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Our vision is to be the
“Bank of First Choice”
for customers, talent,
and investors.

A trustworthy, human,
responsive bank, that
acts as a catalyst for
sustainable growth and
unlocks potential for
households, businesses,
communities, and our
employees.

Together we create Future

Introduction

Our purpose, vision and values

In NBC, our purpose statement is “Together we create Future”. Our vision is to be the “Bank of First Choice” for customers, talent, and investors. A trustworthy, human, responsive bank, that acts as a catalyst for sustainable growth, and unlocks potential for households, businesses, communities, and our people.

NBC possesses a strong legacy and resilience record of over 183 years, fostering continuous innovation and excellence in financial services. Fully aware of the significance of our role, we aim high, work as a team and strive everyday to deliver tangible results and create a more prosperous and sustainable future for all.

Looking ahead, and in line with our purpose, vision, and values, NBC is committed to embedding ESG into its business strategy, operating model, and corporate culture, in order to drive positive change in terms of environmental protection, social progress, and long-term socioeconomic stability.

We are:



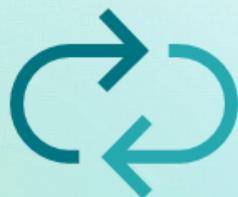
Human

We place the needs and choices of our customers at the centre of everything we do.



Trustworthy

We operate with transparency, knowledge and experience.



Responsive

We provide flexible solutions tailored to the needs of our customers.



A Growth Catalyst

We accelerate sustainable progress and prosperity.

Our PRB roadmap

In September 2020, National Bank of Greece S.A. (hereinafter “NBG” or “the Bank”) endorsed UNEP FI’s Principles for Responsible Banking (RRB or Principles), recognizing the significance of responsible practices in ensuring the sustainability of its own operation, as well as in creating value for its customers, shareholders, employees, and the community at large. Through the Principles, NBG aims to align its strategy with the UN Sustainable Development Goals, the Paris Climate Agreement, and all ensuing European and Greek legislative frameworks. To effectively adopt the Principles within the designated four-year time frame, NBG has taken on decisive actions, as highlighted hereunder:

- **Alignment:** we have integrated ESG considerations into NBG’s strategy and business model, articulating 9 ESG strategic themes under the E-S-G pillars, pursuing its execution via the Bank’s Transformation Program, and monitoring its effect on the Bank’s Business Plan
- **Impact & target setting:** following a trail of annual measurements of own operational and financed emissions footprint, and a solid understanding of key impact areas, we have set a first set of science-based targets for emissions reductions by 2030 in selected portfolios
- **Clients & Customers:** we have enhanced our products and services in line with our ESG strategy and goals, enabling our clients/customers with financing solutions (subsidized or not) to transition their own business models and enhance the quality of everyday life
- **Stakeholders:** we have maintained continuous interaction with and anticipation of our stakeholders’ demands via multiple channels, as well as via regular and ad-hoc engagement instances, regarding them as the bearers of our socio-economic environment’s pulse
- **Governance & Culture:** we have strengthened our governance framework (incl. dedicated committees, new teams/functions) to ensure effective oversight of responsible lending and investing; at the same time, training, performance management and remuneration initiatives keep enhancing internal awareness and culture around sustainability
- **Transparency & accountability:** we have enhanced and expanded our set of non-financial and sustainability disclosures, including a higher degree of external assurance, as in the current report



NBG’s PRB implementation roadmap

This 3rd Self-Assessment and Progress Report outlines the Bank’s progress towards adoption of the Principles. More information about our ESG Strategy and underpinning actions can be found in the Annual Report FY2023, the ESG Report 2022, our public site, and other sources referenced specifically throughout this document.

Principle 1: Alignment



We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

1.1 Business model

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank's portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

Response

Corporate Profile

NBC was founded in 1841 and its shares have been listed on the Athens Exchange since 1880. The Bank's headquarters are located at 86 Eolou Street, 10559 Athens, Greece. Backed by its strong tradition and noteworthy contribution to the economic transformation of Greece, and by the trust of its shareholders, customers, depositors and employees, NBC serves as a pillar of stability for the Greek economy. The Bank is one of the four systemic banks in Greece and one of the largest Greek financial institutions by market capitalization. The Bank and its subsidiaries (hereinafter the "NBC Group" or the "Group") provide a range of universal financial services including mainly retail, corporate and investment banking, transactional banking, leasing, factoring, brokerage, asset management, real estate and insurance related services.

The Group operates mainly in Greece but also abroad, through its banking subsidiaries in North Macedonia (Stopanska Banka) and in Cyprus (NBC Cyprus), with a workforce of 7.889 employees as at 31 December 2023 (of which 6.725 in Greece). As at 31 December 2023, the Bank had a total of 327 Units: 313 Branches including 18 Retail i-bank Tellerless, and 14 Transaction Offices. Through its 1,462 ATMs it offers an extensive network coverage – even in the most remote areas of the country.

The Group's domestic operations accounted for 95.1% of its total lending activities as at 31 December 2023 (the Domestic Banking gross loans) and for 96.5% of its deposits (the Domestic Banking deposits).

Links and references

[NBC Annual Financial Report 2023](#)

- NBC at a Glance, page 5
- Economic and Financial Review, pages 35–39
- Non-Financial Statement, page 94
- Statement of Financial Position, page 184

[NBC ESG Report 2022](#)
About NBC Group, pages 21 – 27

More information is also available at [NBC public portal – ESG](#)

1.2 Strategy alignment

Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?

Yes

No

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?

UN Guiding Principles on Business and Human Rights

International Labour Organization fundamental conventions

UN Global Compact

UN Declaration on the Rights of Indigenous Peoples

Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: ESG Pillar III, EU Taxonomy (Regulation EU 2020/852 of the European Parliament and of the Council)

Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: ESG Pillar III

None of the above

Response

NBG is aware of its growing responsibility to contribute to the achievement of Greece's long-term sustainability objectives, and to ensure compliance at all times with the regulatory framework, as well as with its own voluntary-strategic commitments, including adherence to the PRB. Endowed with a long-standing banking legacy and its capacity to channel capital towards sustainable initiatives, NBG is uniquely positioned to contribute to the objectives of the Paris Agreement and to the Sustainable Development Goals (SDGs), by acting upon its commitment towards an inclusive society founded on human dignity, equality and sustainable natural resource use.

ESG (sustainability) strategy

The Bank has taken into consideration relevant ESG risks and opportunities, and has integrated into its business strategy 9 actionable ESG strategic themes. Each of these themes serves specific SDGs (as depicted below), while altogether serving the Bank and Group's Sustainable Development Policy.

In the area of 'E', specifically, NBG has actively embarked on a journey to sustainable, low-carbon and resilient development. As depicted in NBG's 2022 ESG Report, the Bank set and disclosed its first set of Net Zero targets, aiming to support Greece's decarbonization agenda in line with the

Links and references

[NBG Annual Financial Report 2023](#)

- Our Values, page 6
- Non-Financial Statement, pages 2 – 12
- EU Taxonomy Disclosures, page 138

[NBG ESG Report 2022](#)

- Letter from the CEO, pages 5 – 7
- ESG Strategy, pages 32 – 33

[NBG Sustainable Development Policy](#)

[Pillar III disclosures - December 2023](#)

country's revised National Energy and Climate Plan, playing a pivotal role in the economy's green transition.

ESG Pillar	ESG Strategic Themes	ESG Commitments	Our core values	Sustainable Development Goals
Environmental	Lead the market in sustainable energy financing	Pioneer sustainable bond issuing in the Greek market Growth	Growth Responsive -ness	
		Lead the development of the renewable energy sector		
	Accelerate transition to a sustainable economy	Support green transition of corporates		
		Lead green retail financing & sustainable investments		
	Role-model environmentally responsible practices	Establish a carbon-neutral NBC footprint		
		Protect biodiversity and ecosystem health		
Social	Champion diversity & inclusion	Establish equality in the workplace	Human - Centricity	
		Promote inclusion in the society		
	Enable public health & well-being	Protect the health and family life of our people		
		Enable public health, well-being and sports		
	Promote Greek heritage, culture & creativity	Lead the preservation of Greek cultural heritage		
		Promote contemporary Greek culture and creativity		
	Foster entrepreneurship & innovation	Foster entrepreneurship and innovation		
		Motivate public contribution to new projects		

	Support prosperity through learning & digital literacy	Encourage lifelong learning in and out of the workplace		
		Champion digital literacy across age groups		
Governance	Adhere to the highest governance standards	Ensure best-in-class corporate governance	Trust	 
		Ensure transparency in disclosures and reporting		

Sustainable Development (Sustainability) Policy

NBG constantly seeks to ensure that it substantially and positively impacts the economies and societies where it operates, through its activities (i.e., the provision of its products and services), its role as an employer, as well as via deploying its Corporate Social Responsibility ("CSR") actions. NBG's Bank & Group Sustainability Policy defines the direction to maximising economic, environmental, social and governance benefit, while setting the framework for managing economic, environmental, social and governance impacts of the Bank and the Group, via:

1. reducing and, where possible, offsetting climate and environmental impacts from financing and investing, and from own operations
2. generating long-term value for stakeholders, the economy at large, and the communities where NBG's Group companies operate in Greece and abroad
3. undertaking initiative in the fields of Corporate Governance, Corporate Social Responsibility and Business Ethics, in addition to ensuring compliance with the legal and regulatory framework for these issues
4. protecting the reputation and reliability of the Group and strengthening NBG's renewed value system.

Other applicable regulatory reporting on C&E risks

NBG adheres to regulatory reporting and relevant disclosures requirements, such as the recurring Pillar III disclosures, in particular the dedicated ESG Risks chapter and respective tables, as per EBA's ITS guidelines. In parallel NBG is preparing for the full adoption of the EU Taxonomy (and all related Delegated Acts), in the meantime issuing -as required, via a phased-in approach- its first 2 Taxonomy indicators: GAR based on Turnover and GAR based on Capex.

Principle 2: Impact and Target Setting



We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly¹ and fulfil the following requirements/elements (a-d)²:

a) Scope: What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

Response

PRB Portfolio Impact Analysis

We recognize the importance of comprehending the impacts of our financing activity on our socio-economic environment, as a mechanism of informing and steering our overall ESG strategy. Therefore, per our commitment to the PRB, we are regularly conducting an in-depth impact analysis to identify positive and negative impacts of our Corporate, Business and Retail lending.

Similarly to previous reports, we are using the Portfolio Impact Analysis Tools for Banks. In this 3rd self-assessment report, we have increased the scope of conducting impact analysis with portfolio data (exposures) in NBC Factors and NBC Leasing, in Cyprus, and in North Macedonia. It is noted that NBC's activities in Greece include the Bank's domestic operations, Ethniki Leasing S.A and Ethniki Factors S.A., with the Group's domestic operations accounting for 95.1% of total lending activities, as at 31 December 2023.

The investment banking business was considered, but not included in the analysis, as its incremental impact would not differentiate the results. It will be reconsidered in future analyses.

Links and references

[NBC Annual Financial Report 2023](#)

- Business Overview, p.36-40
- Activities outside Greece, p.51

b) Portfolio composition: Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope

- i) by sectors & industries³ for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or
- ii) by products & services and by types of customers for consumer and retail banking portfolios.

¹ That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

² Further guidance can be found in the [Interactive Guidance on impact analysis and target setting](#).

³ 'Key sectors' relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

Response

For the purposes of NBC's 3rd year Self-Assessment & Progress Report, the Bank focused its PRB Portfolio Impact Analysis on its business activities in Greece, Cyprus and North Macedonia, as follows:

Main geographies / countries of operations (FINREP booking entity):

- Greece: NBC Solo, NBC Factors & NBC Leasing
- Cyprus: Cyprus Branch & NBC Cyprus LTD
- North Macedonia: Stopanska Banka

Core business activities / products

FINREP Segments:

- Non-Financial Corporations
- Other Financial Corporations

Business Segments:

- Mortgage
- Consumer
- Credit Cards
- Small Business
- Corporate

Industry classification

- NACE Rev. 2 Statistical classification of economic activities, for Corporate and Business portfolios – ISIC for the Retail portfolio

Perimeter of portfolios assessed

Corporate Banking

- Corporate Segment
- All in-scope countries

Business Banking

- Small Business
- Greece only

Households

- Mortgage, Consumer, Credit Cards
- All in-scope countries

Below is the composition for the top sectors by portfolio, which for the Corporate and Business banking cover more than 75% of the total Gross Book Value, as at 31/12/2023:

Links and references

Group Corporate Banking (NACE)	Greece (€mn)	North Macedonia (€mn)	Cyprus (€mn)	Total (€mn)
H50 – Water Transport	2,676	0	12	2,689
D35 - Electricity, gas, steam and air conditioning supply	2,487	41	55	2,583
G46 - Wholesale trade, exc. motor vehicles and motorcycles	1,715	91	37	1,843
I55 - Accommodation	1,610	5	13	1,627
L68 - Real estate activities	1,349	20	40	1,409
H52 - Warehousing and support activities for transportation	1,149	0	53	1,202
C10 - Manufacture of food products	984	43	32	1,059
C19 - Manufacture of coke and refined petroleum products	802	0	0	802
G47 - Retail trade, except of motor vehicles and motorcycles	540	73	25	638
C24 - Manufacture of basic metals	460	32	9	501
K64 - Financial service activities, except insurance and pension funding	430	0	70	500
H49 - Land transport and transport via pipelines	361	17	0	378
Business banking (NACE)				Greece (€mn)
G46 - Wholesale trade, exc. motor vehicles and motorcycles				299
G47 - Retail trade, except of motor vehicles and motorcycles				222
I55 - Accommodation				83
C10 - Manufacture of food products				59
A01 - Crop and animal production, hunting and related service activities				50
D35 - Electricity, gas, steam and air conditioning supply				50
G45 - Wholesale and retail trade and repair of motor vehicles and motorcycles				48
I56 - Food and beverage service activities				47
F41 - Construction of buildings				39

H49 - Land transport and transport via pipelines	33
C25 - Manufacture of fabricated metal products, except machinery and equipment	28
F43 - Specialised construction activities	27

Below is the breakdown of the Retail portfolio, by geography and by ISIC code:

Group Retail Banking (ISIC)	Greece (€mn)	North Macedonia (€mn)	Cyprus (€mn)	Total (€mn)
64434 - Home loans /mortgages	6,408	308	35	6,751
64432 - Consumer loans & overdraft	1,082	611	0	1,693
64446 - Targeted products - other vulnerable groups	304	0	0	304
64435 - Vehicle related loans	100	0	0	100
64436 - Education related loans	6	0	0	6
64.431 - Credit cards	440	47	0	488
Total	8,342	966	35	9,343

c) Context: What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate?⁴ Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

This step aims to put your bank's portfolio impacts into the context of society's needs.

Response

NBC's activities in Greece include the Bank's domestic operations, Ethniki Leasing S.A and Ethniki Factors S.A., with the Group's domestic operations accounting for 95.1% of total lending activities, as at 31 December 2023. Therefore, in terms of context for evaluating impact, we mostly considered the current and short- to mid-term socio-economic landscape of Greece, which are also reflected in UNEF FI's Portfolio Impact Analysis Tool for Banks (v3) – Context Module.

In the pursuit of sustainable development, Greece is grappling with an interconnected set of requirements and priorities on one hand, and a set of challenges and threats on the other, while, at the same time, recognizing certain country-specific favourable conditions and opportunities:

Links and references

- [NBC Annual Financial Report 2023](#) – page 36
- [Energy Efficiency Directive \(European Commission\)](#) and [Member States' national contributions](#)
- [Greek National Climate Law – summary EN](#) and official GR document: [Official Gazette \(Greek Climate Law\)](#)

⁴ Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

Priorities

- **Energy sufficiency and resilience:** ‘*Energy efficiency first*’ is a fundamental pillar of the EU policy, which has acquired legal standing via the respective Directive (Energy Efficiency Directive (EU/2023/1791)), and has cascaded down to country-level.
- **Climate action / climate neutrality:** As manifested in Greece’s National Climate Law, improving the adaptive capacity and climate resilience of the country and ensuring the gradual transition of the country to climate neutrality by 2050, is a top national priority.
- **Socio-economic inclusion:** Transition needs to occur in the most sustainable, socially fair, inclusive, and economically efficient way, with emphasis on protecting vulnerable groups and empowering them to develop within an accepting and equitable society. As a first step and as a basis for financial empowerment and inclusion, priority has been placed by the Greek state to the increase of the level of Financial Literacy in Greece. In January 2024, the Greek state announced the first National Financial Literacy Strategy for Greece on the back of the results of the OECD Financial Literacy Survey conducted for Greece in cooperation with the Ministry of Finance. The Strategy identifies seven priority areas and presents a menu of policy tools. Another important pillar of the state’s social policy is the increase of inclusion of Greek citizens to affordable housing, either by owning or renting an affordable property. The Ministry of Social Cohesion and Family Affairs has taken a number of initiatives on this front, the most important being the subsidised housing Program called “My House” targeting young people who want to buy their own house which ran during 2023. In addition, the Ministry announced the Housing Policy for 2024 in December 2023, which includes further initiatives for the vulnerable groups as well as young people.

Challenges

- **Energy intensity hard to attain:** While energy efficiency is receiving strong global, European and country-specific focus, energy intensity –the main metric used for energy efficiency– seems to be decelerating. In Greece, energy efficiency remains a challenge, especially in the residential sector, hindered by the low Energy Classes of the existing building stock and the slow turnaround via new construction and/or retrofitting.
- **Energy crisis fuelling cost inflation and decelerating transition:** Triggered, partly, by geopolitical developments, a large-scale energy crisis is unfolding, with oil and natural gas in the epicentre, causing energy costs to soar and amplifying inflation pressures. Pace of transition is hindered by inherent technical difficulties, but also by apprehension vis a vis energy-related policy and priorities.
- **Technical expertise and data challenges:** Technical skills are strongly in demand but not in ample supply, across involved players: corporates, financial institutions, service providers, even individual consumers, while related ESG data still pose challenges with regards to availability, quality, granularity and cost.
- **Level of Financial Literacy and Inclusion:** In the area of financial literacy, there are many challenges that have been identified based on the OECD Survey for Greece. As adults in Greece scores 61 out of 100 on financial literacy, it is evident that higher levels of financial literacy would make a positive contribution to the financial well-being of individuals and households in Greece. On the other social front, although the affordable housing issue has been identified as a

[NBS Economic Research](#)

[on SMEs](#) – Press release with outcome of recent field study by NBS’s Economic Research on SMEs’ reaction and approach to tackling physical disasters (GR only)

[National-financial-literacy-strategy-Greece.pdf \(oecd.org\)](#)

[Financial-literacy-in-Greece-evidence-adults-young-people.pdf \(oecd.org\)](#)

[Financial-literacy-in-Greece-relevance-actors-initiatives.pdf \(oecd.org\)](#)

["My Home" program - Public Employment Service \(dypa.gov.gr\)](#)

<p>key social problem in Greece especially for the vulnerable segments and young people, according to announcements of the Greek state, there are currently 750,000 “closed” apartments. One of the main reasons that owners do not place those apartments in the market is that they cannot afford the high renovation cost that most of these old apartments need.</p> <p><u>Opportunities</u></p> <ul style="list-style-type: none"> - Greece as a major regional ‘energy-hub’: Amidst the above challenges, a clear opportunity is emerging for the country to become a key energy-hub for the wider region; one that is already recognized and acted upon with a range of energy-related infrastructure projects underway and in the pipeline. - Financing SMEs transition: The structure of the country’s economy and the fundamentals of its economic value creation point to small and medium enterprises as the key agent of transition – SMEs will need and will absorb the bulk of transition financing, and seem to be adopting a healthy, forward-looking outlook regarding the required planning and investments. - Affordable Housing: According to the Housing Policy as announced, the state has launched subsidised programmes for Renovation of old apartments (Exoikonomo-Anakinizo), including their energy upgrade. This program, combined with other EU programmes (such as from EIF) and supported by lending from the banking sector, provide a significant opportunity for the Greek real estate market to increase its supply of properties and to become more efficient in terms of energy consumption. This will in turn have a positive impact on Greek citizens, especially in the vulnerable segments and young people, as it will help sustain the increase in the levels of real estate prices and increase the access to affordable housing. <p><u>Stakeholder engagement</u> (covered in detail under Principle 4)</p> <ul style="list-style-type: none"> - The above topics manifest themselves in the ongoing dialogue the bank holds with its different stakeholders. (Stakeholder engagement is covered in detail under Principle 4) 	
<p>Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)⁵? Please disclose.</p>	
<p>Response</p> <p>NBC Portfolio Impact Analysis</p> <p>The results of NBC’s PRB Impact Analysis by portfolio, using the Portfolio Impact Analysis Tools for Banks (v3) and data with reference date 31/12/2023, are presented below, by portfolio and by geography:</p>	<p>Links and references</p>

⁵ To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.

Corporate Banking		
Greece & Cyprus	Top positive associations: 1. Availability, accessibility, affordability, quality of resources & services 2. Infrastructure 3. Biodiversity & healthy ecosystems 4. Climate stability	Top negative associations: 1. Biodiversity & healthy ecosystems 2. Circularity 3. Climate stability
North Macedonia	Top positive associations: 1. Availability, accessibility, affordability, quality of resources & services 2. Infrastructure	Top negative associations: 1. Biodiversity & healthy ecosystems 2. Circularity 3. Livelihood
Business Banking (SB portfolio)		
Greece	Top positive associations: 1. Availability, accessibility, affordability, quality of resources & services 2. Infrastructure	Top negative associations: 1. Biodiversity & healthy ecosystems 2. Circularity 3. Livelihood
Consumer Banking		
Greece, Cyprus & North Macedonia	Top positive associations: 1. Availability, accessibility, affordability, quality of resources & services	Top negative associations: 1. Availability, accessibility, affordability, quality of resources & services <i>(only relevant for Greece and North Macedonia)</i>
<p>The results showcase once again the impact areas of "Climate Stability" and "Availability, accessibility, affordability, quality of resources and services" as still relevant and significant.</p> <p>In line with the Bank's socio-economic positioning and culture, our long-term strategic orientation, as well as through internal stakeholder engagement and further geographic contextualisation, we maintain the same prioritization, as in prior years' reports, and single out these two areas as top priorities for our target setting and strategy.</p>		
<p>d) For these (min. two prioritized impact areas): <u>Performance measurement:</u></p> <p>Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context.</p> <p>In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health & inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.</p> <p>If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.</p> <p><i>The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.</i></p>		
<p>Response</p> <p>Area 1: Climate stability</p> <p>Through the process of measuring our carbon footprint for 2022, which was used as a baseline in our recent Net Zero target setting exercise, we obtained a deep understanding of the different drivers of our impact on climate, i.e. how our financed emissions, in absolute and in relative terms, are shaped. Financed emissions account for the lion's share of our total footprint – as typically expected in financial institutions – and feature as a key metric for assessing climate performance within the suggested indicators of the Annex, as well.</p> <p>In terms of different sectors/industries and customers causing the strongest impact, i.e. driving mostly our financed emissions coming from our lending and investment portfolio (excl. Sovereign Debt), we have</p>	<p>Links and references</p> <p>UNEP FI – Guidelines for climate target setting</p> <p>NBG ESG Report 2022</p> <ul style="list-style-type: none"> ▪ Our financed GHG emissions, Our financed emissions targets, pages 99 – 107 <ul style="list-style-type: none"> ▪ Complexities and challenges, on page 105 	

followed the NZBA/UNEP FI target-setting guidelines to narrow down the sector/industry and customer perimeters to target to a few 'priority' sectors and / or portfolios ('portfolios' used here to refer to the CRE and RRE perimeters of our lending).

Out of the 11 'priority' sectors recognized by the NZBA, our 2022 financed emissions in the perimeter considered, pinpointed a set of 6 sectors/portfolios/customer segments as the ones causing the strongest impacts: Power generation, Oil & gas, Cement, Aluminium, Commercial Real Estate and Residential Real Estate (Mortgages). These top 6 sectors/portfolios, accounted for the largest part of the total measured portfolio, both in terms of exposure and in terms of Financed Emissions footprint.

Our target-setting approach, its rationale, key parameters, assumptions and limitations are stated in our ESG Report 2022, in particular on pages 104 and 105.

Area 2: Availability, accessibility, affordability, quality of resources and services

During 2023, the Bank has participated in the state Program "My House/Spiti Mou" through which it has offered a subsidised mortgage loan to young people in order for them to buy their first house, under a number of especially favourable terms – for example zero interest rate for 75% of the loan amount (i.e. for the loan amount financed by the state) and 90% Loan-to-Value for all borrowers. The program had specific eligibility criteria, for example maximum age (39 years old), maximum loan amount (€150,000) and maximum annual declared income (€24,000 plus €3,000 per child). Through this process, up to 17/5/2024, the Bank has disbursed c. €150million of new mortgages to c. 1,500 individuals/households (75% of this amount, i.e. €113 million, was funded by the state with zero interest rate for the borrower). Since the Program had a maximum total budgeted amount to be allocated which has been utilized at a 100%, the Bank has received a large amount of loan applications which did not make it to be included in the Program on time. This pool of potential customers has formed the basis of a customer subsegment of young people who have a need to buy a first house with affordable lending characteristics.

Self-assessment summary:

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?⁶

- | | | | |
|--------------------------|---|--------------------------------------|-----------------------------|
| Scope: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Portfolio composition: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Context: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Performance measurement: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

1. Climate stability
2. Availability, accessibility, affordability, quality of resources and services

How recent is the data used for and disclosed in the impact analysis?

- Up to 6 months prior to publication
- Up to 12 months prior to publication
- Up to 18 months prior to publication
- Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: *(optional)*

⁶ You can respond “Yes” to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.

2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets⁷ have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

- a) **Alignment:** which international, regional or national policy frameworks to align your bank's portfolio with⁸ have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

Response

NBG has already published a set of targets addressing the area of **Climate Stability**, and has updated its target on social inclusion in the impact area of **Availability, accessibility, affordability, quality of resources and services**.

Area 1: Climate Stability

Regarding **Climate Stability**, NBG has set targets for 6 sectors and portfolios as presented in the following table, which outlines our financed emissions 2030 targets, together with key aspects (including baseline year and baseline value) and key methodological choices made to derive them by sector:

Sector *	Exposure Measured (€ mn)	Scopes Covered	Unit of measurement	Reference Scenario / Pathway	Baseline Year	Baseline Value	2030 Target	2030 vs. Baseline Delta
Power Generation	1,483	Scope 1, 2	kgCO ₂ / MWh	IEA NZE 2050	2022	169	120	-29%
Oil & Gas	1,029	Scope 1, 2	Indexed, tCO ₂ of 2021 = 100	IEA NZE 2050	2022	100	70	-30%
Cement	50	Scope 1, 2	tCO ₂ / tcementitious	IEA NZE 2050	2022	0.71	0.52	-27%
Aluminium	43	Scope 1, 2	tCO ₂ / taluminium	MPP	2022	11.2	3.9	-65%
CRE	1,441	Scope 1, 2	kgCO ₂ e/m ²	CRREM Greek 1.5°C scenario	2022	83	30	-64%
RRE	6,298	Scope 1, 2	kgCO ₂ e/m ²	CRREM Greek 1.5°C scenario	2022	29	16	-45%

* Note: Prioritization of sectors and portfolios for target setting has not been performed solely using sectoral (NACE code) classification. It was based on the nature of activities financed, and the selection of those

Links and references

[UNFCCC – Nationally Determined Contributions](#)

[Nationally Determined Contributions – Greece](#)

[Connections between Paris Agreement and SDGs | SEI](#)

[European Parliament – EU and the Paris agreement](#)

[European Commission – The European Green Deal](#)

[European Commission – European Climate Law](#)

[European Commission – National energy & climate plans](#)

[Official Gazette \(Greek Climate Law\)](#)

[Greek National Energy & Climate Plan – revised Oct2023](#)

[THE 17 GOALS | Sustainable Development \(un.org\)](#)

⁷ Operational targets (relating to for example water consumption in office buildings, gender equality on the bank's management board or business-trip related greenhouse gas emissions) are not in scope of the PRB.

⁸ Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank's targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.

activities for inclusion in the target-setting involved different parameters, including NACE, but not limited to it, for example, loan use of proceeds, or where (in which activity) the financed entity is active. Hence the column 'Sector' is populated by an overarching sectoral description and not by NACE code.

Overall, across the portfolios included in our climate target setting, we have incorporated on-balance sheet exposures and investment securities for eligible/relevant client segments, as prescribed in the PCAF Standard. Furthermore, for all addressed sectors we have selected the part of the supply chain and the emissions scopes that are meaningful in terms of our exposure level and feasible for our clients to decarbonize, based on the technologies that are currently available. Especially for emission scopes, we focus on Scope 1 and 2 emissions, given the constraints in the quality of the underlying data and the power of our clients to influence their Scope 3 emissions. In the future, as data quality of Scope 3 emissions improves, we will revisit this design choice, in order to extend, where relevant and possible, our targets across all Scopes of clients' absolute emissions.

Area 2: Availability, accessibility, affordability, quality of resources and services

Regarding the impact area of "**Availability, accessibility, affordability, quality of resources and services**", NBC has recently (April 2024) launched a new mortgage loan targeting young people who wish to buy their first house, called "My First House". The product is offered to individuals up to the age of 45, has a maximum loan amount of €350 thousand and a maximum duration of 40 years. The eligibility criteria of the product do not have a maximum disposable income limit, while the Loan-to-Value ratio can reach 90%, in case of properties with high energy classes (A, B & C).

More specifically, the Bank has set a target, in short hereby referred to as 'Social target' or 'Social Inclusion target', to disburse **€200 million of the mortgage loan "My First House" by 2027**. This translates to a number of 2,000 of average-sized loans of €100,000, to at least 2,000 young people (taking into account that such loans very often correspond to a household of two adults, the number of positively impacted individuals can be much higher in reality).

In the area of **Financial Literacy**, the Bank has committed that it will promote initiatives and programmes that target the improvement of **financial literacy in the segment of Households**, as a first segment to focus on. The design of such Programmes, which will also include the formation of partnerships with relevant organisations, is currently in progress and is expected to have an initial form by the end of 2024.

I. Climate Stability - Alignment

A clear link of how NBC's targets support and drive contribution towards national and global goals can be established, following a top-down approach, from the key agreements' content, to the tools put in place at national level, and the targets adopted to serve national goals:

- **Paris Agreement - Nationally Determined Contributions (NDCs) - also, direct and indirect linkages with UN's SDGs:**
NDCs are key to the achievement of the Paris Agreement goals, as they embody country efforts to reduce national emissions and adapt to climate change. The Paris Agreement requires each Party (country) to prepare, communicate and maintain NDCs. Parties shall pursue domestic mitigation measures to achieve NDCs. Research indicates links between Paris Agreement and SDGs (esp. in areas

[Universal Declaration of Human Rights | United Nations](#)

[Financial Health & Inclusion Commitment – United Nations Environment – Finance Initiative \(unepfi.org\)](#)

[Brussels Blueprint EN.pdf \(oecd.org\)](#)

[The European Pillar of Social Rights in 20 principles – Employment, Social Affairs & Inclusion – European Commission \(europa.eu\)](#)

[Housing | FUTURIUM | European Commission \(europa.eu\)](#)

[EUR-Lex – 52021IP0020 – EN – EUR-Lex \(europa.eu\)](#)

[liege-declaration-for-housing.pdf \(europa.eu\)](#)

[PCAF – The Global GHG Accounting and Reporting Standard for the Financial Industry](#)

[UNEP FI – Guidelines for Climate Target Setting](#)

[Science-Based Targets initiative \(SBTi\)](#)

such as affordable and clean energy, life on land, zero hunger, while also pinpointing gaps in other areas such as gender equality, no poverty, peace and justice).

- **EU Green Deal as an outcome of the Paris Agreement:**
To achieve the targets of the Paris agreement, the EU has made its long-term climate goals, including climate neutrality by 2050, legally binding. In November 2019, MEPs adopted a resolution calling for the EU to set climate neutrality by 2050 as its long-term climate goal under the Paris Agreement and to increase the emission reduction target to 55% by 2030. In December 2019, the European Commission presented the roadmap for a climate-neutral Europe: the European Green Deal.
- **European Green Deal · European Climate law · Greek Climate Law (4026/2022) · NECPlan (& update thereof)**
The European Climate Law formalizes legally the goal of the EU Green Deal for Europe to become climate-neutral by 2050. The law also sets the intermediate target of reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels. National energy and climate plans (NECPs) were introduced to outline how the EU countries intend to address the 5 dimensions of the energy union: decarbonisation, energy efficiency, energy security, internal energy market, research, innovation and competitiveness.
- **NBC's climate targets linking to Greek NECP priorities:**
NBC's targets for GHG emissions reductions in the selected sectors (PowerGen, Oil & Gas, Cement, and Aluminium), as well as in the selected RRE and CRE portfolios, link directly to specific components of the revised Greek NECPlan. Indicatively, 1.5: Overview of country objectives, 1.5.1: Green Energy Transition, 2.1: Summary Objectives set by the NECP, and 2.2.1: Reduction of greenhouse gas emissions.
- **NBC's climate targets enhance its C&E strategy:**
At the same time, NBC's GHG emissions reduction targets have come to support and enrich the Bank's C&E Strategy, underpinning the first 2 thematics of its 'E' Pillar: Sustainable energy financing and transition to a sustainable economy, which in turn, drive towards recognized synergies with specific SDGs (7, 9, 11, 12, 13, 14, 15, and 17).

II. Social target - Alignment:

With regards to our Social target, we have identified the following goals, policies, initiatives and frameworks as relevant, both at an international level and at a European level:

A. International-level

- **United Nations (UN) THE 17 Sustainable Development Goals**
 - o **Goal 1 – NO POVERTY , Target 1.4**
By 2030, it must be ensured that all men and women in particular the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services.
 - o **Goal 10 – REDUCE INEQUALITY WITHIN AND AMONG COUNTRIES, Target 10.2**

By 2030, it must be ensured that measures will be taken in order to empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.

- **Goal 11 - SUSTAINABLE CITIES AND COMMUNITIES, Target 11.1**

By 2030 access for all to adequate, safe and affordable housing and basic services must be ensured.

- **Universal Declaration of Human Rights**
According to Article 25: Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
- **UNEP FI's Commitment to financial health and inclusion**
The PRB Commitment to Financial Health and Inclusion is a first-of-its-kind commitment to promote universal financial inclusion and foster a banking sector that supports the financial health of customers. Launched in December 2021, the commitment is a collective journey to accelerate action on financial health and inclusion – one of the top three sustainability challenges identified by signatory banks in the 2020 PRB Collective Progress Report, as where they can have the most impact.
- **OECD champion mayors' commitment for Inclusive Growth / Brussels Blueprint for Affordable Cities and Housing for All**
The Champion Mayors from across the world, who have joined the OECD Champion Mayors for Inclusive Growth Initiative are hereby committing to working to develop targeted solutions to ensure the most vulnerable have access to affordable and quality housing: "We will step up action to boost housing affordability and availability for households most in need, such as low-income households, single parents, unemployed and young people, many of whom are priced out of city centres, by preventing evictions and ensuring security of tenure"

B. European-level

- **European Pillar of social rights**
The European Pillar of Social Rights in 20 principles, is a policy delivered by EU Commission.
According to Principle no 19, Everyone has the right to a good-quality, and affordable place to live.
- **EU's Partnership on Housing - PACT OF AMSTERDAM**
The objectives of the Partnership on Housing were clearly established in the text of the Pact of Amsterdam endorsed by the EU Member States: to have affordable housing of good quality with a focus on public affordable housing, state aid rules and general housing policy.

- **European Parliament resolution of 21 January 2021**
EU Housing policy reflected in EU Parliament's resolution on 'Decent and affordable housing for all' – referencing many of the above goals, principles and frameworks.
- **Liege Declaration for Housing Accessibility in the EU**
Under the auspices of the Belgian presidency, and on the occasion of the European Conference of Housing ministers, by this declaration the ministers underlined the importance of concrete action at EU level to tackle the housing crisis investment in social housing. One of the main points in the declaration is a common call for a European New Deal for Affordable and Social Housing, based on principle 19 of the European Pillar of Social Rights, and a call to the European Commission to take better account of the consequences of EU policies on access to housing.

The Bank believes that via the target of providing €200million disbursements of mortgage loan "My First House" by 2027, the inclusion of young people in the mortgage lending market will be enhanced, as more young people will have the opportunity to acquire their first house with affordable lending terms, most important one being that their own contribution will be starting as low as 10% (for properties with high energy classes). We estimate that via the targeted level of financing (€200million disbursements, average mortgage size €100k) NBC will enable at least 2,000 young people to get access to and benefit from this financial product, ultimately gaining access to affordable housing (as mentioned above, taking into account that such loans very often correspond to a household of two adults, the number of positively impacted individuals can be much higher in reality). This will mean a notable increase of the existing percentage of young people having access to our services, i.e. of the Bank's penetration in the 'youth' segment, one customer segment where the Bank intends to place strategic focus recognizing future potential. Furthermore, the fact that this product offers more favourable terms when financing acquisition of houses with energy classes A, B, and C, also supports the EU policy for the energy upgrading of buildings and the reduction of greenhouse gas emissions, while, at the same time, driving contribution to the climatic alignment of our Mortgage portfolio.

III. Other relevant frameworks:

In terms of methodological and technical frameworks, we follow:

- PCAF Global Accounting Standard, for measuring carbon footprint
- NZBA's guidelines, for Net Zero target-setting
- SBTi guidelines, for adhering to a science-based approach

b) Baseline: Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the [Annex](#) of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Climate change mitigation</i>	...	
	...	
	...	

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Financial health & inclusion</i>	...	
	...	
	...	

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

Response

The following table outlines our 2030 financed emissions targets, together with key aspects (including baseline year and baseline value) and key methodological choices made to derive them by sector:

NBG's financed emissions targets

Sector	Exposure Measured (€ mn)	Scopes Covered	Unit of measurement	Reference Scenario / Pathway	Baseline Year	Baseline Value	2030 Target	2030 vs. Baseline Delta
Power Generation	1,483	Scope 1, 2	kgCO ₂ / MWh	IEA NZE 2050	2022	169	120	-29%
Oil & Gas	1,029	Scope 1, 2	Indexed, tCO ₂ of 2021 = 100	IEA NZE 2050	2022	100	70	-30%
Cement	50	Scope 1, 2	tCO ₂ / tcementitious	IEA NZE 2050	2022	0,71	0,52	-27%
Aluminium	43	Scope 1, 2	tCO ₂ / taluminium	MPP	2022	11,2	3,9	-65%
CRE	1,441	Scope 1, 2	kgCO ₂ e/m ²	CRREM Greek 1,5°C scenario	2022	83	30	-64%
RRE	6,298	Scope 1, 2	kgCO ₂ e/m ²	CRREM Greek 1,5°C scenario	2022	29	16	-45%

In line with the NZBA guideline, the baseline year used reflects the most recent measured state of each portfolio in terms of emissions and adheres to the requirement of no more than two full years lapse.

For the first 3 sectors (i.e., Power Generation, Oil & Gas and Cement), we used IEA NZE 2050 reference pathways. These pathways indicate the most technically feasible, cost-effective and socially acceptable scenarios to reduce global CO₂ emissions to net zero by 2050 and are consistent with efforts to limit the long-term increase in average global temperatures to 1,5°C. For the Aluminium sector we used the Making Possible Partnership (MPP) Net-Zero 1,5 degrees Celsius as the reference transition pathway, while for the CRE and RRE portfolios we used the CRREM Global decarbonization pathway aligned with the 1.5 degrees Celsius scenario, referring to the Greek dataset.

Regarding other metrics (as listed in the [Annex](#)) of direct relevance to Climate, we also monitor the following indicators, and our status/progress is as follows:

Links and references

[NBG ESG Report 2022](#)

▪ Our pathway to Net Zero, pages 107-113

Impact area	Indicator code	Indicator	Response
Climate Stability - Climate change mitigation	A.1.1	Climate strategy in place	Yes
	A.1.2	Long-term Paris-alignment target	Yes
	A.1.4	Analysis of lending and/or investment portfolio in terms of financed emissions; technology mix or carbon-intensive sectors	Yes – all PCAF 'eligible' for Scope 3, Cat 15 asset classes
	A.2.1	Client engagement process	Setting it up
	A.2.2	Absolute financed emissions	12,071ktCO ₂ e (2022)
	A.2.3	Sector-specific emission intensity	(see 2022 Emissions Measurement table in our 2022 ESG Report)

c) **SMART targets** (incl. key performance indicators (KPIs)⁹): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.

Response

Climate targets

1) Power Generation

Target: -29% in financed emissions intensity, reaching 120 kgCO₂e/MWh in 2030 (Scopes covered: 1&2)



Links and references

[NBG ESG Report 2022](#)

▪ Our pathway to Net Zero, pages 107-113

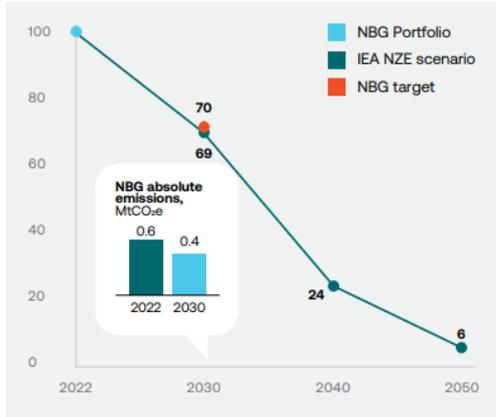
⁹ Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.

2) Oil & Gas

Target: -30% in absolute emissions, indexed at 100 as at 31/12/2022 (Scopes covered: 1&2)

Absolute emissions

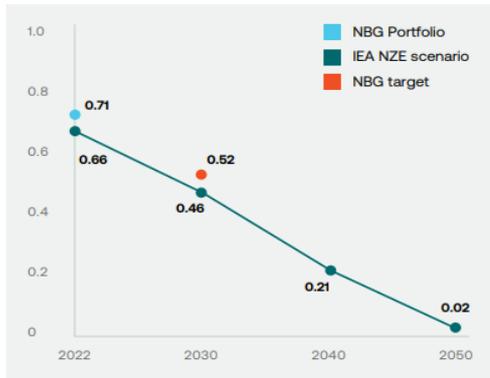
Indexed emissions, 2022=100



3) Cement

Target: -27% in financed emissions intensity, reaching 0.52 tCO₂ / tcementitious in 2030 (Scopes covered: 1&2)

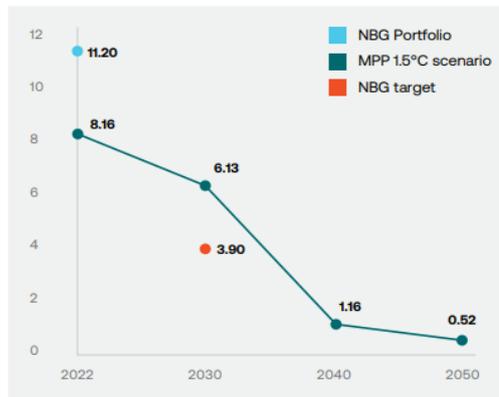
Emission intensity, tCO₂/tcementitious



4) Aluminium

Target: -65% in financed emissions intensity, reaching 3.9 tCO₂ / taluminium in 2030 (Scopes covered: 1&2)

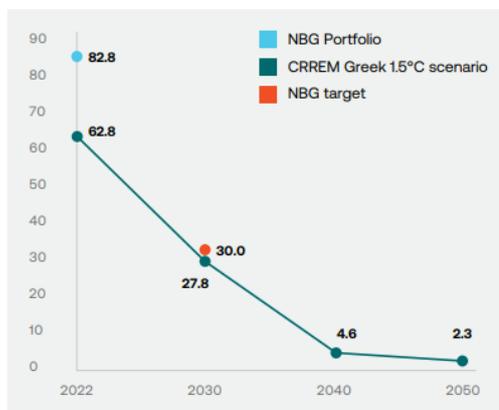
Emission intensity tCO₂/taluminium



5) Commercial Real Estate (CRE)

Target: -64% in financed emissions intensity, reaching 30 tCO₂e/m² in 2030 (Scopes covered: 1&2)

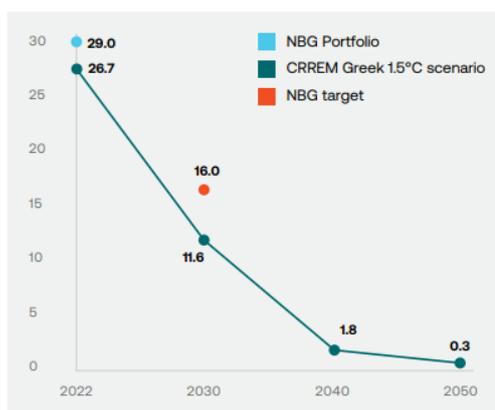
Emission intensity kgCO₂e/sqm



6) Residential Real Estate (RRE)

Target: -45% in financed emissions intensity, reaching 16 tCO₂e/m² in 2030 (Scopes covered: 1&2)

Emission intensity kgCO₂e/sqm



Social Inclusion target

Disburse €200 million of new mortgage loans to appr. 2,000 young people (up to 45 years old) until the end of 2027.

Due to the fact that this is a new product, there is no baseline to compare it with, but as described in previous sections of the report, the estimations were based on applications received for the state program “My House/Spiti mou” which had a similar scope to our new product.

Mortgage Loans disbursed to young people (up to 45 years old)

	2024	2025	2026	2027	2024-2027
#	238	504	599	599	1,940
€m	25	53	63	63	204

d) Action plan: which actions including milestones have you defined to meet the set targets? Please describe.

Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

Response

Climate targets

1) Power Generation

In Greece, the goal is to eliminate lignite by 2028 and for RES to make up c.80% of electricity consumption by 2030. This will require significant investments in new RE production capacity, mainly solar and on-shore/off-shore wind, as well as in renewable energy storage and in the network grid.

Notably, NBS's current portfolio intensity, standing at 169 kgCO₂e/MWh, is below the IEA NZE power generation sector decarbonization pathway, as is our target for 2030. This reflects the Bank's strategy and strong commitment to support the national energy transition plans, by supporting the shift of power generation capacity away from fossil fuels and towards lower-emitting solutions (i.e., natural gas) and RES.

NBS's Project Finance team dedicated to the Energy sector will continue to offer expertise on renewable technologies and energy project financing, allowing the Bank to maintain its position as a leader in RES financing in Greece and the region, while actively collaborating with clients to bolster innovative technologies and seize market opportunities (in new RES capacity, RES storage, industrial electrification, etc.). We expect such opportunities to multiply in the next few years, with the acceleration of the already notable shift of generation capacity away from lignite and oil towards natural gas and RES.

2) Oil & Gas

The Oil & Gas sector is anticipated to maintain some role in the economy until 2050, but at significantly reduced levels of production and utilization, as electrification of economies progresses, and as sustainable fuels become available. In Greece, the refining industry is expected to transition to producing renewable electricity and sustainable fuels (including biofuels and hydrogen). Moreover, refineries are expected to deploy carbon-capture technologies. While remaining alert to overall market and industry developments, we are well-positioned to support clients in their transition journey, leveraging on our leading position, expertise and offering in the energy sector.

3) Cement

The Cement sector's carbon footprint is mainly attributed to emissions intrinsic to the cement production/calcination process, making the sector hard to abate via currently available levers, such as energy efficiency, alternative fuels, and clinker substitutes. As a result, the Cement sector globally, as well as in Greece, is anticipated to decarbonize to a large extent after 2030, when new technologies and sustainable building materials are expected to become available, in combination with the already existing carbon-capture technologies. Despite these challenges, we are committed to supporting our clients' plans to realize their own targets and transition their production

Links and references

[NBS ESG Report 2022](#)

- Our pathway to Net Zero, pages 107-113

processes through currently available levers, as well as through new technologies, as and when these become available.

4) Aluminium

The Aluminium sector is expected to start decarbonizing based on levers already available at-scale, e.g., sourcing electricity from RES. This is so, because smelting emissions are primarily attributed to electricity consumption in the production process. New technologies and usage of recycled materials during production will allow the sector to decarbonize fully post 2030. We are committed to supporting our clients' plans to realize their own targets and transition their production through available levers, as well as through new technologies, as and when these become available.

5) Commercial Real Estate (CRE)

A key factor behind the expected decarbonization of the CRE portfolio in Greece is the transition of the power generation sector, underpinning the reduction of building emissions. Moreover, national and EU targets on the required energy efficiency of CRE properties, as well as the increasing market demand for energy-efficient commercial buildings by businesses, are leading to old building retrofits and to the construction of new buildings of higher energy classes. At NBC, we remain committed to supporting our clients' plans to improve CRE buildings efficiency via either financing retrofitting projects or acquisition of high energy class commercial properties.

6) Residential Real Estate (RRE)

The starting position of our portfolio intensity (29.0 kgCO₂e/ sqm), as well as our target for 2030 stand above the CRREM 1.5 degrees Celsius scenario for Greece. Our target factors in Greece's power generation transition, as well as national and EU policies and directives. We also factor in the fact that we currently rely significantly on proxies for our RRE portfolio financed emissions measurement and target-setting, while expecting underlying data quality to improve as more actual EPC information becomes available. Moreover, Greek government incentives for residential retrofits (e.g., the "EXOIKONOMO – AUTONOMO" Programme, in which we actively participate), as well as increasing demand by individuals for energy-efficient residences, are leading to old building retrofits and the construction of new buildings with higher EPCs. At NBC, we remain committed to maintaining and further enhancing our lending products catering to the needs of this growing market.

Social Inclusion Target

The new mortgage loan "My First House" was launched in April 2024 and as all mortgage loans of the bank, it is offered through the retail branch network all over Greece, where experienced bank employees meet with potential customers (either through an appointment but also walk-in) to understand the customer needs and explain the product characteristics.

Concurrently, a 360° marketing campaign started (TV, radio, Social Media) in order to raise awareness to the public of the availability of the product. The product is also featured on the bank's website. More marketing campaigns will be launched in the future to support demand, if needed.

Given the large number of young people that expressed an interest in buying their first house during 2023 on the back of the state-subsidised programme "My House" but were not able to be included in the

<p>Programme for a number of reasons (mainly due to timing but also ability to find a property that met the criteria as needed), the Bank believes that there is significant demand for such a product in the market.</p> <p>The progress of the product disbursements will be monitored closely by the retail team and will be reported quarterly to the Social Strategy team, while it will be reported on a bi-annual basis to the Group ESG Committee.</p> <p>At the current stage we do not acknowledge any significant or potential indirect impacts of the set targets, either within their own impact area or on other impact areas, and this assessment is based on the nature of the targets per se, which by default does not point to any such risk. Should any such aspects arise in the months to come (we will be in a better position to deem that after a few reporting cycles), we will take appropriate actions to avoid, mitigate, or compensate for any negative impacts.</p>	
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Self-assessment summary			
Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your...			
	Climate	Inclusive, Healthy Economies	
Alignment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	
Baseline	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	
SMART targets	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	
Action plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> In progress <input type="checkbox"/> No	

2.3 Target implementation and monitoring (Key Step 2)

For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only):

describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

Response

This 3rd Self-Assessment Report marks a **notable change in our target-setting**, reflecting the Bank's step-change in ambition around Net Zero, which was disclosed in 4Q.2023, as well as the Bank's emblematic joining of and commitment to PCAF and NZBA, taking place at the same time.

From NBC's initial set of targets, as set in NBC's 1st PRB self-assessment report:

- a. **Target 1 - Climate: €600 million financing of renewable energy in 2022-2025**, is already delivered
- b. **Target 2 - Inclusive, healthy economies: 3 million active digital users (on a 12-month basis) by the end of 2024**, is delivered to a large extent, based on the 2.9mn active users at the end of 2023.

The Bank's new targets, as detailed above in section 2.2, are more up-to-date, more intertwined with our corporate strategy and our business plan, and are set to have a running horizon of a few more years. In these years (mid-term, until 2030), significant progress is expected in both technology and policy advances, which, alongside the Bank's own initiatives and ESG strategy implementation, are going to contribute significantly towards attaining the country's and the continent's sustainability goals.

NBC will be monitoring progress vs. these targets in its upcoming communications and public disclosures, including its 4th RRB report.

Links and references

[NBC - 1st PRB Self-Assessment Report](#)

[NBC - 2nd PRB Self-Assessment Report](#)

[NBC Annual Financial Report 2023](#)

- Supporting digitalization and digital literacy, page 123
- Supporting the renewable energy sector, pages 97,98

Principle 3: Clients and Customers



We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers¹⁰ in place to encourage sustainable practices?

Yes In progress No

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

Yes In progress No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities¹¹). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).

Response

A key pursuit for NBG is to address ESG challenges and opportunities for the benefit of its clients and customers, who trust its brand and reputation. Its engagement with clients and customers builds prosperity via financing sustainability and net-zero transition, nurturing transparent, long-lasting relationships, and encouraging entrepreneurship and innovation:

I. Supporting sustainability and transition to net-zero

NBG plays a leading role in sustainable energy financing and in supporting the transition of its clients and customers towards sustainability. Indicatively:

- The Bank implements its climate and environmental strategy by **promoting sustainable finance**, investments, as well as, "green" banking solutions, i.e. by offering products and services that mitigate climate change and contribute to environmental protection. Following the issuance of its Green Bond Framework and its Green Bond, which is already fully allocated, a Sustainable Financing Framework was developed during 2023, to enhance and replace the Green Bond Framework, including additional green eligible activities alongside other, social in orientation, categories. NBC's goal is to channel any upcoming issuance proceeds into sustainable energy financing in regional RES projects, sustainable financing solutions for small

Links and references

[NBG Annual Financial Report 2023](#)

- Non-Financial Statement, pages 13 – 19, 44 – 53

[NBG ESG Report 2022](#)

- Our sustainable finance, climate and environmental strategy, pages 77 – 84
- Society, pages 118 – 132

[NBG Sustainable Bond Framework](#)

[Greece 2.0 – National Recovery and Resilience Plan](#)

¹⁰ A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

¹¹ Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

businesses, innovative products that will promote e-mobility, as well as financial support of disadvantaged social groups.

- The Bank has recently identified and disclosed a first set of Net Zero targets. In doing so, NBG aims to play a pivotal role in **channelling capital flows towards the transition of key sectors of the Greek economy** in the medium- to long-term. Specifically, the Bank disclosed a set of Net Zero emissions reduction targets for 2030, for its most carbon-intensive sectors and portfolios, namely: Power Generation, Oil & Gas, Cement, Aluminium, Commercial Real Estate and Residential Real Estate. NBG is on a track to cooperate with clients in these sectors in order to achieve the targeted reductions, along the relevant transition pathways. The Bank is bound to be transparent in terms of climate performance and portfolio steering, recognizing that for each sector and client there is a unique decarbonization journey.
- In the course of this journey, NBG's role is to **stand by its corporate clients with continuous engagement** (via an advisory-type role). The Bank has established the "Ethniki 2.0" program, in line with the "Greece 2.0" program, which includes funding for green transition opportunities. NBG actively supports the "Greece 2.0" programme and works both with clients and with the Recovery and Resilience Fund (RRF) to allocate RRF funding to eligible investment plans.
- The Bank has **incorporated environmental, climate, social and governance risks into the credit assessments of corporate clients**, both at obligor and transaction level. Processes and tools have been developed and are used by corporate underwriters, while a direct and continuous dialogue is established with clients, who are called to provide data, information, documentation (and from now on progress) on their ESG practices.
- To its **Retail customers, consumers and small businesses**, NBG plans to meet **increasing demand for green financing** through an array of new green solutions, organic and via partnerships or subsidies, for financing green transportation, home-related services, and energy efficiency home retrofits, over and above its existing green offering.
 - Notably, we have recently launched a partnership with Public Power Corporation (leader energy provider in Greece) to offer financing solutions for installations of photovoltaic systems for retail customers. In addition, we have partnered with EIF and just launched a subsidized energy upgrade consumer loan to retail customers, with preferential interest rates.

II. Promoting responsible customer relationships

At NBG, we focus on promoting what we call "responsible relationships" with our customers:

- **Customer financial protection** – Emphasis is placed on customer financial protection through overseeing newly launched products and services, which are approved by a dedicated Product Committee, as per the Bank's Regulation governing the introduction, modification and withdrawal of its products and services.
- **NBG Group Remuneration Policy** – This Policy includes specific provisions preventing sales personnel remuneration from being based narrowly on financial (P&L) criteria, i.e. not adequately balanced with the interests of our customers. In this way, we aim to restrict mis-selling and ensure compliance with bestselling and consumer protection practices.
- **Strategic Communication Committee** – This Committee is in charge of approving programs aiming to promote the Bank's Corporate image,

products and services, as well as of evaluating proposals for the best and fairest development of the Bank's website and alternative channels, as a means of responsible marketing.

- **Complaints Management** – To manage effectively customer complaints, the Bank has introduced a Customer Complaints Management Policy governing the handling of customers' complaints, in line with its key principles. Also, the Client Conduct Sector undertakes to respond promptly to grievances filed either directly by the Bank's customers or by other bodies.
- **Whistleblowing Policy** – The Whistleblowing Policy in force ensures the existence of appropriate communication channels that enable the submission of whistle-blowers' reports, both coming from within the Bank, as well as from third parties.
- **Protection of personal data** – Through the NBG Group Data Protection Policy, policies for data security and data governance in compliance with GDPR, NBG has enhanced its framework for data security, protection and governance. At the same time, it sets out a uniform set of principles and rules at Group level, by observing the applicable respective national statutory law at country-level.
- **Fraud Case Management Committee** – This Committee is responsible for evaluation and decision making on the recovery of the Bank's customer accounts in case of fraud in transactions carried out through internet & mobile banking and through cards.
- **Training on customer centricity** – NBG has in place extensive skill building programs: At the Branch Network emphasis is placed on customer centricity, through systematic training aiming to empower our front line to provide first-class customer service and experience. Also, compulsory e-learning programs on ethics, anti-fraud, AML/CFT, whistleblowing, risk management and internal controls aim to establish a 'responsible' culture among all NBG staff.

III. Fostering entrepreneurship and innovation

Digitalization and digital literacy – NBG offers a wide range of products and services throughout the digital customer journey, from digital onboarding, to digital value-add services and tools that boost customer engagement, to digital products that meet personalized customer needs: The Bank recently unveiled an appointment booking system through Internet Banking, allowing customers to schedule meetings with Bank representatives via Video Banking, by phone, or at the Branch. Furthermore, the Bank launched NBG Business Mobile Banking, a new application designed exclusively to address the needs of business and corporate customers for seamless financial monitoring and easy completion of their transactions (e.g., FX transactions, card management features, instant notifications, etc.). Moreover, the Bank enabled end-to-end digital onboarding for new self-employed customers via NBG Mobile Banking.

Our digital engagement metrics confirm a positive trajectory: The use of Internet and Mobile Banking continued to increase in 2023. The number of users registered with NBG's digital channels (Internet and Mobile Banking) surpassed 3.9 million (+7.4% y-o-y), active users reached 2.9 million (+6.8% y-o-y), while transactions through digital channels increased by 9.6% y-o-y. It is noted that, as part of its commitment to financial health and inclusion, in previous self-assessment reports NBG had set a target of reaching 3 million digital active users by the end of 2024, a target which is largely attained at the close of 2023.

Looking ahead, the Bank aims to maintain leadership in internet and mobile banking, through continuously enriching its digital products and services, focusing on active users' engagement with the Bank, and extending tailored

<p>functionalities and offering to customer segments with future growth potential (e.g. the youth segment, 18-30 years old).</p> <p>Entrepreneurship, NBC Business Seeds – NBC Business Seeds is an integrated programme designed to foster innovation and export-oriented entrepreneurship. It promotes ideas and new projects through an annual Innovation & Technology competition, educates and mentors participating teams, and also provides infrastructure, networking, and financing to start-ups. All participants in the competition receive information and mentoring by the Bank’s executives and executives of selected partners supporting the program. Furthermore, participating teams have the opportunity to present their idea, meet the other participants, as well as learn more about the innovation support programs provided by NBC’s partners. During the 13 years of its operation and up to 2023, NBC Business Seeds has authorized participations in the share capital of eleven companies amounting to €2.5 million and has provided lending to seven companies amounting to €3.1 million. Moreover, almost €0.6 million have been awarded to date to 130 winning teams and companies via the Innovation & Technology Competition.</p>	
<p>3.2 Business opportunities Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).</p>	
<p>Response</p> <p>Climate and Environment</p> <p>The Bank is aware that activities financed by the Bank, may lead to negative impacts in terms of increased GHG emissions, resource depletion, biodiversity loss, pollution etc., or to positive impacts in terms of supporting climate change mitigation, energy efficiency and reduction of air pollutants etc. So, in line with its C&E strategic themes of ‘leading the market in sustainable energy financing’ and ‘accelerating transition to a sustainable economy’ NBC recognized business opportunities in:</p> <ul style="list-style-type: none"> • <u>Renewable Energy Sources (RES) financing</u> Renewable energy sourcing and storing is an area presenting tremendous potential in Greece and in the region. Notably, the Bank has a €1,981 million outstanding balance in RES as at 31 December 2023, largely exceeding its original UNEP FI target of €600 million RES disbursements in the period 2022-2025. Recently NBC co-signed an emblematic deal for financing 4 PV projects of 730 MWp installed capacity by energy groups RWE and PPC. • <u>Sustainable Bond Framework: a means to fund sustainability projects</u> Following the full utilization of the net proceeds from its €500 million inaugural Green Bond, financing a total of 58 RES projects, the Bank proceeded with the development of a Sustainable Bond Framework. This framework expands its applicability to additional green and new social eligible categories and will govern any 	<p>Links and references</p> <p>NBC Annual Financial Report 2023</p> <ul style="list-style-type: none"> ▪ RES financing: pages 43 and 98-99 ▪ NBC’s Sustainable Bond Framework: pages 83, 98-99 ▪ Net-Zero pledge: Chairman’s & CEO’s statements, 2023 Highlights and detail on pages 95-97 ▪ RRF & Ethniki 2.0: page 100 ▪ EIF: pages 41, 44, 101, 114-5 <p>NBC ESG Report 2022</p> <ul style="list-style-type: none"> ▪ Our sustainable finance climate and environmental strategy, pages 77-84 ▪ Our sustainable finance social strategy, pages 119-132

future issuance of Green, Social and other Sustainability-labelled financial instruments.

- Carbon footprint monitoring and pledge to reducing emissions
The Bank continues measuring its financed emissions, while it recently disclosed its first set of 2030 Net Zero targets, for some of the most carbon-intensive sectors and portfolios. This pledge will underpin the future mix of NBS's portfolio, with credit expansion in certain areas and containment in others. Having analysed the transition investments required by the Greek economy up to 2050, specific sectors and activities have emerged as the ones with the greatest need for transition financing (e.g. transportation, building retrofits, renewable energy, sustainable agriculture). NBS will utilise this analysis to design and offer products, solutions, and advise that will help clients strengthen competitiveness, unlock growth potential, and improve business model resilience in the mid- to long-term.
- Ethniki 2.0
The bank continues to operate "Ethniki 2.0" program, in alignment with "Greece 2.0" program, which finances investment plans that fulfil the criteria of at least one of the 5 pillars of the Recovery and Resilience Fund (RRF) loan program, while ensuring that their implementation "Does No Significant Harm" to EU environmental objectives.
- Supporting SMEs and individuals with EIF subsidies
NBS operates in collaboration with the European Investment Bank, the programme "NBS Loan for Green Investments II" for the financial support of small and Medium-Sized Enterprises as well as Mid-cap Companies. NBS recently launched a new financing product (an EIF-backed Green Consumer Loan) with favourable rate (vs. non-subsidised similar loans) for financing energy home upgrades and zero-emission vehicle purchases.
- Deepening and expanding our 'green' and 'transition' offering
NBS continues to offer financing to individuals and businesses for energy efficiency and buildings retrofits (a rapidly growing market, also benefiting from state-subsidies), for the acquisition of properties with high energy class EPCs, for entering the property ladder, for e-mobility etc. , while actively pursuing the creation of market ecosystems, partnering with other players in these markets to exploit sustainability synergies.

Through the abovementioned actions which support the Environmental pillar we aim to facilitate SDGs 7, 9, 11, 13 and 17.

Inclusive, Healthy Economies

NBS creates actual and potential positive socioeconomic impacts, including impacts on socioeconomic convergence and mobility/infrastructure, through financial products/services that enhance financial inclusion and country-level ability to reduce inequality. NBS also creates positive impacts through initiatives that improve accessibility to both its branches physically and to the use of financial services for individuals and for businesses.

Indicatively, the Bank promotes Inclusive, Healthy Economies via:

- The provision of financial services and products without exclusions.
- The allocation of funds and the provision of appropriate products and services for the needs of customers with the same standards of completeness, quality, good behavior, and correct/adequate information.

[Greece 2.0 – National Recovery and Resilience Plan](#)

[NBS press release on PV regional deal](#)

[NBS – PPC partnership on home energy upgrades](#)

- The protection of customers' financial interests, as well as of their personal data and information privacy.
- Its network's physical footprint in the 13 prefectures indicated as the economically weakest in Greece, and its presence in remote regions and on small islands with a population of less than 5,000 people.
- The financing of infrastructure and mobility projects through its Structured Finance business.
- The accessibility that the majority of the NBC's branches (235 out of 327 in total) provide to customers with disabilities, as well as the provision of functionalities such as voice navigation, chat on mobile, and video banking, on top of already on-offer technical specs for voice instructions and keyboard reading in all of its ATMs.
- Empowering growth and resilience of Small-Medium and Small-sized companies through the Bank's participation in several subsidy programmes, for example in cooperation with European Investment Fund, the Hellenic Development Bank and the European Investment Bank.
- The provision of sustainable mortgages that improve stakeholders' accessibility to adequate, safe and affordable housing and/or ability to finance home repairs or renovation.
 - NBG recently launched a new mortgage loan called "My First House" targeting young people up to 45 years old, with preferential credit terms.
 - The same product also offers preferential terms in case of properties with high energy efficiency certificates.
 - In cooperation with EIB, the Bank recently launched two subsidized products. The first is a consumer loan for energy upgrade of residential properties with preferential terms and the second is a student loan with the scope to finance academic tuition fees, again with preferential terms.

The actions described above, relevant to inclusive and healthy economies, contribute to SDGs 9, 10 and 17.

As previously mentioned, NBG has developed a Sustainable Bond Framework to be used as an overarching governance framework for any future issuance of Green, Social and other Sustainability-labelled products or financial instruments. Part of the proceeds of such a potential bond issuance could be channelled to funding that supports new social eligible categories such as opportunities for underprivileged groups.

Principle 4: Stakeholders



We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups¹²) you have identified as relevant in relation to the impact analysis and target setting process?

Yes In progress No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Response

A stakeholder-focused approach

NBC's stakeholders comprise individuals and legal entities who influence and are influenced or are likely to be influenced by NBC's business decisions, activities and operation. To determine its stakeholders, the Bank typically analyses frequency, nature, content, importance/impact of interaction with each group. This analysis helps identify and group the individuals or organizations with whom the Bank interacts most frequently and those who have the most significant impact on its activities. Following this process and after the validation of the groups in the context of the new GRI materiality process, the following basic groups of stakeholders are recognized:

- Investors and Shareholders
- Customers
- Suppliers and partners
- Business Community (Business Associations, Peers, Rating Agencies/Analysts etc.)
- Employees
- State and Regulators (i.e., Ministries, State Bodies, Regulatory Authorities, Intergovernmental organizations)
- Society – Communities (i.e., Media, NGOs, Civil Society Organizations, Local Authorities)

Valuing the importance of stakeholder engagement for obtaining necessary input to improve its actions and steer its strategy, NBC communicates on a regular basis with each stakeholder group. It does so, by utilizing a combination of communication means, channels, and frequency of

Links and references

[NBG Annual Financial Report 2023](#)

- Regulation and reporting standards, pages 6-9

[NBG ESG Report 2022](#)

- ESG GRI Materiality Analysis pages 65-66 and Stakeholder engagement, pages 72 – 73

¹² Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations

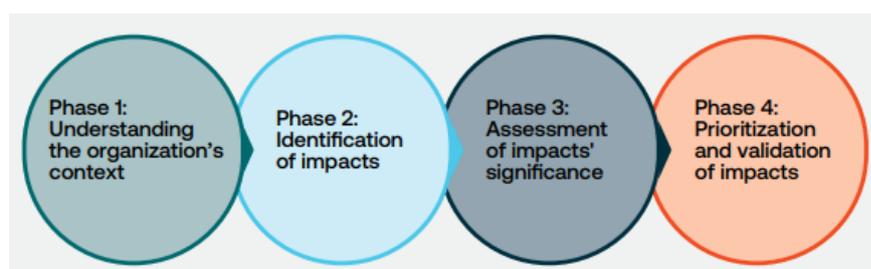
interacting, which is designed to maximize engagement (and is detailed in NBC's ESG Report).

Stakeholder engagement aims at identifying key topics and mutually acceptable solutions with mutual benefits through correct business practices. The expectations of stakeholders, as well as the business environment in which the Bank operates, are constantly evolving, hence evaluating stakeholders' perspective and priorities helps us identify and prioritize our environmental, socio-economic and governance action.

Stakeholder engagement in the context of GRI materiality process

In 2023, NBC conducted a new cycle of GRI materiality analysis, by adopting the updated methodology of the GRI Standards in order to identify and prioritize the positive and negative impacts that the Bank has or may have (actual and potential impacts) on the environment, people and economy.

The materiality analysis process was underpinned by GRI's reporting principles, namely the principles of Accuracy, Balance, Clarity, Comparability, Completeness, Sustainability Context, Timeliness and Verifiability, and it was conducted in 4 phases, as presented below:



Phases 3 and 4, in particular, involved actively engaging external and internal stakeholders belonging to all groups identified above, who were called to rank impacts, make relative assessments thereof, consider potential future impacts, analyse and make a final prioritization of material topics, worthy to be explored and reported within the scope of NBC's ESG Report.

Principle 5: Governance & Culture



We will implement our commitment to these Principles through effective governance and a culture of responsible banking

5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

Yes In progress No

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

Response

ESG-related roles and responsibilities

NBG acknowledges the importance of incorporating the consideration and management of ESG matters into its governance framework in order for it to be effective and impactful.

In this context, and in alignment with the principle of proportionality, NBG is constantly maintaining an ESG governance framework that is appropriate for, and best fitting with the Bank's current risk profile, business model, internal organizational structure, and the nature of its activities.

In this spirit, according to the latest organizational changes, effective as of December 2023, the Bank's current ESG governance framework is depicted in the diagrams below:

Links and references

[NBG Annual Financial Report 2023](#)

- Adhere to the highest governance standards, pages 43-44
- ESG Governance Framework, pages 127, 128

[NBG ESG Report 2022](#)

- ESG governance, pages 172 – 184

[NBG Corporate Governance \(BoD Committees\)](#)

Management Body	
Board & Board Committees	Management Committees
Board of Directors	Board Committees
	Innovation & Sustainability Committee
	Risk Committee
	Compliance, Ethics & Culture Committee
	Strategy & Transformation Committee
	Corporate Governance & Nomination Committee
	Human Resources and Remuneration Committee
	Audit Committee
	Senior Executive Committee
	ESG Management Committee
	Asset and Liability Committee ("ALCO")
	Senior Credit Committee
	Provisions and Write-Offs Committee

Organizational Structure			
1st Line of Defence	2nd Line of Defence – Risk	2nd Line of Defence – Compliance	3rd Line of Defence
Transformation & Strategy Corporate Social Responsibility & ESG Reporting Division	Risk Functions Strategic Risk Management	Data Privacy, Technology & ESG Compliance Advisory Division	Internal Audit
Business Units (Corporate & Investment Banking, Retail Banking)			
Other 1st Line Functions (Real Estate, Finance/Procurement, IT/Ops, HR, etc.)			

Sustainability oversight at Board level

As per NBC's Corporate Governance Code, the Board is responsible for setting strategy, overseeing management, and adequately controlling the Bank, with the aim of enhancing the long-term value of NBC and upholding the general Corporate interest in accordance with the Law.

The Board provides the necessary oversight across all ESG matters, including C&E risks. Specifically, the Board focuses on sustainability and considers, among other factors, ESG-related aspects, when developing the overall business strategy, objectives and risk management framework of the Bank. The Board exercises oversight of ESG-, and in particular C&E-risks, ensuring that material environmental and social considerations are addressed in the Bank's public disclosures.

The Board has explicitly allocated duties and tasks related to ESG matters among its seven Committees (see below) for facilitating the development and implementation of a sound internal ESG governance framework:

- Board Innovation and Sustainability Committee**
 The Board Innovation and Sustainability Committee ("BISC"), established in February 2022, assists NBC's Board of Directors in performing its duties, among others, with respect to developing a sustainable long-term strategy. Specifically, the Committee's mandate includes:

- Continuous monitoring and tracking of important developments and long-term trends related to banking, innovation and ESG.
 - Awareness at Board level of how the banking and broader financial sector landscape is evolving and updated knowledge of the factors that can affect the Bank's long-term strategy (including on ESG and sustainability).
 - Out-of-the-box thinking, as well as exploration and incubation of innovative ideas (including on ESG and sustainability).
- The committee is chaired by Mr. JP Rangaswami, independent Non-Executive Member of the Board.

- **Board Compliance, Ethics and Culture Committee**

The Board Compliance, Ethics and Culture Committee ("CECC") assists NBC's Board of Directors in performing its duties, among others, with respect to enhancing responsible company and management behavior towards sustainable growth and long-term value creation, including considering ESG criteria, and Corporate Social Responsibility (CSR) policies, projects, and activities. Specifically, the Committee's mandate includes:

- Oversight of policies that NBC adopts in compliance with the regulatory framework and best practices (including policies on ESG and sustainability).
- Oversight of the Bank's management of compliance risks, including compliance risks stemming from ESG risks (i.e., C&E, ethical breach, social, HR, and reputational risks).
- Oversight of ethical conduct and culture matters.

The committee is chaired by Mrs. Aikaterini Beritsi, independent Non-Executive Member of the Board.

- **Board Risk Committee (BRC)**

The Board Risk Committee ("BRC") assists NBC's Board of Directors in performing its duties, among others, with respect to risk management issues, including matters relevant to Non-Performing Exposures (NPEs). The Committee ensures that the Bank adheres to supervisory expectations and follows best practices in managing, monitoring, and mitigating C&E risks, and aligning them with the overall risk management framework. Specifically, the Committee's mandate includes:

- Independent review, challenge, approval and oversight of NBC's overall framework for managing financial and non-financial risks (incl. C&E risks) as well as effective and efficient risk management at the Bank and the Group level.
- Definition of risk appetite (incl. risk tolerance and capacity thresholds), and definition and implementation of risk strategy, considering all types of risks (incl. C&E risks).
- Effective oversight of risk frameworks, policies, governance and resources for managing, monitoring and mitigating risks the Bank and Group are exposed to (incl. C&E risks).
- Risk awareness and risk culture are fostered as core components of effective risk management (including with respect to C&E risks).
- Execution of regulatory Stress Tests (including Climate Stress Tests), and the delivery of managerial Stress Tests contributing to the strategy setting and business planning processes.

The committee is chaired by Mr. Claude Piret, independent Non-Executive Member of the Board.

- **Board Human Resources and Remuneration Committee**

The Board Human Resources and Remuneration Committee ("HRRC") assists NBC's Board of Directors in performing its duties, among others, with respect to HR and talent management, performance evaluation, as well as remuneration policy and practices. Specifically, the Committee's mandate includes:

- Attracting, retaining, developing, and motivating executives and employees of the highest professional and moral calibre.
- Development and implementation of a performance management system (PMS) framework for fairly evaluating effort and rewarding performance of executives and employees.

It is noted that performance evaluation includes ESG related criteria and promotes behaviour consistent with the successful achievement of ESG related targets/objectives and ESG related risk approach.

Moreover, variable remuneration and incentive structures include components related to the successful achievement of ESG qualitative and quantitative targets (including C&E targets) and discourage excessive ESG risk-taking.

Specifically, at the beginning of each PMS cycle, the Bank's ESG targets are assigned to the Bank's CEO annual objectives and through a cascading process are subsequently allocated to the CEO's direct reporting lines (i.e. the relevant General Managers). Using the same rationale and as part of the PMS target-setting process, the ESG targets are cascaded further down until the employee level so that all employees, through the duties of their job position, are responsible for contributing to accomplishment of NBC's ESG objectives.

The committee is chaired by Mrs. Anne Marion-Bouchacourt, independent Non-Executive Member of the Board.

- **Board Strategy and Transformation Committee**

The Board Strategy and Transformation Committee ("BSC") assists NBC's Board of Directors in performing its duties, among others, with respect to reviewing and approving NBC's strategic direction, budget and business plan. Specifically, the Committee's mandate includes:

- Review and challenge of management proposals with respect to the Bank's and Group's strategic direction, budget, and business plan, including matters with respect to C&E and other ESG issues.
- Oversight of the planning and implementation of NBC's Transformation Programme initiatives as well as of other strategic projects and transactions.

The committee is chaired by Mr. Wietze Reehoorn, independent Non-Executive Member of the Board.

- **Board Corporate Governance and Nominations Committee**

The Board Corporate Governance and Nominations Committee ("CGNC") assists NBC's Board of Directors in performing its duties, among others, with respect to ensuring adherence to legal and regulatory requirements on its composition, organization, policies and procedures, as well as facilitating the development and implementation of a sound Group corporate governance framework, in alignment with the regulatory framework and international best practices. Specifically, the Committee's mandate includes:

- Oversight of development and implementation of a sound Group corporate governance framework.
- Development and review of NBG's Corporate Governance Code and corporate governance policies.
- Review of Board Governance Model and Committee Charters (incl. assignment on duties on ESG matters, and in particular, C&E risks).
- Proposals on the Board's induction and ongoing training (including ESG trainings).

The committee is chaired by Mr. Wietze Reehoorn, independent Non-Executive Member of the Board.

- **Board Audit Committee**

The Board Audit Committee ("BAC") assists NBG's Board of Directors in performing its duties, among others, with respect to the financial reporting process, the external audit process, the effectiveness of the Internal Control System, and the performance of the Group Internal Audit Function. Specifically, the Committee's mandate includes:

- Reviewing the integrity of the financial statements of the Bank and the Group, including disclosures of sustainability-related non-financial statements.
- Reviewing annually the independence, objectivity, adequacy and operational effectiveness of the Group Internal Audit Function

The committee is chaired by Mr. Matthieu Kiss, independent Non-Executive Member of the Board.

Detailed information on the responsibilities, composition, modus operandi of the Board Committees and interaction between them and the competent executives is included in the Charters of the Board Committees posted on the Bank's website.

Sustainability oversight at the Executive Management level

ESG Management Committee

In addition to the Board of Directors and Board Committees, the Bank monitors its impacts on the environment, society and economy through the ESG Management Committee, chaired by the CEO. The ESG Management Committee was established in 2021 to contribute to the governance of multiple aspects of NBG's ESG strategy and risk management, supporting all the key strategic decisions regarding ESG topics.

The members of the ESG Management Committee are as follows:

The purpose of the ESG Management Committee is to foster the Bank's strategic commitment to sustainable development and corporate responsibility, as well as to ensure appropriate management of ESG matters, including C&E performance and targets, sustainable finance, health and safety, social issues, CSR, corporate governance, and other

Group CEO				
General Manager Transformation, Business Strategy & International Activities	General Manager Corporate & Investment Banking	General Manager Retail Banking	General Manager Group Real Estate	General Manager Group Risk Management, CRO
General Manager Group CFO	General Manager Group Chief Operations Officer ("COO")	General Manager Group HR	General Manager Group Marketing	General Manager Group Compliance and Corporate Governance

sustainability matters. Specifically, the responsibilities of the ESG Management Committee include:

- o Ensuring adherence to the relevant regulatory framework for ESG and sustainability (including on matters relevant to the management of C&E risks), taking also into account best practices included in international treaties and initiatives.
- o Considering trends and best practices with respect to ESG matters, over and above the legal framework/regulatory expectations.
- o Determining the Bank's overall strategy regarding ESG and sustainability issues (including on matters relevant to the management of C&E risks).
- o Overseeing the execution of the Bank's ESG strategy (including matters relevant to the management of C&E risks).
- o Deciding on ESG and sustainability KPIs and targets (including for C&E risks and GHG financed and non-financed emissions).
- o Monitoring and assessing performance against ESG and sustainability KPIs and targets (including for C&E risks and GHG financed and non-financed emissions).
- o Deciding on the policies, initiatives and actions that result in mitigating and/or reducing the environmental impacts and footprint of the Bank.
- o Approving the Bank's disclosures concerning non-financial information and regular public disclosures regarding ESG (including C&E risks, GHG financed and non-financed emissions, and sustainable finance issues) – this includes also the committee's approval of the Bank's PRB Self-Assessment disclosures, such as the present report.
- o Overseeing internal and external communications with respect to ESG and sustainability issues.

ESG Roles and Responsibilities of the Bank's organizational structure across the three lines of defence

The Bank is strongly committed to managing ESG risks, while also addressing related impacts and opportunities, as a strategic priority. This requires an increased focus on availability and capacity in dedicated expert functions, to manage related activities, including the ongoing ESG initiatives that fall under the umbrella of the Bank's Transformation Programme. Importantly, NBG has strengthened its capacity and skills with respect to ESG, with the appointment of specific roles and responsibilities within existing organisational units, as well as the establishment of new ESG-related teams.

<p>In this context, a new independent sector, the C&E Strategy Sector, was set up in December 2022 to define, coordinate and monitor implementation of C&E strategy across the first line business units and functions, including CIB, Retail Banking, Real Estate, Procurement, HR, Marketing and Finance.</p> <p>In addition, a dedicated team was established in 2022, within the Group Strategic Risk Management (“GSRM”) Division under the Group Chief Risk Officer (“CRO”), to monitor and manage C&E factors across all risk types.</p> <p>In December 2023, the Bank proceeded to organizational changes to further strengthen the governance of its ESG strategy and to address the upcoming regulatory requirements more effectively: Two new roles of Assistant General Managers (AGM) were introduced, one reporting to the General Manger of Transformation, Strategy & International Activities and the other to the Group CRO, overlooking, inter alia, the C&E and Social strategy and the C&E Risk respectively.</p> <p>In addition, the former Corporate Social Responsibility & Sustainable Development Division of the Bank & Group, was split into two new Divisions: the Corporate Social Responsibility & ESG Reporting Division, and the Data Privacy, Technology & ESG Compliance Advisory Division. By creating separate divisions, the focus on the specific areas of expertise, alongside the clearly defined roles and responsibilities, will lead to increasingly effective and efficient ESG operations. The Corporate Social Responsibility & ESG Reporting Division of the Bank & Group, is under the supervision of the General Manager of Transformation, Strategy & International Activities and the new AGM of Business Strategy and Sustainability. Its main responsibilities include sustainability reporting, ESG raters’ assessments and communication, the formulation and execution of the Group’s Social Strategy and the development of CSR programmes, as well as coordination across the first line business units and functions pertaining to these issues. Furthermore, the Division closely works with the C&E Strategy Sector, aiming at better coordination and a holistic approach on ESG Strategy, within the responsibilities of the same General Manager. The Data Privacy, Technology & ESG Compliance Advisory Division of the Bank & Group, operates within the Group Compliance function, under the supervision of the General Manager of Group Compliance and Corporate Governance. The objective of this new Division, apart from monitoring of issues pertaining to personal data and AI, is to enhance the monitoring of the respective regulatory framework and advise on its implementation, overseeing and assessing compliance and reputational risks related to ESG and also conducting ESG due diligence for service providers/ suppliers.</p>	
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5.2 Promoting a culture of responsible banking:
Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

<p>Response</p> <p>Within its role as an employer striving to develop human capital, the Bank further strengthened its training and people development in the course of the last reporting period, with particular emphasis on upgrading employees’ skills in and awareness of what can be considered as ‘responsible banking’. An overview of selected initiatives spanning across learning, well-being, and constructive engagement is provided below:</p>	<p>Links and references</p> <p>NBS Annual Financial Report 2023</p> <ul style="list-style-type: none"> Non-Financial Statement, pages 34 – 36, 37 – 40, 46 – 47
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Training and development

In 2023, the Bank's HR offered a wide variety of learning opportunities, aligned with the strategic priorities of the Bank, aiming to foster employee engagement and unleash human potential. Specifically, the Bank provided over 184k training people-hours (an average of 28 training hours per employee) investing €2mil in internal and external learning courses.

The Bank delivers mandatory learning programmes on the NBG Group's Code of Ethics, focusing on bribery, corruption and whistleblowing practices. Relevant learning programs include the Code of Ethics course that ensures that the principles and requirements of the Code are properly understood and implemented by the Bank's employees, and covers areas of the expected behavior at work such as respect for human rights, lack of unconscious bias and zero tolerance to harassment.

Furthermore, the Bank hosts numerous in-house training events targeted to enhance the compliance culture throughout the organization, such as specialized mandatory e-learning on policies for anti-money laundering ("AML") and countering the financing of terrorism ("CFT").

As a separate training initiative NBG conducted a series of ESG-specific awareness trainings, as part of its Transformation Program. For their design, the Bank's C&E Strategy sector and HR teams worked together with an international consulting firm specializing in energy and climate transition. The objective of this series of trainings was to provide participants with an adequate level of understanding of the basic aspects of C&E and wider ESG topics, as well as an update on the recent developments and trends observed in the banking sector. The sessions provided useful background on the factors that have led to the increase in prominence of ESG aspects (risks, impacts, opportunities) for regulators, corporates, and financial institutions, and offered insights into the interplay between the governance/risk management aspects of the ESG integration and the potential to benefit from opportunities arising from the economy's transition. Training was addressed to 3 different groups of stakeholders, namely: Senior leadership team (CEO, GMs, and AGMs), wider leadership group (selected Unit Heads), and Commercial, Risk, Compliance teams involved executives.

In parallel, a new e-learning program has been made available to all NBG Group personnel with the aim to familiarize the employee base with C&E-responsible practices and build awareness of major environmental challenges and their implications for the planet, the bank and its clients. This program ('Climate School') comprises 4 selected mandatory courses and several additional optional courses customized for different roles. Moreover, besides the aforementioned trainings, a series of other ESG-related courses were offered during 2023 to NBG employees from different Business Units, aiming to build necessary expertise in more technical aspects, pertaining to ESG risk management, ESG in Internal Auditing, ESG regulatory landscape, etc.

Enabling health and well-being

Since August 2021, the Bank offers to all employees and their families the service of an Employee Assistance Program ("EAP"), a 24/7 helpline provided by "Hellas EAP", a recognized mental health organization. This programme was renewed in August 2023 in an effort to promote the well-being of our people during continuous / persistent circumstances of unprecedented stress in the workplace and beyond. It is worth noting that NBG partners with Hellas EAP psychologists and counselors in multiple online workshops designed around mental health, well-being, and stress management topics, under the umbrella of "NBG Talks".

[NBG ESG Report 2022](#)

- Our Operational Social Strategy, pages 134 – 156

In response to employees' request to promote work-life balance through flexible working, NBC introduced in 2023 the Work from Home ("WFH") Framework. Through WFH, the Bank offers its employees the option to work from home 5, 10 or 15 days per month, while putting in place the process and system required to manage such a hybrid scheme. In addition, the Bank is implementing new office designs to support this mode of operation, i.e., team members collaborating both from office and from home, providing a better, more flexible working environment.

With regards to the Bank's Performance Management System ("PMS"), introduced since 2021, NBC continues to promote fair and meritocratic performance assessment. For every annual cycle and for every NBC employee, this includes target setting (through a cascading process that ensures alignment with the Bank's strategic objectives) and a mid-year review (for constructive feedback sharing) and concludes with an evaluation (with emphasis on developmental aspects and future growth).

In line with regulatory provisions and supervisory expectations, the NBC Group Remuneration Policy is designed with particular attention to promote incentives (especially in terms of variable compensation) that are aligned with NBC's aim for achieving sustainable business results and with its risk appetite. Specifically, variable remuneration is supported by the annual PMS process, ensuring consistency and clarity of relevant performance goals, including C&E, social and governance objectives, as well as broader behavioral expectations in agreement with NBC's culture and values. The PMS incorporates ESG criteria, specific ESG-related targets and key performance indicators (KPIs) for the Top Management, including the CEO and all members of the extended Executive Committee. Each year, the ESG-related targets and key performance indicators (KPIs) are further strengthened and refined, becoming more specific and comprehensive.

Listening to and communicating with our people

In order to adopt a common culture across the organisation and improve communication and information exchange between employees and management, breaking down silos, and fostering unity and belonging, the Bank developed new and/or enhanced existing communication channels:

- NBC intranet: the Bank's newly revamped intranet is a central point where users can obtain information, regulatory texts, useful guides and lists of Bank applications and productive systems and announcements.
- HR intranet: launched in 2021, NBC's SharePoint cloud site is updated on a daily basis and communicates NBC news (announcements, press releases, information about NBC initiatives and products, etc.), HR related issues, regulatory documents and useful information on all HR related areas that employees need to know about.
- HR e-mail account: the content communicated via this account relates to CEO letters, bank announcements, financial results per quarter, BUs announcements to promote news related to products and services, new IT optimizations/developments, flash news, newsletters, internal campaigns or any other ad hoc news which need to be brought to the attention of employees.
- Employee Activation and Campaign: through this channel, the Bank *aims* to engage employees in purposeful activation of various kinds that cultivate a positive climate, foster togetherness, and enhance connectivity. Furthermore, internal campaigns are built around key topics that promote our Bank's strategy.

- Employee Engagement Survey: the administration of this survey (approximately every 12-18 months) aims to promote a climate of two-way, open communication and co-create an inclusive working environment that empowers and supports. The actual survey period is followed by workshops at team level for discussion of results and action planning.
- ASK HR: is the key service for employees to contact a dedicated internal team of HR professionals regarding everyday enquiries related to HR topics.

Aiming to enhance transparency and open communication and to disseminate our strategy and orientation to our people, a roadmap of senior management touchpoints was prepared, according to which various actions were carried out during 2023, such as:

- Visits of the Bank's management to the Branch Network and townhall meetings at General Division and/or Division level.
- Annual Branch Network Meeting: an event held within the first quarter of each year with the participation of managers from the Branch network within, aiming to review the targets achieved in the previous year and align with priorities set for the next year.
- NBG Flash News: an initiative aiming to disseminate special news items such as campaigns and award/successes in a dynamic and speedy manner.
- Whistleblowing through internet and intranet: the purpose of these channels is to enable employees and other stakeholders to report issues that indicate the possible occurrence of serious irregularity.
- "NBG Talks": a new platform allowing live talks given by specialized speakers and experts from the market which are addressed to all NBG personnel. The talks focus on contemporary topics and concerns such as efficiency in the work environment, cultivation of soft-traits and mindset in the "new era" and matters of well-being.
- NBG Online platform for 'phygital' events: through this new platform, the Bank can enable the performance of virtual and hybrid live events for its employees and its customers.
- Reporting of violent and harassment complaints: NBG has set specific policies for the prevention and containment of all forms of violence and harassment at work, whether related to or arising from work matters, and including gender-based violence, as well as sexual harassment, and provides a framework and overall guidance on the reporting in good faith of any relevant incidents.

5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio?¹³ Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

¹³ Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.

Response

Acknowledging the importance and potential impact of environmental and social risks, NBG proceeded with the identification and materiality assessment of such risks and their incorporation in the overall Risk Management Framework, and is committed to monitoring, assessing and managing the particular risks going forward.

More specifically, the Bank:

- Incorporated ESG risks in its Risk Taxonomy Framework and Risk Identification processes, by recognizing them as transversal, cross-cutting risks (rather than stand-alone risks), and considering them as drivers of existing types of financial and non-financial risks.
- Assigned clear responsibilities for the management of C&E risks within its organizational structure, cascading down through the Three Lines of Defence, including dedicated Committees at the Board and management level (respectively, the Board Innovation and Sustainability Committee and the ESG Management Committee).
- Incorporated ESG risks/drivers in its Risk Management Framework and implemented enhancements per primary risk area, as follows:
 - Developed the methodological approach to identify C&E risks and assess their materiality.
 - Enhanced the incorporation of ESG risks in the Credit Risk Management Framework (detailed below).
 - Enhanced ESG related risk metrics in the Risk Appetite Framework, with the inclusion of metrics with thresholds and also KRIs for monitoring purposes, for an enhanced view of C&E risks, while covering ESG credit risk and strategy-related matters.
 - Aligned the Operational Risk Taxonomy and all other Operational Risk Programs with the inclusion of ESG risks based on the requirements set by the competent authorities.
 - Incorporated Climate Risk Stress Testing in the Bank's Stress Testing framework to assess its vulnerabilities related to climate risk components.
 - Performed an assessment and incorporation of C&E factors in the normative and economic perspectives in its 2023 ICAAP.
 - Continued to enhance the Bank's C&E risk data, monitoring and reporting, considering internal needs and Pillar III disclosure requirements

Enhancements in embedding ESG risks in the Credit Risk Management Framework

The Bank deepened the incorporation of ESG risks in its Credit Risk Management Framework. Namely, it

- enhanced its 2024 RAF Dashboard with the inclusion of credit related metrics
- introduced a dedicated C&E exclusion list and an updated sectoral limits' methodology, aligning its risk appetite accordingly; the exclusion list also considers elements beyond climate (e.g., related to nature and biodiversity preservation)
- thoroughly analysed and approved specific policy actions connected with the ESG credit risk assessment and classification
- performed a prototype deep-dive analysis to incorporate C&E risks in Credit Rating
- enhanced the risk pricing framework for the incorporation of C&E risks

Links and references

[NBG Annual Financial Report 2023](#)

- Climate & Environmental (C&E) Risks , pages 78-79

[NBG ESG Report 2022](#)

- ESG Risk Management, pages 42 – 43, 55 – 58

- reviewed its collateral policies to improve C&E risk mitigation, taking into account the most recent C&E Risk Materiality Assessment
- focused on the development of monitoring and reporting capabilities for the credit portfolio, having established a large set of credit risk related KRIs at various levels (aggregate, sectoral, portfolio/business line etc.) as part of an enterprise wide ESG reporting mechanism

Self-assessment summary

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

Yes No

Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

Yes No

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

Yes In progress No

Principle 6: Transparency & Accountability



We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

Yes Partially No

If applicable, please include the link or description of the assurance statement.

Response

The UNEP FI Principles for Responsible Banking 3rd Self-Assessment & Progress Report has undergone limited assurance by PricewaterhouseCoopers S.A. Limited assurance has been provided on specific responses included in principles 2.1 (Impact Analysis), 2.2 (Target Setting), 2.3 (Target Implementation and Monitoring) and 5.1 (Governance Structure for Implementation of the Principles).

Please refer to the end of this section for the independent limited assurance report.

Links and references

6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

- GRI
- SASB
- CDP
- IFRS Sustainability Disclosure Standards (to be published)
- TCFD
- Other:

Response

Within the scope of the disclosure requirement for non-financial information, the Bank took into account for both its 2022 ESG Report and its 2023 Annual Report international practices and standards such as the Organization for Economic Co-operation and Development ("OECD") Guidelines for Multinational Enterprises (2011), the Global Reporting Initiative ("GRI") Standards (Core option), the Sustainability Accounting Standards Board ("SASB") Standards, the ATHEX ESG Index, RobecoSAM, the Climate Disclosure Standards Board ("CDSB"), the Task Force on Climate-related Financial Disclosures ("TCFD") and the EU Guidelines on

Links and references

[NBS Annual Financial Report 2023](#)

- Non-Financial Statement, Regulation & reporting standards, page 88

<p>non-financial reporting: Supplement on reporting climate-related information.</p>	
<p>6.3 Outlook What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis¹⁴, target setting¹⁵ and governance structure for implementing the PRB)? Please describe briefly.</p>	
<p>Response</p> <p>As we move through our PRB journey, we remain committed to working with UNEP FI to attain full adherence to all Principles. Over the next reporting period we aim to focus on the following areas:</p> <p><u>On impact analysis</u></p> <ul style="list-style-type: none"> • We aim to adopt and practice double materiality in how we assess impact to and from our socio-economic environment • For our action planning, we will be considering more (and/or more in-depth) impact areas, especially regarding social aspects and biodiversity/nature-related aspects of our financing and investing activity <p><u>On climate action</u></p> <ul style="list-style-type: none"> • We will actively steer our portfolio composition (credit expansion mainly) to remain closely in line with our first set of interim Net-Zero targets for 2030, each sector aligning as required with the relevant science-based pathway – as noted, this will entail action at the client and at sectoral level • In this vein, in the 4th Q of 2024 we will be submitting to the NZBA sector/portfolio-specific ‘Transition Plans’ for sectors already targeted • We will also analyse remaining (per NZBA) ‘priority sectors of our lending and investment portfolios in terms of impact/materiality with a view to setting additional NZ targets and committing these targets publicly. Through this commitment, the Bank will continue to deepen the integration of ESG in its overall commercial strategy in order to meet shareholders’ expectations and the country’s decarbonization effort. <p><u>On governance structure</u></p> <ul style="list-style-type: none"> • We shall keep evaluating our governance structure and mechanisms to ensure effectiveness and agility in implementing the Principles and our ESG strategy, in the same way we have done since the onset of our PRB journey (already implementing a 2nd round of organizational changes, as described under Principle 5.1), and adjust if/as required at all levels of our operation. 	<p>Links and references</p> <p>NBG ESC Report 2022</p> <ul style="list-style-type: none"> ▪ page 103

¹⁴ For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

¹⁵ For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

6.4 Challenges

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).

If desired, you can elaborate on challenges and how you are tackling these:

- | | |
|--|--|
| <input type="checkbox"/> Embedding PRB oversight into governance | <input type="checkbox"/> Customer engagement |
| <input type="checkbox"/> Gaining or maintaining momentum in the bank | <input type="checkbox"/> Stakeholder engagement |
| <input type="checkbox"/> Getting started: where to start and what to focus on in the beginning | <input checked="" type="checkbox"/> Data availability |
| <input type="checkbox"/> Conducting an impact analysis | <input checked="" type="checkbox"/> Data quality |
| <input type="checkbox"/> Assessing negative environmental and social impacts | <input type="checkbox"/> Access to resources |
| <input type="checkbox"/> Choosing the right performance measurement methodology/ies | <input checked="" type="checkbox"/> Reporting |
| <input type="checkbox"/> Setting targets | <input type="checkbox"/> Assurance |
| <input type="checkbox"/> Other: ... | <input type="checkbox"/> Prioritizing actions internally |

If desired, you can elaborate on challenges and how you are tackling these:

Response

As investor expectations and regulatory framework evolve, pressure is mounting on banks to include in their **reporting** a broad and complex set of data, information, metrics and plans, which requires integration from different groups/sources (subsidiaries, vendors, customers, etc.), while also checking year-on-year progress against stated goals. Gathering and analysing such data and information has been a key priority area both for RPB implementation and for wider reporting purposes, and to this end we have invested considerable internal resources combined with external advisory. Still, establishing seamless, accurate and relevant reporting necessitates **availability** and **quality of data**, and, moreover, methodological work for its processing and integration. Data quality and required granularity has been tackled via targeted data remediation actions, while availability is a continued challenge, which we address via a combination of direct client engagement, interbank co-ordinated action, and external market data acquisition. NBG remains committed to continuing its building of internal capabilities to improve ESG data collection, data quality and granularity, and reporting, for internal managerial and disclosures purposes. Our action in this direction is included in the Bank's Transformation Program. Indicatively, in the 2024 annual cycle, we are aiming to expand GHG emissions measurement to cover Group level eligible assets perimeter, enhance in-house developed reporting platform's automations, introduce more forward-looking metrics and enable in-house ESG templates generation, etc.



INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT

To
The Management of National Bank of Greece

Subject Matter

We were assigned to provide you with limited assurance on the assessment of specific responses reported in the "UNEP FI Principles for Responsible Banking 3rd Self-Assessment & Progress Report" (the "Report") prepared by National Bank of Greece (the "Bank") for the year ended 31 December 2023, in respect of the following principles:

- 2.1 Impact Analysis
- 2.2 Target Setting
- 2.3 Target Implementation and Monitoring
- 5.1 Governance Structure for Implementation of the Principles

according to the applicable criteria as described below (herein after the "Subject Matter").

Applicable Criteria

The specific responses to the aforementioned selected principles were prepared by the management of the Bank based on the:

- I. "Principles for Responsible Banking Guidance Document", and the
- II. "Principles for Responsible Banking Reporting and Self-Assessment Template"

published by the United Nations Environment Program Finance Initiative ("UNEP FI") in November 2021 and September 2022 respectively, and which collectively constitute the Applicable Criteria for the assessment of the Subject Matter.

Management Responsibilities

The Management of the Bank is responsible for the preparation of the Report, in all material respects, of the Subject Matter in compliance with the Applicable Criteria.

This responsibility also includes the design, implementation and maintenance of internal controls considered necessary to enable the preparation of the Report according to the Applicable Criteria.

Our Responsibility

Our responsibility is limited to the issuance of this limited assurance report, which is based on the assurance procedures we have performed, as described below in the "Scope of work" paragraph, in order to obtain limited assurance on which our conclusion is based about the Subject Matter.

Our work was carried out in accordance with the International Standards on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information ("ISAE 3000 Revised"), issued by International Auditing and Assurance Standards Board ("IAASB") and the terms of engagement as described in the engagement letter that governs this limited assurance report.

ISAE 3000 Revised requires designing and performing our work in order to obtain limited assurance for the evaluation of the Subject Matter as per the Applicable Criteria. In the context of the procedures performed, we estimate the risk of material misstatement of the information that is related to the Subject Matter.



In our opinion, we obtained sufficient and appropriate evidence for the foundation and documentation of this limited assurance report.

Professional ethics and quality management

During our work we remained independent of the Bank, in accordance with the International Code of Ethics for Professional Accountants of the International Ethics Standards Board (IESBA Code) that has been transposed into Greek Law, as well as the ethical requirements of L. 4449/2017 and EU Regulation 537/2014, and more specifically we complied with the provisions of article 5 of the Regulation regarding non audit services.

Our audit firm applies the International Standard for Quality Management (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 quality management system that includes documented policies and procedures relating to compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Scope of Work

We designed and carried out our work in order to obtain the information, analysis and explanations we deemed necessary, in order to assess whether the Subject Matter has been prepared in accordance with the Applicable Criteria. Our work was carried out in accordance with ISAE 3000 Revised in combination with the guidance of the "PRB Guidance for Assurance Providers Version 2" as updated in October 2022 and published in November 2022 by UNEP FI ("Guidance"). Nonetheless, our work does not necessarily obtain the confidence level as outlined in the Guidance, but what is normally obtained by a practitioner in a limited assurance engagement under ISAE 3000 Revised.

In order to form our conclusion, we performed the following procedures in relation to the Subject Matter:

- Performed inquiries and meetings with the Bank's Management on the key governance structures, systems, processes and controls, as applicable, in order to obtain an understanding of the underlying rules on the preparation of the Subject Matter and assess the specific responses provided by the Bank in the Report;
- Obtained and analysed relevant external and internal documentation, provided by the Management of the Bank, to obtain an understanding of the underlying rules on the preparation of the Subject Matter and review the consistency of the information included in the specific responses provided by the Bank in the Report;
- Performed testing, on a sample basis, and analysed documentation supporting the preparation of the Subject Matter, in the specific responses as specified below, to obtain and review sufficient evidence, including reconciling and testing of source data where necessary;
- Analysis of the consistency of the information included in the specific responses provided by the Bank in the Report against information reported in the Annual Financial Statements for the year ended 31 December 2023 approved on 11 March 2024 by the Board of Director of National Bank of Greece S.A.
- Obtained a representation letter from the management of the Bank on the compliance of the Subject Matter with the applicable Criteria and on the reliability and completeness of the information provided;

More specifically, we performed the following procedures regarding the specific responses on the Subject Matter contained in the Report:



Principle 2.1 (Impact analysis)

- Confirmed that i) the Bank's business areas, products and services across the main geographies of operation are clearly described and any exclusions from the scope are referenced in the Report and ii) that the portfolio composition reconciled to management information;
- Performed inquiries and meetings with the Bank's Management and checked that the Bank has analysed its context (i.e. through the use of the UNEF FI's Portfolio Impact Analysis Tool for Banks (v3) – Context Module, stakeholder engagement and external documentation);
- Confirmed that the Bank has disclosed the method for determining its impact areas and has selected its two most significant areas of impact ("Climate Stability" and "Availability, accessibility, affordability, quality of resources and services");
- Tested, on a sample basis, and reconciled to management information the total amount and number of loans disbursed by the Bank up to 17/05/2024, disclosed on the impact area of "Availability, accessibility, affordability, quality of resources and services" with regard to "My House/ Spiti mou" program.

Principle 2.2 (Target setting)

- Performed inquiries and meetings with the Bank's Management and reviewed internal documentation obtained, and confirmed that the targets sets link to the significant impacts the Bank has identified in its impact analysis;
- Confirmed that the alignment of the targets to international, national or other relevant frameworks and contribution to relevant goals is described in the Report;
- Confirmed that the base year (2022) for the targets of the Climate Stability impact area is no more than two full reporting years prior to the year (2023) when the targets have been set;
- Confirmed that the targets set are Specific, Measurable, Relevant and Time-bound.

Principle 2.3 (Target Implementation and Monitoring)

- Tested, on a sample basis, reconciled to management information and confirmed the stated progress the Bank has disclosed on its previously set targets.

Principle 5.1 (Governance Structure for Implementation of the Principles)

- Confirmed the consistency of the governance structure disclosed in the Report based on inquiries and meetings performed with the Bank's Management and on the review of the supporting internal and public available documentation obtained (i.e. Committee Presentations, Financial Statements, NBG ESG Report 2022).

In the context of a limited assurance engagement, the procedures performed vary in nature and timing and are less extensive than in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is significantly lower than the level of assurance which would have been obtained if an assignment of reasonable assurance had been performed.

Inherent Limitations

The work performed does not provide absolute assurance that all material misstatements related to the accuracy and completeness of data and relevant disclosures, as these are included in the Report, will be identified.

Our work covered only the Bank's responses to the principles as listed in the Subject Matter paragraph to obtain limited assurance based on the procedures included in the Scope of Work paragraph.

The Report includes prospective information such as strategy, plans, targets, and expectations. Due to the inherent characteristics of the prospective information pertaining to the uncertainty of their future outcome, we do not provide any assurance on the assumptions or achievability of such aforementioned information included in the Report with regard to the Subject Matter.



Furthermore, we do not provide any assurance on i) any references or information based to external sources or websites or ii) on the reported amounts of the baseline year of the targets set.

Our work does not constitute an audit or review of historical Financial Information, in accordance with applicable International Standards on Auditing or International Standards on Review Engagements, and for this reason we do not express any assurance other than those listed in the paragraph “Scope of Work”.

All issues brought to our attention during the work performed were accordingly communicated to the Bank’s Management.

Limited Assurance Conclusion

Based on the procedures we performed, nothing has come to our attention that causes us to believe that the Subject Matter included in the Report, for the year ended 31 December 2023, has not been prepared, in all material respects, in accordance with the Applicable Criteria.

Restrictions on Use

This limited assurance report is intended solely for the Board of Directors and Management of the Bank, covers only the Subject Matter described herein for the year ended 31 December 2023, and should not be used by any other parties.

Athens, 24/05/2024
Evangelos Venizelos
SOEL Reg. No 39891
PricewaterhouseCoopers SA,
260 Kifissias Avenue, 15232 Halandri, Greece

Annex

A set of indicators has been produced for the impact areas of climate mitigation and financial health & inclusion. These indicators will support you in your reporting and in showing progress against PRB implementation. Banks are expected to set targets that address minimum two areas of most significant impact within the first four years after signing the PRB. That means that Banks should ultimately set targets using impact indicators. Acknowledging the fact that banks are in different stages of implementation and on different levels of maturity and therefore might not be able to report on impact from the beginning, a Theory of Change approach has been used to develop the set of indicators below.¹⁶ The Theory of Change shows the **pathway to impact** and considers the relationship between inputs, actions, outputs, and outcomes in order to achieve impact. The Theory of Change for climate mitigation can be found [here](#), the Theory of Change for financial health & inclusion can be found [here](#).

How to use: Both practice (action, outcome and output) and impact performance need to be understood because practice is the conduit for achieving desired impacts (including targets). The Theory of Change allows to identify metrics and set targets which align with a bank's maturity. The indicators below are all connected to a bank's impact and can be considered as steps towards measuring impact. Some of the practice indicators (on the action, output, and outcome levels respectively) are connected to portfolio composition and financial targets¹⁷ (highlighted in green) or to client engagement¹⁸ targets (highlighted in blue), which enable your overall target. If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex to measure your performance and baseline.¹⁹ Once you have set the target, you can use the indicators as guidance for your action plan as well as defining Key Performance Indicators (KPIs) which you can then use to measure progress against the set targets.

¹⁶ It is not required from banks to work with the Theory of Change concept internally. In fact, the Theory of Change has been used to structure the requirements of setting SMART targets using relevant indicators.

¹⁷ Financial targets also aim for real economy outcomes but are not directly expressed as such. Instead, they are expressed with financial indicators and metrics, e.g., to redirect flows of lending and investments to sectors, activities or projects aligned with SDGs and/or related to the selected impact area. Banks can also set financial targets related to specific types of customers e.g., low-income customers or female entrepreneurs.

¹⁸ Client engagement targets involve engaging relevant clients and customers to enable your overall target. The purpose of client engagement is to support clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

¹⁹ You might not be able to report on all indicators and/or levels of practice (i.e. from left to right), in which case you should report on all applicable indicators on the respective level of practice no matter if it is an action, output or outcome indicator.

- For Signatories of the Net-Zero Banking Alliance:** please report on the climate targets set as required in the [Guidelines for Climate Target Setting](#). As a member of the Alliance, you are required to publish first 2030 targets for priority sectors within 18 months and further sectoral targets within 36 months after signing. You can use the PRB template to disclose the required climate target information if its publication date is in line with the committed NZBA timeframe.

- For Signatories of the Collective Commitment to Financial Health & Inclusion:** please report on financial health and/or financial inclusion targets set as required in the [Financial Health and Inclusion Commitment Statement](#). As a signatory to the Commitment, you have agreed to set a SMART ambitious target within 18 months after signing. To facilitate your process, please refer to the [Guidance on Target Setting for Financial Health and Inclusion](#) and the [Core Indicators](#) to measure financial health and inclusion. Keep in mind that signatories of the Commitment are encouraged to measure as many indicators as possible from the Core Set or their equivalent to be able to set a SMART impact driven target.

Impact area	Practice ²⁰ (pathway to impact)									Impact ²¹		
	1. Action indicators			2. Output indicators			3. Outcome indicators			4. Impact indicators		
	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics
A. Climate change mitigation	A.1.1	Climate strategy: Does your bank have a climate strategy in place?	Yes / In progress / No	A.2.1	Client engagement process: Is your bank in an engagement process with clients regarding their strategy towards a low(er)-carbon business model (<i>for business clients</i>), or towards low(er)-carbon practices (<i>for retail clients</i>)?	Yes / Setting it up / No; <i>If yes:</i> Please specify for which clients (types of clients, sectors, geography, number of clients etc.)	A.3.1	Financial volume of green assets/low-carbon technologies: How much does your bank lend to/invest in green assets / loans and low-carbon activities and technologies?	bln/mn USD or local currency, and/or % of portfolio; <i>please specify</i> the definition of green assets and low-carbon technologies used	A.4.1	Reduction of GHG emissions: how much have the GHG emissions financed been reduced?	% over time; baseline and tracking GHG emissions in kg of CO _{2e} (or applicable metrics) ²²
	A.1.2	Paris alignment target: Has your bank set a long-term portfolio-wide Paris-alignment target? To become net zero by when?	Yes / In progress / No; <i>If yes:</i> - please specify: to become net zero by when? - Emissions baseline / base year: What	A.2.2	Absolute financed emissions: What are your absolute emissions (financed emissions = scope 3, category 15) in your lending and/or investment portfolio?	Total GHG emissions or CO _{2e} <i>(please also disclose what is excluded for now and why)</i>	A.3.2	Financial volume lent to / invested in carbon intensive sectors and transition finance: How much does your bank lend to / invest in carbon-intensive sectors	bln/mn USD or local currency, and/or % of portfolio	A.4.2	Portfolio alignment: How much of your bank's portfolio is aligned with Paris (depending on the target set [A.1.2] either 1.5 or 2 degrees)?	% of portfolio (<i>please specify which portfolio; for corporate and business clients: % of sectors financed</i>)

²⁰ Practice: the bank's portfolio composition in terms of key sectors, its client engagement, and its relevant policies and processes, and, if applicable, its advocacy practices

²¹ Impact: the actual impact of the bank's portfolio

²² If possible and/or necessary, please contextualize the progress: Greenhouse gas emissions might even increase initially because the scope of measurements is extended and financed emissions from a growing proportion of the portfolio are measured, emission factors are updated etc. Emission reductions made by the clients should over time lead to a decrease in GHG emissions financed.

			is the emissions baseline / base year for your target? - Climate scenario used: What climate scenario(s) aligned with the Paris climate goals has your bank used?					and activities ²³ ? How much does your bank invest in transition finance ²⁴ ?			
	A.1.3	Policy and process for client relationships: has your bank put in place rules and processes for client relationships (both new clients and existing clients), to work together towards the goal of transitioning the clients' activities and business model?	Yes / In progress / No	A.2.3	Sector-specific emission intensity (per clients' physical outputs or per financial performance): What is the emission intensity within the relevant sector?	Please specify which sector (<i>depending on the sector and/or chosen metric</i>): kg of CO ₂ e/ kWh, CO ₂ e / m ² ; kg of CO ₂ e/USD invested, or kg of CO ₂ e/revenue or profit					

²³ A list of carbon-intensive sectors can be found in the [Guidelines for Climate Target Setting](#).

²⁴ Transition finance is defined as financing the transition towards a low-carbon future in alignment with the Paris climate goals. It entails any form of financial support for non-pure play green activities to become greener and reduce emissions.

	A.1.4	Portfolio analysis: Has your bank analyzed (parts of) its lending and/or investment portfolio in terms of financed emissions (Scope 3, category 15); technology mix or carbon-intensive sectors in the portfolio?	Yes / In progress / No; If yes: please specify which parts of the lending and investment portfolio you have analyzed	A.2.4	Proportion of financed emissions covered by a decar-bonization target: What proportion of your bank's financed emissions is covered by a decar-bonization target, i.e. stem from clients with a transition plan in place?	%	<i>(denominator: financed emissions in scope of the target set)</i>					
	A.1.5	Business opportunities and financial products: Has your bank developed financial products tailored to support clients' and customers' reduction in GHG emissions (such as energy efficient mortgages, green loans, green bonds, green securitisations etc.)?	Yes / In progress / No; Please specify which ones, and what financial volume and/or % of the portfolio they account for									
B. Financial health	B.1.1*	# of products and services in the portfolio with a focus on financial health	Internal data based. Measures how many of the products and services in the portfolio have a financial health focus. We deem a product or service to have this focus when it facilitates decision making and supports financial health increase based on	B.2.1*	# of individuals supported with dedicated and effective financial and/or digital education initiatives	Based on internal data. Measures the number of users (customers and non customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs,	B.3.1*	% of individuals with a good and/or very good level of financial skills	Assessment based. Measures the percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals	B.4.1	% of customers with a high level of financial health	Survey and/or transactional data based. Measures the percentage of customers with a high level of financial health according to the score chosen by the financial institution.

			our definition of financial health. This covers products and services embedded with nudges to simplify decision making, round-up, high yield savings accounts, easy investment tools, etc.			training videos, articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many cases a prioritized group). Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users.			benefitting from the bank's financial education initiatives.			
	B.1.2*	% of relevant employees supported with effective training on financial inclusion, responsible credit	Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit	B.2.2*	% of customers actively using the online/mobile banking platform/tools	Transactional data based. Measures the percentage of customers logging in, at least once a month, to one of	B.3.2	% of customers who use the bank's services to create a financial action plan with the bank	Transactional and/or survey data based. Measures the percentage of customers who create a financial action plan with	B.4.2	% of customers for which spending exceeded 90% of inflows for more than 6	Survey and/or transactional data based. Measures the percentage of customers with a transaction account and/or savings/investmen

		and/or financial health	and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger skills, and thus, any individual that is supported with the initiative will achieve the desired results. Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers' financial health			the following digital platforms (measure those applicable for your bank): Online internet banking and/or mobile phone banking and/or digital tools (including financial health tools)			the bank using the bank's services. A financial action plan is anything that helps the customer build financial resilience. It is done "with the bank" if the bank can visualize, through the transactions of the customer, the results of the plan.		months last year	t accounts for which spending exceeded 90% of inflows for more than 6 months in the year within the reporting period compared to the total of customers within PRB scope. Focus on main financial institution customers.
	B.1.3	# of partnerships active to achieve financial health and inclusion targets	Based on internal data. Measures the number of partnerships currently active to achieve financial health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.				B.3.3	% of customers using overdraft regularly	Transactional data based. Measures the percentage of customers using the overdraft option in their accounts or credit cards, regularly. Overdraft can be used to handle unexpected emergencies but more than 1/3 of the year (banks may deviate if proper reasons are provided) denotes regularity and a	B.4.3	% of customers that feel confident about their financial situation in the next 12 months	Survey based data. Measures the percentage of customers that answered positively to feeling confident about their financial situation in the next 12 months compared to the total number of customers surveyed. By confident we mean not feeling worried about their financial situation.

								precursor to lower financial health				
							B.3.4	% of customers with a non-performing loan	Transactional data based. Measures the percentage of customers with past-due loans ("past due" defined by policies at each bank) compared to the total amount of customers with loans in the bank's lending portfolio.	B.4.4	% of customers with products connected to long-term saving and investment plans	Transactional and/or survey data based. Measures the percentage of customers with products connected to long-term saving and investment plans. "Long-term" will depend on each bank's definition.
							B.3.5	% of customers showing an increase or stable amounts in savings, deposit and/or investment account balances, quarter on quarter.	Transactional data based. Measures the percentage of customers showing an increase or stable amounts in savings and/or deposit AND/OR investment accounts balances, quarter on quarter.	B.4.5	% of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense	Survey based data. Measures the percentage of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense. We consider a major unexpected expense, one that the customer hadn't planned for and would require them to spend more than what they have available for secondary expenses in their monthly budget or 1/20th of the country's Gross National Income (banks may

					group of individuals (in many cases a prioritized group). Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users.						initiatives so that the target doesn't become a toxic incentive.
	C.12*	% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health	Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the	C.2.2	% of customers with effective access to a basic banking product	C.3.2	% of customers supported with dedicated customer journey/advisory services	"Transactional data based. Where dedicated customer journey/advisory services are in place for prioritized groups , this indicator measures the percentage of customers using such services. Depending on			

			initiative is successful in generating the desired results of stronger skills, and thus, any individual that is supported with the initiative will achieve the desired results. Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers' financial health			accounts, payment accounts, credit cards, saving accounts, deposit accounts, e-money accounts, etc.			size of bank, either number or percentage can be the unit of measure.			
	C.1.3	# of partnerships active to achieve financial health and inclusion targets	Based on internal data. Measures the number of partnerships currently active to achieve financial health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.	C.2.3	# of new customers per month	Transactional data based. Measures the number of new customers per month. Once the bank sets a target, this indicator can become a KPI to measure the percentage of new customers from the prioritized groups, per month.	C.3.3 *	% of customers actively using the online/mobile banking platform/tools	Transactional data based. Measures the percentage of customers logging in, at least once a month, to one of the following digital platforms (measure those applicable for your bank): Online internet banking and/or mobile phone banking and/or digital tools (including financial health tools, if applicable)			