Article 3: Transparency of sustainability risk policies

NBG applies a holistic approach to sustainability, covering the areas of Environment, Society, and Governance (ESG). This approach is dictated by a series of strategic commitments, policies, internal frameworks, and procedures, that began in 2021 is based on the ECB Guide on climate-related and environmental risks[1]. Since then, it has been continuously evolving and strengthened.

A key pillar of this approach is the Group Sustainable Development Policy, which in line with legislative and regulatory requirements as well as with best practices included in international treaties and initiatives focused on sustainable development actions, corporate social responsibility, and business ethics, sets the framework for optimal management of the social, governance, and environmental (ESG) impacts of the Bank and the Group. This way, it defines both the Bank's strategy for leveraging opportunities and the management approach to sustainability risks arising from its operations and interactions with the socio-economic environment.

Recognizing the importance and potential impact of ESG risks, particularly Climate and Environmental risks, the Bank has proactively identified and assessed their significance, incorporating them into the overall Group Risk Management Framework, while it is committed to keep monitoring, evaluating, and managing these risks, on an ongoing basis.

Specifically, since 2022, the NBG has integrated ESG risk assessment into the Credit Granting & Monitoring Process for its corporate portfolio. Moreover, it has developed policies, procedures, and tools used by corporate loan officers to assess and classify borrowers and transactions based on these risks.

In December 2024, the Sustainable Finance Framework was approved to facilitate the identification, assessment, and classification of financing as sustainable. This framework is expected to enhance the Bank's ability to monitor and report its performance against its sustainability financing goals while also serving as a mechanism for their expansion. The ESG risk assessment within the Loan Granting & Monitoring Process for the business portfolio consists of two pillars:

- **Obligor-level assessment**, to evaluate the performance of the Bank's corporate clients based on ESG criteria.

- **Transaction-level assessment**, to classify transactions/loans into categories according to the Sustainable Finance Framework, which incorporates, among

[1] ECB Guide on climate-related and environmental risks, Supervisory expectations relating to risk management and disclosure, November 2020

other elements, criteria for the implementation of the EU Taxonomy (refer to the Annual Financial Report of the Group and the Bank, 31.12.2024, p. 234).

The National Bank monitors the overall carbon footprint by asset class—according to the PCAF methodology—focusing on financed greenhouse gas emissions and the intensity of financed emissions (per € of exposure in 'Gross Carrying Amount Measured'). Additionally, it calculates the PCAF data quality score (refer to the Annual Financial Report of the Group and the Bank, 31.12.2024, p. 249).

This monitoring works in conjunction with sustainability risk assessments, enhancing the relevant data (risk drivers and relevant transmission channels). By taking into account the scale, nature, and scope of activities overall, along with the comparative contribution to the carbon footprint per asset class and operational region, the Bank can adopt a **proactive** approach to sustainability risk management through active portfolio management and steering.

Further details on the integration of ESG risks into the Bank's Risk Management Framework can be found:

- at the Sustainability Report included in the Annual Financial Report of the Group and the Bank, 31.12.2024, pp. 171-337 and section Risk Management, pp. 66-93 ,
- at NBG Pillar III Disclosures on a Consolidated Basis 31.12.2024, section 10. ESG Risks, pp. 85-141.