NATIONAL BANK OF GREECE

Sustainability Disclosures (SFDR) at Entity Level

Articles 3, 4 & 5 of Regulation (EU) 2019/2088

National Bank of Greece S.A. (LEI: 5UMCZOEYKCVFAW8ZLO05) — Reference Year 2025

This document contains the consolidated sustainability disclosures of National Bank of Greece S.A. at entity level, in accordance with Articles 3, 4 and 5 of Regulation (EU) 2019/2088 (SFDR) and Delegated Regulation (EU) 2022/1288 (RTS).

Article 3: Transparency of sustainability risk policies

National Bank of Greece applies a holistic approach to sustainability — that is, in the areas of Environment, Society, and Governance (ESG) — guided by a series of strategic commitments, policies, internal frameworks and procedures, which commenced in 2021 on the basis of the ECB Guide on climate-related and environmental risks, and has since been continuously evolving and strengthened.

A central pillar of this approach is the Bank's and the Group's Sustainable Development Policy, which, in alignment with the requirements of the legislative and regulatory environment, as well as with best practices included in international conventions and initiatives concerning sustainable development actions, corporate social responsibility, and business ethics, defines the framework for the optimal management of the Bank and the Group's ESG impacts . In this way, it sets the outline of both the Bank's strategy for leveraging opportunities and the management of sustainability risks arising from the nature of its operations and from the interaction with its socio-economic environment.

The ESG Committee was established in 2021, and its mission is to assist in the governance of multiple aspects of ESG strategy and implementation, within the framework of the Bank's strategic approach and commitment to the continuous promotion of sustainable development and responsible business matters, with the aim of effectively managing ESG issues, as well as sustainability and sustainable finance matters, in alignment with the requirements of the existing regulatory framework, and also taking into account best practices included in international conventions and initiatives. The ESG Committee places particular emphasis on monitoring, managing and overseeing the relevant impacts, risks and opportunities.

For more information, please refer to the NBG Annual Financial Report for the Group and the Bank 31.12.2025, p. 158.

Specifically, regarding the investment decision-making process: National Bank of Greece, as a "financial market participant" pursuant to Article 2(1)(j) of the SFDR, provides portfolio management services, which it has outsourced to its subsidiary "NBG Asset Management M.F.M.C." (Mutual

Fund Management Company). The integration of sustainability risks into the investment decision-making process for the relevant portfolios is governed by NBG Asset Management's ESG Investment Policy and Strategy (available only in Greek) and the related governance structures (ESG Committee — UCITS/AIFs), which assesses sustainability risks during the selection and monitoring of investments. NBG Asset Management has been a signatory to the United Nations Principles for Responsible Investment (UN PRI), since 2020.

Recognising the importance and the potential impact of ESG risks and, in particular, Climate and Environmental risks, the Bank proceeded in a timely manner with their identification and materiality assessment, integrating them into the overall Group Risk Management Framework, while committing to monitoring, assessing and managing the said risks on an ongoing basis.

Specifically, National Bank of Greece has incorporated ESG risk assessment into the Credit Granting & Monitoring Process for its corporate portfolio since 2022, and has furthermore developed policies, procedures and tools used by corporate loan officers in order to assess and classify borrowers and transactions on the basis of these risks.

In December 2024, with the aim of facilitating the identification, assessment and classification of its financing as sustainable, the Sustainable Finance Framework was approved, which is expected to facilitate effective monitoring and reporting on the Bank's performance against the targets it sets for sustainable financing, as well as to serve as the mechanism for their expansion. The assessment of ESG risks in the Credit Granting & Monitoring Process for the corporate portfolio consists of two pillars:

• Assessment at borrower level, in order to evaluate the performance of its corporate clients, taking into account ESG criteria.

• Assessment at transaction level, in order to classify transactions/loans into categories, in accordance with the Sustainable Finance Framework, which incorporates, among other things, criteria for the application of the EU Taxonomy.

Further information regarding the integration of ESG risks into the credit granting and monitoring process for the corporate portfolio can be found:

– in the NBG Annual Financial Report for the Group and the Bank 31.12.2025, pp. 243–251.

– in the NBG Pillar III Disclosures on a Consolidated Basis as at 31.12.2025, Section 11 – ESG Risks, pp. 104–115.

Framework for the Assessment of Reputational Risks and Litigation Risks Related to Climate and the Environment

NBG has developed a comprehensive framework for the identification, assessment, measurement and monitoring of reputational risks and litigation risks related to climate and environmental factors. Regarding the implementation of the framework, specialised assessment methodologies are used, including counterparty-level scoring tools, which are adapted by type of business relationship (financing activities/borrowers, procurement/suppliers).

Furthermore, the Framework addresses reputational risks related to climate and the environment and litigation risks arising from NBG's own activities, in alignment with the Operational Risk Management Framework. The governance of the Framework is ensured through a dedicated cross-functional working group, responsible for the data, methodologies and risk assessment tools. The Executive Committee approves and oversees its execution, with the support of the ESG Committee, which coordinates and monitors the implementation of risk mitigation actions for reputational and litigation risk.

Sustainable Bond Framework (SBF)

NBG was the first Greek bank to issue a Sustainable Bond Framework (SBF), intended to serve as a general governance framework for every issuance of green, social and other sustainable finance instruments, applied at Bank level. The SBF is based on the eligibility criteria previously used in NBG's Green Bond Framework, extends its application to additional green and new social eligible project categories, and further aligns with more recent market best practices in the rapidly evolving field of sustainable finance and investments (NBG Annual Financial Report for the Group and the Bank 31.12.2025, p. 243).

National Bank of Greece monitors its carbon footprint — both in aggregate and per asset class, following the PCAF methodology —, in terms of financed greenhouse gas emissions and financed greenhouse gas emission intensity (per € of exposure 'Gross Carrying Amount Measured'), also calculating the PCAF data quality score (NBG Annual Financial Report for the Group and the Bank 31.12.2025, pp. 257–268).

This monitoring acts complementary and enhances the information deriving from the sustainability risk assessment (risk drivers and related transmission channels), since, by taking into account the size, nature and scale of activities overall, as well as the comparative contribution to the carbon footprint per asset class and per area of activity, a proactive approach to the management of sustainability risks can be achieved through active portfolio management/portfolio steering.

Further information regarding the integration of ESG risks into the Bank's Risk Management framework can be found:

– in the Sustainability Statement included in the NBG Annual Financial Report for the Group and the Bank 31.12.2025, pp. 243–251, and in the "Risk Management" section, pp. 67–98,

– in the in the NBG Pillar III Disclosures on a Consolidated Basis as at 31.12.2025, Section 11 – ESG Risks, pp. 93–141.

NATIONAL BANK OF GREECE

Article 4: Transparency of adverse sustainability impacts at entity level

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant — National Bank of Greece S.A. (LEI: 5UMCZOEYKCVFAW8ZLO05)

Summary

National Bank of Greece S.A. (hereinafter the "Bank" or "NBG," LEI: 5UMCZOEYKCVFAW8ZLO05), a member of the National Bank of Greece Group (hereinafter the "Group" or "NBG Group"), considers the principal adverse impacts (PAIs) of its investment decisions on sustainability factors, and this statement is the consolidated statement relating thereto.

In accordance with Article 4 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR"), as further elaborated in Article 4 of Delegated Regulation (EU) 2022/1288, this Statement explains how the principal adverse impacts (PAIs) of the Group's investment decisions on sustainability factors are taken into account, and describes the due diligence practices in relation to these impacts, taking into consideration the size, nature and scale of its activities, as well as the types of financial products it makes available on the market.

The Statement covers the reference period from 01/01/2025 to 31/12/2025. Information is reported for the applicable and available indicators for the impact year (Impact Year n) 2025. Important notes for the interpretation of the reference indicators have been included in the 'Explanation' column and in related footnotes of the table "Description of the principal adverse impacts on sustainability factors", as well as in the section "Methodological framework and general clarifications" below.

National Bank of Greece S.A., as a credit institution providing portfolio management services, has delegated the provision of portfolio management services under Annex I of Law 4514/2018 ("MiFID II") to its subsidiary "NBG Asset Management M.F.M.C." (Mutual Fund Management Company). NBG Asset Management M.F.M.C." has been a member and signatory to the United Nations Principles for Responsible Investment (PRI), since 2020. Information regarding the Policies and practices of "NBG Asset Management M.F.M.C." is available at the following hyperlinks:

- Information regarding Policies (available only in Greek)
- ESG Investment Policy and Strategy of NBG Asset Management M.F.M.C. (available only in Greek)

- Disclosure regarding the application of the requirements of Article 4(1) of Regulation (EU) 2019/2088 (SFDR) - available only in Greek
- Statement — No consideration of the adverse impacts of investment decisions on sustainability factors (available only in Greek)
- SFDR Regulation (available only in Greek)
- Active Participation & Voting Rights Policy of NBG Asset Management M.F.M.C. (available only in Greek)
- Sustainability disclosures (available only in Greek)
- Remuneration Policy of NBG Asset Management M.F.M.C. (available only in Greek)

Methodological framework and general clarifications

Scope of application: This statement covers the discretionary portfolio management portfolios of NBG clients, which are managed by NBG Asset Management M.F.M.C. on behalf of NBG under an outsourcing agreement (Total AUM (31/12/2025): €4,971,929). It does not include the standalone products (UCITS/AIFs) of the asset management company, which are covered by its own disclosures.

Calculation methodology: In accordance with Article 6(3) of Delegated Regulation (EU) 2022/1288, each indicator is reported as the average of the measurements as at 31/3, 30/6, 30/9 and 31/12/2025. The value for each quarter at entity level is derived as a weighted average of the portfolios, weighted on the basis of the AUM (NAV) of each portfolio relative to the total.

Data coverage: Portfolio coverage: 100% (all portfolios within scope have PAI data). Coverage at ETF level: ~97.5% of NAV. At the level of individual underlying securities (security-level look-through), coverage is significantly lower, as the data provider applies an estimation model for securities without published data.

Limitations: This Principal Adverse Impacts (PAI) statement is prepared in accordance with Article 4 of Regulation (EU) 2019/2088 (SFDR) and Commission Delegated Regulation (EU) 2022/1288 (RTS) for the reference period 01/01/2025 – 31/12/2025.

During the reference period, there are limitations in the availability, quality, and comparability of ESG data, which may affect the completeness and accuracy of the disclosed information. Given the scale of assets under management (AUM, approximately €5 million), certain conclusions may be subject to statistical uncertainty.

This statement is based on data sourced from recognised third-party ESG data providers and/or public disclosures by investee companies. Such information may be incomplete, inconsistent, or may include estimates and approximations. NBG carries out proportionate quality checks (for consistency and completeness); however, it cannot guarantee the absolute accuracy, completeness, or timeliness of the information.

Data coverage varies by PAI indicator and by investment and is not complete across all indicators and portfolio holdings, which may limit the representativeness of the results. Where primary data is unavailable, documented estimation methodologies are applied (e.g. sector-based proxies or the use of data from peer issuers), in line with market best practices.

The methodologies for calculating PAI indicators are subject to continuous development and may be updated, which may affect comparability across different reference periods. NBG will disclose material methodological changes in future editions of this statement.

In the column "Actions taken, and actions planned and targets set for the next reference period", NBG, taking into account the size and nature of its activities, plans to assess the appropriateness of adopting suitable actions and setting realistic targets for the next period, in conjunction with data availability and quality and regulatory developments. Any material decisions and updates will be disclosed in subsequent editions.

NBG continuously monitors relevant regulatory developments and may reconsider its approach in the future. The above limitations do not negate the obligation to apply proportionate procedures for identifying, prioritising, and mitigating principal adverse impacts.

This document does not constitute investment advice.

Note on third-party ESG data providers: "Recognised" refers to providers with a documented and transparent methodology, adequate market coverage, and the application of quality assurance procedures. NBG maintains relevant documentation on their selection and evaluation.

Previous year data (n-1): There are no comparable previous year data, as this is the first statement under this specific methodology and scope. The column "Impact (year n-1)" is not completed.

General Note: At present, NBG is not in a position to calculate with the required accuracy the figures in the table below for which no numerical data or explanatory text is provided (or does not consider them representative of its role and function as a Financial Institution), and these indicators have been flagged as "not available." Future improvements in the availability of the required data from NBG and the Group's subsidiary companies are expected to improve the quality and completeness of the requested disclosures.

Clarification regarding indicator #1 (Greenhouse gas emissions): The absolute emission figures (Scope 1, 2, 3 and Total greenhouse gas emissions) are provided by the data provider (at ETF level) and may not be fully comparable with indicator #2 "Carbon footprint," as they may reflect a different calculation basis (gross issuer emissions versus allocated/financed emissions). These figures are subject to confirmation and reprocessing by the manager and will be updated if required.

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies					
Adverse sustainability indicator		Metric	Impact (year 2025)	Explanation (coverage[1], measurement unit))	Actions taken, and actions planned and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS					
Greenhouse gas emissions	1. GHG emissions[2]	Scope 1 GHG emissions	37.77 thousand tonnes of CO_2e	Absolute direct greenhouse gas emissions (Scope 1) of the companies within scope. Unit: thousand tonnes of CO_2e. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
		Scope 2 GHG emissions	8.44 thousand tonnes of CO_2e	Indirect emissions from purchased energy (Scope 2). Same scope, weighting methodology and source as the Scope 1 indicator. Unit: thousand tonnes of CO_2e. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
		Scope 3 GHG emissions	685.36 thousand tonnes of CO_2e	Value chain emissions (Scope 3). Unit: thousand tonnes of CO_2e. Coverage:	No measures have been taken at present. NBG monitors all relevant developments

[1] See above, section Methodological Framework and Clarifications ("Scope of Application" and "Data Coverage").
[2] Financed GHG emissions from investments in investee companies within scope.

				100% of portfolios / ~97.5% ETF-level (see Methodological framework).	and may reconsider its approach in the future. Largely based on estimates, as sufficient data is unavailable. It constitutes the main component (~93%) of total emissions.
		Total GHG emissions	731.59 thousand tonnes of CO_2e	Sum of Scope 1+2+3 emissions. Unit: thousand tonnes of CO_2e. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
	2. Carbon footprint	Carbon footprint	592.92 tCO_2e / million EUR	Carbon footprint = Total emissions (Scope 1+2+3) per current value of investments (total NAV). Unit: tCO_2e/million EUR. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
	3. GHG intensity of investee companies	GHG intensity of investee companies	2,148.51 tCO_2e /million EUR revenue	Emission intensity = CO_2e emissions per company revenue (weighted average). Unit: tCO_2e/million EUR revenue. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	5.69%	Percentage of current value of investments in companies in the fossil fuel sector. Relatively stable (~5–6%) throughout 2025. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable	52.37%	Average share of non-renewable energy (consumption + production) of the companies. Coverage: 100% of portfolios	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.

		energy sources compared to renewable energy sources, expressed as a percentage of total energy sources		/ ~97.5% ETF-level (see Methodological framework).	
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0.2839 GWh / million EUR revenue	Energy consumption intensity for companies in high climate impact sectors (NACE A–H, L — Annex I RTS). Unit: GWh/million EUR revenue. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
Biodiversity	7.Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	87.34%	Percentage of investments in companies with sites/operations in or near biodiversity-sensitive areas. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future. The high value (~87%) is typical for diversified ETF portfolios and reflects a broad scope definition by the provider.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	24.18 tonnes / million EUR	Unit: tonnes/million EUR. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future. Limited data availability.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	1.77 tonnes / million EUR	Ratio of hazardous and radioactive waste. Unit: tonnes/million EUR. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future. Limited data availability.
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS					
	10. Violations of UN Global Compact	Share of investments in investee companies that have been involved	10.54%	Percentage of investments in companies with identified violations of the UN Global	No measures have been taken at present. NBG monitors all relevant developments

Social and employee matters	principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises		Compact principles or the OECD Guidelines. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	and may reconsider its approach in the future.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/ complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	85.91%	Percentage of investments in companies without policies/mechanisms for monitoring compliance with UNGC/OECD. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future. The high value (~86%) reflects the nature of the underlying ETFs (mid/small cap companies without disclosed mechanisms).
	12.Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	13.11%	Average unadjusted gender pay gap in the companies. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	38.63%	Average percentage of female board members in the companies. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future. NBG Group BoD ~33% Annual Financial Report of the Group and the Bank p. 107.
	14. Exposure to controversial	Share of investments in investee companies involved in the	1.46%	Percentage of investments in companies involved in the manufacture or sale of	No measures have been taken at present. NBG monitors all relevant developments

	weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	manufacture or selling of controversial weapons		controversial weapons. Coverage: 100% of portfolios / ~97.5% ETF-level (see Methodological framework).	and may reconsider its approach in the future.
Indicators applicable to investments in sovereigns and supranationals					
Adverse sustainability indicator		Metric	Impact (year 2025)	Explanation (coverage, measurement unit)	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	0.1224 tCO_2e / / million EUR GDP	GHG emission intensity per million EUR GDP for countries issuing sovereign/supranational bonds within the ETFs. Unit: tCO_2e/million EUR GDP. Coverage: 100% of portfolios (see Methodological framework).	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	Not available	No data available for this indicator, for the reference period (see Methodological framework, "General Note").	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future.
Indicators applicable to investments in real estate assets					
Adverse sustainability indicator		Adverse sustainability indicator	Impact (year 2025)	Explanation (coverage, measurement unit)	Actions taken, and actions planned and targets set for the next reference period

Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	Not available	No data available for this indicator, for the reference period (see Methodological framework, "General Note").	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future. At NBG Group level (on-balance sheet), relevant information is included in the Sustainability Statement within the 2025 Annual Financial Report of the Group and the Bank.
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	Not available	No data available for this indicator, for the reference period (see Methodological framework, "General Note").	No measures have been taken at present. NBG monitors all relevant developments and may reconsider its approach in the future. At NBG Group level (on-balance sheet), relevant information is included in the Sustainability Statement within the 2025 Annual Financial Report of the Group and the Bank.

Table 2 - Additional climate and other environment-related indicators

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Indicators applicable to investments in real estate assets

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Value of Metric (year 2025)	Explanation (coverage, measurement unit)
Greenhouse gas emissions	19. (18.) GHG emissions	Scope 1 GHG emissions generated by real estate assets	Not available	See Methodological framework, "General Note”
		Scope 2 GHG emissions generated by real estate assets	Not available	See Methodological framework, "General Note”

NATIONAL BANK OF GREECE

		Scope 3 GHG emissions generated by real estate assets	Not available	See Methodological framework, "General Note”
		Total GHG emissions generated by real estate assets	Not available	See Methodological framework, "General Note”
Table 3 - Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters **INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS** **Indicators applicable to investments in investee companies**				
Adverse sustainability impact	**Adverse impact on sustainability factors (qualitative or quantitative)**	**Metric**	**Value of Metric (year 2025)**	**Explanation (coverage, measurement unit)**
Social and employee matters	20. (4.) Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	Not available	See Methodological framework, "General Note”

Summary table of PAI indicators - Entity-level 2025

#	PAI Indicator	Metric	Impact 2025
1	GHG Emissions — Scope 1	thousand tonnes of CO_2e	37.77
	GHG Emissions — Scope 2	thousand tonnes of CO_2e	8.44

	GHG Emissions — Scope 3	thousand tonnes of CO_2e	685.36
	Total GHG Emissions	thousand tonnes of CO_2e	731.59
2	Carbon footprint	tCO_2e / million EUR	592.92
3	GHG intensity of investee companies	tCO_2e / million EUR revenue	2,148.51
4	Exposure to fossil fuels	% of investments	5.69%
5	Share of energy from non-renewable sources	% average share of non-renewable energy	52.37%
6	Energy consumption intensity	GWh / million EUR revenue	0.2839
7	Activities in biodiversity-sensitive areas	% of investments	87.34%
8	Emissions to water	tonnes / million EUR	24.18
9	Hazardous / radioactive waste	tonnes / million EUR	1.77
10	Violations of UNGC / OECD principles	% of investments	10.54%
11	Lack of UNGC / OECD mechanisms	% of investments	85.91%
12	Unadjusted gender pay gap	average %	13.11%
13	Board gender diversity	average % of women	38.63%

NATIONAL BANK OF GREECE

14	Exposure to controversial weapons	% of investments	1.46%
15	GHG intensity of countries (sovereign/supranational)	tCO_2e / million EUR GDP	0.1224
16	Social rights violations by investee countries (sovereign/supranational)	# Number of investee countries	Not Available
17	Exposure to fossil fuels (real estate assets)	% of investments	Not Available
18	Exposure to energy-inefficient real estate assets	% of investments	Not Available
19	GHG emissions generated by real estate assets	thousand tonnes of CO_2e	Not Available
20	Lack of supplier code of conduct	% of investments	Not Available

The values correspond to the detailed Table 1 above (annual average of quarterly measurements, Article 6(3) RTS).

Description of policies for identifying and prioritising principal adverse impacts on sustainability factors

National Bank of Greece applies a comprehensive approach to sustainability management, governed by a series of strategies, commitments, policies and procedures:

- NBG has established and applies the **Sustainable Development Policy of the Bank and the Group**. Its purpose is to set the framework for the development of actions for the management of sustainability matters. According to the Policy, the Bank's commitments focus on its role as a financier and adviser in the effort to transition to a net-zero emissions economy, one that is more circular and less dependent on natural resources, on creating positive socio-economic impacts on its stakeholders and more broadly on the economies and societies where it operates, as well as on its role as an employer, ensuring good and safe working conditions for its workforce, with equal rights and opportunities. The Policy complies with the requirements of the applicable legislative and regulatory framework, as well as with international practices included in international conventions and initiatives aimed at sustainable development, corporate social responsibility and business ethics, and is based, among others, on the applicable legislation on sustainable development, the 17 UN Sustainable Development Goals (SDGs) and the UNEP FI Principles for Responsible Banking (PRBs).

- NBG has developed a **Sustainable Finance Framework** (SFF) with the aim of facilitating the identification, assessment and classification of its financing as sustainable. The SFF facilitates effective monitoring and accurate reporting on the Bank's sustainable financing and can serve as the mechanism for extending sustainable financing to its clients.
- NBG is the first Greek bank to issue a **Sustainable Bond Framework** (SBF), which is used as a general governance framework for every issuance of green, social and other sustainable financial instruments. The SBF received a Second Party Opinion (SPO) from Sustainalytics, verifying that it is credible, effective and is aligned with ICMA's Sustainability Bond Guidelines (2021), Green Bond Principles (2021) and Social Bond Principles (2023).
- **Transition Plan**: NBG published its Transition Plan in June 2025 and continues to support the pathway of six priority sectors/portfolios — Power Generation, Oil & Gas, Aluminium, Cement, Commercial Real Estate (CRE) and Residential Real Estate (RRE) — towards decarbonisation, in accordance with the interim 2030 targets and the planned 2050 pathways. These targets guide NBG's financing decisions and shape the way it supports its clients in their own transition, ensuring that it remains on track to achieve its interim and long-term decarbonisation targets. Specifically for RRE, we expect financing opportunities in the residential energy upgrades market of €150–200 million over the next three years.
- **Credit Policy**: NBG has incorporated ESG risk assessment into its lending policies and procedures, for clients that are non-financial corporations (NFCs), with climate being a key component of the environmental pillar. Specifically, a Borrower-level Assessment against ESG Topics is carried out at the loan application stage through a borrower ESG assessment questionnaire, with the corresponding scorecard leading to a standardised ESG risk vulnerability assessment result. In addition, a Transaction-level Assessment is carried out, which also identifies each individual transaction based on its sustainability characteristics. Finally, NBG maintains a dedicated exclusion list of activities, which covers activities with negative climate & environmental impacts.
- **Property Valuation Policy**: NBG has incorporated specific climate and environment-related parameters (primarily relating to physical risks) into its property valuation policy, which also applies to collateral, in order to mitigate climate and environmental risks.

- **Risk Appetite Framework**: With regard to the monitoring process, NBG has introduced into the Risk Appetite Framework ("RAF") ESG-related Key Risk Indicators ("KRIs") and corresponding thresholds, with the aim of defining its risk appetite with regard to the financing of ESG sensitive activities. More information regarding the integration of ESG risks into the Bank's Risk Management framework can be found in:
    - the NBG Annual Financial Report for the Group and the Bank 31.12.2025, section "Risk Management," pp. 67-98, and
    - the NBG Pillar III Disclosures on a Consolidated Basis as at 31.12.2025, Section 11 – ESG Risks, pp. 93–141.
- **Risk Taxonomy**: NBG has integrated ESG risks into its Risk Taxonomy, recognising them as cross-cutting risks and considering them as factors that affect existing types of financial and non-financial risks.
- **C&E RIMA**: Climate & environmental risks have been incorporated into the Risk Identification and Materiality Assessment (RIMA), which is conducted at least annually. This analysis examines the materiality of risks both at primary risk type level and on a cross-cutting basis.
- **ICAAP Framework**: The Bank has integrated ESG risks into the ICAAP framework. All ESG risks identified as material have been assessed based on the regulatory and economic approach, in accordance with the respective regulatory guidelines.
- **Stress Testing Framework**: Scenario analysis for climate and environmental risks and stress testing is a key tool for assessing the Group's vulnerabilities with regard to material climate and environmental risks; for this purpose, appropriate climate scenarios and methodologies are used.
- **Framework for the Assessment of Reputational Risks and Litigation Risks Related to Climate and the Environment**: NBG has developed a comprehensive framework for the identification, assessment, measurement and monitoring of reputational risks and litigation risks related to climate and environmental risks.
- **Policies relating to Suppliers & Service Providers**: NBG has established various Policies governing its relationship with suppliers and service providers (e.g., the Bank and Group Procurement & Demand Management Policy, the Group Policy on ICT third-party provider arrangements and outsourcing). As a standard practice, NBG assesses its service providers against ESG criteria, in accordance with these Policies, using in-depth questionnaires or specialised software applications. These principles and criteria apply to all employment relationships and to every third party cooperating with the Bank or a Group company, whether for the provision of ongoing services or for the execution of individual projects.
- **Bank and Group Business Continuity Management System Policy**: This Policy describes the fundamental principles governing the Business Continuity Management System of the Bank and the Group, which aims to assess potential business continuity threats and risks and to address

internal and/or external incidents that may disrupt or lead to the disruption of critical operations. NBG incorporates, among other things, climate and environmental scenarios into its business continuity and operational resilience assessments, along with the identification of mitigation measures and procedures for addressing disruptions and restoring operations.

Further information can be found in:

- the NBG Annual Financial Report for the Group and the Bank 31.12.2025, pp. 180-366, and section "Risk Management," pp. 67–98,
- and the NBG Pillar III Disclosures on a Consolidated Basis as at 31.12.2025, Section 11 – ESG Risks, pp. 93–141.

Furthermore, guided by the ongoing protection of the interests of its shareholders, clients, employees and generally all stakeholders, sustainable development and long-term value creation, NBG applies an overall corporate governance framework, which is determined by the provisions of Greek and European legislation, the decisions and acts of the Bank of Greece, the Guidelines of the European Central Bank, the guidelines of the European Banking Authority and the European Securities and Markets Authority, as well as the decisions/guidelines/recommendations of the Hellenic Capital Market Commission.

The Group Code of Ethics holds a prominent position, within NBG's Corporate Governance Framework, clearly defining the ethical principles and values, as well as the rules of business conduct upheld by NBG. The Code applies to all members of the Board of Directors, Senior Executives and employees of the Bank and Group Companies respectively, under any type of employment relationship, as well as to every third party cooperating with the Bank or a Group Company, whether in the context of service provision or project execution (including partners, suppliers, intermediaries, agents and any other entity cooperating with the NBG Group in the context of outsourcing or other types of contracts).

More information can be found in:

- the Corporate Governance Framework | National Bank of Greece
- the NBG Annual Financial Report for the Group and the Bank 31.12.2025, pp. 275-283, 326-330.

Finally, we note that NBG, in the context of its Sustainability Statement disclosures, provides a direct mapping of ESRS data to the SFDR PAI indicators. See NBG Annual Financial Report for the Group and the Bank 31.12.2025, Sustainability Statement, Appendix 2, Data Points from Other EU Legislation, pp. 337–342.

Active engagement policies

The portfolio management offered by NBG is carried out by NBG Asset Management, which applies an Active Participation & Voting Rights Policy (available only in Greek). Through this policy, the management company monitors issuing companies on environmental, social and governance (ESG) matters, exercises voting rights and develops constructive dialogue (engagement) with issuers, taking into account, where available, information relating to the principal adverse impacts on sustainability factors. NBG Asset Management, as a signatory of the UN PRI since 2020, incorporates active engagement within the framework of responsible investment.

References to international standards

With regard to responsible business conduct codes, internationally recognized standards for due diligence and reporting, and alignment with the objectives of the Paris Agreement, NBG, in addition to the Policies and procedures mentioned above (section "Description of policies for identifying and prioritizing principal adverse impacts on sustainability factors"), applies the following:

A methodology for identifying and assessing the principal adverse impacts of the NBG Group on sustainability factors, which is based on the European Sustainability Reporting Standards (ESRS), and specifically on the Double Materiality Assessment (DMA) methodology. The DMA process focuses on loan and investment portfolios, and is broken down into the following steps:

- Overview of the main business activities/sectors, understanding of business relationships, and identification of key stakeholders.
- Identification of impacts using recognised portfolio analysis tools (such as the UNEP FI impact – ESRS topics interoperability tool, and the ENCORE impact tool for adverse environmental impacts) based on existing exposures and the expected dynamics of the Group.

- Prioritisation of existing and potential impacts, taking into account data such as scale, scope, the irremediable character of the impacts, and — for potential impacts — the likelihood of occurrence, and application of quantitative or qualitative thresholds for their characterisation as material.
- Assessment of results and consultation with experts and stakeholders.

By applying the Double Materiality Assessment methodology, the Group identified material impacts related to the topics of climate change mitigation, biodiversity and ecosystems, the provision of secure employment, the provision of adequate wages, the provision of training and skills development, as well as access to products and services.

Further information is available in section [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and the business model, of the Group's Sustainability Statement included in the NBG Annual Financial Report for the Group and the Bank 31.12.2025, pp. 181-182, 200–208.

Since 2021, the Bank has adopted a holistic approach to ESG matters with the aim of creating a sustainable future together with its customers, people and shareholders, which is aligned with selected Sustainable Development Goals (SDGs) and fulfils its commitment to the UNEP-FI Principles for Responsible Banking (PRB). Furthermore, with the aim of reducing its environmental footprint, the Bank has joined the PCAF and NZBA initiatives, as the first Greek bank to set science-based targets for the reduction of financed greenhouse gas emissions for six of its portfolios for 2030, while it has recently developed the related Transition Plan for the achievement of these targets.

NBG's financed emissions targets are aligned with the ultimate 2050 target for the global 1.5°C pathway. The interim 2030 emission targets for the six main sectors/portfolios are set either at, below, or above the 2030 benchmarks of this pathway, depending on NBG's starting position, the available decarbonisation technologies and the market dynamics per sector. Each target was set using credible science-based methods, ensuring clear and measurable emission reduction pathways, supported by the most recent climate science and aligned with the decarbonisation required to achieve the Paris Agreement goals by 2050. With regard to methodologies and tools, the target-setting process incorporates the guiding principles provided by industry initiatives (e.g., PCAF, NZBA) and the most recently available scientific scenarios, which are subject to updates, improvements and modifications. NBG closely monitors developments in order to be in a position to assess the need to review its scenarios and targets in the event of significant changes, so as to ensure that its strategy is aligned with credible and up-to-date frameworks. Also, in 2023, NBG introduced an exclusion list for special-purpose financing that restricts activities deemed to have a negative C&E impact, including financing related to mining and coal, as well as activities with adverse impacts on the conservation of nature and biodiversity.

Furthermore, NBG participates in various initiatives aimed at achieving positive impacts and supporting the UN Sustainable Development Goals, including the following:

- Participation in the UN Global Compact.
- Definition of the ESG strategy around 3 pillars and 9 strategic themes.
- Support of the Principles for Responsible Banking of the United Nations Environment Programme Finance Initiative "UNEP FI" ("PRB" or "Principles"). Through the Principles, NBG aims to align its strategy with the UN Sustainable Development Goals ("SDGs"), the Paris Climate Agreement and all subsequent European and Greek legislative frameworks.

The Bank participates in international initiatives, such as the European Coalition for Energy Efficiency Financing, in a series of interbank initiatives and bodies, such as the Sustainable Development Committee of the Hellenic Bank Association (HBA), the Hellenic Network for Corporate Social Responsibility (CSR Hellas), while it has achieved certification under the international standard ISO 50001:2018 for energy management in its premises. At the same time, it creates and/or promotes retail banking products, such as "My First Home," with a social/developmental orientation, which are aligned with frameworks such as the European Pillar of Social Rights, while, through the active management/steering of its corporate financing and investments (portfolio steering), it contributes to the achievement of the targets of the country's National Energy and Climate Plan (NECP).

Furthermore, the Bank continuously monitors its ESG performance and regularly discloses related results, indicators (KPIs, KRIs), as well as its assessments by rating agencies (ESG Rating Providers), e.g., S&P CDP, ISS ESG, MSCI ESG, Fitch, FTSE4Good ESG index.

For more information regarding the international standards applied by National Bank of Greece, please refer to the NBG Annual Financial Report for the Group and the Bank 31.12.2025, pp. 183–185, 196.

NATIONAL BANK OF GREECE

Historical comparison

There are no comparable previous year data, as this is the first statement under this specific methodology and scope (see the section "Methodological framework and general clarifications" above).

Article 5: Transparency in remuneration policies regarding the integration of sustainability risks

The Remuneration Policy of the Bank and the Group was designed with particular care to avoid incentives (especially with regard to variable remuneration) that may encourage behaviours that are not aligned with NBG's objective of achieving sustainable business results or are inconsistent with the risk appetite. Specifically, variable remuneration is supported by the annual Performance Management System ("PMS") process, which includes, among other things, ESG-related targets. For senior management, including the Chief Executive Officer and senior executives, specific ESG-related targets and KPIs have been established to ensure that appropriate tone from the top is set, with senior executives actively participating in the management of the impacts, risks and opportunities arising from and associated with climate change mitigation and adaptation.

Supplementary clarification (consistency with the integration of sustainability risks): "Sustainability risk" means, pursuant to Article 2(22) of Regulation (EU) 2019/2088, an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment. The Remuneration Policy is consistent with the integration of these risks, as the structure of variable remuneration does not provide incentives for excessive risk-taking, including sustainability risks. The relevant ESG targets and indicators are incorporated into the Performance Management System (PMS) and are applied to the members of Management and to staff whose professional activities materially affect the risk profile of the Bank (identified staff), in accordance with the applicable supervisory framework on remuneration (CRD/EBA). The mechanisms for aligning variable remuneration with risk and the long-term horizon are described in detail in the references below.

For more information, please refer to: NBG Annual Financial Report for the Group and the Bank 31.12.2025, pp. 189, 245, and NBG Pillar III Disclosures on a Consolidated Basis as at 31.12.2025, pp. 101, 104, 160.