

# Second-Party Opinion

## National Bank of Greece Green Bond Framework



### Evaluation Summary

Sustainalytics is of the opinion that the National Bank of Greece Green Bond Framework aligns with the four core components of the Green Bond Principles 2018. This assessment is based on the following:

<b>Evaluation date</b>	April 21, 2020
<b>Issuer Location</b>	Athens, Greece

#### Report Sections

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**USE OF PROCEEDS** The eligible category for the use of proceeds, Renewable Energy, is aligned with those recognized by the Green Bond Principles 2018. Sustainalytics considers that the eligible category will increase the renewable energy share in Greece and advance the UN Sustainable Development Goals, specifically SDG 7.



**PROJECT EVALUATION / SELECTION** Initially, the project evaluation and selection process, including any changes to the Framework, will be overseen by NBG's existing Committee ("Committee"). The Committee will review, approve, and monitor the Eligible Assets in line with the Framework's eligibility criteria. If assets no longer meet the eligibility criteria, the Committee will replace them with new assets within a reasonable timeframe. NBG has noted that it intends to establish a formal ESG Committee in the future. This project selection process is aligned with market practice.



**MANAGEMENT OF PROCEEDS** NBG's Treasury will be responsible for tracking the net proceeds on a portfolio basis. The Treasury will track allocation of proceeds to the eligible project portfolio assets via internal systems, which are monitored at least every quarter. With quarterly monitoring of the portfolio, the Committee will approve the allocation of green bond proceeds. Pending full allocation, the net proceeds will be held in money market products, cash or cash equivalents. The process for management of proceeds is in line with market practice.



**REPORTING** Until full allocation, NBG intends to provide annual allocation and impact reporting on the Investor Relations page of the NBG's website. Allocation reporting will include the total amount of proceeds allocated to Eligible Assets, the amounts allocated to Eligible Assets per category, the share of financing and refinancing, and the balance of unallocated proceeds. Upon data availability, NBG is committed to reporting on relevant impact metrics. Additionally, NBG will provide an Annual Post-Issuance review until full allocation. Sustainalytics views NBG's allocation and impact reporting as aligned with market practice.

## Introduction

Established in 1841 and headquartered in Athens, National Bank of Greece (“NBG”, the “Bank” or the “Issuer”) offers retail and corporate banking services through its branches and subsidiaries in Greece and overseas. As of December 2019, NBG had approximately 10 million deposit accounts, 2 million lending accounts, 390 branches, and one private banking unit.

NBG has developed the National Bank of Greece Green Bond Framework (the “Framework”) under which it intends to issue green bonds and use the proceeds to finance or refinance, in whole or in part, existing or future projects that will lead to a decarbonized economy through increasing the share of wind, solar and hydro energy in Greece. The Framework defines eligibility criteria in one area:

1. Renewable Energy

NBG engaged Sustainalytics to review the National Bank of Greece Green Bond Framework, dated April 21, 2020 and provide a second-party opinion on the Framework’s environmental credentials and its alignment with the Green Bond Principles 2018 (GBP).<sup>1</sup> This Framework will be published in a separate document.<sup>2</sup>

As part of this engagement, Sustainalytics held conversations with various members of NBG’s management team to understand the sustainability impact of their business processes and planned use of proceeds, as well as management of proceeds and reporting aspects of NBG’s Green Bond Framework. Sustainalytics also reviewed relevant public documents and non-public information.

This document contains Sustainalytics’ opinion of the National Bank of Greece Green Bond Framework and should be read in conjunction with that Framework.

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<sup>1</sup> The Green Bond Principles are administered by the International Capital Market Association and are available at <https://www.icmagroup.org/green-social-and-sustainability-bonds/green-bond-principles-gbp/>

<sup>2</sup> The National Bank of Greece Green Bond Framework will be available on National Bank of Greece’s website at: [www.nbg.gr/en/the-group/investor-relations](http://www.nbg.gr/en/the-group/investor-relations)

## Sustainalytics' Opinion

### Section 1: Sustainalytics' Opinion on the National Bank of Greece Green Bond Framework

Sustainalytics is of the opinion that the National Bank of Greece Green Bond Framework aligns with the four core components of the GBP 2018. Sustainalytics highlights the following elements of NBG's Green Bond Framework:

- Use of Proceeds:
  - The eligible category, Renewable Energy, is aligned with those recognized by the GBP 2018.
  - NBG may finance or refinance equipment, development, manufacturing, construction, operation, distribution and maintenance of the following renewable energy technologies in Greece: (i) onshore wind energy, (ii) photovoltaic solar, and (iii) small hydro projects (<20 MW). Sustainalytics positively notes that NBG limits green bond financing to small-scale hydropower projects below 20 MW in capacity.
  - NBG has set a three-year look-back period for its refinancing.
- Project Evaluation and Selection:
  - Initially, NBG's existing Committee (the "Committee"), comprised of members from the Treasury, Corporate Governance, Strategy, Finance, Risk, IT, Procurement, Marketing, and Real Estate Divisions, will be in charge of the project evaluation and selection process as well as any updates made in the Framework. Eligible Assets will be screened against NBG's Environmental Policy<sup>3</sup> and Environmental Management System,<sup>4</sup> local laws and regulations including any applicable regulatory environmental and social requirements. The Committee has a direct reporting line to the Steering Committee and approves the selected Eligible Assets after examining their alignment with the eligibility criteria. In case of material changes, the Committee will substitute the current assets with new Eligible Assets on a best-effort basis. Furthermore, NBG has stated its intent to develop a formal ESG Committee in the future, and once that committee has been established, it will take over management of the project evaluation and selection. Sustainalytics considers this process to be in line with market practice.
- Management of Proceeds:
  - NBG's Treasury will manage the proceeds on a portfolio basis. Eligible Assets will be labelled respectively in NBG's internal information systems and will be reviewed at least quarterly to ensure alignment with the Framework eligibility criteria. Through quarterly monitoring and evaluation, the Committee will provide the final approval of green bond proceeds allocation to Eligible Assets. Pending full allocation, unallocated proceeds will be held within the Treasury in money market products, cash and cash equivalents. Sustainalytics considers this process to be in line with market practice.
- Reporting:
  - On an annual basis, NBG commits to providing a report on allocation and impact on the Investor Relations section of its website until full allocation. Impact reporting will disclose (i) the total amount of proceeds allocated to Eligible Assets, (ii) the amounts allocated to eligible assets, (iii) the share of financing and refinancing, and (iv) the balance of unallocated proceeds. Additionally, where feasible, impact reporting will provide information on impact indicators including (i) installed renewable energy capacity in GW or MW, (ii) expected or actual annual renewable energy generation in GW or MW and (iii) annual GHG emissions reduction or avoidance in tCO<sub>2</sub>e.
  - Until full allocation, NBG will annually engage an external party to review its projects and confirm its allocation is aligned with the eligibility criteria and provide the Post-Issuance report. Sustainalytics considers this process to be in line with market practice.

<sup>3</sup> NEG, Environmental Policy Statement of NBG, at: <https://www.nbg.gr/en/the-group/corporate-social-responsibility/responsibility-environment/environmental-policy-statement>

<sup>4</sup> NBG, Environmental Management System, at: <https://www.nbg.gr/en/the-group/corporate-social-responsibility/responsibility-environment/environmental-management-system>

## Alignment with Green Bond Principles 2018

Sustainalytics has determined that the National Bank of Greece Green Bond Framework aligns with the four core components of the GBP 2018. For detailed information please refer to Appendix 1: Green Bond/Green Bond Programme External Review Form.

## Section 2: Sustainability Strategy of NBG

### Contribution of framework to National Bank of Greece's sustainability strategy

NBG has adopted a Corporate Social Responsibility (CSR) Action framework which guides its business operations in three Action Areas: 1) community, 2) culture and 3) environment,<sup>5</sup> with the goal of promoting sustainable development.<sup>6</sup> Governance and oversight of the Bank's CSR and Environmental Management is led by the Group Corporate Governance & CSR Division with the mandate to continually pursue and upgrade the role of Environmental Management and CSR on the Bank's activities and operations.<sup>7</sup>

In line with its commitment to advance sustainability, the Bank introduced several green banking products in 2018 to its retail segment.<sup>8</sup> For its structured finance segment, NBG approved financing of EUR 507 million towards Greece's renewable energy sources and infrastructure<sup>2</sup> in 2019, and aims to maintain a leadership position in large Structured Finance transactions in this space, as one of its priorities for 2020. The Bank recognises that climate change will lead to the development of a new area of business and intends to support innovative products designed to reduce Greenhouse Gas (GHG) emissions.<sup>9</sup> While Sustainalytics acknowledges the Bank's CSR strategy and green banking products' contribution to sustainability, it also notes that NBG has not established quantitative time-bound targets for green lending, and encourages the Bank to set targets to further strengthen its commitment to sustainability. The Bank is also working towards setting Group-level targets to reduce its own carbon footprint, which it expects to publish in 2020.

Sustainalytics is of the opinion that the National Bank of Greece Green Bond Framework is aligned with the Bank's overall sustainability strategy and initiatives and will further the Bank's action on its key environmental priorities.

### Well positioned to address common environmental and social risks associated with the projects

While it is recognized that the net proceeds from the bonds issued under the Framework will be directed towards eligible projects that are recognized by the GBP 2018, Sustainalytics acknowledges that the development of renewable energy facilities may have associated negative environmental and social impacts. Some key environmental and social risks associated could include worker health and safety, land use change and biodiversity disturbances due to infrastructure development. Sustainalytics is of the opinion that NBG is able to manage and/or mitigate potential risks through implementation of the following:

- NBG states that its lending practices incorporate international principles to ensure environmental risk management, safeguarding of human and labour rights and antibribery. The key principles applied in this regard are:
  - UN Global Compact<sup>10</sup>
  - UN Sustainable Development Goals<sup>11</sup>
  - UN Environment Programme Finance Initiative (UNEPFI)<sup>12</sup>
  - World Business Council for Sustainable Development<sup>13</sup>
  - EBA-GL-2017-11<sup>14</sup>

<sup>5</sup> NBG, "CSR Policy of NBG and its group", at: <https://www.nbg.gr/en/the-group/corporate-social-responsibility/csr-framework/csr-policy-nbg-group>

<sup>6</sup> NBG, "Responsibility Corporate Social Action programme", at: <https://www.nbg.gr/en/the-group/corporate-social-responsibility/csr-framework/responsibility-corporate-social-action-programme>

<sup>7</sup> NBG, "Organizational Structure for CSR Issues", at: <https://www.nbg.gr/en/the-group/corporate-social-responsibility/csr-framework/organizational-structure>

<sup>8</sup> NBG, "Annual Report 2019", (2019), at: <https://www.nbg.gr/english/the-group/investor-relations/Documents/Financial%20Results%20Announcements/Financial%20Report%2031%2012%202019%20EN.pdf>

<sup>9</sup> NBG, "Climate Change", at: <https://www.nbg.gr/en/the-group/corporate-social-responsibility/responsibility-environment/climate-change>

<sup>10</sup> UN, "Global Compact", at: <https://www.unglobalcompact.org/>

<sup>11</sup> UN, "Sustainable Development Goals", at: <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

<sup>12</sup> UNEP, "Finance Initiative", at: <https://www.unepfi.org/>

<sup>13</sup> WBCSD, "World Business Council for Sustainable Development", at: <https://www.wbcsd.org/>

<sup>14</sup> EBA, "Final Report on Guidelines on Internal Governance", (2017), at:

<https://eba.europa.eu/sites/default/documents/files/documents/10180/1972987/eb859955-614a-4afb-bdcd-aaa664994889/Final%20Guidelines%20on%20Internal%20Governance%20%28EBA-GL-2017-11%29.pdf?retry=1>

- NBG is certified to standards ISO 9001:2015<sup>15</sup> and ISO 37001:2016<sup>16</sup> on Compliance & Regulatory Affairs and Corporate Governance & Corporate Social Responsibility; the Bank is confirmed to effectively apply ISO 26000:2010<sup>17</sup> and ISO 19600:2014.<sup>18</sup> The Bank complies with the ISO 14001<sup>19</sup> standard for its Environmental Management System.<sup>20</sup>
- NBG has adopted the Group Compliance Policy to meet requirements and manage risks in accordance with the national<sup>21</sup> and broader European Union<sup>22</sup> legislation and regulations.
- Greece is classified as one of the “Designated Countries” by the Equator Principles, implying the presence of robust environmental and social governance systems, legislation and institutional capacity for protecting the environment and communities<sup>23</sup>.
- In 2015, the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD) participated in a share capital increase for the Bank. As part of the operation the Bank entered into an agreement with both institutions to comply with the applicable legislation for environmental and social management. Since 2017, the IFC is no longer a shareholder at the Bank, but the agreement with the EBRD remains in force to comply with EBRD’s Performance Requirements and Guidance.<sup>24</sup>
- In credit processes, the Bank implements Environmental & Social Risk Management to identify, evaluate, manage (prevention, avoidance or mitigation) and monitor environmental and social risks that may arise from borrowers’ business activities.<sup>25</sup> In the event that a borrower or warrantor would fail to comply with environmental and sanitary legislation the Bank may decide to terminate the loan contract.<sup>24</sup>

Based on the above, Sustainalytics is of the opinion that NBG has implemented adequate measures and is well positioned to manage and mitigate environmental and social risks commonly associated with the eligible categories.

### Section 3: Impact of Use of Proceeds

The use of proceeds category is aligned with those recognized by the GBP. Sustainalytics has focused on below on the impact and relevance of this category in the local context.

#### Importance of increasing renewable energy in Greece

Following the EU’s commitment to a clean energy transition, Greece implemented its *National Energy and Climate Plan (NECP) 2021-2030*.<sup>26</sup> According to the NECP, Greece aims to reduce its GHG emissions by 33% and increase the use of renewable energy sources by at least 35% in gross final energy consumption by 2030 compared to the 1990 level.<sup>26</sup> The total primary energy supply (TPES)<sup>27</sup> in Greece has shown a downward trend between 2006 and 2016 due to the financial crisis from 2009.<sup>28</sup> In 2016, oil accounted for 50% of TPES, followed by coal (19.0%), natural gas (15.2%), biofuels and waste (6.1%), hydro (2.1%), solar (2.3%), wind (1.9%), and electricity imports (3.3%), of which 84% is fossil fuels.<sup>28</sup>

NBG will finance and refinance renewable energy use including, (i) onshore wind, (ii) solar thermal and (iii) small hydro energy projects (<20 MW), in accordance with national targets. With respect to onshore wind, the *National Action Plan* of Greece outlines its target of increasing wind energy capacity five-fold by 2020

<sup>15</sup> ISO, “Quality Management Systems”, at: <https://www.iso.org/standard/62085.html>

<sup>16</sup> ISO, “Anti-bribery management systems”, at: <https://www.iso.org/standard/65034.html>

<sup>17</sup> ISO, “Guidance on Social Responsibility”, at: <https://www.iso.org/standard/42546.html>

<sup>18</sup> ISO, “Compliance Management Systems”, at: <https://www.iso.org/standard/62342.html>

<sup>19</sup> ISO, “Environmental Management”, at: <https://www.iso.org/iso-14001-environmental-management.html>

<sup>20</sup> NBG, “Environmental Management System”, at: <https://www.nbg.gr/en/the-group/corporate-social-responsibility/responsibility-environment/environmental-management-system>

<sup>21</sup> NBG, “Supervisory Authorities”, at: [https://www.nbg.gr/english/nbg-group-compliance/Documents/Supervisory%20Authorities%20\[3\]/Supervisory%20Authorities.pdf](https://www.nbg.gr/english/nbg-group-compliance/Documents/Supervisory%20Authorities%20[3]/Supervisory%20Authorities.pdf)

<sup>22</sup> NBG, “Compliance Principles and Policies”, at: [https://www.nbg.gr/english/nbg-group-compliance/Documents/Compliance%20Principles%20and%20Policies%20\[1\]/Compliance%20Policy.pdf](https://www.nbg.gr/english/nbg-group-compliance/Documents/Compliance%20Principles%20and%20Policies%20[1]/Compliance%20Policy.pdf)

<sup>23</sup> The Equator Principles, “Designated Countries”, at: <https://equator-principles.com/designated-countries/>

<sup>24</sup> NBG, “2018 Corporate Social Responsibility Report”, (2019), at: <https://www.nbg.gr/english/the-group/corporate-social-responsibility/annual-csr-reports/Documents/CSR%20REPORT%202018.pdf>

<sup>25</sup> NBG, “Environmental & Social Management System”, (2018), at: [https://www.nbg.gr/english/the-group/corporate-social-responsibility/csr-framework/Documents/ESMS\\_Final\\_English\\_07\\_2018.pdf](https://www.nbg.gr/english/the-group/corporate-social-responsibility/csr-framework/Documents/ESMS_Final_English_07_2018.pdf)

<sup>26</sup> Ministry of Environment and Energy, “National Energy and Climate Plan”, (2019), at: [https://ec.europa.eu/energy/sites/ener/files/el\\_final\\_necp\\_main\\_en.pdf](https://ec.europa.eu/energy/sites/ener/files/el_final_necp_main_en.pdf)

<sup>27</sup> TPES is the total supply of energy consumed by the nation either in transformation such as power generation and refining, or in final use.

<sup>28</sup> OECD/IEA, “Energy Policies of IEA Countries - Greece Review 2017”, (2017), at: <https://webstore.iea.org/download/direct/270>

compared to 2011.<sup>29</sup> After this timeframe, Greece intends to achieve a 2.4% increase (7.3 TWh to 17.2 TWh) in power generation from wind farms between 2020-2030.<sup>26</sup> In the case of solar thermal, only a few EU Member States have achieved a high level of solar thermal technology deployment to date, with Cyprus in the lead, followed by Austria, Greece and Denmark.<sup>30</sup> Solar thermal energy has high cost effectiveness for heat production and still needs to be developed further to be utilized to its full potential.<sup>30</sup> Greece has set a target in the NECP to increase power generation from solar thermal energy from 0 TWh to 0.3 TWh between 2020-2030.<sup>26</sup> In the case of hydropower, which is crucial for renewable electricity generation globally, with ecological benefits in terms of emergency management and reduction of flooding risk, it can also bring negative environmental impacts such as a loss of aquatic habitat and a change of landscape.<sup>31</sup> Furthermore, small-scale hydropower (<20 MW), considered beneficial and has less of an environmental impact on the hydrology of the river. Greece aims to increase power generation from hydro energy by 20% (5.5 TWh to 6.6 TWh) between 2020-2030, as outlined in the NECP.<sup>26</sup>

Given its dependence on fossil fuels for energy supply in Greece, Sustainalytics is of the opinion that NBG will contribute to increasing the national renewable energy share, aligned with the national and EU commitment to the transition to a low-carbon economy.

#### Alignment with/contribution to SDGs

The Sustainable Development Goals (SDGs) were set in September 2015 and form an agenda for achieving sustainable development by the year 2030. This green bond advances the following SDG goal and target:

Use of Proceeds Category	SDG	SDG target
Renewable Energy	7. Affordable and Clean Energy	7.2 By 2030, increase substantially the share of renewable energy in the global energy mix

#### Conclusion

NBG has developed the National Bank of Greece Green Bond Framework under which it will issue green bonds and the use of proceeds to finance Renewable Energy, specifically, (i) onshore wind energy, (ii) solar thermal energy, and (iii) small hydro projects (< 20 MW). Sustainalytics considers that the projects funded by the green bond proceeds will increase the share of renewable energy in Greece's energy mix and facilitate meeting the national and EU climate-related targets by 2030.

The National Bank of Greece Green Bond Framework outlines a process by which proceeds will be tracked, allocated, and managed, and commitments have been made for reporting on the allocation and impact of the use of proceeds. Furthermore, Sustainalytics believes that the National Bank of Greece Green Bond Framework is aligned with the overall sustainability strategy of the Bank and that the green use of proceed category will contribute to the advancement of the UN Sustainable Development Goals 7. Additionally, Sustainalytics is of the opinion that NBG has adequate measures to identify, manage and mitigate environmental and social risks commonly associated with the eligible projects funded by the use of proceeds.

Based on the above, Sustainalytics is confident that National Bank of Greece is well-positioned to issue green bonds and that the National Bank of Greece Green Bond Framework is robust, transparent, and in alignment with the four core components of the Green Bond Principles 2018.

<sup>29</sup> IRENA, "30 Years of Policies for Wind Energy: Lessons from Greece", (2013), at: [https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2013/GWEC/GWEC\\_Greece.pdf?la=en&hash=F31D429C63D9D3FAA59BB0D9B1C1C19AC99D4C28](https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2013/GWEC/GWEC_Greece.pdf?la=en&hash=F31D429C63D9D3FAA59BB0D9B1C1C19AC99D4C28)

<sup>30</sup> IRENA, "Renewable energy prospects for the European Union: Preview for policy makers", (2018), at: [https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2018/Feb/IRENA\\_REmap\\_EU\\_2018.pdf](https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2018/Feb/IRENA_REmap_EU_2018.pdf)

<sup>31</sup> APER/European Hydropower Association, "Hydropower and Environment – Technical and Operational Procedures to Better Integrate Small Hydropower Plants in the Environments", (2008), at: [https://ec.europa.eu/energy/intelligent/projects/sites/iee-projects/files/projects/documents/sherpa\\_report\\_on\\_environmental\\_integration.pdf](https://ec.europa.eu/energy/intelligent/projects/sites/iee-projects/files/projects/documents/sherpa_report_on_environmental_integration.pdf)

## Appendices

### Appendix 1: Green Bond / Green Bond Programme - External Review Form

#### Section 1. Basic Information

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<b>Issuer name:</b>	National Bank of Greece
<b>Green Bond ISIN or Issuer Green Bond Framework Name, if applicable: <i>[specify as appropriate]</i></b>	National Bank of Greece Green Bond Framework
<b>Review provider's name:</b>	Sustainalytics
<b>Completion date of this form:</b>	April 15, 2020
<b>Publication date of review publication: <i>[where appropriate, specify if it is an update and add reference to earlier relevant review]</i></b>	

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#### Section 2. Review overview

##### SCOPE OF REVIEW

The following may be used or adapted, where appropriate, to summarise the scope of the review.

The review assessed the following elements and confirmed their alignment with the GBPs:

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Use of Proceeds        | <input checked="" type="checkbox"/> Process for Project Evaluation and Selection |
| <input checked="" type="checkbox"/> Management of Proceeds | <input checked="" type="checkbox"/> Reporting                                    |

##### ROLE(S) OF REVIEW PROVIDER

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Consultancy (incl. 2 <sup>nd</sup> opinion) | <input type="checkbox"/> Certification |
| <input type="checkbox"/> Verification   | <input type="checkbox"/> Rating        |
| <input type="checkbox"/> Other <i>(please specify):</i>                         |  |

Note: In case of multiple reviews / different providers, please provide separate forms for each review.

##### EXECUTIVE SUMMARY OF REVIEW and/or LINK TO FULL REVIEW *(if applicable)*

Please refer to Evaluation Summary above.



## Section 3. Detailed review

Reviewers are encouraged to provide the information below to the extent possible and use the comment section to explain the scope of their review.

### 1. USE OF PROCEEDS

Overall comment on section (*if applicable*):

The eligible category, Renewable Energy, is aligned with those recognized by the GBP 2018. NBG may finance or refinance equipment, development, manufacturing, construction, operation, distribution and maintenance of the following renewable energy technologies in Greece: (i) onshore wind energy, (ii) solar thermal energy, and (iii) small hydro projects (<20 MW). Sustainalytics positively notes that NBG limits green bond financing to small-scale hydropower projects below 20 MW in capacity. NBG has set a three-year look-back period for its refinancing.

#### Use of proceeds categories as per GBP:

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Renewable energy   | <input type="checkbox"/> Energy efficiency   |
| <input type="checkbox"/> Pollution prevention and control  | <input type="checkbox"/> Environmentally sustainable management of living natural resources and land use |
| <input type="checkbox"/> Terrestrial and aquatic biodiversity conservation   | <input type="checkbox"/> Clean transportation  |
| <input type="checkbox"/> Sustainable water and wastewater management   | <input type="checkbox"/> Climate change adaptation   |
| <input type="checkbox"/> Eco-efficient and/or circular economy adapted products, production technologies and processes                             | <input type="checkbox"/> Green buildings   |
| <input type="checkbox"/> Unknown at issuance but currently expected to conform with GBP categories, or other eligible areas not yet stated in GBPs | <input type="checkbox"/> Other ( <i>please specify</i> ):  |

If applicable please specify the environmental taxonomy, if other than GBPs:

### 2. PROCESS FOR PROJECT EVALUATION AND SELECTION

Overall comment on section (if applicable):

Initially, the project evaluation and selection process, including any changes to the Framework, will be overseen by NBG's existing Committee ("Committee"). The Committee will review, approve, and monitor the Eligible Assets in line with the Framework's eligibility criteria. If assets no longer meet the eligibility criteria, the Committee will replace them with new assets within a reasonable timeframe. NBG has noted that it intends to establish a formal ESG Committee in the future. This project selection process is aligned with market practice.

#### Evaluation and selection

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Credentials on the issuer's environmental sustainability objectives            | <input checked="" type="checkbox"/> Documented process to determine that projects fit within defined categories |
| <input checked="" type="checkbox"/> Defined and transparent criteria for projects eligible for Green Bond proceeds | <input checked="" type="checkbox"/> Documented process to identify and manage potential ESG risks associated    |



with the project

- Summary criteria for project evaluation and selection publicly available  Other (*please specify*):

#### Information on Responsibilities and Accountability

- Evaluation / Selection criteria subject to external advice or verification  In-house assessment
- Other (*please specify*):

### 3. MANAGEMENT OF PROCEEDS

Overall comment on section (*if applicable*):

NBG's Treasury will manage the proceeds on a portfolio basis. Eligible Assets will be labelled respectively in NBG's internal information systems and will be reviewed at least quarterly to ensure alignment with the Framework eligibility criteria. Through quarterly monitoring and evaluation, the Committee will provide the final approval of green bond proceeds allocation to Eligible Assets. Pending full allocation, unallocated proceeds will be held within the Treasury in money market products, cash and cash equivalents. Sustainalytics considers this process to be in line with market practice.

#### Tracking of proceeds:

- Green Bond proceeds segregated or tracked by the issuer in an appropriate manner
- Disclosure of intended types of temporary investment instruments for unallocated proceeds
- Other (*please specify*):

#### Additional disclosure:

- Allocations to future investments only  Allocations to both existing and future investments
- Allocation to individual disbursements  Allocation to a portfolio of disbursements
- Disclosure of portfolio balance of unallocated proceeds  Other (*please specify*):

### 4. REPORTING

Overall comment on section (*if applicable*):

On an annual basis, NBG commits to providing a report on allocation and impact on the Investor Relations section of its website until full allocation. Impact reporting will disclose (i) the total amount of proceeds allocated to Eligible Assets, (ii) the amounts allocated to Eligible Assets, (iii) the share of financing and refinancing, and (iv) the balance of unallocated proceeds. Additionally, where feasible, impact reporting will provide information on impact indicators including (i) installed renewable energy capacity in GW or MW, (ii) expected or actual annual renewable energy generation in GW or MW and (iii) annual GHG emissions reduction or avoidance in tCO<sub>2e</sub>. Until full allocation, NBG will annually engage the external party to review its projects and confirm its allocation is aligned with the eligibility criteria and provide the Post-Issuance report. Sustainalytics considers this process to be in line with market practice.

**Use of proceeds reporting:**

- |  |  |
|--|--|
| <input type="checkbox"/> Project-by-project            | <input checked="" type="checkbox"/> On a project portfolio basis |
| <input type="checkbox"/> Linkage to individual bond(s) | <input type="checkbox"/> Other ( <i>please specify</i> ):        |

**Information reported:**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Allocated amounts     | <input checked="" type="checkbox"/> Green Bond financed share of total investment |
| <input type="checkbox"/> Other ( <i>please specify</i> ): |   |

**Frequency:**

- |   |                                      |
|---|--------------------------------------|
| <input checked="" type="checkbox"/> Annual                | <input type="checkbox"/> Semi-annual |
| <input type="checkbox"/> Other ( <i>please specify</i> ): |                                      |

**Impact reporting:**

- |  |  |
|--|--|
| <input type="checkbox"/> Project-by-project            | <input checked="" type="checkbox"/> On a project portfolio basis |
| <input type="checkbox"/> Linkage to individual bond(s) | <input type="checkbox"/> Other ( <i>please specify</i> ):        |

**Frequency:**

- |   |                                      |
|---|--------------------------------------|
| <input checked="" type="checkbox"/> Annual                | <input type="checkbox"/> Semi-annual |
| <input type="checkbox"/> Other ( <i>please specify</i> ): |                                      |

**Information reported (expected or ex-post):**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> GHG Emissions / Savings | <input type="checkbox"/> Energy Savings   |
| <input type="checkbox"/> Decrease in water use              | <input type="checkbox"/> Other ESG indicators ( <i>please specify</i> ): Installed renewable energy capacity, Expected or actual annual renewable energy generation |

**Means of Disclosure**

- |   |  |
|---|--|
| <input type="checkbox"/> Information published in financial report  | <input type="checkbox"/> Information published in sustainability report  |
| <input type="checkbox"/> Information published in ad hoc documents  | <input checked="" type="checkbox"/> Other ( <i>please specify</i> ): Investor Relations section of NBG's website |
| <input type="checkbox"/> Reporting reviewed (if yes, please specify which parts of the reporting are subject to external review): |  |

Where appropriate, please specify name and date of publication in the useful links section.

**USEFUL LINKS** (e.g. to review provider methodology or credentials, to issuer's documentation, etc.)

[www.nbg.gr/en/the-group/investor-relations](http://www.nbg.gr/en/the-group/investor-relations)

**SPECIFY OTHER EXTERNAL REVIEWS AVAILABLE, IF APPROPRIATE**

**Type(s) of Review provided:**

- |  |  |
|--|--|
| <input type="checkbox"/> Consultancy (incl. 2 <sup>nd</sup> opinion) | <input type="checkbox"/> Certification |
| <input type="checkbox"/> Verification / Audit                        | <input type="checkbox"/> Rating        |
| <input type="checkbox"/> Other ( <i>please specify</i> ):            |  |

**Review provider(s):**

**Date of publication:**

**ABOUT ROLE(S) OF INDEPENDENT REVIEW PROVIDERS AS DEFINED BY THE GBP**

- i. **Second Party Opinion:** An institution with environmental expertise, that is independent from the issuer may issue a Second Party Opinion. The institution should be independent from the issuer's adviser for its Green Bond framework, or appropriate procedures, such as information barriers, will have been implemented within the institution to ensure the independence of the Second Party Opinion. It normally entails an assessment of the alignment with the Green Bond Principles. In particular, it can include an assessment of the issuer's overarching objectives, strategy, policy and/or processes relating to environmental sustainability, and an evaluation of the environmental features of the type of projects intended for the Use of Proceeds.
- ii. **Verification:** An issuer can obtain independent verification against a designated set of criteria, typically pertaining to business processes and/or environmental criteria. Verification may focus on alignment with internal or external standards or claims made by the issuer. Also, evaluation of the environmentally sustainable features of underlying assets may be termed verification and may reference external criteria. Assurance or attestation regarding an issuer's internal tracking method for use of proceeds, allocation of funds from Green Bond proceeds, statement of environmental impact or alignment of reporting with the GBP, may also be termed verification.
- iii. **Certification:** An issuer can have its Green Bond or associated Green Bond framework or Use of Proceeds certified against a recognised external green standard or label. A standard or label defines specific criteria, and alignment with such criteria is normally tested by qualified, accredited third parties, which may verify consistency with the certification criteria.
- iv. **Green Bond Scoring/Rating:** An issuer can have its Green Bond, associated Green Bond framework or a key feature such as Use of Proceeds evaluated or assessed by qualified third parties, such as specialised research providers or rating agencies, according to an established scoring/rating methodology. The output may include a focus on environmental performance data, the process relative to the GBP, or another benchmark, such as a 2-degree climate change scenario. Such scoring/rating is distinct from credit ratings, which may nonetheless reflect material environmental risks.

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