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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 NBG, 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 employees.

Throughout our history, from 1841 until today, we recognize that our successful business activity is mainly based on the fact that we operate guided by our values and our principles. Those values are, and will remain, etched in our DNA in order to move forward together to the next day.

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”) became a signatory of the Principles for Responsible Banking (“PRB”), a voluntary initiative of the UNEP FI aimed at ensuring that banks align with the vision society has set out for its future in the SDGs and the Paris Climate Agreement.

As a signatory of UNEP FI and for properly and effectively implementing the UNEP FI PRB within the designated four-year time frame, NBG fostered the implementation process by undertaking several actions, which are highlighted hereunder:

- Establishment of a robust Governance Framework over ESG matters and in particular: Our ESG Management Committee, chaired by the Chief Executive Officer (CEO), governs all strategic decisions related to ESG, while a new Board Committee on Innovation & Sustainability has come into force to oversee ESG forward-looking matters. NBG has integrated the management of ESG topics across the three lines of defence, with the appointment of specific roles and responsibilities within existing organizational units, as well as the establishment of new ESG related teams. In this context, a new independent sector, the Climate & Environmental Strategy Sector, has been set up to define, coordinate and monitor implementation of Climate & Environmental Strategy across the first line. A dedicated Group Corporate Social Responsibility & Sustainable Development Division has been established under the Group Chief Compliance and Corporate Governance Officer to oversee compliance and reputational risk matters pertaining to corporate social responsibility, sustainability, and climate change. Finally, a dedicated team within the Strategic Risk Management Division oversees C&E factors across risk types.
- 2 SMART targets have been set, specifically:
 - Target 1 – Climate: €600 million financing of renewable energy in 2022-2025,
 - Target 2 – Inclusive, healthy economies: 3 million active digital users by the end of 2024
- Development of NBG’s PRB target monitoring and review process
- Submission and publication of NBG’s 1st PRB Self-Assessment Report

In line with the defined PRB implementation roadmap, this 2nd Self-Assessment and Progress Reports outlines the Bank’s actions and key progress against the targets and PRB Principles.

More information about our ESG Strategy and actions can be found within the Annual Report FY2022, the ESG Report 2021 and other sources referenced throughout this document.



NBG's PRB implementation roadmap

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

NBG 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.

The Bank and its subsidiaries (hereinafter the "Group") provide a wide range of financial services including mainly Retail, Corporate and investment banking, non-performing management & Specialized Asset Solutions, transactional banking, leasing, factoring, brokerage, asset management, real estate management and insurance related services.

The Group operates mainly in Greece but also abroad, mainly in N. Macedonia and Cyprus where it operates banking subsidiaries.

The Bank is one of the four systemic banks in Greece and one of the largest financial institutions in Greece by market capitalization, holding a significant position in Greece's financial services sector. As at 31 December 2022, the Bank had a total of 345 Units:

- 328 Branches including 9 Retail i-bank Tellerless
- 16 Transaction Offices
- 1 Branch Annex

Furthermore, the Bank, through 1,485 ATMs (628 onsite and 857 off-site), offers an extensive network covering – even in the most remote areas of the country.

The Group's domestic operations accounted for 95.4% of its total lending activities as at 31 December 2022 (the Domestic Banking gross loans) and for 96.7% of its deposits (the Domestic Banking deposits).

Links and references

Annual Report FY2022

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

ESG Report 2021

About NBG Group, pages 19 – 23

More information is also available at NBG's website

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 follows a holistic approach regarding, Environment, Social and Governance ("ESG") areas, to ensure compliance with evolving regulatory framework, fulfilment of its commitment to the Principles for Responsible Banking ("PRB") and implementation of ESG best practices across the organization (covering management of credit and other types of risk, business strategy, products and services, reporting, as well as efforts to reduce NBG's direct and indirect emissions footprint).

Furthermore, in the NBG's ESG Report 2021, the Bank demonstrates the alignment of its actions with the United Nations Sustainable Development Goals ("UN SDGs"). The responsible approach of reduction of its environmental footprint is an essential and indispensable part of the Bank's ESG Strategy, which actively pursues the realization of wider environmental goals as these are stipulated through the UN SDGs and the Paris Climate Agreement.

Sustainability / ESG Strategy

Sustainability and Corporate Social Responsibility ("CSR") are integral parts of our philosophy, and we constantly take new initiatives in the context of fully integrating CSR principles and environmental, social and governance ("ESG") considerations into our practices. NBG's strategic decision is to constantly upgrade its role and contribution to sustainable development in the context of its activities and operations. Under the umbrella of its Transformation Program, the Bank has articulated its overarching ESG Strategy, on the basis of its Group Sustainable Development Policy.

Links and references

Annual Report FY2022

- Our Values, page 6
- Non-Financial Statement, pages 78 – 98


ESG Report 2021



- Letter from the CEO, pages 7 – 10
- Sustainability Strategy, pages 34 – 35
- Sustainability Policy, pages 36 – 37

NBG Sustainable Development Policy

NBG has defined nine ESG strategic themes, across the pillars of Environment, Society and Governance, that are aligned with our purpose and values to create a more prosperous and sustainable future together with our customers, people and shareholders. At the same time, our ESG strategic themes complement our overall corporate strategy and transformation, and our vision of becoming the undisputed Greek Bank of First Choice.

Our ESG strategic themes are also aligned with the UN SDGs, which express our urgent call for good health, equality and climate change mitigation. In order to meet EU’s climate and energy targets for 2030 we align our commitments with sustainable projects and activities. Our ESG Strategy highlights how our commitments complement our ESG strategic themes, values and contribution to the UN SDGs.

ESG Pillar	ESG Strategic Themes	ESG Commitments	Our core values	UN SDGs
Environmental	Lead the market in sustainable energy financing	Pioneer sustainable bond issuing in the Greek market Growth	Growth Responsiveness	
		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 NBG 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		

	<p>Promote Greek heritage, culture & creativity</p> <p>Foster entrepreneurship & innovation</p> <p>Support prosperity through learning & digital literacy</p>	<p>Lead the preservation of Greek cultural heritage</p> <p>Promote contemporary Greek culture and creativity</p> <p>Foster entrepreneurship and innovation</p> <p>Motivate public contribution to new projects</p> <p>Encourage lifelong learning in and out of the workplace</p> <p>Champion digital literacy across age groups</p>		
Governance	<p>Adhere to the highest governance standards</p>	<p>Ensure best-in-class corporate governance</p> <p>Ensure transparency in disclosures and reporting</p>	Trust	

Sustainability Policy (Bank & Group Sustainable Development Policy)

At NBG we recognize that our operations have direct and indirect economic, social and environmental impacts on our stakeholders, as well as wider impacts on the economy, society and the natural environment. We recognize the importance of our role as a financial institution in the transition to a sustainable economy, and the importance of complying with the relevant regulatory requirements.

Towards this direction, we have adopted a Sustainability Policy, the purpose of which is to set the framework for the development of actions that assist in the management of economic, social, governance and environmental impacts of the Bank and the Group of Companies and mainly lead to:

1. Reducing our environmental impacts, as such arise from the financing of our customers' activities, as well as from the operation of NBG itself.
2. Generating long-term value for our stakeholders, the economy at large and the communities where all our Group companies operate in Greece and abroad.
3. Undertaking initiatives and innovative actions in the fields of Corporate Governance, Corporate Social Responsibility and

Business Ethics, in addition to ensuring compliance with the current legal and regulatory framework for these issues, thereby contributing to our common goal of making NBG the Bank of first choice.

4. Protecting the reputation and reliability of the Group and the cultivation/strengthening of our value system.

In the context of the policy, the Bank recognizes the interests and expectations of the Stakeholders and seeks to foster continuous communication/interaction through various communication channels, in accordance with internationally recognized standards, in order to understand, evaluate and meet the material issues that they are concerned about, i.e. the issues with the greatest importance in terms of the decisions and choices of the Stakeholders and those with the greatest socioeconomic importance.

The Bank's response to the concerns and expectations of its Stakeholders contributes in the medium-long term to the ongoing improvement of its operation, products and services. NBG Bank & Group Sustainable Development Policy is publicly available on our website and is also communicated to our employees through internal communications and awareness / training initiatives.

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 identifying and comprehending the most significant positive and negative impacts of our products and services on the society, the environment, and the economy, as an important mechanism informing our overall Sustainability/ESG strategy.

Therefore, in the context of our participation and commitment to the PRB, we are regularly conducting an in-depth impact analysis to identify potential positive and negative impacts of our Corporate, Business and Retail lending.

Our latest PRB Portfolio Impact Analysis exercise, performed in 1Q.2023, used FY2022 data and deployed the updated UNEP FI Portfolio Impact Analysis tool (Version 3, updated in February 2023). The analysis covered our exposures in Corporate, Business and Retail portfolios in Greece given that these operations accounted for c. 95% of Group's total lending activities as of 31 December 2022. Investment Banking line has been considered, but not included in the data analysis, as its incremental impact would not differentiate the results. It will be reconsidered for inclusion in the next Report.

Exposures arising from our international operations (North Macedonia, Cyprus, Romania, Bulgaria, Luxembourg, Netherlands, and the U.K.), as well as investment banking fees have been excluded from the analysis, as they were deemed immaterial.

Links and references

ESG Report 2021

- Impact Analysis, pages 46 – 55

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](#).

<p>GRI Materiality Analysis</p> <p>The GRI materiality analysis is an integral part of our ESG reporting, as it serves as a tool to recognize and appreciate the impact of our activities to our natural and socio-economic environment, as such impact is viewed and prioritized from the point of view of our Stakeholders.</p> <p>Our latest GRI materiality analysis took place in the context of our ESG Report for 2020 and was also used for the purposes of the ESG Report for 2021. We have scheduled a new materiality analysis to take place later this year to inform our ESG Report for 2022 (in compliance with the new GRI materiality methodology), however, in what concerns this second Self-Assessment & Progress Report, we have kept the former under consideration, deeming it as still relevant and useful in complementing the results of our most recent PRB Portfolio Analysis.</p> <p>The materiality analysis consists of three phases: Identification of relevant sustainability topics to the business model and the activities of the Bank, prioritisation of the identified topics and validation of the derived impact areas.</p> <p>Through its GRI materiality survey, NBG assessed and identified the material topics (including financed and non-financed impacts) relevant to the impacts they create to its stakeholders and the broader economy, society and the environment. The outcomes indicated the following as the bank's top material impacts:</p> <ul style="list-style-type: none"> ▪ Financed impacts Impacts of products and services to: climate change, circular economy (resource efficiency/security), creation of employment, acceleration of economic convergence, support of inclusive and healthy economies. ▪ Operational impacts In-house environmental impacts, customer financial protection, privacy & data security, occupational health, safety and wellbeing. 	
<p>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</p> <p>i) by sectors & industries³ for business, Corporate and investment banking portfolios (i.e., sector exposure or industry breakdown in %), and/or</p> <p>ii) by products & services and by types of customers for consumer and Retail banking portfolios.</p> <p>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.</p>	
<p>Response</p> <p>For the purposes of NBG's 2nd year Self-Assessment & Progress Report, the Bank focused its PRB Portfolio Impact Analysis on its business activities in Greece, which, as at 31 December 2022, accounted for 95.4% in terms of its total lending activities.</p>	<p>Links and references</p>

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

<p>For Corporate and Business portfolios, we further examined the breakdown of exposures to sectors based on the obligor's 4-digit NACE code and proceeded our analysis of the impacts of the top 50 sectors in terms of exposure (as per the UNEP FI tool guidance). In particular:</p> <ul style="list-style-type: none"> • Corporate portfolio: Impact analysis was performed for the top 50 4-digit NACE codes in terms of exposure (accounting for 82% of the total Corporate exposures). • Business portfolio: Impact analysis was performed for the top 50 4-digit NACE codes in terms of exposure (accounting for 59% of the total Small Business exposures). <p>For Retail portfolio, the analysis covers the total portfolio for Greece at a product level, considering credit cards, consumer loans, mortgages, education & vehicle-related loans, as well as targeted products towards vulnerable groups.</p>	
<p>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.</p> <p><i>This step aims to put your bank's portfolio impacts into the context of society's needs.</i></p>	
<p>Response</p> <p>The process to identify the Bank's most significant potential impacts is based on a combined assessment of the relative level of needs (importance) of impact areas for Greece, as included in the UNEP FI tool, combined with the feedback received during our engagement process with key stakeholders, aiming at identifying the most material impacts that need to be disclosed in our ESG Report (in compliance with GRI materiality methodology).</p> <p>In addition, we are monitoring the ongoing developments in the availability of sustainability-related data and information on sustainability matters for Greece, and we collaborate with a wide-range of stakeholders to incorporate country specificities in the development of our net-zero target setting process (work-in-progress) and product offering.</p>	<p>Links and references</p> <p>ESG Report 2021</p> <ul style="list-style-type: none"> ▪ GRI Materiality Analysis, pages 50 – 59
<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><u>2023 PRB Portfolio Impact Analysis</u></p> <p>The results of NBG's PRB Impact Analysis by portfolio, using the UNEP FI tool and FY2022 data, are presented below:</p>	<p>Links and references</p>

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

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 portfolio

Positive impacts: resources & services, and infrastructure

Negative impacts: climate & environment (circularity and biodiversity)

Business portfolio

Positive impacts: resources & services, and healthy economies

Negative impacts: climate & environment (circularity and biodiversity)

Retail portfolio

Positive impacts: resources & services, and socio-economic convergence

Negative impacts: resources & services, and climate

Prior Stakeholder Engagement Background

Following the results of the 2021 impact analysis and subsequent stakeholder engagement (on the basis of the -then- recognized topics), the Bank made a series of committing decisions to align its strategy and activity with the identified priority-impact areas, at the time.

In particular, the impact areas of "**Climate**" and "**Inclusive, Healthy Economies**" were prioritized as the most significant impact areas, given a) the Bank's lending portfolio and client structure at the time, b) the country needs assessment, and c) the long-term strategic orientation of the Bank. On the former, Climate, the aim was to reduce negative impact and, inversely, on the latter, Inclusive Economies, the aim was to increase positive impact.

In particular, around Inclusive, Healthy Economies, we intend to explore this area more deeply to further understand our impact, considering the local (country), potentially even local, challenges, as these are shaping and continuously changing (increasing decentralization trends, pandemic reinforcing digital as a way of transacting, digital nomads, etc.), so that we can better establish the link of our offering, especially the Retail and Small Banking business offering, with the needs and aspirations of the society and the local communities.

Co-assessing current portfolio analysis with prior stakeholders' input

For the purposes of this 2nd year Self-Assessment & Progress Report, we regarded the selection of 'Climate' and 'Inclusive, Healthy Economies' as still relevant and significant, as well as broadly aligned with the results of the most recent portfolio analysis, since the latter have confirmed the climatic concern across portfolios and the prevalence of inclusion and convergence on the positive impact side.

Therefore, in terms of PRB target-setting, we are keeping -as will be described in detail later on- our selected SMART targets in these 2 areas of impact.

It should be noted that in 2023, the Bank aims to proceed with its net-zero target setting and reperform its GRI materiality survey following the

<p>updated GRI methodology, as required in the context of our ESG Reporting.</p> <p>Therefore, we expect the outcomes of the above, in conjunction with the recent PRB portfolio impact analysis exercise, to guide the selection of our key impact areas going-forward, thus incorporating feedback from all relevant stakeholders and, accordingly, enhancing/adjusting our targets, as deemed fit.</p>	
<p>d) For these (min. two prioritized impact areas): <u>Performance measurement</u>: 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>We have, via the means of the above-mentioned quantitative and qualitative practices and tools, identified broadly the 'pools' in our portfolios (be it customers or be it type of lending (products) or be it economic sectors financed) causing the strongest actual positive and negative inside-out impact. These differ by impact area, and we are yet to complete the full -quantitative- assessment of their performance, especially in the second identified area, where we are looking into the country's and local specificities, with a view to potentially refine/adapt the indicators we want to monitor going forward.</p> <p>In particular for Corporate customers, the Bank introduced in April 2022 a set of ESG questionnaires and relevant assessment procedures (including sector-specific ones) to its lending processes. Their aim is not only to meet existing and forthcoming regulatory requirements, but also to address the issue of ESG data availability and granularity by implementing a robust data collection process to source client data. By collecting and storing customer-level ESG data, NBG will be better placed to identify and address the ESG impact of its Corporate lending portfolio, to balance both economic and sustainability objectives in its financing decisions, and to actively foster sustainable growth and transition towards a low-carbon economy, in line with its core values, vision and strategy.</p> <p>Regarding <i>Climate</i>, in order to reduce its negative impact, the Bank puts emphasis on promoting sustainable finance and investment, as well as "green" banking, in response to growing interest of customers in services and products that contribute to environmental protection and sustainable development. In that regard and within the context of the Environmental pillar of NBG's ESG strategy the Bank supports its clients</p>	<p>Links and references</p> <p>ESG Report 2021</p> <ul style="list-style-type: none"> ▪ Green banking products (for Retail banking customers), page 74 ▪ Supporting inclusive and healthy economies page 97 <p>More information is also available at NBG's website.</p>

through a series of actions, which are forming the basis for our performance assessment:

- Loans for the purchase, repair or construction of energy upgraded homes (Estia Green Home) and home energy improvement loans (Exoikonomo 2021).
- Green consumer loans for the purchase of energy efficiency and energy-saving products, including the purchase of new electric and hybrid vehicles.
- Green loans offered to Small Business customers for the financing of the installation of solar panels and the construction of photovoltaic power stations.
- Targeted propositions for the green transition of Corporate clients (in the context of the Ethniki 2.0 campaign/RRF program).
- Financing of Renewable Energy Source investments.

Regarding *Convergence & Inclusion*, in order to increase its positive impact, the Bank supports its clients via a series of initiatives, forming the basis for our performance assessment, indicatively through:

- Maintaining a presence in frontier regions and on small islands with a population of less than 5,000 people.
- Providing access to NBG products and services to people with disabilities, through the Bank's internet banking and its ATMs.
- Providing financing to small businesses with advantageous terms (e.g., loans for the support of women entrepreneurship).

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 checked="" 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 change mitigation & climate change adaptation
2. Inclusive, Healthy Economies

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

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

The Bank has gained a good understanding of key sectors' contribution to the - potential - positive and negative socioeconomic impact through its financing activity. These key sectors identification resulted from deep-dives performed to our Corporate, Business and Retail exposures through multiple internal or regulatory exercises over the last two years.

Indicative examples are the UNEP FI Portfolio Impact Analysis following our commitment to PRB, ECB's Climate Risk Stress Test exercise conducted in the first half of 2022, STE and Pillar 3 submissions in March and April of 2023, internal exercises aiming to review and expand our product offering, the Sustainable Financing Framework update, the Impact reporting accompanying our Green Bond issuance, our GHG emissions measurement etc.

Having identified its areas of most significant impact, NBG has set -and still maintains as relevant- two SMART targets to reduce the negative impacts on "Climate" and increase its positive impacts on "Inclusive, Healthy Economies":

Target 1 - Climate:

€600 million financing of renewable energy in 2022-25

Through our first target we aim to drive alignment with SDGs 7, 9, 11, 13 and 17 by financing the development of RES projects that contribute to the production of cleaner, climate friendly forms of energy. Moreover, the selected target is also linked to the EU Taxonomy Regulation and the Greek climate law 4936/2022 objectives, while it is in directional alignment with the country's pledge for emissions reduction (55% by 2030) and neutrality by 2050, as an increased portion of RES financing is bound to bring a notable drop in our financed GHG emissions in the heavy contributing sector of electric power generation (D35.1).

Target 2 - Inclusive, healthy economies:

3 million active digital users (12-month) by the end of 2024

Considering our second target, we aim to drive alignment with SDGs 4, 9, 10 and 17, through the provision of continuous access to our products and services for every client, reducing the barriers and making more

Links and references

Annual Report FY2022

- Non-Financial statement, page 74
- Non-Financial Statement, pages 86 – 88

ESG Report 2021

- ESG Risks, pages 42-45
- Impact Analysis, page 47

efficient the access to essential banking solutions and offerings. In the next months we intend to build on this existing target in a way we can - better- connect this to the impact made via our loan portfolio. To this end, we intend to explore the analysis possibilities of version 3 of the Portfolio Impact Analysis Tool for Banks or further internal analysis to adapt if/as necessary this target, so as to ensure it aligns with our intended social effect.

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:

Impact area	Indicator code	Response
Climate change mitigation	A.3.1	The Bank has set a target to achieve €600 million of new disbursements for RES projects within the period 2022-2025. (Corresponding to €150 million p.a., starting in 2022)
	...	
	...	

Impact area	Indicator code	Response
Financial health & inclusion	B.2.2	3 million active digital users (12-month) by the end of 2024 (Corresponding to ~ 180k increase p.a., on a base of 2.45 million as at YE2021)
	...	
	...	

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.

⁷ 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

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.

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	Links and references
<p>NBG is one of the leading banks in providing RES financing and continuously aims at enhancing its current market position through the development of dedicated products for, and the active engagement of its front-line with, Retail and Corporate clients.</p> <p>Within this context, our target corresponds to the provision of new disbursements for RES purposes of €150 million per year for the period 2022 – 2025. For now, we regard RES exposures as our baseline, however, taking into consideration UNEP FI feedback and issued guidelines for climate related target setting, we intend to use NBG's emissions data as a basis for strategic decision making in this area. Once our 2022 emissions inventory is in place and our NZ targets are specified for the short-, mid-, and long-term, we will be able to fully conform, shifting this climatic target, its baseline, and its monitoring, directly to GHG emissions reduction.</p> <p>Regarding NBG's commitment to contribute to more inclusive and healthy economies, the Bank focuses on increasing the number of active users of its digital services. NBG's Digital Strategy is to support the customer-centric business model, placing special emphasis on designing smart digital solutions that meet modern customer needs, and providing high quality transaction experience 24/7 through all digital networks. NBG focuses on the enhancement of the digital transformation process through the reduction of branch transactions and their channeling towards alternative networks.</p> <p>Within this context, our target corresponds to digital users' annual increase of 180k for the period 2022 – 2024 (linear approach to end-target). For now, we regard our active digital users (on a 12-month basis) as at YE2021 as our baseline, however, taking into consideration UNEP FI feedback and issued guidelines on financial inclusion and financial health target setting, we intend to take a step-approach and potentially refine this as required in the next months.</p>	<p>Annual Report FY2022</p> <ul style="list-style-type: none"> ▪ Key Highlights, pages 14, 88, 101

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	Links and references
<p>Target 1 - Climate: €600 million financing of renewable energy in 2022-25</p> <p>The Bank has set a Climate related target of extending €600 million financing of renewable energy in the period 2022-25.</p>	<p>Annual Report FY2022</p> <ul style="list-style-type: none"> ▪ Key Highlights, pages 13 – 14 ▪ Transformation Program

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

<p>The KPI used to monitor the target set is the total annual disbursed amount allocated to RES projects.</p> <p>Target 2 - Inclusive, healthy economies: 3 million active digital users (on a 12-month basis) by the end of 2024</p> <p>An Inclusive, Healthy Economies related target of reaching 3 million active digital users (on a 12-month basis) by the end of 2024 has also been set.</p> <p>The KPI used to monitor the target set is the total number of 12-month active users, i.e., users that perform at least one activity through the Bank’s digital channels on an annual basis. Per the UNEP FI Guidance on financial inclusion/financial health target setting, and in particular Digital Access, being our focus area for Target 2, this KPI constitutes our STEP 3 in a sequence of a 5-Step approach, coming as a result of appreciating country context and setting baselines and priorities, to our best current understanding (subject to refining as stated above).</p>	<p>Achievements in 2022, page 21</p> <p>ESG Report 2021</p> <ul style="list-style-type: none"> ▪ Impact Analysis, page 47
<p>d) <u>Action plan:</u> which actions including milestones have you defined to meet the set targets? Please describe.</p> <p>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.</p>	
<p>Response</p> <p>Climate</p> <p>Considering the specific climate-related target of extending €600 million financing on renewable energy sources in the period 2022-25, the Bank has integrated the aforementioned target within its annual and 3-year business plans, periodically monitoring progress and implementing actions and initiatives that will facilitate the attainment of this goal.</p> <p>More broadly, and in line with the three Climate and Environmental Themes of our ESG Strategy (“leading sustainable energy financing”, “accelerating sustainable transition”, and “role-modelling environmentally responsible practices”), the Bank undertook in 2022 important initiatives and implemented projects with positive impact on Climate, while also enhancing its internal practices (e.g., reporting and governance) in managing Climate and Environmental matters, in line with supervisory recommendations. Indicatively:</p> <ul style="list-style-type: none"> • Specific product offerings have been promoted to serve the two Climate & Environmental Strategic Themes regarding “leading the market in sustainable energy financing” and “accelerating transition to a sustainable economy” (for more details please refer to section 2.1 d). • A GHG Emissions inventory has been created (containing 2020 and 2021 data) and a baseline has been set with regards to the measurement and containment of the Bank’s carbon footprint, including both non-financed and financed emissions. 	<p>Links and references</p> <p>Annual Report FY2022</p> <ul style="list-style-type: none"> ▪ Key Highlights, page 13 ▪ Transformation Program, pages 21 & 22 ▪ Non-Financial statement, page 87 <p>Green Bond Impact Report 2022</p>

- A Sustainable Lending Criteria Framework has been established, in order to identify and classify the activities included in the Corporate lending portfolio that contribute to the transition towards a more sustainable economy.
- ESG Questionnaires for the assessment of Corporate lending, both at borrower and at transaction level, have been introduced.
- The allocation of net proceeds from NBG's €500 million Green Preferred Senior Bond has progressed (reaching completion in 1Q.2023), earmarking Green Bond funds to solar, wind and small hydro projects across the country.

The Bank continues working on the 'E' strategic themes, implementing a specific action plan, in the short- and medium-term:

- Regarding the goal to **lead the market in sustainable financing**, the Bank aims to capture domestic as well as regional opportunities in the energy sector, leveraging its leading position and the expertise of its teams. A Sustainable Financing Framework is being developed, which will include additional green financing categories alongside other -social in orientation- eligibility categories.
- Considering the ambition to accelerate the **transition to a sustainable economy**, the Bank focuses on the analysis of its financed emissions and is in the process of determining the relevant emissions' reduction pathways that will align its lending activities with the net zero goal. NBG will consider the results of this process and will articulate, in cooperation with its clients, specific actions, in order to support them during the decarbonization of their activities.
- In order to adopt **climate & environmentally responsible practices** the Bank will proceed with the necessary actions to reduce its operational emissions, will continue enhancing its ESG capabilities and infrastructure (data and reporting, risk management etc.) and will support through sponsorships activities that promote environmental awareness and innovation.

In support of the above strategic themes, we are putting in place an ESG Reporting Framework and a Reporting Tool/platform underpinning it, as part of NBG's Transformation Program, to enable the tracking of different metrics and KPIs associated with Sustainability (UNEP FI Targets included).

Inclusive, healthy economies

As a key pillar of NBG's Digital Strategy the Bank introduced new digital capabilities in combination with campaigns to promote digital channels which led to a significant acceleration of digital usage and engagement.

In particular, the Bank focuses on the acceleration of customers' migration to digital channels, through the offering of new solutions and customer experience enhancements such as:

<ul style="list-style-type: none"> • For individuals: NBG cards are “live” on Google wallet / Apple Pay and new transactions and products are available on internet & mobile banking. • For businesses / Corporates: new business mobile apps are “live”, enhancements were performed in online legalisation services and the digital migration to online platforms continues (Client Trade & i-FX), combined with the development of innovative solutions via Application Programming Interfaces (“APIs”). <p>In this second targeted area, per the UNEP FI Guidance and feedback, we will proceed with Steps 4 and 5, last 2 steps in a 5-step approach, to determine measures and actions, and finally to de(re)fine respective KPIs, in our focus topic of Digital Access.</p> <p>Regarding the do-no-significant-harm principle, from our current standpoint, we do not (fore)see any significant potential negative impacts by the above targets to other SDGs, but we remain alert and shall reevaluate this aspect in our next Report.</p>	
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	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 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

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

At NBG's 1st PRB self-assessment report, 2 SMART targets have been set. Specifically:

- a. **Target 1 - Climate:** €600 million financing of renewable energy in 2022-25
- b. **Target 2 - Inclusive, healthy economies:** 3 million active digital users (on a 12-month basis) by the end of 2024

Overview of actions and progress

Following the initial target setting, the Bank has taken the necessary actions and processes and is currently on-track for their achievement. In line with other actions that the Bank currently undertakes (e.g., updated GRI materiality survey, net-zero target setting etc.), NBG will review and recalibrate/update as necessary the above targets in alignment with its overall strategic objectives.

Target 1 – Climate

- The Bank has determined annual disbursements of at least €150 million to achieve the total of €600 million disbursements for the period 2022 – 2025.
- RES financing is promoted through Corporate and Retail banking initiatives.
 - **In Retail and Small Business Banking:** via a series of participations in European and local subsidized programs, partnerships with energy providers for the offering of financing for RES related equipment, and 'green' lending product development.
 - **In Corporate:** via channelling of the proceeds from the issuance of NBG's Green Bond (the first green senior bond in the Greek market) towards Renewable Energy projects financing. Moreover, as the target exceeds the amount of the net proceeds from the € 500 million Green Bond issuance, the Bank aims to also utilize its liquidity from different sources.
- RES targets are monitored frequently and at least on an annual basis by the ESG Management Committee. Business units have also

Links and references

Annual Report FY2022

- Key Highlights, pages 13 – 14
- Transformation Program Achievements in 2022, page 21

ESG Report 2021

- Impact Analysis, page 47
- Green banking products, page 74
- NBG's Green Bond, page 194




integrated the RES financing targets into their annual business plans.

Overall, the Bank is well above track to achieve the 1st target set for Climate, which is expected to be met by 2023, considering that in FY 2022 the disbursements in RES-related sectors was €541mn, while further changes are under evaluation to align its targets with the net-zero target setting strategy.

Target 2 - Inclusive, healthy economies

- The Bank has set a target for an annual increase of 180k active digital users.
- The introduction of new digital capabilities in combination with campaigns to promote digital channels led to a significant acceleration of digital usage and engagement in 2022 with digital active users reaching 2.7 million (+10.5% y-o-y).
- The Bank achieved acceleration of customers' migration to digital channels, through the offering of new solutions and customer experience enhancements:
 - For individuals: NBG cards are "live" on Google wallet / Apple Pay, new transactions and products are available on internet & mobile banking.
 - For businesses/ Corporates: new business mobile app is "live", as well as enhancements in online legalisation services; digital migration to online platforms (Client Trade & i-FX) continues, as well as the development of innovative solutions via Application Programming Interfaces ("APIs").

A digital leap forward creating a new competitive advantage

	Key digital metrics	New digital functionalities
 Onboard	<ul style="list-style-type: none"> • Digital subscribers 3.7 million (+7.4% y-o-y). • Mobile app downloads 3.6 million (+22.0% y-o-y). 	<ul style="list-style-type: none"> • Digital onboarding enhancements. • Online Sole Proprietorship onboarding via NBG Mobile Banking (January 2023).
 Engage	<ul style="list-style-type: none"> • Digital active users (12 months) 2.7 million (+10.5% y-o-y). • Digital active users (1 month): 2.3 million (+10.6% y-o-y). 	<ul style="list-style-type: none"> • Contactless Payments via Mobile Banking: NBG cards on Google Pay and Apple Pay. • FX transfers for all bank customers. • Request for remittances' fate and request for amendment via Internet Banking. • Internet & Mobile Banking based on Accessibility Compliance standards for people with disabilities. • Instant notifications service for business users. • Second Authentication Factor using Push OTP.
 Gross-sell	<ul style="list-style-type: none"> • Digital sales c.275 thousand products (+25.1% y-o-y). 	<ul style="list-style-type: none"> • Expansion of online repayments to a wide range of lending products. • New products added in the digital sales portfolio (new credit card offering, Money Box savings tool, New Generation investment). • Increase of Express personal loan credit limit from €2,000 to €6,000.

Considering the previous year's performance, NBG is currently above track to achieve its 2nd target, and it is expected to be met by 2024 or earlier.

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

Our vision is to become the bank of first choice for our customers, but also to attract talent and investors. A trustworthy, human, responsive bank that acts as a growth catalyst and unlocks potential for households, businesses, and communities.

NBG acknowledges that the journey towards establishing sustainable and sound climate and environmental practices involves a series of actions within the short-, medium- and long-term horizons. To that end, the Bank is already pursuing key priorities across the three strategic themes encapsulating its climate change and decarbonization strategy as part of its overall ESG Strategy.

Foster sustainable practices

NBG appreciates that the provision of financing by the Bank leads to environmental impacts depending on the activity financed. The Bank puts emphasis on promoting sustainable finance and investment, as well as "green" banking, in response to growing interest of customers in services and products that contribute to environmental protection and sustainable development and reduce the impact of climate change.

In this context, NBG already plays a leading role in the energy financing and in supporting the transition towards more sustainable business models. Indicatively:

- The Bank promotes **sustainable energy financing** and following the issuance of the Green Bond Framework, a Sustainable Financing Framework is being developed (incl. -by design- a set of detailed and transparent eligibility criteria for the selected projects/assets and 3rd-

Links and references

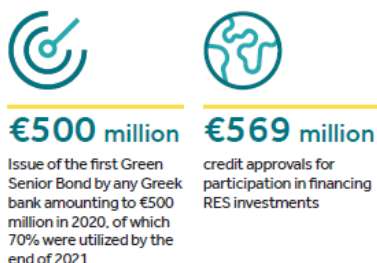
Annual Report FY2022

- Key Highlights, page 13
- Non-Financial Statement, pages 86 – 91, 94 – 98

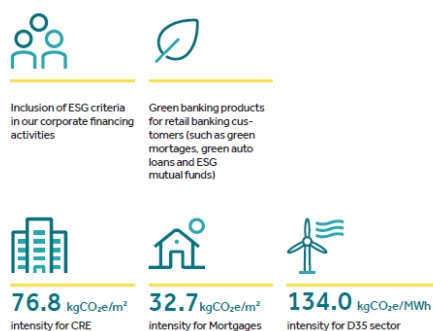
ESG Report 2021

- Our Sustainable Finance, Climate Change and environmental Strategy, pages 69 – 76
- Society, pages 96 – 106

party verification), which will include additional green eligible activities alongside other, social in orientation, eligibility categories. NBG's goal is to further promote energy financing by leading regional RES projects and promoting sustainable solutions for small businesses, as well as offering innovative products that will facilitate the process of energy transition.



- NBG aims to contribute to the **acceleration of the transition to a sustainable economy**. The Bank established a financed emissions baseline (its GHG emissions inventory for 2020 and 2021, adding now 2022 in this time series), and is in the process of defining an emissions' reduction trajectory for specific sectors comprising its lending portfolios as the most impactful asset class, by applying science-based methodologies. Considering the results of the target setting process, the Bank will focus its actions on carbon intensive sectors, and in cooperation with its clients, will formulate specific plans to achieve the reduction in emissions required by the relevant transition pathway.



- NBG's goal is to strongly **support** its corporate clients throughout their **decarbonization journey**, by offering sustainable financing and continuous engagement (advisory role). Indicatively, Corporate clients' initiatives already include the offering of targeted propositions for green transition in the context of the Ethniki 2.0 program, while new packaged solutions focusing on sustainable value chains are planned. The offering of targeted products to meet the increasing demand of Retail customers, consumers and small

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, for transition financing will have to be expanded / adjusted e.g., through new partnerships for financing green transportation and housing ecosystems, over and above existing green products for the energy upgrades of homes, the purchase of hybrid or electric vehicles, etc.

- Furthermore, the Bank has enhanced its **lending policies and processes** incorporating environmental (including climate change), social and governance criteria applied both at obligor and transaction level. The Bank introduced in April 2022 a set of **ESG Questionnaires** (including sector-specific ones) to its lending processes, both for new lending and refinancings for corporate clients. In this context, documentation, and tools (i.e., ESG process guidelines, user manuals, ESG scoring methodologies, ESG specific scorecards) have been developed and are used by the corporate underwriters in order to assess and classify obligors and transactions in terms of ESG related risks and sustainability lending criteria.

Promoting responsible relationships with our customers

At NBG, our programs, actions and practices focus on the promotion of responsible relationships with our customers, via:

- **Customer financial protection** - Emphasis on customer financial protection is pursued through the implementation of procedures for controlling newly launched products and services, approved by dedicated Product Committee as per the Regulation governing the introduction, modification, withdrawal of the products and services of the Bank.
- **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 in detail the management of customers' complaints, as well as 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 being submitted by third-parties.
- **Protection of personal data** - through the development of NBG Group Data Protection Policy, Policies for Data Security and Data Governance in compliance with GDPR: All these Policies further enhance the existing framework for data security, data protection and appropriate data governance, while at the same time they set out a uniform framework of principles and rules at Group level, by observing the applicable respective national statutory law of the country where each Group Company is active.

- **Fraud Case Management Committee** - responsible for the evaluation and decision-making for the recovery of the Bank's customer accounts in case of fraud, for transactions carried out through digital banking (internet & mobile banking) and through cards.
- **Product & Service array** - NBG offers a wide range of financial products and services that aim to meet the ever-changing needs of our Retail and business clients, effectively and comprehensively, and optimize customer experience and satisfaction, ensuring at the same time transparency and responsible information.
- **Training on customer centricity** - NBG has in place extensive and long-term development activities supporting the Bank's Transformation Program effort in the area of people development with a variety of in-house and external learning programs focused on developing technical, behavioral and leadership skills. We focus our efforts on enhancing the customer-centric culture of the Branch Network, through systematic training activities aiming to empower our front line to provide first-class customer service and experience. Lastly, compulsory e-learning programs on ethics, values, anti-fraud, AML/CFT, whistleblowing, risk management and internal controls have significantly strengthened our efforts to establish an appropriate culture among our employees.
- **NBG Group Remuneration Policy** - via specific provisions preventing the remuneration of sales personnel from being based solely on financial (P&L) criteria and goals, narrowly promoting the Bank/Group' interests (and not those of the consumer/customer, aiming to restrict mis-selling practices and ensure compliance with bestselling and consumer practices).

Supporting entrepreneurship and innovation

Supporting Digitalization

The Bank places special emphasis on supporting its customers through the design of smart digital solutions that meet customer needs. NBG's electronic banking services benefit all our customers, whether individuals or businesses, and at the same time help reduce our environmental footprint.

The introduction of new digital capabilities in combination with campaigns to promote digital channels led to a significant acceleration of digital usage and engagement in 2022:

- Digital active users reach 2.7 million (+10.5% y-o-y).
- 17.5% y-o-y increase in transactions via digital channels.
- 25.1% y-o-y increase in sales via digital channels.

Supporting Entrepreneurship – NBG Business Seeds

NBG Business Seeds is an integrated program designed to foster innovative and export-oriented entrepreneurship. NBG Business Seeds includes actions that aim at showcasing innovative ideas and projects, training and mentoring young entrepreneurs, and providing

infrastructures, networking and financing. Once the annual competition "Innovation & Technology" is over and the awards given, NBG supports the implementation of selected proposals that are distinguished.



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.).

Response

Climate

The Bank is aware that the transition journey into climate friendly economies will involve great challenges ahead, but at same time will create opportunities for products and services that contribute to the achievement of the Paris Agreement goals and of the National climate strategic objectives. NBG is already providing products and services with 'Green' characteristics and aims to further enhance its current portfolio with offerings that incorporate robust criteria aligned with national and international standards and best market practices on sustainable activities.

In line with its environmental strategic themes of (1) leading the market in sustainable energy financing and (2) accelerating the transition to a sustainable economy the Bank builds on and enhances the energy and environmental potential of Greece, as follows:

- 'Green' financing through an array of products and services, such as the Green Loan, Estia Green Home, Exoikonomo 2021 etc.
- Renewable Energy financing via a special team that handles applications for funding of Renewable Energy Sources (RES) projects and provides advice to potential project finance investors, as well as to SMEs.
- Green Bond Issuance: Within the two years of the issuance, 100% of the proceeds have been allocated to 58 renewable energy projects across Greece:
 - Environmental infrastructure projects (via central government or local authorities' organizations).
 - Investment in environmental protection, "clean" technology, certification of environmental management systems, saving energy and natural resources.
- NBG 2.0: As part of supporting the sustainable economy transition, the Bank has established the NBG 2.0, in alignment with the "Greece

Links and references

Annual Report FY2022

- Non-financial statement, pages 88 - 89

ESG Report 2021

- Green banking products, page 74
- Our sustainable finance social strategy, page 97
- NBG's Green Bond, page 194

2.0: National Recovery and Resilience Plan”, which is structured around 5 pillars, including the green transition of the Greek economy. In order to identify the areas with increased potential for sustainable and transition financing, the Bank has performed, in cooperation with external consultants and subject matter experts, various analyses of the transition investments required in Greece for a period of up to 2050. During that process, specific sectors and activities have emerged as the ones with the greatest potential for transition financing, such as transportation (electric vehicles), energy upgrade of buildings, renewable energy sources and sustainable agriculture.

We acknowledge that the aforementioned activities are merely an indication of the areas that the Bank’s efforts should focus on, however they provide a valuable starting point for the design of dedicated products and services. NBG seeks to continuously update its understanding of the actions required for the sustainable transition of the Greek economy, in order to provide a complete set of products and services that cover the transition needs of its clients.

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

Inclusive, Healthy Economies

NBG constantly seeks to contribute to the creation of positive economic and social impacts for its Stakeholders and more broadly for the economies and societies where it operates through its activities (the provision of funds, products and services). The Bank focuses on promoting Inclusive, Healthy Economies through a series of programs such as:

- The provision of financial services and products with equal treatment and without exclusions.
- The access to finance without discrimination or exclusion.
- 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.
- The protection of customers' financial decisions, of their data privacy and information.
- The presence of the Bank in frontier regions and on small islands with a population of less than 5,000 people.
- The provision of access to NBG products and services to people with disabilities, through the Bank’s internet banking and its ATMs network.
- The provision of financing to small businesses with advantageous terms (e.g., loans for the support of women entrepreneurship).

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

NBG is also in the process of developing its Sustainable Financing Framework that will incorporate eligible social activities, for the use of the proceeds of any future sustainable bond issuance. Part of the proceeds of such a potential bond issuance could be channeled to funding that supports entrepreneurship, innovation and 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

NBG's stakeholders comprise individuals and legal entities who influence and are influenced or are likely to be influenced by NBG's business decisions and activities. The Bank applies specific procedures to identify its stakeholders and engages with its stakeholders on a regular basis through dedicated processes and communication channels and analyses the key issues of concern and expectations that arise for each stakeholder group.

Accordingly, 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)

NBG communicates on a regular basis with each stakeholder group as it considers important to obtain the necessary information to improve its actions. Stakeholder engagement aims at identifying key topics and acceptable solutions with mutual benefits through correct business practices.

Links and references

Annual Report FY2022

- Corporate Governance Statement, pages 81 – 84

ESG Report 2021

- ESG at NBG, pages 50 – 59

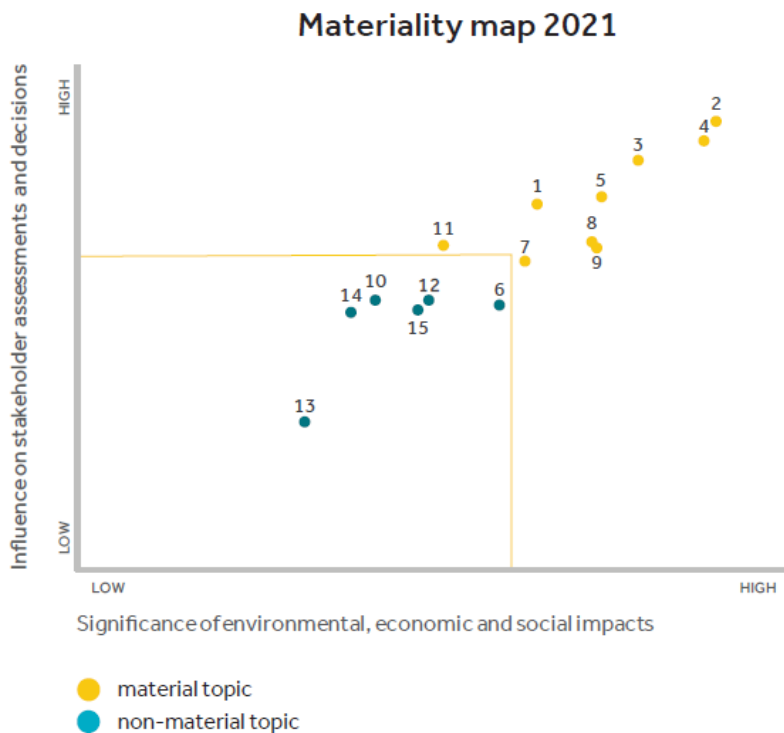
¹² Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations

The expectations of stakeholders, as well as the business environment in which the Bank operates, are constantly evolving. Evaluating the key issues helps us to identify and prioritize the environmental, socio-economic and governance issues that are of highest concern to stakeholders and the Bank.

This process is carried out annually or no later than every two years and was last completed in October 2021. In the context of the Bank’s ESG Report, which is being evaluated by third parties and various Rating Agencies, NBG applies the AA1000 Accountability Principles Standard (“AA1000 APS” 2008), in order to include the relevant stakeholders (as recognized by the Bank) in the process of identifying, understanding and responding to ESG issues.

Stakeholder engagement in the context of GRI materiality process

Our Strategy has taken into account the GRI Materiality, Completeness, Sustainability Context and the Stakeholder Inclusiveness Principles. In 2021, we carried out a materiality e-survey that was considered in the process of our ESG reporting and was found in line with our strategic direction for ESG. Through the materiality e-survey, the material topics that NBG has identified as relevant to the impact it creates to its stakeholders and to the broader economy, society and environment were assessed, resulting in the materiality map below, along with their prioritization.



Identified sustainability topics

Financed impacts

2	Impacts of products and services to climate change
3	Impacts of products and services to the acceleration of the circular economy (resource efficiency/security)
4	Impacts of products and services to the creation of employment
5	Impacts of products and services to the acceleration of economic convergence
6	Impacts of products and services to the provision of housing
7	Impacts of products and services to supporting inclusive and healthy economies

Operational impacts

1	In-house environmental impacts
8	Customer financial protection
9	Privacy & data security
10	Human capital development
11	Occupational health, safety and wellbeing
12	Dignity and equality (i.e., equal opportunities, diversity, human rights)
13	Governance body composition, roles and responsibilities
14	Regulatory compliance and business ethics (i.e., anti-corruption, anti-competitive behavior, responsible tax payments, data protection, responsible procurement, remuneration policy etc.)
15	Risk management (i.e., incorporation of ESG Factors in Credit Analysis)

A new materiality analysis is scheduled to take place within the context of the 2022 ESG Report, in compliance with the GRI materiality methodology (2021). In accordance with the new methodology, the Bank shall describe:

- how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships.
- how it has prioritized the impacts for reporting based on their significance.

As expectations of stakeholders and business environment are constantly evolving, we will strive to maintain frequent engagement in order to be able to timely identify and prioritize the most important issues and impact areas. In this spirit, we are considering possibilities around collaboration and/or partnering with organizations/institutions active in this area that could support us in deepening our expertise or enhancing our assessment of impact areas.

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 roles and responsibilities

The Bank has assigned the responsibility for the management of climate related and environmental risks throughout its organizational structure, cascading through the 3 lines of defence, and has also established new Committees (BoD Innovation and Sustainability Committee and ESG Management Committee) to further enhance the overall management and oversight of C&E risks and ESG matters.

Sustainability oversight at Board level

As per NBG's Corporate Governance Code, the Board is responsible for setting strategy, overseeing management and adequately controlling the Bank, with the ultimate aim of enhancing the long-term value of NBG and upholding the general Corporate interest in accordance with the Law. The Board focuses on sustainability and consider, among others, climate-related and environmental issues when developing the overall business strategy, objectives and risk management framework, and exercise effective oversight of ESG risks (including climate-related and environmental risks). Within this context, the Board ensures that material environmental and social considerations are integrated into the Bank's strategy, business model and risk management system, and are addressed in its public disclosures.

- **BoD Innovation and Sustainability Committee**

The recently established Innovation and Sustainability Committee, formed at Board level (established by Board decision in February 2022), has as its purpose to act as a dedicated body to support the Board of Directors in ensuring there is continuous monitoring and tracking of important developments and long-term trends related to

Links and references

Annual Report FY2022

- NBG at a glance - About Environment, Social and Governance, page 6
- Corporate Governance Statement, pages 131 – 132, 148 – 150

ESG Report 2021

- Sustainability governance, pages 156 – 158

More information regarding the Bank's **Sustainability Governance** is available in the following sources:

- Compliance, Ethics and Culture Committee Charter, page 9
- Innovation & Sustainability Committee Charter, pages 4 and 6

innovation, sustainability, Information Technology, ESG and banking. The aim of the Committee is to ensure that the Board possesses the necessary awareness of how the financial landscape is evolving and has updated knowledge of the factors that may affect Bank's long-term strategy, its position in the market and the perception that stakeholders have about the Bank. Within this context it may provide feedback to the Compliance, Ethics and Culture and other Committees, for further consideration.

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

The Compliance, Ethics and Culture Committee assists NBG's Board of Directors in performing its duties among others with regards to enhancing responsible company and management behaviour towards sustainable growth and long - term value creation. In particular the roles and responsibilities of the Committee include:

- The oversight of Policies that the Bank adopts in compliance with the regulatory framework and best practices (incl. on ESG and sustainability).
- Oversight of the management of the Bank's staff compliance and ethical conduct and assessment of the extent to which the Bank is managing its compliance risk effectively (incl. compliance risks stemming from C&E risks).
- Interaction with the Innovation & Sustainability Committee, with regards to long-term trends or significant developments especially on ESG and sustainability.

- **Board Risk Committee (BRC)**

The BRC has two roles, namely it operates: a) as the Board Risk Management Committee and b) as the Board Committee Responsible for Non-Performing Loans/Exposures (NPLs/NPEs) as prescribed by Art. 10 par. 8 of Greek Law 3864/2010, as in force. Amongst other responsibilities, the BRC is responsible for:

- Independent challenge, approval and oversight of the overall framework for managing financial and non-financial risks (incl. C&E risks) and the effectiveness and efficiency of risk management of the Bank and the Group.
- Definition of risk appetite (incl. risk tolerance & risk capacity thresholds), as well as development and implementation of risk strategy, considering all types of risks (incl. C&E risks), in line with business strategy, objectives, culture and values of the Group.
- Oversight of risk frameworks, policies and resources for managing, monitoring and mitigating risks that the Group is exposed to (incl. C&E risks).
- Ongoing monitoring and supervision of the management of different types of risks, including the overview of the C&E stress testing content, execution and outcome.

- Corporate Governance Code, pages 3-8, 23-27
- NBG Bank & Group Sustainable Development Policy, pages 7-8

- Fostering of a risk awareness culture as a core component of effective risk management (incl. with respect to C&E risks), ensuring sound risk governance arrangements and management incentives/disincentives are in place.

Sustainability management at the Executive level

• ESG Management Committee

The ESG Management Committee was established in November 2021 to strengthen the governance of multiple aspects of NBG's ESG strategy and its implementation. In this context, its purpose is to continuously promote sustainable development and responsible entrepreneurship. The Committee's aim is also to monitor the effective management of ESG, sustainability and sustainable financing issues, in line with regulatory requirements, while taking into account best practices included in international treaties and initiatives.

ESG Management Committee set up



- Committee Purpose**
- Foster the Bank's strategic commitment to sustainable development and corporate responsibility.
 - Manage ESG matters incl. environmental performance, health and safety, CSR, corporate governance and other sustainability matters.

- Committee Responsibilities**
- Ensures adherence to the relevant regulatory framework for ESG and sustainability (incl. on matters relevant to the management of C&E risks).
 - Considers trends and best-practices (over and above the legal framework/regulatory expectations).
 - Determines the Bank's overall strategy regarding ESG and sustainability issues (incl. matters relevant to the management of C&E risks).
 - Oversees execution of the Bank's ESG strategy (incl. on matters relevant to the management of C&E risks).
 - Decides on ESG and sustainability KPIs and targets (incl. for C&E risks and greenhouse emissions).
 - Monitors and assesses performance against ESG and sustainability KPIs and targets (incl. for C&E risks and greenhouse emissions).
 - Decides on the policies, initiatives and actions that result in mitigating and/or reducing the environmental impacts and footprint of the Bank.
 - Approves the Bank's disclosures concerning non-financial information and regular public disclosures regarding ESG and sustainable financing issues.
 - Oversees internal and external communications with respect to ESG and sustainability issues.

Group Corporate Social Responsibility & Sustainability Division

A dedicated Group Corporate Social Responsibility & Sustainability Division is competent for Corporate social responsibility, as well as sustainability and climate change related issues. Executives of the said Division refer to the Group Chief Compliance and Corporate Governance Officer, who reports directly to the Board's Compliance, Ethics and Culture Committee as the competent Committee for overseeing the Bank's Corporate Social Responsibility policies, community investment, environmental, climate change, social and other similar projects and activities.

Group Climate & Environmental (C & E) Strategy Sector

A new Group Climate & Environmental Strategy Sector has been established in December 2022 and is operating under the Group General Manager of Transformation, Strategy & International Activities. It is responsible for co-ordinating and supporting the first line in shaping and executing C & E strategic initiatives, as well as for the incorporation of ESG considerations (and in particular C & E related/dependent input) into the business plan and budgeting process (in coordination with all involved units).

Strategic Risk Management Division, Risk Culture & Risk PMO

Strategic Risk Management Division has been assigned with the role of exercising a holistic view on C&E risk content, being the central C&E reference point within Risk Management. More specifically, it aims to align C&E risk management processes involving the different risk divisions/experts across risk types (including the execution of C&E Stress testing), as well as to serve as a central point of interaction with the NBG Strategy executives. The above setup is supported in terms of coordination by the Risk Culture & Risk PMO Division.

Internal Audit

Internal Audit is responsible for the assessment of Bank's capacity and capability to manage C&E risks through relevant Audit diagnostics and reviews.

Overall, it should be highlighted that NBG continues to evolve in terms of its Sustainability Governance, in line with regulatory guidance/feedback, good international practices, and the direction of the Bank's ESG strategy.

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).

Response

NBG constantly seeks to ensure that its contribution substantially impacts the country and its people, always looking ahead to the next day of the Greek society. The Bank realises its institutional responsibility to create positive economic and social impacts for its stakeholders and more broadly for the economies and societies where it operates, and it does so through its activities (the provision of financing, and more broadly banking products and services), its role as an employer, as well as via its CSR actions.

To this end, a brief overview of our selected actions performed to foster a culture of responsible banking among our employees is included below, with further details described within the NBG Annual Report FY2022 and ESG Report 2021.

Training

The Bank contributed to the development of its staff, providing over 220k training hours and doubling the training budget in 2022.

Number of training events	Number of participants	Training Hours
1,351	55,890*	225,584

*Of which the unique participants amounted to 8,017.

Links and references

Annual Report FY2022

- Non-Financial Statement, pages 91 – 94

ESG Report 2021

- Our Operational Social Strategy, pages 113 – 141

The Bank delivers e-learning programs on NBG Group's Code of Ethics, which focus, among others, on bribery and corruption issues and are mandatory for all employees. At the same time, new mandatory e-learning programs have been issued, relating to the updated Cyber-Security and Anti-Money Laundering policies, while e-learning programs on work ethics, the whistle-blowing policy and internal control continue to be available to all Group personnel, significantly backing the Bank's efforts to establish a respective culture among its employees.

Furthermore, the Bank is in the process of enhancing its training offering by providing a new Senior Management engagement and awareness program on climate and sustainability aspects to set the tone from the top, as well as a Bank-wide ESG basic awareness program. Through this structured discovery and learning process, NBG employees will gain a better understanding of the impending challenges posed by environmental issues, cover basic knowledge gaps, but more importantly develop the skills to identify business opportunities that are in line with NBG's overarching environmental strategic themes. This program will empower our workforce to proactively address the evolving ESG landscape and leverage it to drive sustainable growth.

Listening to our people

In May 2022, the 2nd Employee Experience Survey was conducted, giving to all employees the opportunity to express their views pointing out what they perceive is working well at NBG and where there is room for improvements. A "Value Index" was also introduced in the survey in order to establish whether employees believe that the behaviour of Senior Management and the Heads of Teams is consistent with the Bank's Values.

Employees were informed about the results of the Survey through open discussions held at team level. The aim of these discussions – over 100 in total, across the organization – was the preparation of action plans for the areas of concern in their day-to-day activities and to explore how, through targeted actions, they can enhance experience, cooperation and efficiency. By the end of 2022, 80% of the expected action plans had already been completed and submitted to HR.

In addition, regular and open internal communications are carried out at a Bank level, aiming to enhance transparency, as well as to disseminate the Bank's strategy and orientation to all employees. Indicative actions include:

- CEO Breakfasts, Management Team visits to the Branch Network, meetings at General Division and/or team level.
- "NBG Talks":
NBG Talks is a new platform allowing live talks given by specialized partners and experts from the market which are accessible by all NBG personnel. The talks focus on 3 main pillars involving contemporary topics and concerns: efficiency in the work environment, cultivation of soft-traits and mindset in the "new era" that affect the quality of our work experience, matters of well-being etc.

<ul style="list-style-type: none"> • <i>NBG Newsletter "The Bank is each and every one of us":</i> It includes a host of news and recent Bank successes as well as special sections such as interviews of members of the Management Team and "Expert Talks" with guest professionals and experts from various sectors. • <i>Central NBG Online platform for conferences/speeches/events:</i> In November 2022, the process for the supply of an online platform for events hosting was completed, enabling the performance of virtual and hybrid live events/conferences/speeches for the Bank's staff and its customers. • <i>"ASK HR" Function:</i> Through the new "ASK HR" channel, employees can communicate directly with HR by email or phone, as well as through the relevant Intranet site for HR related topics. <p>Remuneration</p> <p>NBG acknowledges the fact that responsible banking can be promoted through an incentives system that promotes a specific set of behaviours. In order to align our ESG strategy with the incentives provided to the Bank's teams, we have embedded ESG criteria in our Performance Management regarding senior executives:</p> <ul style="list-style-type: none"> • NBG's Variable Remuneration Scheme, for the reward of NBG personnel in with the annual performance score- • As in 2022, ESG related targets and KPIs were included in the 2023 Performance Management System for the Top Management. 	
<p>5.3 Policies and due diligence processes</p> <p>Does your bank have policies in place that address environmental and social risks within your portfolio?¹³ Please describe.</p> <p>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.</p>	
<p>Response</p> <p>Acknowledging the importance and potential impact of ESG risks, the Bank has 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:</p> <ul style="list-style-type: none"> • Incorporated C&E risks in its Risk identification, by recognizing in its Risk Taxonomy Framework ESG as transversal, cross-cutting risks (rather than stand-alone) and considering them as drivers of existing types of financial and non-financial risks. 	<p>Links and references</p> <p>Annual Report FY2022</p> <ul style="list-style-type: none"> ▪ Non-Financial Statement, pages 73 – 75 ▪ Non-Financial Statement, page 87 <p>ESG Report 2021</p> <ul style="list-style-type: none"> ▪ ESG Risks, pages 42 – 45

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.

- Developed a methodological approach to assess the materiality of ESG risks as drivers of existing types of financial and non-financial risks.
- Incorporated ESG risks/drivers in the Risk Management Framework of the existing risk types and implemented the necessary enhancements into their area of expertise, as follows:
 - The Bank incorporated the assessment of ESG risks in its Credit Granting & Monitoring Process of the Corporate portfolio.
 - ESG related qualitative and quantitative risk metrics (C&E metrics for monitoring purposes) have been introduced to the Risk Appetite Framework of the Bank.
 - The Bank aligned the NBG Risk Taxonomy and all other Operational Risk Programs with the inclusion of ESG risks based on the requirements set by the competent authorities.
 - The Bank incorporated ESG risks in the ICAAP/Internal ST Frameworks.

Sustainable Lending Criteria and ESG Assessment Questionnaires

The Bank has enhanced its lending policies and processes incorporating environmental, social and governance criteria, applied both at obligor and transaction level. In this context NBG has established a Sustainable Lending Criteria Framework (SLCF), in order to identify and classify the activities included in its Corporate lending portfolio against sustainability criteria. The Framework outlines the rationale of classification of an activity as sustainable, building upon the EU Taxonomy Regulation and the Sustainability-Linked Loan Principles (SLLP).

Moreover, the Bank introduced in April 2022 a set of ESG Questionnaires (including sector-specific ones) to its lending processes, both for new lending and refinancings for Corporate clients. In this context, documentation, and tools (i.e., ESG process guidelines, user manuals, ESG scoring methodologies, ESG specific scorecards) have been developed and are used by the Corporate underwriters in order to assess and classify obligors and transactions in terms of ESG related risks and sustainability lending criteria. The aim is not only to fulfil existing and forthcoming regulatory requirements, but also to address the issue of ESG data availability and granularity.

Action Plans on ESG Risks

Going forward, the Bank is planning to further enhance the incorporation of ESG factors in its Risk Management Framework, as methodological approaches mature, quantification/analytical capabilities develop, and additional climate and environmental data become available.

Moreover, key initiatives relevant to the implementation of the ESG strategy are being included in the Transformation Program to ensure a high level of focus and execution discipline in the aforementioned critical areas. Planned actions are summarized as follows:

- Enhancement of C&E Credit Risk Capabilities through:
 - Further integration of C&E risks in lending policies (limits, thresholds, etc.)

<ul style="list-style-type: none"> ○ Adjustment of risk classification procedure via linking C&E risks with credit risk ○ Incorporation of C&E risks into loan pricing, and ○ Regular monitoring of credit risk's C&E risk drivers ● Launch of the regular operational Climate risk monitoring, covering materially affected risk types, for historical/static KRIs. ● Execution of a pilot set of forward-looking Climate risk stress projections (medium-term, under static approach). 	
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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 provided responses within this PRB report have not been independently assured.

PwC provided limited assurance on the accuracy and completeness of certain quantitative indicators, linked to the Bank's material issues, as part of the ESG Report 2021 and NBG Group Annual Financial Report 2022. For more details, please refer to the PwC assurance reports included in the respective publications.

We appreciate that 3rd-party independent verification will be required in future reporting, per the UNEP FI Guidance on Step 3-Accountability.

Links and references

Annual Report FY2022

- Non-Financial Statement, pages 176 – 182

ESG Report 2021

- ESG Risks, pages 237 – 241

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: ATHEX ESG, RobecoSAM, CDSB & EU guidelines for NFR, OECD Guidelines for MNEs

Response

Within the scope of the requirement for the disclosure of non-financial information in the Annual Report FY2022 as well as the ESG Report 2021, the Bank took into account 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 non-financial reporting: Supplement on reporting climate-related information.

Links and references

Annual Report FY2022

- Non-Financial Statement, pages 81
- Business Overview, pages 37 and 40

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.

Response

The Bank has already begun incorporating key ESG strategic areas into its overall business strategy. In this context, NBG will articulate a complete ESG strategic roadmap, comprising a set of actions which will be implemented in the short-, medium- and long-term horizon.

Climate

Regarding the area of "leading the market in sustainable energy financing" NBG plans to implement a series of activities such as:

- Finalizing its Sustainable Financing Framework, which will include additional "Green" (e.g., energy efficiency) and "Social" eligible categories, as compared to the existing Green Bond Framework.
- Continuing the expansion of its Corporate RES financing, considering domestic as well as regional opportunities in the energy sector, leveraging its leading position and the expertise of its teams.
- Setting up a dedicated task force within Structured Finance team to pursue regional RES/energy opportunities.
- Further promoting Retail RES products (e.g., green SB loans for photovoltaics) by developing a network of relevant partnerships (B2B, B2C).

Considering the Bank's strategic goal to accelerate the transition to a sustainable economy, NBG has already measured (based on the PCAF methodology) its financed and non-financed emissions for 2020 and 2021 and is in the process of measuring the same for 2022. Moreover, NBG is initiating its journey of setting and committing to GHG emission reduction targets and supporting the transition of its clients. Specifically, after the Bank gains a detailed understanding of the transition pathways for selected sectors/asset classes (focusing on carbon-intensive ones), and the relevant business implications, the Bank will articulate its financed emissions reduction strategy and translate it into concrete action plans to be followed for the decarbonization of its portfolio. Finally, the Bank will commit to its emission reduction targets (by applying science-based methodologies), monitor the progress of the decarbonization process against targets set and proceed with any remediation actions as required.

In the context of adopting climate & environmentally responsible practices, the Bank will continue its efforts towards decreasing its operational (non-financed) emissions aiming to contribute to the Bank's net zero goal. NBG will continue supporting and sponsoring environment-related initiatives and will further accelerate the improvement of its ESG capabilities and infrastructure in terms of ESG

Links and references

Annual Report FY2022

- Non-Financial Statement, pages 84 – 88

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.

data and reporting, governance, risk management, awareness & culture, etc.

Financial health & inclusion

In order to increase the number of active digital users the Bank aims to leverage the latest technology and expand its digital offering. By providing enriched digital services to customers, NBG will enable further migration of transactions to digital channels, providing an engine for robust future growth. In particular, the redesign of the internet banking service for Business and Corporate customers, as well as the new revamped mobile banking application for Retail customers will upgrade the customers' digital experience (customer journeys) and help NBG maintain its significant position in the market of internet and mobile banking services.

In addition to the above, a new materiality analysis is scheduled to take place in view of the upcoming 2022 ESG Report, in compliance with the updated GRI materiality methodology. We will consider the input from the Bank's stakeholders to re-assess and re-prioritize if needed the impacts that NBG creates to its stakeholders and the broader economy, society and environment.

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

Key challenges that we have faced so far include data availability, quality and reporting capabilities.

At NBG, we understand that without easily accessible, complete and accurate data, it is difficult to monitor and manage our performance, progress vs. targets and fulfil the relevant reporting requirements, as well as to track the effectiveness of our initiatives. Therefore, as the Bank accelerates its ESG transformation journey, the emphasis on high-quality, verifiable, and consistent data has become increasingly important.

In that regard, at the back of and in continuation of a series of data issues identification and remediation (resulting from recent / current reporting exercises), the Bank is currently implementing a centralized ESG Reporting architecture that will ramp up NBG's ESG reporting capabilities and data collection and governance process. Indicatively, the designed infrastructure will allow for:

- A single access point for ESG-related information, avoiding siloed and dispersed data collection and storage.
- Auditability at every step of the process ensuring a robust, future-proof trail.
- Scalability that addresses current and forthcoming reporting needs arising from ESG standards and regulations.
- A roadmap for the assignment of data owners and for the identification of data gaps and remediation actions.

Appendix 1 – References

List of publicly available documents referenced in this report

Links to documents referenced	Publication/Latest version date
NBG Annual Financial Report 2022	03/2023
NBG ESG Report 2021	03/2023
NBG Sustainable Development Policy	05/2021
Ethics Culture Committee Charter	03/2022
Innovation Committee Charter	02/2022
Corporate Governance Code	02/2022
Green Bond Impact Report	02/2022
ATHEX ESG Reporting Guide NBG Disclosures 2021	10/2022
NBG Group Website	N/A

Appendix 2 – UNEP FI PRB Definitions

Definitions according to the UNEP FI PRB

The distinction between Impact Areas and Topics is a new feature in the revised Impact Radar, seeking to provide further granularity and accuracy across the three pillars, while offering a more streamlined set of Impact Areas. In particular:

- Impact Areas represent the relevant and pursued objectives for each of the three pillars. They respond to the question: ‘what is the goal or objective that needs to be achieved?’
- Impact Topics provide, where relevant, a further breakdown of the constitutive elements of the Impact Areas. They respond to the question: ‘what are the constitutive parts of the goals/objectives, or what is their achievement a function of?’

Summary of key impact areas:

Corporate portfolio

Negative impacts: climate & environment (circularity and biodiversity)

Positive impacts: resources & services, and infrastructure

Business portfolio

Negative impacts: climate & environment (circularity and biodiversity)

Positive impacts: resources & services, and healthy economies

Retail portfolio

Negative impacts: resources & services, and climate

Positive impacts: resources & services, and socio-economic convergence



Appendix 3 – Impact Results

NBG’s portfolio impacts results - Corporate banking


























Type of impact	Impact Area	Impact Topic	Associated SDGs	NACE Sectors that impact related areas
Negative	Climate	Climate Stability		<ul style="list-style-type: none"> • 50.20 Sea and coastal freight water transport • 35.11 Production of electricity • 68.20 Rental & operating of own or leased real estate • 19.20 Manufacture of refined petroleum products
		Biodiversity & healthy ecosystems		<ul style="list-style-type: none"> • 50.20 Sea and coastal freight water transport • 35.11 Production of electricity • 55.10 Hotels and similar accommodation • 68.20 Rental and operating of own or leased real estate • 19.20 Manufacture of refined petroleum products • 52.23 Service activities incidental to air transportation
		Circularity		<ul style="list-style-type: none"> • 52.23 Service activities incidental to air transportation
Positive	Availability, accessibility, affordability, quality of resources & services			<ul style="list-style-type: none"> • 35.11 Production of electricity • 55.10 Hotels and similar accommodation • 68.20 Rental and operating of own or leased real estate • 19.20 Manufacture of refined petroleum products • 52.23 Service activities incidental to air transportation
		Infrastructure		<ul style="list-style-type: none"> • 35.11 Production of electricity • 68.20 Rental & operating of own or leased real estate

NBG's portfolio impacts results - Business banking



Type of impact	Impact Area	Impact Topic	Associated SDGs	NACE Sectors that impact related areas
Negative	Climate	Climate Stability		<ul style="list-style-type: none"> 35.11 Production of electricity 41.20 Construction of residential and non-residential buildings
		Biodiversity & healthy ecosystems		
		Circularity		
Positive	Availability, accessibility, affordability, quality of resources & services			<ul style="list-style-type: none"> 35.11 Production of electricity 55.10 Hotels and similar accommodation 41.20 Construction of residential and non-residential buildings
		Healthy economies		

NBG's portfolio impacts results - Retail banking

Type of impact	Impact Area	Impact Topic	Associated SDGs	NACE Sectors that impact related areas
Negative	Availability, accessibility, affordability, quality of resources & services		        	<ul style="list-style-type: none"> • Home loans /mortgages • Consumer loans & overdraft • Credit cards • Targeted products - other vulnerable groups • Vehicle related loans • Education related loans
	Climate	Climate Stability		<ul style="list-style-type: none"> • Home loans/mortgages • Vehicle related loans
		Circularity	 	
Positive	Availability, accessibility, affordability, quality of resources & services		        	<ul style="list-style-type: none"> • Savings accounts • Home loans /mortgages • Consumer loans & overdraft • Current accounts • Credit cards • Targeted products - other vulnerable groups • Certificates of deposit • Vehicle related loans • Education related loans
	Socio-economic convergence		 	<ul style="list-style-type: none"> • Home loans /mortgages • Consumer loans & overdraft • Credit cards • Targeted products - other vulnerable groups • Vehicle related loans • Education related loans

Appendix 4 – UNEP FI Template 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 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 (for business clients), or towards low(er)-carbon practices (for Retail clients)?	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 ₂ e (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?	A.2.2	Absolute financed emissions: What are your absolute emissions (financed emissions =	Total GHG emissions or CO ₂ e <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 activities and transition	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	% 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.

			<p>- Emissions baseline / base year: What is the emissions baseline / base year for your target?</p> <p>- Climate scenario used: What climate scenario(s) aligned with the Paris climate goals has your bank used?</p>		scope 3, category 15) in your lending and/or investment portfolio?			<p>finance: How much does your bank lend to / invest in carbon-intensive sectors and activities²³? How much does your bank invest in transition finance²⁴?</p>			the target set [A.1.2] either 1.5 or 2 degrees)?	
	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; <i>If yes:</i> please specify which parts of the lending and investment portfolio you have analyzed	A.2.4	Proportion of financed emissions covered by a decarbonization target: What proportion of your bank's financed emissions is covered by a decarbonization 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	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	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	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

			<p>when it facilitates decision making and supports financial health increase based on 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.</p>			<p>by the bank. An initiative encompasses courses, programs, 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</p>			<p>chosen by the financial institution. Should be measured on individuals benefitting from the bank's financial education initiatives.</p>		<p>the financial institution.</p>
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					users and # of interactions for anonymized users.							
	B.1.2*	% 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 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	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 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)	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 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.	B.4.2	% of customers for which spending exceeded 90% of inflows for more than 6 months last year	Survey and/or transactional data based. Measures the percentage of customers with a transaction account and/or savings/investment 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 precursor to lower financial health	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.
							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.

												expense arises, how can you cover it right now?" and give the multiple choice options of insurance, emergency funds, loan, credit card, family/friends, etc.
C. Financial Inclusion	C.1.1*	# of products and services in the portfolio with a focus on financial inclusion	Internal data based. Measures how many of the products and services in the portfolio have a financial inclusion focus. We deem a product or service to have this focus when its design facilitates the access and usage by the prioritized customer. For example, no-fee savings account, low interest microloan, offline access or sim-based banking apps, etc	C.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, 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	C.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 benefitting from the bank's financial education initiatives.	C.4.1	% of customers with 2 or more active financial products, from different categories, with the bank	Transactional data based. Measures the percentage of customers with 2 or more active financial products, from different categories, with the bank. By active we mean there's at least one usage per month. By category we mean credit/debt, savings/deposit/payment, insurance, investment, etc. Once a target has been set for this indicator, we encourage banks to ensure responsible selling policies or other initiatives so that the target doesn't become a toxic incentive.

					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.							
	C.1.2*	% 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	C.2.2	% of customers with effective access to a basic banking product	Transactional data based. Measures the percentage of customers with effective access to a basic banking product. By effective we mean the usage beyond first access. Basic banking products vary by bank. Good	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			

		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			examples are: checking accounts, payment accounts, credit cards, saving accounts, deposit accounts, e-money accounts, etc.			services. Depending on 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)			
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