1. "Metrics related to Affected communities", 3.4.3.1. "Metrics related to Consumers and End-users" and 4.1.3.1. "Metrics related to Business Conduct" in the Sustainability Statement, sustainability information for which the applicable criteria are self-defined, the nature of this sustainability information, and absence of consistent external standards, allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact the comparability of sustainability matters reported by different entities and from year to year within an entity as methodologies develop.

In reporting forward-looking information in accordance with ESRS, Management of the Bank is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Bank and the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

As discussed in Note 2.1. "Climate Change", the sustainability information includes, among others, information based on climate-related scenarios, that is subject to inherent uncertainty regarding the likelihood, timing or effect of possible future physical and transitional climate-related impacts.

Our work covered the subject matters listed in the section "Scope of Work Performed" for obtaining limited assurance and is based on the procedures included in the Program, as defined in this section of our report. Our work does not constitute an audit or review of historical financial information in accordance with the applicable International Standards on Auditing or International Standards on Review Engagements, and for this reason, we do not provide any other assurance beyond what is stated in the section "Scope of Work Performed".

Auditor's responsibilities

This limited assurance report has been prepared based on the provisions of Article 154C of Law 4548/2018 and Article 32A of Law 4449/2017.

Our responsibility is to plan and perform the limited assurance engagement to obtain limited assurance about whether the Sustainability Statement is free from material misstatement, whether due to fraud or error and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material when, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000, we exercise professional judgment and maintain our professional skepticism throughout the engagement.

Our responsibilities in respect of the Sustainability Statement, in relation to the Process, include:

- Performing risk assessment procedures, including obtaining an understanding of internal controls relevant to the engagement, to identify risks in the Process applied by the Group to identify the information reported in the Sustainability Statement does not address the applicable requirements of the ESRS, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process and

- Designing and performing procedures to evaluate whether the Process to identify the information reported in the Sustainability Statement is consistent with the Bank's description of its Process as disclosed in Note 1.4.1. "Description of the process to Identify and Assess Material Impacts, Risks and Opportunities".

In addition, we are responsible for:

- Performing risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify disclosures where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal controls.
- Designing and performing procedures responsive to disclosures in the consolidated Sustainability Statement, where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls.

Scope of the Work Performed

Our work involves performing procedures and obtaining audit evidence to form a limited assurance conclusion and are limited to the procedures listed in the limited assurance program issued by the Board of Directors of the Hellenic Accounting and Auditing Supervisory Oversight Board according to its 262/22.01.2025 decision (hereinafter the "Program"), developed for the purpose of issuing of a limited assurance report on the Group's Sustainability Statement.

Our procedures were designed for the purpose of obtaining a limited level of assurance to support our conclusion but not for obtaining evidence that would be required to provide a reasonable level of assurance.

Athens, 27 February 2026

The Certified Public Accountant

Konstantinos Kakoliris

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