



2025 ESG Factsheet

July 2028

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01 ESG Highlights

Sustainability Milestones in NBG's history 1860-1973



1860

Participation in the capital of the company that constructed the **National Theater** in Athens.

1880-1890

Participation in the capital of the company that constructed the **Corinth Canal**.

1895-1896

Financing for the hosting of the **1st modern Olympic Games** held in 1896 in Athens.

1913-1914

Financial aid for the relief program for families and soldiers of **Italian wars**.

1922

Provision of loans, donations and aid to the refugees from **Asia Minor**.

Arrangement of the wheat harvest collection in Eastern Thracia to feed the refugee population.

1938

Establishment of NBG's **Historical Archive**.

1966

Establishment of NBG's **Cultural Foundation (MCT)**.

1866-1867

Financial assistance to the refugees from Crete and the earthquake victims of **Katolonia**.

1893-1894

Financial assistance to the earthquake victims of Zante and **Lokida**.
Financing of the restoration of the **Orthodox Seminary of Chalkis**.

1911

Recruitment of the **first female employee** in NBG.

1916

Systematic integration of women in NBG's service.

1931

Financing of the creation of the Athens suburb of **Flotiel** to provide housing for NBG employees' members.

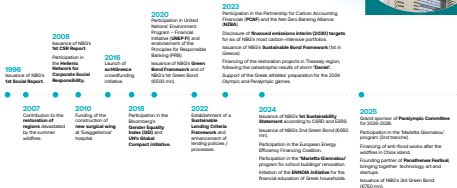
1940-1944

Financial assistance to **relief programs on the front**.
Donation of a mobile surgery to the **Greek Red Cross**.
Financing of a convalescence home for the wounded.
Support of various welfare organizations during the Nazi occupation in Greece.

1973

Introduction of the on-line and real time transaction systems (**first Greek bank**).

Sustainability Milestones in NBG's history 1996-2025



ESG Strategy Overview

Our Values

Human

Trustworthy

Responsive

Growth Catalyst

Our ESG Strategy - Key Strategic Themes

ENVIRONMENT

- Lead the market in sustainable energy financing.
- Accelerate transition to a sustainable economy.
- Role-model environmentally responsible practices.

Our Commitments

- Lead the development of the renewable energy sector.
- Pioneer sustainable bond issuing in the Greek market.
- Enable the green transition of Corporates.
- Lead Retail green financing.
- Establish a carbon neutral H&G footprint.
- Protect biodiversity and ecosystem health.



SOCIETY

- Champion diversity & inclusion.
- Enable public health & well-being.
- Promote Greek heritage, culture & creativity.
- Foster entrepreneurship & innovation.
- Support prosperity through learning & digital literacy.

Our Commitments

- Establish equality in the workplace.
- Promote inclusion in society.
- Protect the health and family life of our People.
- Enable public health, well-being and sports.
- Lead the preservation of Greek cultural heritage.
- Encourage lifelong learning.
- Champion financial and digital literacy.



GOVERNANCE

- Adhere to the highest governance and reporting standards.

Our Commitments

- Ensure best-in-class corporate governance.
- Ensure transparency in disclosures and reporting.



2025 Key Achievements and Highlights

Our commitment towards sustainable, just, and inclusive growth remains an integral part of our vision and strategy



We commit to taking responsible action towards climate transition, investing in society and in our people and adhering to the highest governance standards. Towards these directions, we have enhanced our actions and strengthened our position with respect to all ESG pillars.

Taking responsible action towards climate transition

- Issuance of 3rd Green Senior Preferred Bond of €350 m (July 2025).
- Issuance of 4th Green Senior Preferred Bond of €600 m (January 2026).
- Expansion of Corporate RES financing with €2.5 bn outstanding balances in Renewable Energy projects (as at 31.12.2025).
- Launch of our new “Energy Baseded Swap” product for firms to stabilize their energy costs for up to 10 years.
- Issuance of Transition Plan (June 2025) to enable the steering of 6 priority sectors towards 2050 NetZero goal, following our 2030 interim targets.
- Ongoing operationalization of our:
 - EU Taxonomy architecture.
 - Sustainable Financing Framework (SFF) including governance, policies and processes.
- For 2024-2028:
 - a. Target to support the RRE retrofit market with €80-200 m loans.
 - b. Target to increase the Corporate RES portfolio to more than €2.5 bn (by 2027).

Investing in society and in our people

- Continuous support of Greek households / communities through €575 m in mortgage disbursements.
- Expansion of financial access for small businesses through numerous co-financed programs with the European Investment Bank (EIB), European Investment Fund (EIF) and the Hellenic Development Bank (HDB).
- Active support in public schools’ renovation program “Marika Giannakou” with a €25 m donation.
- Promoted Greek culture and heritage by supporting MIT Cultural foundation with €2.8 m.
- Supported talent development by offering c. 208,000 training hours to HBG employees.
- For 2026-2028:
 - a. Commitment to support access to housing by providing more than €600 m annual new mortgage disbursements.
 - b. Target of 250 m mortgage loans to young people to buy their first house.

Adhering to the highest governance standards

- Continuous strengthening of our ESG operations with transparency and integrity.
- Implementation of a strong ESG oversight through Board-level Committees and enhanced internal controls.
- Representation in the Board of Directors:
 - Female directors: 33%.
 - Independent non-executive directors: 70%.
- Integration of ESG KPIs into performance and remuneration frameworks.
- Robust compliance across several matters, such as:
 - Anti-money laundering.
 - Anti-corruption.
 - Data privacy.
 - Ethical conduct.

Strong performance in ESG ratings and indices

NBG gives great emphasis on systematically improving its performance on ESG topics

The Bank is being evaluated by ESG raters, that focus on different aspects of its ESG performance and strategy, and participates in many national and international ESG indices. The Bank's latest ESG performance, memberships and distinctions are shown in the table below:

ESG ratings & indices		2023	2024	2025	Year of Coverage	Key insights
 MSCI	ESG rating	A	A	A	12th	Industry-adjusted score: 30
 ISS ESG	ISS Corporate-rating ISS ESG score (6-10)	C- 7 (11/2)	C (Prime) 7 (11/3)	C (Prime) 7 (13/3)	8th	Top 30% banks globally
 CDP	Carbon disclosure score	C	C	C	19th	Climate Area: score upgrade in 8 categories, A score in 8 categories
 Sustainalytics	ESG score	16.4 (Low Risk)	15.4 (Low Risk)	16.2 (Low Risk)	14th	Top 15% banks globally
 S&P Global Ratings	ESG score	B+	B+	B+	14th	Top 15% banks globally - 1st in Greece
 Compustat ESG	ESG rating	3	3	3	4th	
 FTSE4Good	ESG index	✓	✓	✓	20th	Top 15% banks globally
	Gender Equality	✓	✓	✓	8th	
	ESG index	✓	✓	✓	8th	

Memberships



Selected awards



Diamond Corporate Responsibility Index (CRI)
Top ESG Performing Company 2023



Best Bank for Large Corporates
Best Investment Bank for Financing contributing to energy transition



Best Corporate Governance
Green 2023



Financing for the Future Award
Energy Related Deal product

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Individuals, SMEs and
professionals](#)[2.4 Materials, waste and water
management](#)[2.5 C&S exclusion list](#)

02 Environment

2.1 Climate-related targets



NBG's targets on Financed Emissions and on Own Operations Emissions are in line with its [Sustainability Policy](#) and reflect its 3 Environment-specific strategic themes, namely: **Sustainable Energy Financing**, **Transition to a Sustainable Economy**, and **Responsible own Practices**.

Financed emissions^{1,2}

In its commitment towards achieving **Net Zero by 2050**, NBG has established a set of **interim (2030) emission reduction targets** for all of its most carbon-intensive **sectors / portfolios**. Each target was set using credible sectoral science-based pathways, underpinned by the latest climate science and aligned with the decarbonization required to achieve the Paris Agreement goals by 2050. In June 2023, NBG published its [Transition Plan](#), outlining a series of initiatives by sector to support customers' decarbonization plans and the Greek economy's transition overall.

Sector (Scope 3, Cat. 15)	Metric	Baseline (2020)	2025	Target (2030)	% Targeted Reduction (vs. 2025)	Key decarbonization levers
Power Generation	kgCO ₂ e / MWh	189	106	50	-53%	Lignite elimination and H&D in power generation
Oil & Gas ³	2020 index kgCO ₂ e/100	100	77	70	9%	Oil & Gas actors' diversification, carbon capture-uptake
Cement	kgCO ₂ e / t cementitious	671	667	650	2%	Production efficiency, alternative fuels, clinker substitutes
Aluminium	kgCO ₂ e / t aluminium	112	89	39	45%	Low-carbon smelting, production technology advances
Commercial Real Estate	kgCO ₂ e / m ²	57	52	30	42%	Energy efficiency increases
Residential Real Estate	kgCO ₂ e / m ²	38	37	16	57%	Home retrofits and newbuild standards

Own Operations emissions^{4,5}

NBG has also set **interim 2030 targets** for its **own operational footprint**, focusing on emissions within the Bank's immediate sphere of control, using SBTi's Absolute Contraction approach.

Scope	Metric	Baseline (2020)	2025	Target (2030)	% Targeted Reduction (vs. 2025)	Key decarbonization levers
Scope 1	kgCO ₂ e (abs. emissions)	2,398	1,808	1,391	24%	Energy upgrades in NBG buildings, car fleet electrification
Scope 2 (market-based)	kgCO ₂ e (abs. emissions)	224	0	0	0%	Guarantees of Origin certificates for purchased electricity

1. Financed emissions targets relate to those loans set considering and/or monitored against customers' Scope 1 & Scope 2 market-based emissions.

2. Absolute financed emissions are measured in CO₂ equivalents. They include 3 scenarios years, as those are included in customers' Scope 1 and 2 disclosed emissions, and as in the relevant sectoral emission factors, where no disclosures are available.

3. For market portfolio, it has been an NBG design choice to not leverage the sectoral emissions (as opposed to physical emission intensity).

4. Set per SBTi's Absolute Contraction Approach, assuming Net-Zero by 2050, and each year reducing by 47% in the case of Scope 1, and by 65% in the case of Scope 2 – market-based.

5. In line with SBTi requirements for base year selection following base year selection going back up to two years), 2021 was selected as the baseline year for Scope 1 and Scope 2 targets. At the time the target setting analysis was performed, 2021 was the latest full reporting year for which data was available.

2.2 Sustainable energy financing | Corporates

NBG's monitors and steers its Corporate portfolio to ensure that the mix of its financings and investments is aligned with its interim 2030 targets and the envisioned trajectory to get there

In this context, the Bank offers specialized programs and participates in international initiatives, aiming to assist its customers achieve their own transition plans, and participating in the country's effort towards achieving the goals of its National Energy and Climate Plan.

RES Financing

NBG focuses on advancing its RES financing, closing 2025 with **€2.5 bn** on-balance sheet exposures in Renewable Energy projects, (**€660 mn** disbursements to Corporate customers during 2025), targeting to increase the RES portfolio to more than **€3.3 bn** by 2027.



Recovery and Resilience Fund (RRF) projects

NBG actively supports the "Greece 3.0" Program and works with the RRF to allocate grants or loans under favourable terms to eligible investment plans.

Through the "Greece 3.0" program, NBG facilitated, by the end of 2025, a total of **€1,340 mn** of financing in terms RRF participation, of which **€1,334 mn** are under the Green Transition Pillar.

Energy Baseload Swap

NBG continued to market the "Energy Baseload Swap" product, allowing small and large businesses to stabilize their energy costs (in the case of consumers) or their income (in the case of RES producers) for a period of **up to 10 years**.

Sustainability-linked Loans (SLLs)

NBG supports the transition of Corporate customers through sustainability-linked loans, amounting to more than **€50 bn** by 2025-end.

Green Bonds

NBG has issued four Green senior preferred Bonds to date, amounting to a total of **€2.5 bn**. As of July 2025, **€2.33 bn** proceeds have been channelled to **325** renewable energy infrastructure projects across Greece, with total capacity of **6,700 MW**, contributing to **3,162,227 tCO₂e** annual avoided emissions.



2.3 Sustainable energy financing | Individuals, SBs and professionals

NBG supports businesses and households in achieving sustainability through a comprehensive range of tailored financing solutions, which inter alia promote the energy upgrade of older homes in Greece and support the development of the renewable energy sector by smaller companies

Individuals

NBG designs and offers financial products that support **energy improvement** of houses and green vehicles purchases, such as:

- **ESPA Mortgage loans** for financing a house acquisition, construction or renovation.
- **Embedded loans** with energy trade and supply companies for home photovoltaic solutions, heat pumps purchase etc.
- **Loans for energy improvements and energy efficiency** for the purchase of energy-saving products, and financing new hybrid or electric vehicles.

NBG participates in several state-driven programs and cooperates with international institutions to offer products for **home renovation and energy upgrade**, such as:

- **State-driven Programs "EXCELLENCE"** for home energy efficiency improvements with 100% subsidy of interest rate and zero fees.
- **State-driven program "Upgrade my House"** (and other related programs) for home energy upgrade.
- **EIF Green Loan** for green upgrades on their homes with a low interest rate.



Small Businesses and professionals

During 2025 the Bank continued to support **sustainable economic development** by participating in initiatives such as:

- In collaboration with the **European Investment Fund (EIF)**:
 - **InvestEU – RRF GR Sustainability** program financing green transition.
 - **InvestEU – RRF GR Innovation & Digitalisation** program financing investments in digital transformation.
- In collaboration with the **European Investment Bank (EIB)**, the **Green Investments III** program, for investments in renewable energy production of SMEs.

NBG supports the implementation of smaller-scale RES projects by offering own financing products for e.g., the construction of small-scale photovoltaic parks and the installation of solar panels.

2025 KEY FIGURES (BALANCES)



€233 mn

green mortgages
(actual EPC A++)



€51 mn

home retrofit loans (a 30% share in "Eudamros" program disbursements)



€62 mn

green auto loans



€59 mn

green business loans

TARGET



€150-200 mn

financings for energy upgrades
over the next 3 years (2026-2028)

2.4 Materials, waste and water management

NBG uses materials which mainly concern office equipment and consumables, for example writing materials, light bulbs, UPS, batteries, office consumables (including toner and ink cartridges), paper, computers and other electronic devices. Its water supply comes from the public water supply network.

Management of paper consumption

The Bank's actions related to the reduction of the paper consumption, are as follows:

- Since 2021, the Bank's correspondence (internal and to 3rd parties) is fully managed by the Internal Electronic Document Management System.
- 222,900 documents were exchanged through the Internal Electronic Document Management System, thus saving c.582,900 page printouts.
- Within the Bank's Transformation Program, a **paperless initiative** has been launched, gradually introducing enhancements such as:
 - The Electronic Signature Management Application for tablet or internet / Mobile Banking.
 - The Document Digitization Application for digitization of documents in-store.
 - The Digital File System for documents' categorization into digital folders.
- 71 mm documents and c. 5.4 mm transactions receipts were electronically signed, resulting in 12.5 mm less printouts in 2025.

Management of other solid waste

To minimize the environmental impact of equipment disposal (computer, other furniture and appliances), the Bank systematically **recycles** via its partner companies' accumulators, small batteries, low-energy light bulbs and electrical/electronic appliances. All these recycling programs are implemented in cooperation with licensed contractors.

Toner management

NBG outsources the printing needs of HQ Units located in central buildings and Branch Network as well as the management of waste originating from device consumables. In 2025:

- 950 tonnes were recycled through NBG's 2,052 Managed Print Services units.

Recycling bins (paper/plastic/aluminum)

The Bank has deployed a recycling program for the collection and recycling of paper, plastic, aluminum, and different types of equipment. The relevant quantities per type for 2025 are depicted below:

- 278 tons of paper.
- 892 kg of plastic/aluminum.
- 929 kg of small and large batteries.
- 216.5 tons of electronic and electrical equipment.
- 276 kg of low voltage lamps and lighting equipment.

Reuses or donations

NBG extends the lifespan of its retired office and technological equipment by donating it to organizations and entities that need in-kind support.

- 15 donations totaling 459 pieces of electronic equipment and office furniture.

Water management

- NBG's consumes water mainly in rest room facilities and for the clearing of the work areas, while the use of water-cooled air-conditioning systems is limited.
- The water discharged from the Bank's buildings is wastewater managed by the local wastewater treatment networks.
- NBG's water reduction actions focus mainly on preventing and avoiding leakages by regularly maintaining its piping network. In 2025:
 - Water intensity of NBG's operations stood at 50 litres per person per day.
 - Total water withdrawal reached 0.08 mm cubic meters.

2.5 C&E exclusion list

NBG's Risk Appetite Framework incorporates a dedicated Climate & Environmental exclusion list, containing activities considered to bear negative C&E impact, including inter alia, indicatively the following:

- No new investments in new coal mines or expansion of existing coal-mines.
- Clients with coal-fired electricity generation related revenues, unless there is a diversification strategy with transition plan to sustainable fuels and engagement to a credible time-bound exit plan from coal-fired electricity generation.
- Activities related to deforestation or the burning of natural ecosystems for the purposes of land clearance.
- Activities related to drift net fishing in the marine environment using nets in excess of 2.5km in length.
- Any transaction located in and with negative impact on UNESCO World Heritage Sites, unless the required environmental permits are approved.
- Any transaction located in and with negative impact on Wetlands registered by the Ramsar Convention, unless the required environmental permits are approved.
- Any transaction located in and with negative impact on protected areas designated as part of Natura 2000 in accordance with EU Directive 92/43/EWG, or any locally designated protected areas (protectedplanet.net as most comprehensive global database on protected areas), unless the required environmental permits are approved.

Please note there are no Unconventional Oil & Gas operations to finance or invest in within the current sphere of the Bank's activities and, hence, no related exposures; therefore there is no explicit reference of any such exposures in our public reporting, neither the need to include explicit exclusions regarding Unconventional Oil & Gas financings/investments in our exclusion policy.



[3.1 Our People](#)[3.2 Our Customers](#)[3.3 Our Social Contribution](#)

03 Society

03 Society

3.1 Our People

3.1.1 Own Workforce

3.1.2 Supporting our people | Benefits

3.1.3 Supporting our people | Learning & Development

3.1.4 Remuneration, DEI, Employee Evaluation, Health and Safety

3.1.5 Hiring Initiatives

3.1.6 Communication Channels



3.1.1 Own Workforce

Our driving force

With our people at the forefront, we are committed to continuous growth and development by fostering a working environment that blends **collaboration, productivity and well-being**. This commitment is reflected through our continuous effort to understand our people's needs, adhere to the best international HR practices, and support an ongoing dialogue with the employees' unions, aiming to strengthen HSB's culture to enable employees to feel **respected, valued and empowered** to manage their everyday responsibilities and advance their careers.

New Labor Regulation

In 2025, HSB established a **new Internal Labor Regulation**, introducing a single, unified employment framework applicable across the organization. Through this new Regulation, the Bank aims to:

- Enhance transparency, consistency and equal treatment for all employees.
- Modernize employment practices and remove constraints related to exclusive entry-level hiring.
- Enable a stronger focus on the development and progression of internal talent as a priority.
- Introduce a simplified and more flexible career progression structure, significantly reducing the time required for high-performing employees to progress.

Through these changes, the Bank further strengthens its corporate culture and reinforces trust and equal opportunities within its workforce.

OWN WORKFORCE IN NUMBERS

As of 31 December 2025, HSB's personnel totaled **6,506 employees** with an average age of **46 years** and an average tenure of **17 years**. A further analysis is depicted below:



3,579

Women



3,950

Headquarters



4,874

Africa



6,462

Permanent



2,927

Men



2,556

Branch Network



1,632

Head of Office



44

Temporary

3.1.2 Supporting our people | Benefits

Support for employees and their families

NBG acknowledges that work-life balance plays a pivotal role in employees' well-being, engagement and performance. In this context, the Bank offers a range of benefits and relevant schemes for employees and their families, as following:

- **Leave for parents to attend parent-school teacher meetings:** In 2025, 2,057 employees (1,676 women and 381 men) were entitled to such leave, of which 2,504 employees (1,658 women and 846 men) used it.
- **Leave for parents of children aged up to 4 years:** An additional 3-day special paid leave to working parents, irrespective of the number of children. In 2025, 894 employees (568 women and 326 men) were entitled to such leave, of which 698 employees (453 women and 245 men) used it.
- **Maternity / Paternity leave:** Each mother is entitled to 124 consecutive calendar days, i.e. 121 weeks, and each father to 14 business days. After the end of maternity leave, mothers are entitled to choose between a reduced work schedule (by 3 hours for the first 3 years and 1 hour for the next 3 years) or a cumulative leave of equal time (8+2 months respectively). Fathers are also entitled to the said reduced work schedule or cumulative leave (38.6 weeks), if the mother waives this benefit. The total leave for mothers reaches 57.7 weeks and for fathers - 4.3 weeks.
- **Other leaves:**
 - 10 business days of additional annual leave to employees - parents of children with disabilities.
 - 4-day additional leave for caregiving of parents, and 6-days additional leave in case of hospitalization of a child or spouse.
 - Additional educational leave to support employees' professional development (in 2025, a total of 577 employees took educational leave for a total of 1,328 days).

ADDITIONAL EMPLOYEES' BENEFITS



Flexible start time option: Employees can choose their daily work start time between 09:00 and 09:00 (does not apply to the Branch Network or physical security positions).

General Childcare Allowance: In 2025 NBG supported 2,949 full-year equivalent beneficiaries, with an average payment of €1,462 per beneficiary (totaling to c. €3.4 mn).

Financial assistance for nursery school/ kindergarten and back-up childcare services (c. €238 mn was paid in 2025).

Financial awards to employees' children for outstanding school performance.

Lump sum benefit (endowment) to children and one-off lump sum to active and retired employees whose children are accepted to a university in a different city from their place of residence.

Summer camp programmes for employees' children (€734,604 was paid in 2025).

Financial assistance for active and retired employees' children with disabilities.

Preferential lending terms for employees (housing, personal e.g., student, consumer).

Go For More (NBG loyalty program) for employees: Extra privileges (e.g., points/discounts) above those provided to NBG's clientele.

Additional insurance coverage in the event of death or accident (partial or total disability besides the obligatory insurance in TYRET, EPRA, etc.).

Financial support/allowance for the seriously ill (€102,382 was paid in 2025).

Assisted reproduction: NBG covers costs excluded from insurance coverage.

Specialised support

- **Supporting employees who have experienced violent incidents:** To address post-traumatic symptoms caused specifically because of bank robbery, NSRF implements a special counselling program with the help of a special network of psychologists, in-group or in individual sessions. Furthermore, the Bank has published short guides for the prevention and management of robberies and course of action and behaviour in case of robbery. In 2023, 0 (zero) robberies were committed in NSRF Branches.
- **Employee Assistance Programme:** Since 2021, the Bank has offered an Employee Assistance Programme (EAP) as an employee benefit, available to all employees and their family members at no cost, on a 24/7, 365-day basis, under strict principles of anonymity and confidentiality. The EAP operates as a dedicated helpline and is provided by Helios EAP, a well-established external provider of employee support services in Greece in the area of mental health. Comprehensive information on the operation and scope of the EAP is accessible to all employees through the HR intranet, alongside digital libraries covering mental health and well-being topics.
- **Employees with disabilities:** To support vulnerable members of the population in cooperation with the competent bodies, in 2023 NSRF employed 122 individuals with special needs, corresponding to 1.8% of the total employees (2024: 1.6%) while taking several actions to facilitate their access to its premises such as installing special elevators, ramps and handrails.
- **Personnel Mutual Health Fund (TYPCT):** TYPCT is the health insurance body and health care provider for the majority of NSRF's employees and pensioners. The primary goal of TYPCT is to provide high quality primary and secondary health care, as well as outstanding social care services to its insured members. TYPCT's main actions during 2023, include:
 - Management and execution of the vaccination program.
 - Adoption of all new Treatment Prescription Protocols as a prerequisite for appropriate pharmaceutical care for TYPCT's members.
 - Voluntary blood donation programs with the participation of the Bank's employees to cover the needs of the NSRFMF Blood Bank (734 blood bottles were collected).
 - Employees and pensioners serving in the polyclinics in the cities of Patras and Hersonissos.
 - Accommodation of 3,500 children in the summer camps of Dionysos and Sani.
 - Child psychiatrist / psychologists to support children with special abilities and their parents.
 - Assessment program of learning readiness for children to attend primary school.
 - Family holiday packages at Chalkidiki camp (711 participants for 2023).
 - Opportunities for children of NSRF's employees at the age of 15–18 years old to participate in an exchange program between TYPCT and a youth organization in Berlin.



Union Organizations - Collective Labor Agreements

- The Bank respects and promotes the unquestionable constitutional right of employees to freedom of association, i.e., to form and participate in associations and unions. Currently, there are **6 (six) unions** which operate in the context of the Bank's employees' representation.
- NIG is firmly committed to respecting the human rights of its workforce and promoting a fair and inclusive working environment. This commitment is underscored in its Corporate **Collective Labor Agreement (CLA)**, negotiated between the Bank and Representatives of Employee Unions, covering a wide range of labor issues from hiring to retirement, such as promotions, appointments, remuneration, leave entitlements and disciplinary matters.
- The Corporate CLA has a duration of 3 years. The agreement reflects NIG's commitment to its own workforce, and in particular towards the principles of fairness, equality and respect for workers' rights, serving as a framework for ensuring appropriate working conditions, safeguarding against discrimination and promoting open communication. As at 2025-end, **100% of NIG employees** were covered by the latest corporate Collective Labor Agreement (signed on 14/03/2025 with a 3-year duration) while **85% of employees** were Union members (2024: 100%, 85%).
- A selected **employees' representative** may act as an observer on Board of Directors matters - that is, being kept informed about HR-related items discussed at Board level - and holds monthly meetings with the Board Chairman / CEO.

Flexible working

The Bank's **Work from Home (WFH) Framework** promotes employees' work-life balance through flexible working by offering the option to work from home for 5, 10 or even 15 days per month (subject to agreement with the employee's manager). As at year-end 2025, 80% of eligible employees participated in the work-from-home programme, with an average of 43% of their working time spent remotely.



100%

of NIG employees are covered
by the latest corporate
Collective Labor Agreement

3.1.3 Supporting our people | Learning and Development

NBG has adopted a strategic mindset that positions learning as a **strategic growth enabler**, by embedding it as a core cultural and business investment. Its learning model is designed for **scalability** and **flexibility**, while leveraging **leading expertise** and delivery methods.

NBG consistently prioritizes the training and skills development of its people, equipping them with the necessary skills to respond to evolving business needs. Through its comprehensive approach, the Bank ensures its workforce remains adaptable, forward-thinking, and better prepared for future challenges, positively impacting every region where the Bank operates. Specifically, in 2025 NBG:

- Delivered c. **208,000 learning hours** through numerous learning programs, including **flagship trainings** designed to build critical capabilities in areas such as Sustainability, Artificial Intelligence, Leadership & Management, and Relationship Management (RM) roles across all Retail Banking segments in Greece.
- Rolled out impactful **talent development initiatives**, including mentoring and coaching, providing personalized growth opportunities to high-potential employees as well as mid-level and senior managers.
- Collaborated with the University of Piraeus and the Association of Chartered Certified Accountants (ACCA), as well as with internationally recognized e-learning platforms like Coursera, Udemy and the Corporate Finance Institute (CFI).
- Supported its employees through fee payments for maintaining their international accreditations, paid educational leave and ongoing academic collaborations.

It should be noted that **all major flagship programs** offered to the Bank's workforce in collaboration with external training providers are **co-designed** with the dedicated internal L&D team, ensuring that the expertise, methodologies, frameworks and models are tailored to the organization's culture, language and business reality, while also reflecting its core values.

Learning programs overview

	Participations	Total hours
Regulatory certifications	10,900	80,000
Relationship Management (RM)	10,000	40,000
Management and Leadership	4,000	20,000
Domain-specific / other functional skills	11,100	32,000
Tech fluency and innovation	2,000	10,000



1,048

formal courses
(all levels)
(80% in-house)



-€5 mn

annual training
budget
(€5.62 average spent
per FTE employee)



-208k

training hours
(2025 target:
maintain
>200k hours level)



6,128

unique trainings
(80% of Bank's
employees)



42,305

participations
in in-house
courses



7,441

participations
in external
seminars

-30 FTEs dedicated to developing, implementing and overseeing the training plan

NBG Academy



NBG Academy is the Bank's structured **internal learning ecosystem**, as its main role is to deliver tailored training curricula aligned with strategic priorities, regulatory requirements, identified skill gaps and business transformation needs

It also promotes skills development through **access to top e-learning platforms** like Coursera, Udemy and the Corporate Finance Institute (CFI), which provide employees with opportunities to engage in high-quality e-learning programs across a broad spectrum of topics relevant to the banking sector.

The Bank also offers a broad portfolio of e-learning courses through its internal learning management system (**LMS**), ensuring scalable access to technical, digital, compliance and leadership training across the organisation.

2025 key job-specific trainings

Data security and privacy-related risks trainings

NBG provides training on data security and privacy-related risks to its employees as part of its broader compliance and digital skills training portfolio. Training initiatives cover key areas including cybersecurity and GDPR, delivered through the Bank's Internal Learning Management System (LMS), which ensures scalable access to **compliance training across the organisation**.

In addition to the Bank-wide mandatory compliance trainings, NBG offers specialised, role-specific training programmes for employees in cybersecurity, data management and information security roles, designed to deepen technical expertise and ensure alignment with evolving regulatory and threat landscapes. These programmes cover the following key areas:

- **Cybersecurity & Information Security Management:** Targeted courses including Cybersecurity and RegTech Fundamentals, Cybersecurity and Privacy, and preparation for internationally recognised professional certifications such as CISM (Certified Information Security Manager) and CCRP (Certified Cyber Crime/Risk Prevention).

- **Digital Operational Resilience Act (DORA):** Dedicated training is provided on the EU's Digital Operational Resilience Act (DORA), ensuring that relevant employees are equipped with a thorough understanding of the regulatory requirements concerning ICT risk management, digital operational resilience testing, ICT-related incident reporting, and third-party ICT risk oversight.
- **Data Privacy & GDPR:** Dedicated training on GDPR breaches, administrative and civil liability is provided to relevant roles, ensuring in-depth understanding of the regulatory framework, compliance obligations and the legal consequences of data protection violations.
- **IT Security Controls & Risk Assessment:** Specialised training on the identification and evaluation of IT & Operations security controls to strengthen the Bank's internal defence mechanisms and supports a risk-aware culture across technology functions.
- **Cloud Computing, Data Management & AI:** A comprehensive portfolio of courses including Cloud Computing fundamentals, Microsoft Azure Data Fundamentals, Microsoft Fabric Lakehouse and Data Warehouse Implementation, Data Preparation and Management, Data Analysis, Data Science for Agile Decision-Making and AI/Natural Language Solutions in Azure to ensure that employees handling sensitive data and digital infrastructure are equipped with the necessary skills to manage data securely and responsibly within modern cloud-based and AI-driven environments.

Ethics & Compliance trainings

- NBG's **Code of Ethics** e-learning course as well as **Personal Data Privacy Protection**, **Whistleblowing Policy**, **AML / CFT**, **KYC** programs are mandatory for all Bank's employees and integrate topics such as non-discrimination principles, fair treatment of customers, rules of business conduct, responsible customer communications, anti-corruption (e.g. gifts, hospitality, facilitation payments) as well as reporting channels for cases of potential breaches of ethics, illegal behaviour, and misconduct.
- Notably, the **Code of Ethics** course follows best learning practices as it also embeds topics such as non-discrimination and fairness awareness, is being delivered through the Bank's LMS with systematic assignment, tracking and reminders, remains available to all employees for reference and refresher purposes while it is available in both Greek and English language.
- Data privacy awareness training, embedded in the Bank's mandatory training ecosystem, includes data privacy content ensuring scalable access across the organisation and covers cybersecurity principles and concepts as well as digital skills development programs as a key area of the Bank's strategic priorities.
- To strengthen internal ESG compliance culture and anti-greenwashing awareness, in 2023, a dedicated anti-greenwashing compliance e-learning training program was made available to all NBG employees.

Consumer financial protection trainings

- In compliance with the regulatory framework of MFID II on markets in financial instruments and IDD on insurance distribution, NBG implements structured certification procedures for customer-facing employees involved in the distribution of investment products and provision of investment services, insurance intermediation and knowledge adequacy procedures for mortgage loans.
- NBG customer-facing staff participates in the regulatory accreditation examinations/ preparation or in the re-accreditation training process for investment services and insurance intermediation (303 Investment Services certificates in categories A1-D and 40 Insurance Intermediation were acquired while 313 Investment Services Accreditations and 1,711 Insurance Intermediation Accreditations held by NBG employees were renewed).



- Dedicated programmes on **integrity selling** and **exceptional customer service techniques** are delivered to all customer-facing roles, reinforcing responsible sales behaviours and a robust customer-centric culture.

DEI-focused leadership training

- A targeted and systematic **DEI-focused leadership training** is provided across middle and senior management levels, incorporating awareness-raising modules on inclusivity, diversity, equity and inclusion topics.

Talent development

NIG invests in identifying, evaluating, and developing its people, ensuring the organization is equipped with the right talent to meet current and future business needs. Building on the continuous identification of high-potential employees, NIG implemented a series of **targeted developmental initiatives** in 2025, including:

- **Personalized development plans**, tailored to each individual's growth areas and career trajectory.
- **1:1 coaching sessions** with certified internal coaches.
- **A Mentoring Program** engaging 37 senior executives of the organization as mentors.
- Participation in specially designed **Leadership Skills programs** and courses through the **Coursera** platform.

Furthermore, to support the growth and future readiness of our interns, **28 individuals** participated in **Assessment and Development Centres**, specifically designed to evaluate and develop their leadership, communication, and collaboration skills - providing a structured foundation for their professional development and long-term potential.

In parallel, in 2025 NIG conducted a structured **Leadership Development assessment**, aiming at strengthening leadership capabilities and ensuring continuity at the Top Management level. Through a consolidated assessment of leadership potential and organizational readiness, the process resulted in tailored individual development plans and clearly defined focus areas for growth, safeguarding the organization's future leadership pipeline. The initiative will be further expanded in 2026 to include Director-level roles.

Training Evaluation

NIG discloses the evaluation methodology of its training programs, while detailed evaluation data remain available internally to supervisors and relevant stakeholders.

The Bank tracks and evaluates the effectiveness of its learning initiatives through multiple complementary methods, such as:

- **Post-training evaluation surveys** and knowledge or case-based assessments, as well as **focus groups interviews** (where applicable).
- **Employee Engagement Surveys**, which provide feedback on overall satisfaction, including perception of learning and development opportunities.

KEY EVALUATION CRITERIA



- Overall program satisfaction.
- Likelihood of recommending the program to colleagues (NPS).
- Relevance to participants' needs.
- Ability to apply acquired skills and knowledge to daily work tasks.
- Learning effectiveness in supporting content comprehension.

Notably, across all key evaluation criteria, the combined scores of "I agree" and "I totally agree" consistently exceeded 80%, reflecting high levels of participants' satisfaction and programs' effectiveness. Specifically, for 3 of NIG's flagship programs, the evaluation outcome is depicted in the table below:

COMBINED AVERAGE SCORE PER PROGRAM

Leadership & Management Moving Forward (in-person training)	97.36
Relationship Management	
Sales Enablement (in-person training)	94.99
Negotiations (in-person training)	94.08
Artificial Intelligence Every Day AI Proficiency (live online workshops)	82.36

To ensure that training and skills development programs remain closely aligned with business priorities, NIG has adopted a **proactive learning service model** based on a relationship-driven partnership with each Business Unit, enabling HR to actively listen to evolving skill needs, and co-design targeted learning interventions that enhance both current performance and future readiness. Through this model, the Bank receives continuous employee feedback, ensuring that concerns are addressed, recommendations are surfaced, and initiatives are adjusted where necessary.

3.1.4 Remuneration

NBG is committed to ensuring that **all its employees are fairly and adequately compensated**. The minimum fixed remuneration offered is determined in accordance with applicable sectoral and Corporate Collective Labor Agreements, which themselves set wage floors above the national minimum wage.

Aligning with the latest Corporate Collective Labor Agreement, the **entry salary of NBG in Greece in 2025 stood at 138% of the statutory minimum wage** as defined in the national General Collective Labor Agreement, irrespective of gender, age or geographical region (within Greece).

More specifically:

- NBG Remuneration Policy establishes structured **deferral requirements for variable remuneration**, particularly for **Material Risk Takers**, i.e. employees whose professional activities could have a material impact on the organization's profile. For personnel classified in this category, variable remuneration is paid partly upfront and partly deferred with a minimum deferral of **4-6 years**. At least 50% of their variable remuneration is paid in financial instruments such as shares, subject to an additional retention period. In practice, and depending on the structure of the variable remuneration, other employees may also receive their remuneration deferred over a multi-year period.
- NBG variable remuneration framework is explicitly designed to align compensation with both performance and risk outcomes. **Performance targets**, set at senior management level and cascaded across the organization, go beyond financial results to **include risk, ESG-related**

objectives as well as broader behavioral expectations, aligned with the Bank's business strategy, conduct and ethics standards. For Material Risk Takers specifically, variable remuneration is structured so that employees are neither rewarded for taking transaction-specific excessive risk nor for assuming cumulative risk that exceeds the organization's Risk Appetite Framework limits. Formal processes are in place to ensure that risk incidents, conduct issues and financial performance are factored into remuneration decisions and the Bank's conduct Risk Assessment Committee has the authority to reduce, cancel or claw back variable remuneration where appropriate.

- NBG Remuneration Policy contains explicit **malus and clawback provisions** applicable to variable remuneration. Under the malus provisions, the Bank reserves the right to postpone, reduce, or cancel previously vested or vesting payments in the event of significant deterioration in financial and capital performance. Under the clawback provisions, any variable remuneration already paid may be reclaimed if it is subsequently discovered that the performance underpinning such remuneration derived from practices inconsistent with the Bank's principles and policies - including violations of regulations or procedures, misconduct, or actions that caused significant losses.

¹ NBG salaries are paid with 80% of the statutory minimum daily wage (increased by 20%, and multiplied by 26 working days per month), without age or gender discrimination.

Fair pay and transparency



The Bank has established policies, regulations and procedures to deal with employees' issues, including working hours, leave, overtime, remuneration and other issues related to the general working status of the Bank's employees, in compliance with the applicable legislative and regulatory framework. The Bank undertakes several actions such as the following:

- **Ensures employees are taking their paid annual leave:** NRG actively monitors annual leave balances at employee level to ensure that employees fully exercise their paid leave entitlements within the statutory timeframe. Beginning each October, employees and their managers are informed of outstanding leave balances and are encouraged to plan and utilize any remaining leave. As a result of this proactive approach, the annual leave utilization rate reached **99.9%** in 2025.
- **Monitors the gender pay gap:** NRG considers Pay Equity and Transparency to be integral to its remuneration philosophy as well as broader Human Capital strategy. A fair and objective remuneration framework supports employee engagement, strengthens talent retention and contributes to the Bank's long-term sustainable performance.
- **Monitors Pay Equity:** The Bank is committed to ensuring equal remuneration for men and women across its workforce. The unadjusted gender pay gap, i.e., measuring the overall difference in mean and median remuneration between male and female employees, is disclosed annually in [NRG's Sustainability Statement](#).

- **Prepares for the EU Pay Transparency Directive:** Ahead of the EU Pay Transparency Directive's transposition deadline, NRG has undertaken a comprehensive readiness assessment in collaboration with an external expert company, under the oversight of the [Bank's HR and Remuneration Committee](#). Relevant workstreams (completed or underway) include the review of job architecture and role classification, the assessment of pay-setting processes against the Directive's transparency requirements, the strengthening of data and reporting infrastructure, and training initiatives to embed pay transparency principles across the organization.

- **Avoids or reduces overtime or excessive working hours:** NRG promotes responsible working time practices and seeks to minimize excessive working hours within the limits established by applicable legislation and internal policies. The Bank also encourages employees to make full use of their annual leave entitlements and monitors leave utilization on an ongoing basis.
- **Monitors working hours:** Working hours and workload allocation are primarily overseen by the employees' line managers. Working hours and overtime are monitored through the ERGANI system, while overtime is compensated. Recurrent overtime patterns are periodically reviewed to support appropriate workload management and resource planning.
- **Includes strategic KPIs in remuneration metrics:** NRG's variable remuneration schemes include a bonus scheme for the Head Office personnel and a direct scheme for Branch Network personnel. Both are aligned with the Group's Remuneration Policy, which explicitly includes provisions for the consideration of sustainability matters as part of remuneration.

Variable remuneration and incentive structures are based, inter alia, on the achievement of targets as evaluated through the annual Performance Management System (PMS) process. Sustainability-related targets have been introduced within NRG's PMS since 2021, ensuring consistency with sustainability strategy and objectives, and reflect a weight of **+10% of total achievement** for the Bank's Top Management. These targets are refined and strengthened annually, becoming more detailed and comprehensive. Furthermore, sustainability-related targets are cascaded down to employees across all levels, meaning that each employee, through their senior executive, has implicit sustainability-related targets which are aligned with the Bank's broader sustainability goals.

3.1.4 Diversity, Equity and Inclusion

The [Group Code of Ethics](#) provides specific guidelines on the values that employees must uphold and includes specific commitments to promoting inclusion for all, upholding NBG's principles of **demonstrating respect** for others and **developing talent with fairness and transparency**

Diversity, Equity and Inclusion

To this effect, NBG does not tolerate any kind of discrimination or offensive behaviour against one's personality (e.g., moral, sexual or other kind of harassment, intimidation, persecution), or social exclusion or unfair treatment due to nationality, race, colour, ethnic or social origin, membership of a national minority, property, birth, disability, age, sexual orientation, gender, genetic features, family status, religious or political views or physical disabilities, veteran status, citizenship status, marital status, or pregnancy.

Furthermore, to prevent and address any forms of discrimination, NBG has set up:

- The [Policy on Violence and Harassment](#) and the [Policy for the Management of Internal Complaints Regarding Cases of Violence and Harassment](#), which provide the framework and overall guidance on reporting in good faith, preventing and containing any incidents of violence and harassment at work.
- The [Whistleblowing Policy](#), which allows NBG's stakeholders, as well as any other 3rd party, to submit a report on potential breaches of conduct, illegal behaviour, discrimination, or other misconduct and includes a mechanism for grievance / complaints.

WOMEN BY POSITION 2025



- 48% women in total management¹
- 31% women in senior management (within 2 levels of executive management)²
- 47% women in middle management (3 or more levels from executive management)
- 52% women in junior management³
- 57% women in non-managerial positions
- 54% new hires that are women
- 137% women attrition
- 51% employees promoted during the fiscal year that are women
- 37% women in IT / Engineering
- 48% women in management in revenue-generating functions

1. Managerial positions refer to senior, middle and junior managerial positions.

2. Senior management positions refer to CEOs, CEOs, Senior Managers, Managers.

3. Junior management positions refer to Head of Subdivisions of Head Office.

3.1.4 Employee Evaluation

The Performance Management System (PMS) is an integral part of the Bank's strategic business plan and transformation efforts and is inspired by the principles of transparency, collegiality, meritocracy, objectivity and fairness



EMPLOYEES' EVALUATION (PMS) 2025

91%

5,932

employees participated in
regular performance and
career development reviews

The Bank's Performance Management System is a valuable means of participation, motivation and continuous improvement and development of employees. Considering the above, the PMS is based on:

- The **employee's contribution** to the achievement of predetermined, realistic and uniform Division targets.
- The **skills** relevant to the employee's job duties, position and level of responsibility.
- The **needs of support and training** to improve the employee's work performance.
- The **development** of the employee to support their career path.

PMS applies to all NIG employees, and the Performance Evaluation and Development Regulation is available through NIG's intranet site. The PMS includes the **annual target setting process**, which aligns team efforts with NIG's strategic objectives as well as **mid-year reviews**, focusing on providing **constructive feedback** and identifying opportunities for improvement and skills development.

Note: All employees are evaluated, except those who do not meet the eligibility criteria based on leave or actual days worked during the year.

3.1.4 Health and Safety

Safeguarding health, safety and well-being for our people, customers, and communities

NBG prioritizes employee well-being and safety by fostering a safe and healthy work environment across the Bank and its Group companies.

These measures include the ongoing upgrading of the shuttering of the Bank's buildings, branches and ATMs with technical interventions (security roller shutters, fortification of central safe facilities, ATM money boxes, ATM perimeter reinforcement, motion detectors and cameras, ink-staining System) and the installation of deterrent doors in the branches and controlled access system in selected administrative buildings.

In line with the Greek Law 3850/2010, NBG's **Regulation for the Prevention and Protection of Health and Safety**, aims to eliminate any risks related to the health and safety of its employees. The Bank's **Health and Safety Framework** covers all employees who have an employment relationship with the Bank and carry out their work either within the Bank's premises and facilities, or through Work from Home (WFH). The Bank has also developed the **Physical Security Regulation** which determines the roles, responsibilities and actions/procedures regarding the prevention and handling of fire, emergencies and natural disasters.

The most important actions in 2023 regarding **training and readiness** on safety issues are:

- Participation of **5,734 Bank employees** in the simulation drills of an emergency event in 2023 buildings, as part of the intra-bank fire protection measures framework.
- Training seminars of **546 Bank employees** on fire safety issues by local competent Fire Authorities.
- Preparation of Emergency and Evacuation Plans (Greek Law 3850/2010) against fire and earthquake risks (indication of escape routes / exits in 209 NBG buildings/branches).



NBG provides a comprehensive suite of health and safety training programs to its employees, delivered through e-learning modules & in-person classroom sessions, covering the following:

• **Physical Security & Emergency Preparedness:** Multiple e-learning courses cover the Bank's Physical Security Regulation, branch security protocols, emergency response procedures, building evacuation, and the management of crises and natural disasters.

- **First Aid:** In-person classroom sessions equipping employees with essential skills for the prevention and management of workplace health and safety incidents, including Cardiopulmonary Resuscitation (CPR), the safe use of Automated External Defibrillators (AEDs), wound and burn management, and assistance to unconscious or choking individuals.
- **Remote Working Safety:** A dedicated e-learning course addresses information security best practices for employees working outside the Bank's physical premises, covering the secure use of remote working tools, tool-specific security guidelines, and the management and reporting of potential security incidents during remote work.

Health and Safety Committee

NBG has set up the **Health and Safety Committee**, comprising elected employee representatives, as well as a representative from the Bank, and convenes on a quarterly basis

The Committee aims to improve the working environment and the compliance with health and safety requirements, and is responsible for:

- Examining the working conditions in every building housing the Bank's employees.
- Proposing measures to improve the working environment, monitoring the observance of health and safety measures and contributing to their implementation.
- Collecting data on work-related accidents and days of illness occurring in the workplace.
- Submitting proposals to the competent Unit within the Bank, while in cases of serious work-related accidents, ensuring that the appropriate measures are taken to prevent re-occurring.

- Pointing out hazards at the workplace and proposing prevention measures to Units, thus participating in the formulation of the NBG Staff Health and Safety Protection Regulation.
- Informing the Bank's executive management in case of an immediate and serious risk, to take all the necessary measures.

Notably, each employee has the right to express concerns about the safety of a task and can refuse it if deemed unsafe while a complaints' submitting mechanism is available.

Note: After 1,670 initial visits were conducted in 2022 buildings (740 visits by Occupational Physicians and 930 visits by Safety Technicians) no recorded instances of musculoskeletal disorders or other similar diseases.

3.1.5 Hiring initiatives

NBG is committed to attracting and developing **young talent**, creating **meaningful job opportunities** and offering **valuable professional experience** in a modern working environment.

Youth employment

Key internship programs:

- **"I-work@nbg"**: A 10-month paid internship for postgraduate students, providing hands-on experience in specialized banking functions aligned with their academic background. In 2025, the program welcomed **33 students**, **85% of whom** were subsequently hired into permanent positions.
- **"Next Banking Generation"**: A 6-month paid internship offering **3 positions** for postgraduate students enrolled in the University of Piraeus (Department of Banking & Financial Management) and the ACCA Accelerate program. The program counts toward three years of practical experience required for ACCA qualification, with top performers eligible for direct hiring and ACCA-examination sponsorship.
- **"KILIAS"**: An ESPA-funded program enabling bachelor's students to complete internships across NBG's Branch Network and Headquarters year-round, with costs covered by their university. In 2025, **365 students** completed internships through this program.
- **Internship program for students at Technological Educational Institutes**: In 2025, NBG offered six-month internship placements to **18 students** at Greek Technical Educational Institutes (ITEI) as part of completing their academic studies.

Talent acquisition

NBG actively engages with the talent market through career days, university events, guest lectures at postgraduate programs, and participation in **"Reclaim Greece"** (New York City, 2025) - an initiative connecting highly-skilled Greek professionals abroad with career opportunities in Greece.

Local employment

NBG demonstrates a strong commitment to **local employment** through targeted hiring across its Branch Network nationwide. In 2025, the Bank recruited:

- **70 entry-level employees** to cover operational needs across its Branch Network. These positions spanned both major urban centers, such as Attica and Thessaloniki, regional branches across the country, from the Ionian Islands to the Peloponnese and Central Greece - reflecting NBG's dedication to supporting employment nationwide. During the same year, NBG also employed **47 seasonal staff** in targeted Branch Network units across Greece, reinforcing its support for local communities and regional employment.
- **300 highly specialized professionals** for key positions in its Headquarters, ensuring it continues to attract and retain top-tier expertise across all critical business functions.



NBG at "Reclaim Greece" (New York City, 2025)

3.1.6 Communication channels



Digital Communication Channels

- **NBS intranet:** A central point where users can obtain information, regulatory texts, useful guides and lists of Bank applications and product development or service notifications and announcements, as well as access dedicated functional sites from a single hub.
- **HR intranet:** Communicates HR related issues, regulatory documents and useful information on employee-related topics, such as Onboarding, Performance Management, Recruitment, Training, open positions, etc.
- **HR e-mail account:** Through this account, announcements and directives are released to NBS staff in a speedy, efficient and effective manner.
- **"Ask HR":** The key point of contact of employees with HR regarding everyday enquiries. This channel enables employees to raise concerns, submit questions and share suggestions, reinforcing a culture of accessibility and responsiveness on a daily/ ad hoc basis. The Bank is committed to continuously enhancing its Ask HR services to ensure more direct and effective communication with employees. In this context, the new AI assistant "Ask HR Chat", available 24/7, has been developed and launched in Q4 2025.

Leadership visibility initiatives: A roadmap of senior leadership touchpoints such as visits of the management team to the Branch Network, townhall meetings at Function and/or Division level, and Senior Management roadshows.

Annual Branch Network Meeting: An event held with the participation of all Managers from Branch Network and Senior Management with the purpose of reviewing the targets achieved in the previous year and providing information on, and alignment with, the priorities that have been set for the next year.

Annual Transformation Program ceremony: An event held with the participation of key stakeholders of NBS's Transformation Programme (TP), including Senior Management, with the purpose of celebrating the key achievements of the TP in the previous year and discussing the key strategic priorities for the current year.

NBS Flash News: Hosting news and special topics such as campaigns, sponsorships, and awards/successes.

"NBS Talks": A platform of live talks given by experts from the market focusing on different topics such as efficiency in the work environment, soft skills and well-being.

Whistleblowing: Providing Group employees with the appropriate channels (through internet / intranet) to report issues indicating suspected misconduct, wrongdoing, or a breach of law, regulation, or Group policy.

Reporting of violent and harassment complaints: Providing the framework and overall guidance on the reporting incidents of violence or harassment at work. Complaints may be submitted either informally (orally) or formally (via e-mail, letter or through the HR intranet website). Any employee reporting incidents related to the violation of human rights or affected by such incidents is protected from acts of retaliation, in line with the relevant Policies and procedures.

KEY INSIGHTS

In 2025, NBS HR received

16,817

questions (6,000 phone calls,
6,000 emails and 4,817 forms)

95.5%

of queries were answered
within the same day

Direct dialogue and feedback mechanisms

- **CEO Town Hall:** Introduced in November 2025 as part of the Bank's "Open & Inclusive Culture" action plan, the CEO Town Hall is a Bank-wide digital engagement event through which the CEO communicates NRG's strategic direction, priorities, performance updates and key challenges to all employees. This session aims to inform, align and engage employees, while strengthening trust, transparency and dialogue between leadership and employees. The CEO Town Hall will become a regular internal communication touchpoint, with cadence aligned to key business milestones.
- **CEO Breakfast Sessions:** These sessions, during which the CEO meets and holds discussions with various Head Office teams, promote transparent communication between leadership and employees, providing a platform for open dialogue and exchange of ideas, on an ongoing/ad hoc basis.
- **HR Business Partners (HRBPs):** Acting as strategic advisors and advocates for managers and employees, HRBPs work closely with teams across the organization, gathering insights, addressing concerns and providing guidance to ensure alignment with the Bank's policies and values on a daily/ad hoc basis.
- **Collaboration with Representatives of Employee Unions:** Engagement meetings with Representatives of Employee Unions ensure a constructive partnership with employees' representatives on key matters concerning NRG's workforce and occur on an ongoing/ad hoc basis.

Employee Engagement Survey (EES)

Conducted approximately every 3 years since October 2020, these surveys have fostered **two-way communication** and helped create an inclusive and supportive working environment. Each survey is followed by **team-level workshops** to discuss results and develop actionable **improvement plans**, as well as Bank-wide action plans to address overarching themes and priorities, with the Group Human Resources Division responsible for monitoring and implementing these **action plans**. The third and most recent survey was conducted in May 2024 while the fourth survey is scheduled to take place in Q4 2026.

2024 EES / KEY INSIGHTS



Employee participation



Employee engagement



Proud to work for NRG



Strong employee perceptions across key culture and sustainability dimensions, including respect and dignity, confidence in the Bank's future, and its environmental and social responsibility

Through the Employee Engagement Surveys, the Bank ensures measurable progress in areas such as:

- Employees' engagement and motivation.
- Manager-employee relationships.
- Satisfaction with job role and workplace environment.
- Happiness and stress levels at work.

Following the survey, workshops are organized **at the unit level** to facilitate discussion, share insights and create **Bank-wide action plans** and unit-specific plans to address particular /local concerns. This structured approach ensures that feedback is not only heard but also acted upon, driving meaningful outcomes and promoting a culture of engagement and responsiveness.

03 Society

3.2 Our Customers

3.2.1 Own network

3.2.2 Socio-economic convergence

3.2.3 Customer insights

3.2.4 Complaints management

3.2.5 Responsible marketing practices

3.2.6 Handling of vulnerable customers
and customers with disabilities



3.2.1 Our network

Branch Network

NSG is engaged in a continuous process of optimizing its branch network's operations in terms of footprint, operating model, performance management, image and service in its pursuit to maximize its growth potential, deliver a superior customer service and drive sales efficiencies.

The NSG branch network comprises of **303 Units** (303 Branches of which 46 Tellerless Branches and 2 Transaction Offices), of which 32 Branches (or 11% of total branches) and 1 Transaction Office (or 50% of Transaction Offices) in sparsely populated or remote or economically disadvantaged areas.

The Bank deploys innovative solutions to its branch network, such as paperless processes, to improve customer experience and reduce its environmental footprint.

Digital Banking

The Bank aims to leverage technology to expand its digital offering as a means for providing enriched services to customers, further enabling the migration of transactions to digital channels and providing an engine for robust future growth.

Internet Banking for both Individuals and Businesses is available for everyone with access to internet, while Mobile Banking for both Individuals and Businesses is available for downloading at the respective stores for Android and iOS devices.

During 2025, the Bank processed **1.56 mn** supporting documents through fully digital channels, either via direct customer submission or digitization by Bank personnel using tablet devices, thereby avoiding the use of physical photocopies. Furthermore, more than **71 mn** documents were digitally signed, demonstrating the continued adoption of paperless processes and reinforcing the Bank's commitment to operational excellence and digital transformation.

2025 KEY FIGURES

1,360

ATMs (on-site and off-site)

388

ATMs (all located inside the Bank's branches)

208

Deposit Machines

~4.7 mn

Digital statements for deposit accounts, credit cards, mortgage & consumer loans

~4.5 mn

Users registered in digital channels (o/e ~25% new in 2025)

~3.3 mn

Digital active users¹ (+5.5% y-o-y)

28.3%

NBG sales through digital channels²

~150 mn

Transactions completed through digital channels

~6 mn

App downloads

¹ Digital active users are users who have logged in at least once during 2025.

² Percentage of products (eg. cards/loans) sold through NBG's digital channels



Supporting remote regions and islanders and economically weakest regions

- NBG maintains a presence in remote regions and in islands with a population of less than 5,000 people and is the only Bank present on certain islands (e.g., Alonissos, Sifnos and Sikyros). As at 31 December 2022, in these sparsely populated regions NBG's network included 14 Units and maintained off-site ATMs in 21 access points (or 940% of off-site ATMs).
- Moreover, NBG is present with 22 Units in the 13 prefectures indicated as the economically weakest in Greece.
- Until August 15th 2022, the Bank applied **zero charges** on transactions carried out via the ATM network of other banks, in 26 small islands and/or low-populated remote areas where it has no presence, by covering the respective OAGS charges (21 off-site ATMs). Since August 15th, all respective charges considering transactions carried out via the ATM network of other banks have been removed, according to relevant legislation.

DISTRIBUTION OF BRANCHES & ATMS



3.2.2 Socio-economic convergence



Supporting Corporates (incl. SMEs and professionals)

HBO is committed to empowering the growth and resilience of professionals and enterprises by supporting their sustainable development efforts. Among numerous others, during 2023, the Bank participated in or offered directly the following selected initiatives and programs:

- **In cooperation with the European Investment Fund (EIF):**
 - **'HBF GR Sustainability'** and **'HBF GR Innovation & Digitalization'** programs guaranteed by the Invest EU Fund to support digital transformation. **'HBF GR Sustainability'** program sets Social Accessibility Investment criteria under which the investment purpose of the loan shall be one or more the following: investments to enhance accessibility of services, products and infrastructures and to develop assistive technologies and making the organisation and its premises accessible for customers and employees with disabilities and/or impaired function.
 - **Microfinance Program** guaranteed by the InvestEU Fund for financing entrepreneurship.
- **In collaboration with the European Investment Bank (EIB):**
 - HBO loans for 'Entrepreneurship & Social Impact' and 'SMEs & MidCaps & Social Objectives' for promotion of youth employment and women empowerment.

- **In collaboration with the Hellenic Development Bank (HDB):**
 - Guarantee Programs through the TEPX III Guarantee Fund and Loan Fund to enhance liquidity.
 - Credit risk protection for newly established enterprises (less than five years in operation) through the TEPX III Guarantee Fund.
 - Recovery Microfinance Fund for Natural Disasters under TEPX III Portfolio Fund.
- **Own financing products:**
 - 'Farmer's Card' and 'Contract Farming Financing' offering financing and bridge liquidity at favourable terms to farmers and livestock breeders.

Supporting housing acquisition for individuals

HBO offers financial products that improve customers' accessibility to **adequate, safe and affordable housing**. Selected home-related products include the following:

- **'SPTs MOU 2'** state-subsidized program: granting low-interest loans to young people for acquiring their first house.
- **'My First House'** loan with favorable financing terms for individuals, up to 50 years old, wishing to buy their first home.

Supporting students' financial needs

- **Student Loan Program** backed by the European Investment Fund, designed for students to fund their academic journey at various levels (e.g. undergraduate, graduate, post-graduate).
- **'Student Life'** a complete package of products for students of all ages at the beginning of their cooperation with the banking system, as well as students of various education levels, efficiently covering their financial needs.

3.2.3 Customer insights



Listening to the needs of our customers

The continuous improvement of customer experience is a top priority for HNG. In this context, on an annual basis, the Bank designs and implements a **Consumer Insights and Customer Experience Research Plan**, through which it gains deeper insights into consumers' needs, trends, perceptions and expectations and formulates optimized action plans for products, services and customer experience, based on the insights derived.

The survey results are discussed extensively with the Business Units (Retail, Corporate) and the Transformation Program Office to design action plans based on the relevant insights. For key research projects, short versions of findings are presented to the Top Management, including the Executive Committee and the Board of Directors of HNG.

In 2022, more than **55 consumer research programs** were implemented, leveraging both qualitative (focus groups and in-depth interviews) and quantitative techniques (interviews through email, telephone and online panels), aiming to provide insights on topics such as:

- **Customer Experience:** Optimization of the experience offered across different customer segments, touchpoints and journeys.
- **Segments:** Exploration of the different needs and motivations of HNG's customer segments.
- **Greek market & banks:** Decoding of consumers' social and financial needs, and recording of perceptions related to the image, offering and positioning of HNG and other Greek banks.
- **Products & services:** Design of new propositions and optimization of the current products and services offered across the different channels of the Bank.

In the context of measuring its **customer experience (CX)**, the Bank systematically gathers customer insights from the three below key pillars:

- **Competitive CX insights:** An ongoing online survey that evaluates HNG among its main competitors in Greece, executed by an independent, external partner. According to the data (Q3 2022), HNG leads the Greek systemic commercial banks as far as the Net Promoter Score (NPS) for the total customer base is concerned.
- **Relationship CX insights:** Two annual, long-standing surveys for customers belonging to different segments (sample included 2000 Mass, Premium and Business Banking customers, who have interacted through any channel with the Bank, over the last 3 months; a similar study was conducted for HNG's Corporate customers).
- **Transactional CX insights:** An ongoing, internal survey mechanism provides CX insights regarding channels and products, soon after a customer interacts with the Bank.

How would you rate your experience with NRG?



Relationship CX Survey Identity

Audience:

Mass, Premium and Business Banking customers of NRG
(Mass n=1,500, Premium n=500, Business Banking n=500).

Scope:

Overall experience with the Bank and evaluation of channels used.

Research agency:

KANTAR.

Methodology:

Telephone interviews from representative customer lists | Branded Survey.

Sample:

Customers who interacted with NRG within the last 3 months, through any channel.

Timing:

December 2025 – February 2026.

Customer Satisfaction

NRG's customer satisfaction level emerges as follows:



Satisfied Mass and Premium customers with overall positive experience with NRG (i.e., "Good", "Very Good" or "Excellent" on a 5-point scale).

NRG targets to keep a satisfaction level of over 80%.

Mass and Premium customers represent ~95% of NRG's total active customers.

Customer Experience

NRG leverages the CX measurement framework to:

- Prioritize high-impact customer journeys.
- Redesign experiences that meet our diverse customer base needs in everyday life.
- Drive a customer-centric culture in front-line and central units.

The Bank is simultaneously working on multiple end-to-end Customer Journeys or targeted redesign projects with linked to specific customer experience objectives. As an example, the new end-to-end Branch onboarding process recently launched delivers a superior experience with speed and simplicity.

3.2.4 Complaints management

Complaints handling

NIG has established the Group Complaints Management Policy which sets out the key principles and processes that govern the handling of complaints with respect to products and services. In this context, the Bank has set up a dedicated **Client Conduct Sector**, which operates within the Business Regulatory Compliance and Client Conduct Division and is responsible for handling and processing customer complaints, comments or suggestions. The Sector is staffed with a qualified and experienced team and is tasked with addressing customer-related issues in an independent and impartial manner. Any complaints can be submitted by:

- Completing an online form available on NIG's website.
- Posting a letter or the relevant complaints form available at all NIG Branches.
- A hotline established for oral customer complaints' receipt.

Upon the complaint receipt, a confirmation of receipt is sent, and a full investigation of the matter is carried out in cooperation with the relevant Bank Units. Once the investigation is completed, NIG updates the customer about the issue, including the provision of a suggested solution or requesting any necessary clarifications.

It is noted that:

- Complaints are systematically analyzed to **identify patterns** of potential customer detriment, emerging thematic risks, and underlying control vulnerabilities, effectively transforming them into early warning signals that enable proactive decision-making and strengthen the Bank's conduct risk oversight.
- NIG employs a **root-cause analysis (RCA)** methodology to investigate the underlying drivers of customer complaints and identify systemic, procedural, or product-related factors that may give rise to recurring customer dissatisfaction while strengthening its conduct risk framework and advancing a culture of accountability and customer-centricity.
- Within the Client Conduct Sector operates the **Complaints Insights Hub**, providing structured

monthly and quarterly analytics across agreed Business Units, Senior Management as well as at Board level. Given the importance of the appropriate handling of complaints, the Executive Committee is informed monthly on the progress of complaints, relevant risks and the respective complaint management KPIs.

As part of its continuous improvement agenda, NIG is actively exploring the integration of **Artificial Intelligence (AI)** tools into its complaints management framework to further enhance the Bank's capacity in areas such as:

- Automated categorization and prioritization of incoming complaints, enabling faster routing to the appropriate handling teams.
- Sentiment analysis and early detection of recurring complaint patterns, supporting proactive identification of systemic issues.
- Predictive analytics to anticipate potential complaint volumes and allocate resources accordingly.

2025 KPIs

Complaint ratio

0.28 complaints per 1,000 customers/month

(response times remained mostly within regulatory thresholds)

Average duration of completed cases

<15 days

(well below the Bank's RSL threshold)

Complaints submitted through Supervisory and other Authorities

-0.5%

(demonstrating effectiveness of the Bank's internal complaints resolution mechanism)

The figures above demonstrate NIG's operational resilience and sustained focus on fair, transparent, and consistent customer outcomes, even under increased demand. In parallel, enhanced monitoring of aging cases and thematic recurrence further strengthened control over execution quality.

3.2.5 Responsible marketing practices



Marketing Policy and practices

NBG implements the Group's **Marketing Compliance Policy for Products and Services**, in accordance with applicable legislation and recognized best advertising practices, a unified and responsible framework governing all marketing and communication activities addressed to existing and potential customers, irrespective of channel, content, or target audience. Through this framework, the Bank ensures that all marketing practices are conducted in a responsible, transparent manner, enabling customers to make informed and responsible financial decisions. Notably, frontline sales employees are certified in specialized fields of Corporate & Investment Banking and Retail Banking (e.g. for provision of investment services, / insurance products).

CORE PRINCIPLES GUIDING NBG'S MARKETING PRACTICES

Legality and compliance

Adherence to the applicable legal and regulatory framework (including consistency with the Hellenic Code of Advertising and Communication).

Transparency and clarity

- Material information (including key terms, conditions and any risks) is clear, comprehensible and accessible to customers.
- Consistent presentation of information across communication channels, publishing of information (e.g. general information, products' characteristics) on NBG's website.

Accuracy & substantiation

Communicated claims are evidence-based and verifiable, not omitting or obscuring essential information.

Fairness in communication

- Avoidance of misleading, aggressive or unfair commercial practices.
- Communication is tailored to the understanding and needs of the target audience.

Respect for customers' protection and rights

Respect for customer interests (including data protection and privacy).

Social responsibility & inclusion

Communications respect human dignity, avoid discriminatory content, not exploiting vulnerable groups (e.g., children) or consumer inexperience.

Prohibited practices

Use of unfair competition methods and any unfair, unlawful or misleading acts and practices is strictly prohibited.

Digital and social media safeguards

Clear identification of advertising communications, respect for customer consent and opt-out mechanisms.

Sustainability and ESG communications (Incorporation and implementation of internal Anti-greenwashing framework/ Guidelines)

All ESG or environmental claims are clear, accurate and duly substantiated, mitigating the risk of misleading practices.

Fair advertising policies / procedures

To further ensure that its advertising practices support **fair customer outcomes** and **support trust** in its operations, the Bank:

- Has established and implements a **comprehensive framework** governing advertising and promotional communications to ensure that all advertising communications comply with defined standards of fairness, transparency and consumer protection (promotional and advertising activities are designed based on product characteristics and target audience needs and are subject to ex ante review by the competent the Bank's Compliance / Legal Services Units, campaigns are monitored throughout their lifecycle).
- Communicates only claims or statements are based on verifiable and substantiated data, thus appropriately reflecting the characteristics, benefits and risks of the relevant products and services.
- Applies digital and social media controls that ensure transparency of sponsored content, prevention from fraud or misleading design/practices and provide clear distinction between commercial and non-commercial content.

Product / Service reviews

NBG applies a structured approach to its products and services' lifecycle management, including the launch of new offerings and the repositioning / ongoing evolution of existing ones, aiming to ensure that their design, implementation and ongoing management are aligned with regulatory requirements, customer protection principles, and sound and responsible business practices.

- **Lifecycle review approach:** Review across all stages of their lifecycle, ensuring that key features, terms, and conditions, and overall value proposition are appropriately assessed and remain consistent over time.
- **Pre-launch reviews (including marketing alignment):** Review of the key features, risks and conditions prior to the launch of any related campaign, to ensure that communications accurately reflect product characteristics and are appropriately aligned with the identified target audience, considering the product's nature and any complexity.
- **Ongoing monitoring and assessment:** Identification of potential issues, performance assessment and continued alignment with regulatory expectations and internal standards.
- **Customer feedback and continuous improvement:** Conduct related assessments to capture insights that contribute to their continuous improvement.



3.2.6 Handling of vulnerable customers and customers with disabilities

Digital channels

NBG continuously invests in new technologies and infrastructures that cater for people with disabilities, focusing on adding new functionalities on its digital channels.

As at 2023-end, the Bank offers:

- 249 branches and 888 ATMs across the country accessible to customers with **physical disabilities**.
- 1,360 ATMs in total (898 on-site and 462 off-site) meeting the technical specifications for **voice instructions and keyboard reading system**.
- Internet and Mobile banking for Individuals and Businesses designed taking into account the **WCAG 2.2 Level AA standards** (layout, navigation, UI components).
- **Video banking** services are offered to Business and Premium customers who cannot visit our branches (due to mobility impairment).
- **Chat service** at NBG site.

Supporting vulnerable borrowers

NBG places particular emphasis on aiding vulnerable borrowers (including unemployed and low-income individuals, people facing serious health issues and the heirs of deceased borrowers) regain their financial stability and avoid financial exclusion by offering several targeted solutions, thus contributing to the strengthening of the Greek society's cohesion.

- **Debt Restructuring Solutions:** NBG offers debt restructuring solutions, such as loan term extension, interest rate modification, instalment reduction or debt splitting arrangements.

- **OCW Mechanism (under Law 4038/2020):** The Bank actively participates in the Out-of-Court Workout Mechanism, contributing to the development of sustainable repayment solutions for eligible borrowers facing financial difficulties while also assisting applicants throughout the entire process by offering guidance regarding the submission of their applications.
- **Social Support Initiatives:** The Bank undertakes targeted initiatives to support customers affected by social, economic or natural crises (e.g., for individuals affected by natural disasters, for households challenged by the rising floating interest rates during 2023-2024, for customers during the COVID-19 pandemic).
- **Paperless Processes:** Beyond its environmental and operational benefits, the paperless process also generates positive social impact by facilitating access to banking services for customers with limited mobility due to health conditions, disabilities or geographical constraints, allowing them to be served effectively without requiring their physical presence at a branch.
- **Code of Conduct** (established by the Bank of Greece under Law 4024/2012): NBG provides convenient debt settlement solutions considering borrowers' vulnerabilities.

Complaints management

NBG is committed to ensuring that complaints from **vulnerable customers and customers with disabilities** are handled with sensitivity and care. The Bank offers priority handling for such cases, along with assistance in form completion as well as any additional support deemed necessary on a case-by-case basis, to ensure an accessible complaints experience.

Branch Network

The Bank has specific instructions to Branch Network employees that customers with disabilities should be served with priority when visiting its premises.

03 Society

3.3 Our Social Contribution

- 3.3.1 Social commitment at NRG
- 3.3.2 Our Social contribution | Overview
- 3.3.3 Education and Financial Empowerment
- 3.3.4 Public Health and Well-Being
- 3.3.5 Environment Protection
- 3.3.6 Entrepreneurship and Innovation
- 3.3.7 Greek Heritage, Culture and Creativity



3.3.1 Social commitment at NBG

The Bank's comprehensive Social strategy framework has been designed and is being deployed across the following 5 key pillars:



3.3.2 Our social contribution | Overview

2025 marked one more year of NBG's impactful actions towards the Greek society

The aggregate amount approved by NBG for the completion of **120 sponsorships / donations** in 2025, in 5 distinct categories, amounted to **€6.6 mn**, while an additional **€2.8 mn** was allocated to support the actions of the Bank's Cultural Foundation (MCT).



In collaboration with other Greek banks, during 2025, NBG participated in impactful initiatives towards society such as the "Marietta Giannakou" program for the renovation of public schools in Greece and the restoration of the Zografion Lyceum in Constantinople.

Finally it should be noted that NBG offers the opportunity to its customers to donate amounts to a number of **NGOs / philanthropic organizations**, as part of their payments or transfer transactions. In 2025, the total amount that was collected through this process was **€303 k** as a result of c. **40 k donations**.

¹ Excluding sponsorship for the "Marietta Giannakou" public schools renovation program or other systemic initiatives undertaken under the umbrella of the Hellenic Banking Association.

A list of the most significant initiatives taken per category in 2025 can be found below:

Education and Financial Empowerment

"Marietta Giannakou" Program: Renovation of 400 public school buildings in 2025 (**€100 mn** by the 4 Greek systemic banks - **€25 mn** for NRG), plus additional **€100 mn** committed for 2026 (**€25 mn** for NRG).

ENHORIA¹ Initiative: Research Hub: 3 funded projects underway; Digital Hub: 2 Special Awards on Financial Empowerment (**€10 k**); Community Hub: official website launch (www.enhoriainitiative.gr).

Zografion Lyceum Restoration: Joint donation of **€0.5 mn** by the Hellenic Bank Association members to support the restoration of the Zografion Lyceum in Constantinople, one of the diaspora's most important educational institutions.

Public Health and Well-Being

Ippokratelion Hospital Thessaloniki: Construction studies for the renovation of the Artificial Kidney Unit.

Emergency Rescue: Rescue helicopter leasing for National Emergency Aid Center (EKAB) (**100** flight hours, **91** patients transported).

Greek Athletes Program: Support of 7 champions, incl. Olympic and Paralympic champions in track and field, judo, swimming and tennis.

Sports Tournaments: Official Banking Partner of the ATP-250 Hellenic Championship international tennis tournament organized for the first time in Greece. Strategic sponsor of Davis Cup Athens.

Environment Protection

Chios Island: Anti-flood works after the 2025 wildfires (concluded in 2026).

Volunteer firefighters: Equipment for **45** teams (c. **2,000** volunteers) and **14** experiential workshops in collaboration with Deimos, WWF and 2 foundations (2024-2025).

Thessaly restoration: Restoration of railway infrastructure damaged by storms "Daniel" & "Glas" (**€2.75 mn**).

Entrepreneurship and Innovation

NRG Business Seeds Competition: **€0.75 mn** awards to **140** start-ups over 15 years; **€5.5 mn** loans/direct investments to 15 start-ups.

Innovation ecosystem: Strategic partner of Endeavor Greece; Founding Partner of the inaugural Paratheneas festival, with **21 k** participants (of which **1.3 k** founders, **0.6 k** investors) from **44** countries.

Junior Achievement: Gold sponsor of the "JA Virtual Company Program" for high-school students, offering mentors & coaching.

Greek Heritage, Culture and Creativity

NRG Cultural Foundation (MKT): 14 book editions/prints, 5 exhibitions, over 70 cultural events during 2025.

NRG Historical Archive: 2 large exhibitions (on Greek Refugees from Middle-East and Hellenic National Costume).

Greek National Opera: Sponsorship of 2 educational programs across 4 islands, reaching **~1.4 k** children in 10 schools (2025-2026).

Greek National Gallery: Long-term strategic partnership plus 3-year exclusive sponsorship for publishing program.

1. In partnership with Secretary Prof. Yi. Palaiologos & NRG Services, focused on empowering financial decisions of households through Research, Digital & Community hubs (€54 mn committed for 3 years).

In 2026, NBG continues to undertake significant initiatives, such as:

Education and Financial Empowerment

Financial Education Platform: A platform hosted in NBG's site, designed to be a trusted financial advisor for the Greek society.

ENHORIA¹ Initiative: 2 NBG Business Seeds special awards and 3 new research projects sponsored.

OECD Global Money Week (Smart Money Talks): NBG participation with a talk on "Money Psychology" to ~600 NBG employees.

Public Health and Well-Being

Athens Olympic Swimming Centre: Grand Sponsor of the renovation of the Athens Olympic Swimming Centre.

Paralympic Committee: Grand Sponsor of Paralympic Committee for 2026-2028.

Environment Protection

Volunteer firefighters: c. 3,000 volunteer firefighters and >70 volunteer teams supported in collaboration with Cemusa, WWF and 2 foundations (2023-2026).

Entrepreneurship and Innovation

NBG Business Seeds Competition: 10th Competition conducted with **record-high** submissions (>32% y-o-y).

Innovation ecosystem: Founding Partner of the Parathena festival since first year, with **115 k** participants from **60** countries.

Greek Heritage, Culture and Creativity

NBG Historical Archive: Inauguration of a new periodical exhibition "Lambros Ortinos": aspects of print-making.

Greek National Opera: Sponsorship of 3 educational programs across 4 islands, reaching ~4 k children in 12 schools (2025-2026).

Social initiatives in collaboration with other Greek Banks

"Meliarta Giannakou" Program

2nd phase of public schools' renovation program, increasing total number of renovated schools to 670 (€100 m total, €25 m for NBG).

"Academia 2030"

1st phase of the infrastructure upgrade of 2 selected Greek Universities (€160 m total, €40 m for NBG).

Emergency Rescue

Rental and operation of 2 rescue helicopters for the Greek National Emergency Aid Center (€2 m total, €0.5 m for NBG).

Zografion Lyceum Restoration

Joint donation of €0.5 m by HGA members to support the restoration of the Zografion Lyceum in Constantinople, one of the diaspora's most important educational institutions.



¹ In partnership with Secretary Prof. Yi. Palaiaras & NRG Semens.

² National and Kapodistrian University of Athens, Aristotle University of Thessaloniki, National and Technical University of Athens.

3.3.3 Education and Financial Empowerment

NBG's Financial Education Platform

In the last quarter of 2023, NBG's Social Strategy Division, in close collaboration with Marketing, core Retail & Business Units, Economic Analysis, Compliance and IT, initiated the development of a [Financial Education Platform](#) in alignment with National Financial Literacy Strategy for Greece⁶.

The platform, hosted on NBG's website (nbgr.gr), serves as a trusted source of financial knowledge for both NBG customers and the wider public.

Through clear, reliable, accessible and engaging content, it helps individuals at every stage of life (from students and young professionals to families and those planning for retirement) as well as SMEs, better understand financial concepts and terminology. By adopting an **education-driven approach**, NBG aims to promote financial literacy as a key driver of growth and empowerment, fostering long-term trust, confidence, and greater **financial awareness** across society.

NBG has prioritized 4 life-stage segments:



- Youth (18-29 years).
- Families with children (30-55 years).
- Pre-retirement (55+ years).
- Small Business Owners.

The platform's content is structured on 5 themes:

- | | | |
|---|-------------------------------|--------------------------------------|
| 01
Budgeting and
Financial Management | 02
Saving
and Investing | 03
Lending and
Debt Management |
| 04
Digital Banking
and Cybersecurity | 05
Insurance | |

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Υπολογιστής



6. (2022-2024) National Financial Literacy Strategy for Greece, OECD Publishing/Paris, <https://doi.org/10.1787/925056447> en.



ENNOIA Initiative

As part of its social strategy and with a focus on financial literacy, NBG, in partnership with **Accenture Greece**, Professor **Michael Halliassos**, and the non-profit organization **Komvos - Node**, launched ENNOIA Initiative (in 2024)

The initiative aims to support Greek households in making financial decisions, managing their finances effectively, and ensuring financial resilience. ENNOIA is **funded exclusively by NBG** and is structured around the following 3 main pillars:

Research Hub

Supporting scientific research on issues related to household financial empowerment and financial inclusion.

In 2025, **3 proposals** (out of 30 submitted) **were approved** for funding.

Digital Hub

Fostering entrepreneurship and the development of innovative products, services and tools to help households in financial education and sound economic decision-making.

3 ENNOIA special awards offered through NBG's **Business Seeds** program.

Community Hub

Promoting the transfer of knowledge and solutions related to financial education and household financial decisions through a **specialized website**, conferences, and other information actions.

www.ennoiainitiative.gr

"Marietta Giannakou" public schools renovation program



In December 2024, the 4 Greek systemic banks decided to support the Public Schools Renovation Program "**Marietta Giannakou**" with a **first tranche of €100 mn (€25 mn each)**

- The program was launched in 2025, covering renovation works for **400 school buildings** housing **400 schools** (20 kindergarten, 250 primary and 130 secondary) with c. **400k-450k children in 230 municipalities** all over Greece.
- The construction works took place during the 2025 summer school break, **finished before school openings** and included repairs and painting of school buildings, renovation of laboratories, installation of ramps for the disabled, upgrades of sports facilities.

- The program ran with the oversight of the State, while a **Steering Committee** with representatives of the 4 systemic banks and coordination by the Hellenic Banking Association (HBA) was formed to monitor the progress and the payments to the contractors.
- In September 2025, the CSOs of the 4 systemic banks and the Chairman of HBA attended the opening of a school in West Attica together with the Prime Minister.
- In May 2026, the 4 Greek systemic banks signed the **second tranche** of the program of **€100 mn (additional support of €25 mn provided by each bank)**. This tranche will cover the renovation costs for **additional 240 school buildings**; relevant works will be completed by **September 2026**.
- The third and fourth tranche (€100 mn each in 2026 and 2027 respectively) will be assessed on an annual basis and are subject to the progress of the program's implementation, its requirements, and the prevailing financial market conditions.
- The "Marietta Giannakou" program is expected to be completed in 2028, improving the learning environment of **2,500 state schools** under a total budget of **€400 mn** (the biggest CSR initiative in Greece so far).

EXPECTED BENEFICIARIES BY 2028



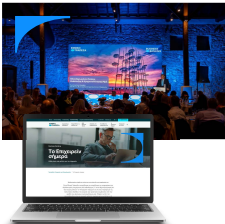
2,500

state schools
nationwide

DISTRIBUTION OF SCHOOLS

per periphery (1st tranche)





Supporting local SMEs

In the context of accelerating the sustainable transformation of Greek SMEs, since 2022, NBG organizes **nationwide Business Banking events**

that connect businesses with **ESG-aligned financing solutions**, including guaranteed and co-financed schemes supporting green and sustainable investments, while also strengthening their business planning and decision-making capabilities. Specifically, during these events SMEs owners get the opportunity to discuss needs, ideas, concerns and get the appropriate guidance by NBG executives, while in parallel are being informed in topics such as:

- SMEs market trends and the latest economic developments both at country-level and regional-level.
- New financial tools that can utilize to support their business development.
- NBG's Business Banking holistic approach / offering and the advisory role of Business Banking Relationship Managers.
- Business planning and decision-making.

Since the initiation of Business Banking events' roll-out, NBG has organized **34 events in 17 big cities** in Greece, where **more than 5,000 SME owners have participated**. In parallel, Bank's executives from the Branch Network and Business Banking segment have conducted dedicated visits to the premises of ~250 medium or small enterprises.

In 2025, NBG rolled out **7 Business Banking events** throughout Greece.

Furthermore, NBG has also established a **dedicated knowledge hub** in the Bank's site, aiming to enhance **financial literacy**. The content is designed by NBG's Economic Analysis Division and Business Banking Segment executives and provided in an 'easy-to-understand' wording, includes SME-focused studies and insights and also promoted to customers through a structured newsletter series. The latest studies released focus on topics such as Artificial Intelligence, digital migration, imposed tariffs' effects, ESG / sustainability as well as the recent geopolitical uncertainties.

3.3.4 Public Health and Well-Being

As part of its long-standing commitment to supporting Greek sports, NBG stands alongside **seven top athletes** as they try to make their dreams come true and put Greece on the map of world sports. Our purpose is to offer our athletes effective support to fully dedicate themselves to their training and performance, helping them achieve their goals and reach their full potential.

Athletes' sponsorships

In 2025, we proudly stood by Maria, Mitos, Michalis, Elna, Thodoris, Apostolos and Christos along this extremely demanding but beautiful journey they have embarked upon.



Tennis

Highest-ranked Greek woman tennis player

Maria
Sakkari



Long jump

Gold medal at the 2024 Paris Olympics

Mitos
Tentoglou



Track and Field

International paralympic athlete

Michalis
Seifis



Hammer Throw

Christos
Frantzeskakis



Javelin Throw

Elna
Tsengio



Judo

Thodoris
Tsikalas



Swimming

Apostolos
Siskos

SPORTS

Athletic Events sponsorships



In parallel, during 2025, HBG proudly undertook several sponsorships, aiming to support the organization of international sporting events. Specifically, the Bank was accredited as Official Banking Partner of the **ATP 500 Helladic Championship** (the international tennis tournament organized for the first time in Greece) and strategic sponsor of **Davis Cup Athens**.

PUBLIC HEALTH

Emergency Rescue Support



In order to enhance Greece's **Emergency Rescue Support** capabilities, during 2025, HBG proceeded with covering the rental and operation costs of a rescue helicopter to support the **National Emergency Aid Center (EKAK)** during the summer (peak tourist) season.

The rescue helicopter operated for **110 flight hours** and transported **41 patients** that needed hospitalization.

3.3.5 Environment Protection

NBG's social strategy and sponsorship programs are designed to deliver positive impact for the communities in which the Bank operates, especially those impacted by natural disasters, while in parallel we continue to deploy initiatives to protect the environment.



Anti-flood works in Chios Island

In 2025, one of our key initiatives for the protection of our environment focused on the **restoration of forest areas in Chios Island** which were severely impacted by the catastrophic fire in the summer of 2025.

Notably, the donation reached to **€1.3 mn** and was safeguarded by the Greek Ministry of Environment and Energy.

This initiative included the implementation of all the immediate actions required for:

- Limiting soil erosion.
- Protecting the burned area (194 mm² or 15% of the total Chios area) from further degradation.

- Protecting other areas of Chios Island from potential floods (by building over **100km** of protective barriers).

Support to volunteer fire-fighters

In the context of **"Initiative 31"**, the Bank joined forces with the John S. Latsis Public Benefit Foundation and the Athina I. Martinou Foundation, with the collaboration of Deimos Non-Profit Foundation, WWF Greece, and HGGG (Higher Incubator Giving Growth & Sustainability), to support **~3,000 volunteer firefighters** and **71 specialized teams** across Greece by providing all the necessary:

- Training.
- Supplies.
- Equipment.

to successfully continue carrying out their firefighting operations.



SUPPORTED

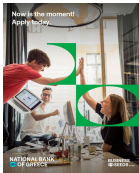


~3,000
volunteer firefighters

71
teams

3.3.6 Entrepreneurship and Innovation

The Bank is committed to supporting programs and initiatives that nurture entrepreneurship by acting as a founding partner or offering awards to innovative ideas that have the potential to deliver meaningful social impact.



NBG Business Seeds

Business Seeds is the Bank's acceleration program for start-up companies with a focus on sectors such as: Fintech, Sustainability, Regtech, Digital Business, Proptech and Financial Literacy, offering infrastructure and financial support as well as networking opportunities, ensuring that program participants have the resources and knowledge required to succeed.

Since the program's inception, 17 years ago, the Bank has awarded a total of **658** grants to **192** start-ups, and **€5.5** mn loans and direct investments to **21** start-ups, while the 16th Annual NBG Business Seeds Innovation and Technology Competition launched with record-high submission proposals (~20% y-o-y).

Innovation events and initiatives

Starting from 2005, NBG is one of the two founding partners of **Panathénëa**.

- Panathénëa is a student-led, international innovation festival and conference, aiming to put Athens into the spotlight of the global startup and entrepreneurship ecosystem. During its **2025** launch, the festival attracted **2k** participants from **44** countries.
- In **2026**, Panathénëa attracted **6.5k** attendees from **60** countries, including **1.5k** investors. Aside from the founding partner support, NBG further contributed to the festival via co-organizing (together with its partners) a total of **6** high-profile side events.



NBG participates in an ongoing strategic partnership with **Endeavor Greece**, supporting the Greek as well as regional (European/ MENA) innovation ecosystems. This includes co-organizing and/or sponsoring high-profile events such as Fintech Athens, Innovation Greece, Athens Innovation Summit and the Greek Delegation at Slush. In these events, the Bank also cooperates with **further parties** such as Greek Public Universities, Non-Profit Foundations/ NGOs, Big-4/ Consulting Firms etc.

Finally, the Bank acted as a major sponsor of the **Junior Achievement Virtual Company Program** and notably engaged a team of its executives as **inspirational mentors** and judges in the Trade Fairs and Final Awards Ceremony.

3.3.7 Greek Heritage, Culture and Creativity

The [NBG Historical Archive](#) is a notable centre for documentation of the **economic, political, cultural and social history of the country**, and holds a full historical archive covering almost the entire history of the modern Greek state. The Historical Archive is active in the fields of archiving, historical research, publishing, exhibit management and curatorship as well as museum education.

The Historical Archive includes **c.14,000 running metres of archival material** and a significant number of collections created due to preservation and accumulation of items within the Bank or by acquisition through donation and purchase. These collections consist of banknote specimens, coins, medals, office machines, architectural plans, artworks and various companies' and individuals' artefacts. Its specialized library carries over **35,000 book titles and 60,000 volumes** in Greek and other languages.

It is worth mentioning that during 2025, **1,111 students** of primary and secondary education participated in the educational programs of NBG's Historical Archive while a total of **260 researchers** were served by its reading room, across 379 visits or remotely.

The main events, initiatives and exhibitions organized during 2025 were as follows:

- The stories behind the **Publication Hellenic National Costumes** exhibition (hosted at Benaki Museum of Greek Culture): **8,394 visitors**.
- The **"Networking Culture"** symposium, a distinguished event organized by the Network of Museums and Cultural Institutions of Athens (hosted at Karatzas Mansion).
- Participation in public outreach activities such as the **Night of Museums** and **Open House**.
- The **"An initiative of the National Bank of Greece for Clean Energy in the First Half of the 20th Century: The Case of the 'White Coal' Archive"** project, carried out in collaboration with Archives Portal Europe (APE). The result was that images of 580 documents and metadata for 30,825 records were made accessible online to the international public. This project was completed in 2025 with the hybrid workshop **"The 'White Coal' Digitization Project"** (hosted at Megaro Clomid).
- **"Refugees in the wake of the Lausanne Treaty. The National Bank of Greece contributes to their integration into the new homeland"** exhibition (hosted at Small Greek House): **1,760 visitors**.



The [National Bank of Greece Cultural Foundation \(MIET\)](#) occupies a leading role in Greece's cultural life for 60 years, by virtue of the continuous support of the National Bank. It features an extensive range of activities, including research, archiving, publishing, cultural and educational programming, academic meetings, lectures and various events.

During the year, MIET welcomed 6,604 visitors to its temporary exhibitions, while 3,662 students and participants attended its educational programs and guided tours, and 3,535 researchers utilized its archival resources. The main events during 2023 were as follows:

- **Publishing & Distribution:** Release of 14 new titles and 11 reprints, along with the distribution of 9,236 academic textbooks to university students.
- **"1943-1974. Cultures in Conflict: Life-Art-Propaganda" exhibition:** welcomed over 3,500 visitors, accompanied by panel discussions, lectures, and screenings at the Greek Film Archive.
- **Exhibitions in Thessaloniki:** Renée Revai's TSHOM, Aris Georgiou's Homo Ludens retrospective, and The Invisible Role of Women Through Time in collaboration with the Municipality of Thessaloniki.
- **Academic Conferences & Symposia:** "The Future of Humanities and Social Sciences in Greece", "Challenges and Opportunities for the European and Greek Economy", and the annual Georgios I. Mavros Memorial Lecture featuring Anna Applebaum (Autocracy Inc.).
- **Educational programmes** and activities aimed at both the general public and audiences with specialised interests.
- **Book Fairs & Outreach:** 4th Book Bazaar at the Old Stock Exchange, GSA Old-Book Bazaar, active participation in the Thessaloniki International Book Fair.
- **Digital Archiving & Access:** Processing of research requests; digitisation of thousands of documents.



MIET



[4.1 Our ESG Governance](#)[4.2 Responsible Supply Chain Management](#)[4.3 Human Rights](#)[4.4 IT and Data](#)

04 Governance

04 Governance

4.1 Our ESG Governance

- 4.1.1 Roles and responsibilities on ESG matters
- 4.1.2 Sustainability management | 3 LoDs model
- 4.1.3 ESG-related business conduct
- 4.1.4 Responsible approach to tax



4.1.1 Roles and responsibilities on ESG matters

OVERVIEW OF NRG GOVERNANCE ON ESG

Board & Board Committees

Board of Directors

ESG Committee

Audit

Risk

Corporate Governance
and Nominations

Human Resources
and Remuneration

Strategy and
Transformation

Compliance, Ethics
and Culture

Innovation and
Sustainability

Management Committees

Executive Committee

ESG Management
Committee

ESG Framework

Acknowledging the necessity and importance of a strong governance structure for the management of ESG-related matters, NRG has established an ESG framework that provides essential foundation for long-term value creation and is appropriate to the Bank's current risk profile, business model and size, organization structure and the nature of its activities.

In this framework, the role of the Board is to ensure the highest transparency and oversight standards over ESG issues, while the management is entrusted with the day-to-day operations, business and longer-term strategic planning, subject to the Board's oversight. The [ESG framework](#) adequately ensures that:

- The Management and its Committees embed ESG considerations into Bank's business strategy and effectively manage ESG risks.
- The responsibilities related to the management of ESG risks, with a focus on C&E risks, are clearly assigned and documented in the relevant policies, procedures and controls and the role of Units involved is fully in line with supervisory expectations.
- The effective oversight over exposures and response to ESG risks, with a focus on C&E risks, is exercised.
- A sound and comprehensive approach is in place to embed ESG risks in the overall business strategy and risk management framework, including Key Risk Indicators and appropriate limits.



- Adequate financial and human resources, including awareness and expert trainings are available to relevant personnel.
- The remuneration policy and practices stimulate behavior consistent with ESG objectives and risk management approach.
- A holistic approach to ESG data governance is being applied, and IT systems are being adapted to systematically collect and aggregate the necessary data, with a particular focus on data required for the management of C&E risks.
- Reports produced accurately present the impact of ESG-related matters on NRG's business model, strategy and risk profile.

BoD composition

The Bank gives great emphasis on **ensuring diversity** including in terms of gender representation, age, nationality, and variety of educational background, experience, and expertise, while maintaining a greater share of Independent Non-Executive Directors than required by the minimum regulatory provisions by Greek Law 4706/2020 on Corporate Governance of Sociétés Anonymes.

- The Board is comprised of **12 members**, of which 10 are non-executives and two are executive members. Independent non-executive members constitute **75% of BoD members**.
- The representation of women on the Board of Directors is currently at **33%** and the representation of men at **67%**.
- The age of Board Members varies and is **in the range of 50 to 70**, except for two Directors being over 70.
- The Board of Directors of the Bank has a multinational composition, including **six different nationalities**, namely Greek, Dutch, French, British, Spanish and Romanian. In total, the Bank's Board consists of 6 Greek and 6 non-Greek members.
- The expertise of its Board Members covers all areas of knowledge and experience required in accordance with the Bank's business activities.
- All Board members possess a **diverse set of skills** related to ESG issues and relevant trends, as well as engage in continuous trainings, educational initiatives and strategy days focused on banking trends, ESG, AI, data management and cybersecurity.

RESPONSIBILITIES OF THE BOARD

As per HNG's [Corporate Governance Code](#), the Board of Directors is specifically responsible for:

01

Providing the necessary oversight of the ESG strategy implementation and across all ESG risks, with a focus on C&E risks

02

Ensuring that material environmental and social considerations are addressed in the Bank's public disclosures

03

Approving the ESG strategy details incorporated in the Annual Budget and Business Plan



The Board has explicitly allocated duties and tasks related to ESG among its seven BoD Committees, for the oversight of key areas such as emissions measurement and target-setting, C&E governance, C&E risk management and C&E data, systems and reporting.

4.1.2 Sustainability management | 3 LoDs model

The integration of ESG risks (including C&E risks) within the organizational structure in accordance with the **Three Lines of Defence (LoD)** model



1st Line of Defence Key Responsibilities

Transformation and Strategy Units

Climate & Environmental Strategy

- Support to ESG strategy shaping and enabling/monitoring its execution.
- Coordination of involved 1st LoD Units in carrying out C&E-related initiatives.
- Awareness enhancement of climate change impacts to NRG; promotion of customers' transition.
- Calculation of financed and non-financed emissions and contribution to EU Taxonomy implementation.

Social Strategy & ESG Reporting

- Preparation of annual Sustainability Statement and monitoring of Bank's participation to ESG ratings/indices.
- Support to Management in shaping Bank's social strategy; design of actions addressing social issues.
- Management of sponsorships and Bank's archive material / artistic collection.

Corporate Transformation

- Support of planning, monitoring, and execution of key cross-functional efforts included in NRG's Transformation Program.

Business Strategy

- Incorporation of ESG considerations in overall NRG's strategy, budget and Business Plan.

Business Units

CB

- Financing of Corporate clients' transition and emissions' reduction, due diligence on Corporate clients' ESG risks and responsibility of ESG risk-taking.

Retail Banking

- Introduction and promotion of ESG products (e.g., green SB loans, green mortgages, loans for hybrid/EV cars) in accordance with ESG policies and risk limits.

Other Units

- **Procurement:** assessment of ESG risks for NRG's vendors / suppliers.
- **Real Estate:** implementation of the energy strategy for the Bank's owned / leased buildings.
- **HR:** development of initiatives focusing on e.g., DG, performance/talent management and support of ESG strategy through internal communications and trainings.
- **IT:** incorporation of ESG data in Bank's IT systems and in the Enterprise Data Warehouse.

2nd Line of Defence Key Responsibilities

Risk Units

Strategic Risk Management

- Development of a holistic ESG risk management framework (incl. methodology for the identification, measurement and assessment of ESG risks, incorporation of ESG risks in Bank's business strategy).
- Coordination of actions to ensure adherence to supervisory expectations with regards to C&E risks.

Other Risk Units: each Unit (e.g., Credit Risk, Market & Liquidity Risk, Operational Risk) measures, manages and mitigates C&E risks/drivers and their impact on existing financial / non-financial risk types, while Risk Culture & PMO Unit coordinates the management of ESG risks. Notably:

- The Group Chief Credit Officer and Credit Divisions ensure incorporation of ESG considerations within lending policies and processes.
- The Group CRO is a member of the Executive Committee and reports to the Board Risk Committee.

Compliance Units

Data Privacy, Technology & ESG Compliance Advisory

- Advises on compliance with the ESG legal/regulatory framework by offering relevant guidance to Bank's Units.
- Monitors ESG regulatory developments and relevant supervisory expectations and informs Bank's Units.
- Monitors compliance measures and exercises ESG Due Diligence with increasing focus on greenwashing, ESG and reputational risks.

Compliance Internal Governance

- Monitoring of regulatory corporate governance developments and best practices and incorporation in the Bank's governance policies and procedures.
- Reviews Board Committee charters, formulation of the Annual Board Budget, Annual GoD / Committee reports and annual Board training plan.
- Effective adjustment of the Bank's internal governance framework.



Compliance Risk Governance & Monitoring

- Independently assesses and monitors ESG-related compliance risks and provides independent assurance on the adequacy and effectiveness of related controls.
- Conducts risk-based compliance testing and monitoring to evaluate whether ESG-related obligations are effectively embedded within Bank's policies / processes.
- Leads strategic ESG-compliance Risk Management initiatives (incl. new frameworks' impact / green washing assessments).
- Supports the Bank's governance framework by monitoring ESG-related remediation actions and providing risk insights.

3rd Line of Defence Key Responsibilities

Internal Audit

- Audits procedures and practices relevant to ESG across the 1st and 2nd lines of defence.

4.1.3 ESG-related business conduct | Policies

The key Policies and procedures that support NBG's responsible business conduct, banking practices and cover the identification, management and mitigation of social, governance and reputational impacts and risks, are categorized as follows:

Demonstrating responsible behavior and respect for human rights

- [Group Code of Ethics](#)
- [Group Policies for the Prevention of Conflicts of Interest](#)
- [Group Whistleblowing Policy](#)
- Group Policy on Violence and Harassment at Work
- Policy for the Management of Internal Complaints regarding Cases of Violence and Harassment

Acting with responsibility towards customers

- Group Complaints Management Policy
- Group Policies for the Provision of Investment and Insurance Services

Combating financial crime

- [Group Anti-Bribery and Anti-Corruption Policy](#)
- Group Anti-Fraud Policy
- [Group Policies for Anti-Money Laundering \(AML\) and Counter-Terrorist Financing \(CTF\) \(Group AML/CTF Policy, Sanctions Policy, Policy for Virtual Assets, AML/CTF for Cross-Border Correspondent Banking Policy\)](#)

Following a responsible approach for the protection of personal data and data security

- Group Personal Data Management Policy
- Group Information Security Policy

Ensuring transparency in donations and sponsorship

- Group Policy on Donations, Sponsorship and Charity Contributions



4.1.3 ESG-related business conduct | Anti-bribery / corruption

Anti-bribery / anti-corruption procedures

The Bank has established procedures for identifying, reporting, investigating, and remediating breaches of the [Anti-Bribery / Anti-Corruption policy](#), including escalation channels, confidential reporting mechanisms (whistleblowing), documentation requirements, disciplinary measures where appropriate, root-cause analysis and corrective action plans to prevent recurrence. Depending on identified risks and the nature of their activities, **key elements** of these procedures include:

- Clear, effective and properly **enforced guidelines** regarding the acceptance/offering of gifts and business hospitality, political donations and Politically Exposed Persons (PEPs), charitable contributions and sponsorships, facilitation payments, accounting and transactions, human resources activities, lending and service operations and procurement services.
- **Whistleblowing mechanisms**, allowing confidential reporting of bribery/corruption suspicions.
- Root-cause analysis (RCA) for material/significant policy breaches or other high-risk incidents.

NBG's **Anti-Bribery / Anti-Corruption risk assessment** identifies and evaluates a series of risk areas, related to geographic exposure, interaction with public officials, 3rd parties (e.g., suppliers, agents, intermediaries), transactions, gifts and business hospitality, charities and sponsorships, personnel and participation in mergers, acquisitions and AIs.

This risk assessment also considers a comprehensive set of control domains that include the clarity and governance of the Group's policy framework, the adequacy and relevance of training programs, the robustness of 3rd party due-diligence processes, the effectiveness of monitoring and testing activities, the operation of preventive / detective controls within payment and transactional processes, and the quality and timeliness of related investigations.

Notably, **all 15 Units** of NBG Group's Compliance and Corporate Governance Function are certified with the international standard **ISO 37001** (Anti-bribery management systems).

Contributions to political parties

Onboarding of **Politically Exposed Persons (PEPs)** requires senior management approval, in alignment with the provision of AML Regulations and guidelines. Additionally, the Bank has established risk-based onboarding and approval procedures for customers presenting elevated money laundering or terrorist financing risk due to geography, industry, or product profile. In both PEPs and other high-risk customers, enhanced due diligence measures are applied.

The Bank addresses **political contributions** as well as **charitable contributions and sponsorships** through its Anti-Bribery and Anti-Corruption Policy. In particular:

- NBG is a commercial organization and as such, its operations are only oriented towards business activities and therefore **NBG does not intervene in political issues** or in **issues concerning political parties**. It does not offer gifts and donations to political parties, and it does not offer contributions or other facilitations to candidates for public positions or to political parties or other political organizations.
- The members of the Board, the Senior Management and in general the Bank's personnel are prohibited from making any direct or indirect contributions to political parties, organizations or individuals engaged in politics, as a way of obtaining advantage in business transactions or influencing a tender or other decision in favour of the Group. Granting loans to the above-mentioned categories is allowed, under the condition that the requirements of the NBG Credit Policy are met and that it is consistent with the relevant provisions of the applicable legislative and regulatory framework.
- NBG ensures that charitable contributions and sponsorships are not used as a means of influencing 3rd parties with the ultimate purpose of obtaining preferential treatment or business benefits. In no case can charitable donation or sponsorship be used as a subterfuge for bribery or corruption. All charity and donation activities are done in good faith and are not aimed to gain any business or other advantage that may be considered improper.

Notably, **NBG does not** make any contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations and other tax-exempt groups **whose primary role is to influence political campaigns or legislation**.

4.1.3 ESG-related business conduct | Anti-greenwashing



Anti-greenwashing

Recognizing Greenwashing risks (in connection to ESG and reputational risks) and with the aim to strengthen the transparency and credibility of the Group's ESG-related communications and products, NRG has established an internal anti-greenwashing framework (procedures, Guidelines and Tool) for identifying, monitoring and preventing greenwashing practices (i.e. practices in which sustainability-related statements, actions or communications do not clearly and fairly reflect the underlying sustainability profile of an entity, financial product or financial service and may be misleading to consumers, investors or other market participants).

As defined in the Group's internal framework, all sustainability/ESG-related statements included either in disclosures, communications, or in the promotion of our products and services are to be accurate, fair, clear and not misleading, simple and concise and refrain from misleading environmental statements and practices related to Greenwashing.

Also, to foster ESG culture and anti-greenwashing awareness, a dedicated training program on greenwashing has been available to all NRG employees since March 2025.

4.1.4 Responsible approach to tax

NBG is subject to income tax and pays the fair amount of taxes, based on the results of its activity, duly and on time

The Bank's Taxation Division monitors tax developments on a constant basis and undertakes an advisory and supervisory role ensuring the Bank's **compliance with the applicable tax legislation**, shielding it against tax risks and protecting its Management from any serious charges or criminal liability, in Greece and abroad as it acts under the **tax principles approved by NBG's Executive Committee** since 2019.

In this context, NBG operates under the following **primary principles**:

- Pays the fair amount of taxes based on the results of its activity, contributing in the best way to the fiscal targets of Greece.
- Ensures full compliance with the applicable tax legislation, including efficient taxation management, smooth collaboration with tax authorities.
- Handles tax issues in accordance with the tax legislation, the international best practices and guidelines, including OECD Transfer Pricing Guidelines, BEPS and EU Directives.
- Acts under full transparency.
- Adopts safe handling on tax matters, by avoiding abusive tax planning and by rejecting transactions which have no economic or commercial substance.
- Avoids the creation of non-transparent corporate organizational structures.
- Does not promote or even encourage tax avoidance, both for its own transactions and for those of its customers.

NBG and its significant subsidiaries in Greece voluntarily engage an independent external auditor (currently PwC) to conduct an annual tax compliance audit, in accordance with the Greek tax certificate regime. The Board's Audit Committee is periodically informed on tax matters, including compliance, tax risk and significant tax positions by the external auditor following the conclusion of this engagement. This process enhances tax transparency, ensures compliance with applicable tax laws and supports the monitoring of tax risks and controls.



04 Governance

4.2 Responsible Supply Chain Management



4.2 Responsible Supply Chain Management

As a financial institution, NBG acknowledges its critical role in driving responsible business practices across its value chain and assesses the ESG impacts deriving from its value chain as of **major importance**. In this context, NBG has established a **comprehensive ESG due diligence framework** governing its relationships with Third-Party Providers (TPPs).



Under key policies - including the Group Procurement & Demand Management Policy, the Group ICT Third Parties & Outsourcing Policy and the Group Code of Ethics - NBG assesses TPPs against ESG criteria using deep-dive questionnaires and/or specialized software applications. Notably, ESG principles apply to all 3rd parties collaborating with the Bank or Group companies, whether for ongoing services or specific project work.

TPPs are expected to comply with NBG's Code of Ethics, adhere to its ESG standards, actively support sustainable and responsible

business practices, cooperate with NBG on ESG-related assessments and data requests, and cascade equivalent sustainability expectations to their own subcontractors and supply chain partners. NBG's due diligence practices are grounded in internationally recognised frameworks, including the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UNGPs) and the UN Global Compact (UNGC).

COMMITMENT FOR SUSTAINABLE PROCUREMENT

NBG acknowledges that its procurement operation constitutes a strategic instrument for promoting elevated standards of responsibility, efficiency and equity. By committing to fostering transparency, integrity, and sound governance in its procurement processes, the Bank aims to encourage the creation and delivery of products and services with reduced environmental impact, enhanced energy efficiency and improved labour conditions.



ESG Due Diligence for Third-Party Providers (TPPs)

To identify and mitigate potential adverse impacts arising from the ESG risks of its service providers and other third parties, NBG has implemented a dedicated ESG Questionnaire. This questionnaire is issued during the Service Provider Due Diligence stage and enables NBG to assess prospective providers against a set of ESG criteria designed to assess whether they:

- Operate in an ethical and socially responsible manner.
- Adhere to internationally recognized standards on human rights and fair working conditions.
- Take appropriate measures to protect the environment.
- Apply sound corporate governance practices.

The assessment covers, inter alia, the following dimensions and criteria:

- **Environmental criteria:** Measurement and reduction of GHG emissions, energy management, resource efficiency, climate transition planning, and compliance with applicable environmental laws and standards.
- **Social criteria:** The protection of human rights, diversity and inclusion, non-discrimination, occupational health and safety, and the prohibition of child labour and forced labour.
- **Governance criteria:** Data privacy, anti-bribery and anti-corruption measures, ethical business conduct, and the existence of a [Code of Conduct](#) and whistleblowing mechanisms.

Where gaps or weaknesses are identified and as appropriate, NBG may require the implementation of **Corrective Action Plans (CAPs)** with agreed remediation timelines, apply enhanced monitoring, or escalate oversight, while prioritizing constructive engagement and remediation before escalation where possible.

In addition, in line with DORA (Regulation (EU) 2023/2554), which requires financial entities to identify, assess, and continuously monitor ICT third-party risk, NBG has integrated an ESG Risk Assessment into the due diligence process for all prospective or

existing **ICT service providers**. This complements DORA requirements relating to the maintenance of a Register of Information, robust contractual safeguards, incident reporting, and exit strategies.

Currently, NBG's ESG supplier due diligence procedures are subject to certain limitations, including reliance on supplier self-assessment, data availability in certain geographies, and the progressive roll-out of assessments across the existing supplier base. The Bank is enhancing its procedures to address these limitations.

KEY INSIGHTS

NBG's main suppliers include suppliers of IT (hardware / software) and other services (e.g., consultants, advertising companies) while there is limited procurement of non-services. In 2023:

NBG engaged with c. **5,600 suppliers** (of which 94% located in Greece and 6% abroad). All of them were informed of and agreed with the required terms to conduct business with the Bank.

There were **no confirmed incidents** where contracts with business partners were terminated or not renewed due to violations related to corruption.



~5,600
Suppliers



Services
mostly in IT,
Consulting & Advertising



94%
located
in Greece



Zero
incidents
of corruption



ESG Reputational Assessment Integration

NBG has developed a robust and comprehensive **ESG Compliance & Reputational Assessment framework**, fully aligned with recognized international standards, to proactively identify, monitor, and manage ESG and reputational risks across its entire third-party ecosystem.

Leveraging **Factiva** (Dow Jones) – one of the world's most trusted adverse-media screening platforms – and anchoring its methodology to leading frameworks including the EU's CSRD, CSDDD, ISO 26400, and the UN Global Compact, NBG completed its first full assessment cycle covering **1,400 third parties** with outstanding results: **90% of suppliers** were cleared or placed under standard monitoring, with zero environmental or social flags raised during the cycle.

By assessing ESG reputation across the supply chain, the Bank protects its standing with regulators and investors, sustains resilient and responsible partnerships, and creates lasting value for shareholders, customers, and communities.

04 Governance

4.3 Human Rights



4.3 Human Rights

NBG has a prime responsibility and duty to protect and promote all safeguarded human rights for its employees, customers, stakeholders and the society as a whole by adhering to the highest governance standards and international frameworks.

To this end, NBG:

- Commits to protect and promote the human rights across its operations, supply chain and customers, as well as all its stakeholders.
- Is working towards developing the necessary policies, procedures and mechanisms that support its objective to avoid causing or contributing to adverse human rights impacts.

The Bank demonstrates **responsible behaviour and respect for human rights** through a clear framework consisting of key policies and codes such as the following:

- [Group Code of Ethics](#).
- [Group Whistleblowing Policy](#).
- [Group Policy on Violence and Harassment at Work](#).
- [Policy for the Management of Internal Complaints regarding Cases of Violence and Harassment](#).
- [Group Complaints Management Policy](#).
- [Group Personal Data Management Policy](#) for customers.

NBG's respect for human rights across all its activities is guided by:

- Its corporate culture and **core values**, namely Human, Trustworthy, Responsive, and Growth Catalyst.
- The relevant **legal and regulatory framework**, which is incorporated across all its operations, as well as **international norms**, including the Bank's participation in the **UN Global Compact** and the endorsement of its **ten Principles**.

It should be pointed out that NBG aims to also implement in the future processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

Notably, the Bank's commitments with respect to human rights that are relevant to its own workforce include, *inter alia*:

- Respecting the human rights of others, including the labor rights of people in its own workforce.
- Showing zero tolerance with respect to trafficking human beings, forced or compulsory labor, and child labor, all of which are recognized human rights violations.
- Enabling the identification of human rights impacts and providing remedies where these are found to occur.



04 Governance

4.4 IT and Data

4.4.1 Data Privacy

4.4.2 Information Security

4.4.3 Artificial Intelligence



4.4.1 Data Privacy

Safeguarding data privacy and personal data

NBG is firmly committed to upholding the highest standards for the protection of **data privacy** and **personal data**, ensuring full compliance with the relevant legislative / regulatory frameworks such as the **GDPR** legislation

In this context:

- NBG's **Personal Data Management Policy** establishes the key principles, roles and safeguards governing the protection and lawful processing of personal data across the Bank.
- The BoD approves the Policy and is kept informed of key personal data protection matters, in line with the governance framework set out in the Policy.
- The Policy applies to all employees and third parties providing services on behalf of NBG and covers all forms of physical/electronic data processing carried out.
- During 2025, NBG undertook several **awareness initiatives** to foster a **robust data privacy culture**:
 - Targeted GDPR guidance and Q&As on high-risk and operational topics, such as pseudonymization, marketing and consent, data minimization, access rights and data erasure.
 - Targeted workshops, interactive seminars and AI-driven micro-training modules on key GDPR topics, including banking secrecy and personal data breach management.
 - Updates to core compliance tools and templates, including LIA, DPIA, and personal data breach assessment templates.

- Integration of AI-specific data protection considerations into AI compliance assessment processes.
- Strengthened governance and coordination through Group-level DPO forums, ambassador networks and guidance reflecting supervisory decisions and evolving regulatory expectations.
- Dedicated teams assisting BUs to ensure responsible data handling.

Data privacy program

NBG's data privacy program comprises of the following elements:

- **Privacy management / governance:** NBG's major GDPR compliance arrangements include the designation of a **Data Protection Officer (DPO)**, a dedicated Data Privacy Compliance Division, a Personal Data Protection Policy and a Personal Data Protection Committee.
- **Board privacy reporting:** The Board of Directors approves the Personal Data Management Policy and is kept informed of key personal data protection compliance matters.
- **Mandatory training:** During 2025, NBG undertook awareness initiatives including interactive workshops on GDPR topics and e-learning / seminars designed for employees.
- **Breach notification process:** Group Personal Data Management Policy provides for the escalation, assessment and management of personal data breach incidents, with the involvement of the DPO, Group CSO and other competent functions. Where required, personal data breaches are notified to the HOPA and/or affected data subjects in accordance with the GDPR.

Specifically, the DPO coordinates the handling of such incidents with the support of the competent units, while the Group CSO coordinates response and remediation actions where the incident concerns information systems security. NBG applies appropriate **technical and organisational measures** to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, in accordance with the Bank's relevant internal policies and procedures and the applicable legal and regulatory framework.

Data collection, processing and handling

- Personal data are used only for **specific, explicit and legitimate purposes**, in accordance with the principle of purpose limitation, with NRG determining the appropriate legal basis for each processing activity. Those purposes include, inter alia, customer identification and verification, communication with customers, conclusion and performance of contracts, provision and management of banking services, transaction servicing, compliance with legal and regulatory obligations and protection of the Bank's rights and legitimate interests, where applicable. Any further processing is assessed considering its compatibility with the original purpose and is carried out only where and to the extent this is permitted under the applicable legal and regulatory framework.
- The **categories of personal data** processed may include, indicatively and depending on the relevant product, service or transaction, identification and verification data, contact details, demographic data, financial and transactional data, electronic identification and authentication data, data required for due diligence, sanctions screening, anti-money laundering and counter-terrorist financing purposes, as well as data required for creditworthiness assessment, risk management and compliance with legal and regulatory obligations.
- NRG collects personal data **primarily from data subjects** and may also collect or receive personal data from third-party sources, competent authorities or publicly accessible sources, only where and to the extent permitted or required under the applicable legal and regulatory framework and where necessary for specified, explicit and legitimate purpose.
- Disclosures to **3rd parties** take place only where there is an appropriate legal basis and where such disclosure is necessary in the context of the relevant contractual or transactional relationship, compliance with legal or regulatory obligations, cooperation with competent authorities, or the use of service providers acting on behalf of the Bank. Where 3rd-party service providers process personal data on behalf of NRG, they act under the Bank's instructions and on its behalf, pursuant to written contractual arrangements and in accordance with NRG's Personal Data Management Policy, applicable data protection requirements and relevant internal procedures. Consent is also obtained where required under the applicable legal framework. It is noted that the contractual arrangement with NRG includes **audit rights**, enabling the Bank to verify compliance where appropriate, while NRG also assesses relevant 3rd parties' GDPR compliance through a **dedicated questionnaire**.



- NRG applies the principles of data minimisation, purpose limitation and storage limitation in accordance with its Personal Data Management Policy and the applicable data protection framework. Personal data are collected and processed only to the extent appropriate, relevant and necessary for the specified purposes of processing, and are **retained only for as long as required** for those purposes and/or under the applicable legal and regulatory framework. In any case, such retention **does not exceed 30 years** from the termination of the banking contract or transaction, reflecting the applicable general limitation period for claims under the Greek Civil Code. After the applicable retention period expires, personal data are destroyed in accordance with the Bank's relevant policies and procedures.

Individuals' rights

NRG informs data subjects of their rights under the GDPR, as well as of the process for exercising those rights, through its [Statement regarding the Protection of Personal Data](#), which is available on the Bank's website. It is noted that data subject requests are handled in accordance with the Bank's internal procedures, under the DPO guidance and with the support of the competent units. The Bank responds to such requests within the statutory deadline, i.e. **one month**, and, where an extension is required, informs the data subject within the applicable deadline of the reason for providing the extension.

4.4.2 Information Security

The Bank considers its information as a strategic asset and fully recognizes the importance of protecting and safeguarding it, as it is critical to its operation

Against this background, **Group Information Security Policy** constitutes the foundation of the Information Security Management System (ISMS), setting out Management's commitment, the governance model and the principles of Information Security / Cybersecurity. These principles are further elaborated through the **Group Information Security Regulation**, which provides the guidelines of the Information Security Framework for the protection of confidentiality, integrity, availability and authenticity of information assets and the enhancement of digital operational resilience against cyber threats.

At an operational level, the Policy and the Regulation are further specified through a comprehensive set of **ISMS Information Security procedures and Work Instructions**, which are based on international standards, regulatory frameworks and best practices. Specifically, MBG:

- Ensures **ongoing alignment with the applicable Greek and European regulatory framework** to which it is subject and has a **designated Group CISO role** who oversees the Information Security Division as well as the Group's Cybersecurity Division.
- Has adopted **best practices** to ensure the Group's business continuity, enhancing its resilience to cyber-attacks and maintains an insurance policy covering potential impacts resulting from cybersecurity incidents or data breaches.
- Has attained the **PCI DSS certification** while its Information Security Management System is certified to **ISO/IEC 27001** and conforms to **ISO/IEC 27007** (the certification scope covers the provision of IT infrastructure and services).
- Follows a multilayered approach for the **protection of its information assets**. This approach includes but is not limited to Distributed Denial-of-Service ("DDoS") protection, information intelligence services, perimeter controls such as firewalls, IDSs/IPSs, Secure Email Gateways, Secure Web Gateways, Endpoint protection, Data Leakage Prevention ("DLP") solution, Security Information and Event Management ("SIEM") solution, 24x7 Security Operations Center ("SOC").
- Continuously **improves its cyber security systems** with the strengthening of detection, response, and protection mechanisms, to ensure high level of customer service, the protection of personal data, enhance service efficiency and the safeguarding of business activities.
- Carries out **security reviews** regularly and whenever deemed necessary in accordance with best practices, while cybersecurity audits are conducted at least annually by regulatory authorities, the independent Group Internal Audit Function and external auditors in the context of the cybersecurity certifications attained by the Bank.
- Implements a **comprehensive framework of technical and organizational measures** for the management of Information Security and ICT incidents, in alignment with international standards, ensuring appropriate preparedness, clear definition of roles and responsibilities, and continuous training of designated personnel. Within this framework, a formal escalation process has been established, enabling employees to promptly report incidents, vulnerabilities, or suspicious activities through official communication channels. In parallel, the Bank ensures timely detection, effective response, and mitigation of potential impacts, while during the management of each incident a review is conducted to derive lessons learned and support the continuous improvement of relevant processes.
- Conducts a modern **Cyber Security Awareness Program**.

4.4.3 Artificial Intelligence

Responsible Artificial Intelligence



To ensure that all use of its AI systems aligns with the expectations, and requirements set forth both by society and the relevant regulatory authorities, NBG has adopted a Group Policy for the Responsible Use of Artificial Intelligence

This Policy is built around 7 defined [Responsible AI Principles](#), namely:

- **Accountability:** Holding NBG accountable for ensuring adherence to applicable laws, policies, and standards and for the appropriate and effective use of AI systems.
- **Transparency and Disclosure:** Maintaining complete transparency with all relevant stakeholders when using AI systems and their interactions with them (transparency constitutes a mandatory criterion in the ethical scoring of every AI model by NBG).
- **Fairness and Equity:** Remaining vigilant against the possibility of biases in data and algorithms resulting in inequitable outcomes and decisions.
- **Data Protection and Privacy:** Ensuring the Bank's AI systems comply with all applicable data privacy laws and protect privacy and personal data (NBG's policy for the Management of Personal Data supplements its Responsible Use of AI Policy).
- **Human-Centricity:** Designing AI systems to empower, preserve authority, and ensure the well-being of humans using them.
- **Reliability, Safety, and Security:** Ensuring NBG's systems are robust and resilient and have safeguards to reduce the risk of unintended behaviors and outcomes.
- **Social / Environmental Consciousness:** Designing AI systems and processes promoting positive, sustainable impact and avoiding perpetuating adverse effects on society, the environment (NBG designs and trains AI models and optimizes AI processes to be energy-efficient across services and infrastructure).

It is noted that:

- The Board of Directors is the highest endorsing decision-making body for the Responsible Use of AI Policy.
- The Bank abstains from the procurement, development or deployment of prohibited systems, as defined in the EU AI Act, setting clear boundaries for what Artificial Intelligence can do.

Additionally, the Bank has issued a Regulatory Compliance Guideline addressing AI risk assessment and regulatory obligations, including compliance with the EU AI Act (EU Regulation 2024/1689) and has developed a methodology for the Ethical Review of Chatbots relying on LLMs.

In terms of its **AI programs and applications**, NBG ensures that the measures set are proportionate to the risks and benefits of AI use

Specifically, the Bank:

- Employs a **robust access management system** across all applications, strictly controlling access to sensitive AI capabilities through role-based permissions and authorization protocols.
- Labels **AI-generated content and outcomes** of AI-driven decisions so that all relevant stakeholders are informed about the use of AI systems and their interactions with them, while the AI Compliance process evaluates transparency requirements for each AI system.
- Deploys an **annual reevaluation process** for all deployed AI models based on their ethical score.
- Implements a **standard internal process** to assess AI compliance for all relevant projects.
- Maintains **established complaint handling and feedback mechanisms** that allow individuals to contest AI outcomes.
- Designs and **trains AI models and optimizes AI processes** with a view to improving energy efficiency across its services and infrastructure.
- Provides **ongoing training** on the responsible use of AI.





05 Appendices

Environment | 2025 Carbon footprint – emissions measurement

Scope 1 emissions (tCO₂e)^{1,2}

Stationary Combustion	628
o/eu Gas Fuels (natural gas)	573
o/eu Liquid Fuels (heating/oil)	245
Mobile Combustion	421
o/eu Diesel	108
o/eu Petrol	311
o/eu LPG	1
o/eu CH ₄	0
Fugitive Emissions ³	548
Total	1,608
Data Coverage (of eligible for measurement)⁴	100%

Scope 2 emissions (tCO₂e)

Location based ^{5,6}	10,668
Market based ^{7,8}	0
Data Coverage (of eligible for measurement)⁹	100%

Scope 3 Non-Financed Emissions (tCO₂e)^{10,11}

Cat. 1 Purchased goods and services	34,607
Cat. 3 Fuel and energy related activities	347
Cat. 4 Upstream transportation and distribution	1,888
Cat. 6 Business travel ¹²	6,864
Cat. 7 Employee commuting ¹³	3,940
Total	47,646

¹ Measured according to GHG Protocol's "to Corporate Accounting and Reporting Standard" and using the operational control approach.

² Emission factors sourced from the 2024 list of Sources by the Ministry of Environment and Energy, complementing the methodology outlined in the National Climate Law.

³ For the calculation of emissions from refrigerants, we use the GWP year time horizon warming potential (GWEP) included in the IPCC Sixth Assessment Report, 2021 (AR6).

⁴ Coverage is calculated over the entire bank's operations relevant to Scope 1 (buildings for stationary combustion, vehicles for mobile combustion, and refrigerants for fugitive emissions), for which data is available.

⁵ Scope 2 emissions measurement follows the location-based and market-based methods in accordance with GHG Protocol's "Scope 2 Guidance" and GPP's "Technical Guide: Accounting of Scope 2 emissions".

⁶ Emission factors are sourced from the 2024 Energy Use Report by the Green Renewable Energy Sources Operator & Distributor, or Cogen (S&PBP-EL) and/or Energy Production Use for location-based emissions.

⁷ Emission factors are sourced from the 2024 Energy Use Report by the Green Renewable Energy Sources Operator & Distributor, or Cogen (S&PBP-EL) and/or Energy Production Use for market-based emissions.

⁸ Coverage is calculated over the entire bank's energy consumption, that is eligible for measurement.

⁹ Following GHG Protocol's methodology "Corporate Value Chain (Scope 3) Accounting and Reporting Standard" and "Technical Guidance for Calculating Scope 3 Emissions" supplement.

¹⁰ Conversion rates for the calculation of Scope 3 emissions are based on GHG Protocol's methodology. Calculations take into consideration CO₂, CH₄, and N₂O.

¹¹ Emission factors used for Categories 1) 3) 4) 6) and 7) are sourced from: a) GHG Department for Environment (Forest & Rural Affairs (2018)) and b) PCGP emission factor database at central bank.

¹² According to GHG Protocol, business travel includes emissions from the transportation of employees for business-related activities (not commuting to/from home) and from hotel stays for business purposes.

¹³ Employee commuting encompasses the outcome of an employee commuting survey conducted in 2020, and is updated with 2025 staff data.

Environment | 2025 Carbon footprint – emissions measurement

Scope 3 Financial Emissions, cat. 15 (tCO₂e)^{14,15}

Business Loans & Unlisted Equities	17,603
Project Finance	3,708
Commercial Real Estate	80
Mortgages	166
Corporate Bonds & Listed Equities	1,349
Sovereign Debt	53,77
Motor Vehicle Loans	6
Total	30,483
Exposure measured (€ m)	50,023
Data Coverage (of eligible for measurement)	98%
Average PCMP data quality score	3.0

Emissions Intensities

Scope 1 over headcount (tCO ₂ e / employee)	0.38
Scope 3 excl. Cat. 15 over Net Core Income (tCO ₂ e / € m)	18
Scope 3 Cat 15 over exposure measured (tCO ₂ e / € m)	0.66

Green Asset Ratio KPIs (Stock)¹⁶

GAR – Turnover	1.85%
GAR – CAPEX	3.60%

¹⁴ OffScope use Green : no removals, no carbon credits, no avoided emissions

¹⁵ Includes financial emissions measured in CO₂ equivalents. They include: Greenhouse gases, as these are included in client's Scope 1 and 2 disclosed emissions, and use in the relevant sectoral emission factors, where no disclosures are available

¹⁶ SAR KPIs are shown at NBS Group level

Environment | Energy, waste, water management and other 2025 key figures

Energy consumption (MWh) ¹

Renewable energy ²	43,636
o/in self-generated	254
Non-renewable energy	5,428
o/in nuclear	0
Total	49,064
Energy intensity (MWh/employee) ³	2.7
Data Coverage (of eligible for measurement) ⁴	100%

Water consumption (mm³)

Water withdrawn	0.08
Water discharge	0
Total net freshwater consumption	0.08
Data Coverage (of eligible for measurement) ⁵	100%

Waste generated (tonnes)

Hazardous	
Small batteries	0.82
Low energy light bulbs	0.076
Electronic/electrical equipment	216.072
Non-hazardous	
Paper	27,586
Metal (aluminium cans and foil)	0.083
Metal (mixed cans)	0.093
Plastics PET	0.380
Plastics PP	0.084

Sustainability indicators

Electric/hybrid car fleet %	8.9%
Solar capacity in HQ buildings (MW)	0.304

¹ Conversion of underlying fuel volumes to energy is based on conversion factors by IGO's EOPPs.

² Purchased electricity from Renewable Energy Sources (RES) is based on Quantity of Origin (QO) received from electricity providers.

³ Types of energy included in the intensity ratio: electricity, thermal energy (natural gas, heating oil/gas oil), energy from transportation fuels (diesel petrol, LPG, LNG).

⁴ Energy intensity is calculated by dividing the total energy consumption originating from head offices and branches (excluding consumption in off-site OTEs and fleets) with the total active employees in head offices and branches at year end.

⁵ Eligible for measurement 100% head offices and branch networks (not off-site OTEs and fleets).

⁶ Coverage is calculated over the entire water consumption of the Bank (equal to water withdrawn in our case), which is the eligible consumption for measurement.

Society | Employee turnover

Employee Turnover 2025	<35 years			35-50 years			>50 years			Total		
	Female	Male	Total	Female	Male	Total	Female	Male	Total	Female	Male	Total
Voluntary employee turnover (%)	6.76%	3.31%	6.03%	16.0%	3.33%	16.6%	0.6%	0.63%	0.66%	16.6%	1.31%	1.63%
Involuntary employee turnover (%)	0%	0%	0%	0.04%	0%	0.05%	0.04%	0%	0.04%	0.04%	0.04%	0.05%
Total rate of employee turnover (%)	6.76%	3.31%	6.03%	16.0%	3.33%	16.6%	0.6%	0.63%	0.66%	16.6%	1.31%	1.63%
Number of employees	9	4	13	38	45	83	3	8	11	57	49	106

Employee Turnover 2024	<35 years			35-50 years			>50 years			Total		
	Female	Male	Total	Female	Male	Total	Female	Male	Total	Female	Male	Total
Voluntary employee turnover (%)	5.7%	12.36%	8.76%	1.7%	3.07%	1.87%	11.76%	30.67%	16.66%	5.06%	8.7%	6.74%
Involuntary employee turnover (%)	0%	0%	0%	0.04%	0.03%	0.03%	0.03%	0%	0.03%	0.03%	0.03%	0.03%
Total rate of employee turnover (%)	5.7%	12.36%	8.76%	1.7%	3.07%	1.87%	11.76%	30.67%	16.66%	5.06%	8.7%	6.77%
Number of employees	6	11	17	40	39	79	134	311	345	160	261	421

Note: Number of employees with involuntary turnover (employees disciplined or dismissed due to non-compliance with anti-corruption policy/policies) 3

Society | Leaves, new hires and absentee rate

Parental leave ¹	2024			2023		
	Female	Male	Total	Female	Male	Total
Employees that were entitled to parental leave	67	63	130	70	69	139
Employees that took parental leave	66	21	107	79	7	86
Return to work % of employees that took parental leave	100%	100%	100%	100%	100%	100%
Retention % of employees that took parental leave	99%	100%	99%	100%	100%	100%

¹ After the end of maternity leave, mothers are entitled to choose between extended work schedule (by 2 hours for the first 7 years and 1 hour for the next 7 years) or a cumulative leave of equal time (6 x 3 months, respectively). The 6 months (263 weeks) cumulative leave does in 12 month leave in case of multiple pregnancies. Fathers are also entitled to Parental extended work schedule or cumulative leave (263 weeks), if the mother takes this benefit. The total leave for mothers equals to 177 weeks (263-263). The total leave for fathers equals to 263 weeks (263-263) only if mothers do not use the 263 leave.

Maternity / Paternity leave ^{1,2}	2024		2023	
	Maternity	Paternity	Maternity	Paternity
Employees who used leave	37	64	69	73

¹ Each mother is entitled to 92 consecutive calendar days (263 weeks)

² Each father is entitled to 92 business days

New Hires	2024			2023		
	Female	Male	Total	Female	Male	Total
< 30 years	44	26	70	66	63	129
30-60 years	63	79	142	107	79	186
> 60 years	3	4	6	7	6	13

Absentee Rate ³	2024	2023
Absentee Rate	0.84%	0.79%

³ (Number of absentee days in the accounting period / (Employee attendance in the accounting period in the accounting period) x 100)

Society | Remuneration metrics

	2024	2023
CEO pay ratio		
CEO pay ratio ¹	22.8	26.7
CEO's annual total compensation (€) ²	1,015,000	1,700,000
Median annual total compensation for all employees ³	44,310	47,561

1. CEO compensation divided by the median employee's compensation

2. Includes salary, bonus, benefits and actual paid awards

3. Excluding CEO's compensation - 0

	2024	2023
Ratio of basic salary of women to men (by hierarchy level)		
Employees without supervision responsibilities	0.88	0.87
Employees with supervision responsibilities	0.89	0.89
General Managers and Assistant General Managers	0.89	0.88
Total	0.89	0.89

	2024	2023
Organisation's gender pay gap		
Mean pay gap (%) - salary + bonus	11.1%	10.64%
Median pay gap (%) - salary + bonus	5.03%	5.67%
Mean pay gap (%) - salary	10.64%	10.0%
Median pay gap (%) - salary	5.00%	4.83%
Mean pay gap (%) - bonus	13.80%	16.70%
Median pay gap (%) - bonus	2.0%	8.0%

	2024	2023
Adequate wage		
Employees paid below applicable adequate wage benchmarks	0	0
Non-employees in own workforce paid below applicable adequate wage benchmarks	0	0

Society | Learning and development metrics

Average training hours Gender / Seniority	2024			2023		
	Female	Male	Total	Female	Male	Total
Employees without supervision responsibilities	35.38	34.15	34.77	33.35	35.94	31.35
Employees with supervision responsibilities	42.11	37.76	39.94	42.10	42.39	42.24
General Managers (GMs) and Assistant GMs	26.00	23.70	24.35	20.88	23.80	19.39
Total	34.17	31.87	33.02	34.81	33.08	33.93

Chair and Executive members of the BdO are included

Total training hours Gender / Seniority	2024			2023		
	Female	Male	Total	Female	Male	Total
Employees without supervision responsibilities	61,421	66,227	127,648	60,960	60,368	121,328
Employees with supervision responsibilities	33,731	28,603	62,334	33,662	30,070	63,732
General Managers (GMs) and Assistant GMs	300	476	876	167	207	374
Total	95,452	95,306	190,758	94,729	90,645	185,374

Chair and Executive members of the BdO are included

Average training hours Gender / Compensation	2024		2023	
	Top 10%	Bottom 90%	Top 10%	Bottom 90%
Female	34.73	35.43	37.19	34.43
Male	37.42	33.41	34.79	33.85
Total	36.43	34.52	36.02	33.73

Training courses	2024		2023	
	Participants	Total hours	Participants	Total hours
AML	11,822	67,948	7,926	54,543
ESG risk identification for RMs	999	3,360	999	1,549
ESG / Sustainability-related	6,543	18,299	5,716	4,007
Human Rights	2,270	5,960	2,803	14,766
Anti-bribery / Anti-corruption	7,089	7,277	4,716	4,263
Branch Network employees	34,679	123,960	27,983	112,085

1 Not unique participants

Society | Health and Safety metrics

	2024	2023
Work-related injuries^a		
Number of fatalities because of work-related injury	0	0
Rate of fatalities because of work-related injury	0	0
Number of high-consequence work-related injuries (excluding fatalities)	19	19
Rate of high-consequence work-related injuries (excluding fatalities) ^b	0.28	0.30
Number of recordable work-related injuries	19	19
Rate of recordable work-related injuries	0.28	0.30
Number of hours worked ^c	12,502,000	12,672,000

a. Days of absence are recorded from the first day thereof.

b. It is noted that no work-related injuries or fatalities occurred for workers who are not employees, but whose work and/or workplace is controlled by the organization. No employee has been excluded from this disclosure.

c. The injury rate (IR) has been calculated as follows: (Total number of injuries) ÷ (Total working hours) × 200,000. IR rates also include results.

d. The number of hours has been calculated as follows: IR (hours/year) × IR (working days) × 2000 hours/year/employee ÷ No. of employees.

Governance | BoD key figures

BoD gender / age diversity	2024				2023			
	Male		Female		Male		Female	
	50-70	>70	50-70	>70	50-70	>70	50-70	>70
Executive Directors	1		1		1		1	
Non-Executive Directors	1	1				1		
Independent Non-Executive Directors	4	1	3		6		2	1

BoD data	2024	2023
Average board meeting attendance (% of meetings of board of directors/supervisory board)	99%	92%
Average Executive Committee's meeting attendance (% of meetings of executive committee)	100%	100%
Non-executive/independent directors with 4 or less other mandates	10	8
Average tenure of board members (years)	5.5	5.5
Average age of board members	65	63
Independent or non-executive members with industry experience	10	9
Women officers in Bank's Executive Committee (%)	20%	20%
Various Board committees chaired/co-chaired by a woman (%)	38%	38%

2025 & 2034 BoD diversity targets

Quantitative target for BoD gender representation ¹ 33%

¹ Percentage of BoD members of the underrepresented gender to be at least 50% of the total number of Board members, rounded to the previous integer

Governance | Other metrics

2025 Breaches

Information security breaches	0
Customers and employees affected by company's information security breaches	0
Conflicts of interest breaches	0
Money Laundering or Insider trading breaches	0
Corruption or Bribery breaches	0
Discrimination or Harassment breaches	1

Record keeping (in years)

Record keeping for all anti-money-laundering / terrorism financing-related documents	5

2025 Fines	Amount	Number
Fines in relation to corruption	€0	0
Legal and regulatory fines, settlements, and enforcement actions associated with false, deceptive, or unfair marketing, labeling and advertising	€0	3

THROUGHOUT 2025, THERE WERE:



No completed legal actions concerning anti-competitive behavior.

No violations of anti-trust and monopoly legislation.

No monetary losses, as a result of business ethics violations.

No critical concerns raised or communicated to the Board of Directors.

No **material cases** of non-compliance with regulatory provisions (particularly in relation to consumer and investor protection).

No cases of non-compliance with regulations and/or voluntary codes concerning marketing communications.

No cases identified regarding Anti-Bribery and Anti-Corruption.

No cases of whistleblowing encountered relating to financial reporting and/or auditing matters.

Abbreviations

The following table presents the explanation of specific abbreviations used within this ESG Report, to ensure that all readers are familiar with their meaning.

ACCA	Association of Chartered Certified Accountants.	CIB	Corporate and Investment Banking.	EAP	Employee Assistance Program.
AEDs	Automated External Defibrillators.	CISO	Chief Information Security Officer.	ECS	Employee Engagement Survey.
AGMs	Assistant General Managers.	CLA	Collective Labour Agreement.	EFRA	Social Security Organisation.
AI	Artificial Intelligence.	CNG	Compressed Natural Gas.	EIB	European Investment Bank.
AML/CFT	Anti-Money Laundering/Counter-Terrorist Financing.	CPR	Cardiopulmonary resuscitation.	EIF	European Investment Fund.
APC	Archives Portal Europe.	CRI	Corporate Responsibility Index.	EKAB	National Emergency Aid Center.
APS	Automated Payment Systems.	CRO	Chief Risk Officer.	ENNOIA	NGOs joint initiative for Empowering Households in their Financial Decision-Making.
AR	Assessment Report.	CSR	Corporate Social Responsibility.	EPC	Energy Performance Certificate.
ATEI	Higher Technological Educational Institute.	CSRD	Corporate Sustainability Reporting Directive.	ESG	Environmental, Social, Governance.
ATP	Association of Tennis Professionals.	CX	Customer Experience.	ESRF	NSRF (National Strategic Reference Framework).
ATM	Automated Teller Machine.	C&E	Climate and Environmental.	ESRS	European Sustainability Reporting Standards.
BDPS	Base Erosion and Profit Shifting.	DARDEP S.A.	Greek Renewable Energy Sources Operator & Guarantees of Origin.	EV	Electric Vehicle.
BoD	Board of Directors.	DDoS	Distributed Denial-of-Service.	EU	European Union.
C&E	Climate and Environmental.	DEFRA	Department for Environment Food & Rural Affairs.	ETEs	Full-Time Equivalents.
CAPEx	Capital Expenditures.	DEI	Diversity, Equity and Inclusion.	GAR	Green Asset Ratio.
CAPs	Corrective Action Plans.	DLP	Data Leakage Prevention.	GDPR	General Data Protection Regulation.
CISM	Certified Information Security Manager.	DIAS	Interbanking Systems S.A.	GEI	Gender Equality Index.
CORP	Certified Cyber Crime/Risk Prevention.	DORA	Digital Operational Resilience Act.	GHG	Greenhouse Gas.
CDP	Carbon Disclosure Project.	DPIA	Data Protection Impact Assessments.	GMs	General Managers.
CEO	Chief Executive Officer.	DPO	Data Protection Officer.	GoOs	Guarantees of Origin.
CPI	Corporate Finance Institute.				

GWP	Global warming potentials.	LoD	Line of Defence.	RES	Renewable Energy Sources.
HAEE	Hellenic Association for Energy Economics.	LPG	Liquefied Petroleum Gas.	RMa	Relationship Management.
HBA	Hellenic Banking Association.	MICF	NGO Cultural Foundation.	RRE	Residential Real Estate.
HDB	Hellenic Development Bank.	MFID	Markets in Financial Instruments Directive.	RRF	Recovery and Resilience Facility.
HDPAA	Hellenic Data Protection Authority.	MPS	Managed Print Services.	SB	Small Business.
HQ	Headquarters.	MSCI	Morgan Stanley Capital International.	SBTi	Science Based Targets Initiative.
HR	Human Resources.	NBG	National Bank of Greece S.A.	SDGs	Sustainable Development Goals.
HRBPs	HR Business Partners.	NBG HA	NBG Historical Archive.	SFF	Sustainable Financing Framework.
IDSs	Intrusion detection systems.	NGOs	Non-Governmental Organizations.	SIRM	Security Information and Event Management.
ICT	Information & Communication Technology.	NIR	National Inventory Report.	SMEs	Small and Medium sized Enterprises.
IPSs	Intrusion Prevention Systems.	NPS	Net Promoter Score.	SULs	Sustainability-Linked Loans.
ILO	International Labour Organization.	NZBA	Net Zero Banking Alliance.	SOC	Security Operation Center.
IEC	International Electrotechnical Commission.	OCW	Out of Court Workout.	TEPIX II	Entrepreneurship Fund II.
IR	Injury Rate.	OECD	Organisation for Economic Cooperation and Development.	TPPS	Transactional Net Promoter Score.
IPCC	Intergovernmental Panel on Climate Change.	Ops	Operations.	TuRs	Terms of Reference.
ISO	International Organization for Standardization.	OyW	Of Which.	TP	Transformation Programme.
ISS ESG	Institutional Shareholder Services - Environmental, Social, Governance.	PCAF	Partnership for Carbon Accounting Financials.	TPPs	Third-Party Providers.
ISMS	Information Security Management System.	PCI DSS	Payment Card Industry Data Security Standard.	TYPET	NGOs Personnel Mutual Health Fund.
IT	Information Technology.	PEPs	Politically Exposed Persons.	UI	User Interface.
JA	Junior Achievement.	PET	Polyethylene Terephthalate.	UN	United Nations.
JV	Joint Ventures.	PMS	Performance Management System.	UNEP FI	United Nations Environment Program Finance Initiative.
KPI	Key Performance Indicator.	PMO	Project Management Office.	WCAG	Web Content Accessibility Guidelines.
KYC	Know-Your-Customer.	PRB	Principles of Responsible Banking.	WFH	Work from Home.
LIA	Legitimate Interests Assessment.	PP	Polypropylene.	WWF	World Wildlife Fund.
L&D	Learning & Development.	PwC	PricewaterhouseCoopers.	Y-O-Y	Year-over-year.
LUMs	Large Language Models.	QAAs	Questions and Answers.		
LMS	Learning Management System.	RCA	Root Cause Analysis.		

