



ABBank

Sustainability Report

2025

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1. About this report

Aegean Baltic Bank S.A. (“ABBank” or the “Bank”) is a Greek banking institution founded in 2002 and supervised by the Bank of Greece. The Bank operates primarily in corporate banking, with longstanding expertise in shipping finance and a growing presence in Greek corporate lending, trade finance, commercial real estate and renewable energy financing.

Headquartered in Maroussi, Athens, ABBank also operates service locations in Piraeus and Glyfada and provides selected cross-border services in European markets. As of 31 December 2025, the Bank continued to pursue a diversified portfolio strategy aimed at balancing its shipping and non-shipping exposures while maintaining a prudent risk profile and strong capital position.

This report covers the period from 1 January 2025 to 31 December 2025 and presents ABBank’s most significant impacts on the economy, environment and people. It has been structured around the Bank’s material topics and prepared with reference to the GRI Standards 2021 architecture, including GRI 1, GRI 2 and GRI 3, together with the relevant topic-specific disclosures where applicable.

The report covers the Bank and, where applicable, its consolidated reporting boundary, including its wholly owned subsidiary established for the management of a seized real estate asset. Unless otherwise stated, the disclosures in this report refer to activities undertaken during the 2025 financial year and include both qualitative narrative and quantitative performance information relevant to ABBank’s ESG priorities.

The report is structured around ABBank's material topics, identified through its materiality assessment and stakeholder engagement process, in line with GRI 3. These topics inform the report's organization across the Environmental, Social and Governance pillars and support a clear link between impacts, management approach, performance and future priorities. No external assurance was obtained for this reporting cycle.

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2. Statement of the CEO

Dear Stakeholders,

At Aegean Baltic Bank sustainability is an integral part of our strategy, governance, and long-term value creation model. As a financial institution, we recognize the critical role banks play in supporting economic resilience, enabling the transition to a low-carbon economy, and fostering inclusive and sustainable growth for society.

During 2025, we continued to strengthen our commitment to responsible banking by embedding Environmental, Social, and Governance (ESG) principles across our operations, financing activities, risk management framework, and stakeholder engagement practices. Our ambition is not only to deliver sustainable financial performance, but also to generate positive impact for our customers, employees, shareholders, communities, and the broader economy.

We operate in a rapidly evolving environment shaped by climate change, geopolitical uncertainty, technological transformation, and increasing social expectations. In response, we have enhanced our ESG governance structures and reinforced the integration of sustainability considerations into strategic decision-making processes. Through our policies, due diligence mechanisms, and risk assessment procedures, we seek to identify, prevent, mitigate, and address actual and potential impacts related to our business activities and value chain.

Climate action remains a strategic priority for our Bank. We aim to support the transition toward a lower-carbon economy by facilitating sustainable finance initiatives, promoting access to green financing solutions, and encouraging practices that contribute to improved environmental performance. In parallel, we continue to place emphasis on financial inclusion, customer trust, data protection, diversity and equal opportunity, employee wellbeing, and ethical business conduct.

Our approach is guided by transparency, accountability, and continuous improvement. We actively engage with stakeholders to better understand their expectations and material sustainability topics, ensuring that our actions remain aligned with evolving market, regulatory, and societal needs.

This ESG Report reflects our ongoing commitment to responsible business practices and provides a transparent overview of our performance, priorities, and progress. While challenges remain, we are confident that sustainability is fundamental to the resilience and future success of our Bank.

I would like to thank our employees, customers, investors, regulators, and partners for their continued trust and collaboration. Together, we will continue building a more sustainable, inclusive, and resilient future.

Sincerely,

Aristidis Vourakis

Chief Executive Officer
Aegean Baltic Bank

3.ABBank at a glance



Our Vision

Our vision is to strengthen ABBank's role in the market through trusted, long-term customer relationships and disciplined growth. We seek to deliver specialized banking solutions that support the resilience, competitiveness and sustainable development of the businesses we serve.



Our Mission

Our mission is to provide responsible, relationship-driven corporate banking services through a balanced portfolio of traditional and specialized solutions. We aim to create long-term value for customers, shareholders, employees and society by combining financial discipline with sound governance and a forward-looking ESG perspective.



Our Values

Our values guide decision-making, shape our culture and reinforce our commitment to integrity, accountability, professionalism and long-term value creation. They form the basis for how we engage with customers, colleagues, shareholders, regulators and the wider community.

Focused on the Customer

Our Bank places its customers at the center of its activities. We have been committed to high professional standards and we are determined to offer top quality products and services.



Innovation

In order to meet our customers' requirements, we continuously try to find solutions by incorporating new developments in an attempt to dynamically respond to the diversity of the business environment.



Teamwork

We invest on the knowledge of our people and their entrepreneurial culture, while we encourage teamwork in order to achieve our goals and pursue success.



Respect

The relationships with our customers are based on mutual respect and are characterized by honesty and trust. By embodying these values, ABBank strives to lead the way in sustainable Banking, setting a benchmark for excellence and integrity.



OUR
VALUES

3.1. Business Strategy

ABBank's strategy is designed to address the evolving banking needs of its corporate clients through tailored solutions, specialist sector expertise and timely execution. Since 2018, the Bank has followed a deliberate diversification strategy, aiming to achieve a more balanced mix of shipping and non-shipping exposures, reduce concentration risk and broaden its income base.

In parallel, ABBank continues to strengthen the integration of environmental, social and governance considerations into its strategy, governance and risk framework. This includes the identification of material topics, the development of ESG priorities and the gradual embedding of sustainability-related considerations into business planning and decision-making.



3.2. Business model

ABBank is a specialist corporate banking institution with longstanding expertise in shipping finance. Since 2018, the Bank has progressively broadened its activity by offering corporate banking products and services to Greek SMEs and larger corporates outside the shipping sector, supporting a more diversified business profile and income base.

The Bank operates from its headquarters in Maroussi and maintains service locations in Piraeus and Glyfada. It also has one wholly owned subsidiary, established to hold and manage a repossessed real estate asset. ABBank is supervised by the Bank of Greece as one of the Less Significant Institutions of the Greek banking system.

Below is an overview of the range of corporate banking products and services ABBank offers to meet the business needs of its shipping and non-shipping customers, including Greek corporates and SMEs, across financing, operational transactions, treasury and advisory services.

3.2.1. Shipping Finance

- The Bank's main ship financing products and services, in bilateral or syndicated form, include:
- Pre and post-delivery new building financing.
- Short, medium and long-term financing for the acquisition of second-hand ships.
- Working Capital facilities to ship-management companies.
- Issuance of Letters of Guarantee (LGs).
- Other Trade Finance facilities (including discounting of trade receivables).
- Arrangement and Agency/Management of Club & Syndicated term loans.

3.2.2. Greek Corporate Finance

- Term financing of industrial or commercial investments in buildings or equipment.
- Term financing for the construction or acquisition of commercial real estate property (CRE mortgage lending).
- Term financing of renewable energy projects (wind parks, solar energy parks).
- Short-term Working Capital facilities against specific projects and/or contracts.
- Trade Finance facilities for the supply of raw materials.
- Issuance of Letters of Guarantee (LoGs) for participation in auctions, tender offers etc.
- Management/Agency of Bond loans and/or Club & Syndicated term loans.

3.2.3. Treasury & Risk Management Products

The Bank offers all essential products required for shipping and non-shipping companies as well as a range of Listed and Over the Counter (OTC) traded financial instruments aiming to enhance investment yields or hedge earnings or costs:

- Interest Rate and Foreign Exchange (FX) hedging through derivative products.

- Spot and Forward FX conversion transactions.
- Bond transaction services.

3.2.4. Customer Deposits and Cash Management Transaction Services

The Bank offers a broad range of liquidity management solutions, in the fields of:

- Call, Current Account and Time Deposits and customized depository products
- Liquidity Management and Payments
 - International payment services including crew allotments and cash-to-master payments
 - Dedicated Electronic Banking System (Gemini) with tailored ERP configuration ¹

3.2.5. Customer cheques and bank drafts

- Vessel sale and purchase closing transactions and escrow account handling
- ABBank Debit Card, for use of its corporate and its (few) natural person customers
- Having obtained the required “passporting” license from the BoG and BaFin (the German Financial Supervisory Authority), ABBank has commenced since September 2019 cooperating with German retail deposits electronic brokerage and management platforms, hence accepting through this channel German retail deposits.

3.2.6. Web-Banking

Since Q4 2020, the Bank has been operating its Web-Banking platform, which is now available on a 24-hour basis, providing customers with access to money transfers, payments and automatic account balance information services.



¹ To date, the Bank also offers its clients, free of charge, its in-house developed dedicated e-payment platform (GEMINI), customizing it to their IT systems. The dedicated platform provides a reliable and secure manner uploading and automatic execution of payment instructions, also producing real-time swift copies/confirmations.

3.3. Economic Performance

Table 1: ABBank's Financial Review (P&L)

P&L	2025 (€ in millions)	2024 (€ in millions)
Net Interest Income	32.2	40.9
Net Fee and Commission Income	3.5	4.1
Total Operating Income	39.1	41.9
Total Operating Expenses	-18.1	-19.3
Net Profit	13.2	18.7

Figure: Profit and loss comparison (2025 vs 2024)

Table 2: ABBank's Financial Review (Balance Sheet)

Balance Sheet	2025 (€ in millions)	2024 (€ in millions)
Shipping Loans	447.6	405
Corporate Loans	139.9	126.1
Total Gross Loans	588.0	532.4
Total customer Deposits	1,024.50	973.8
Total Assets	1,215.30	1,151

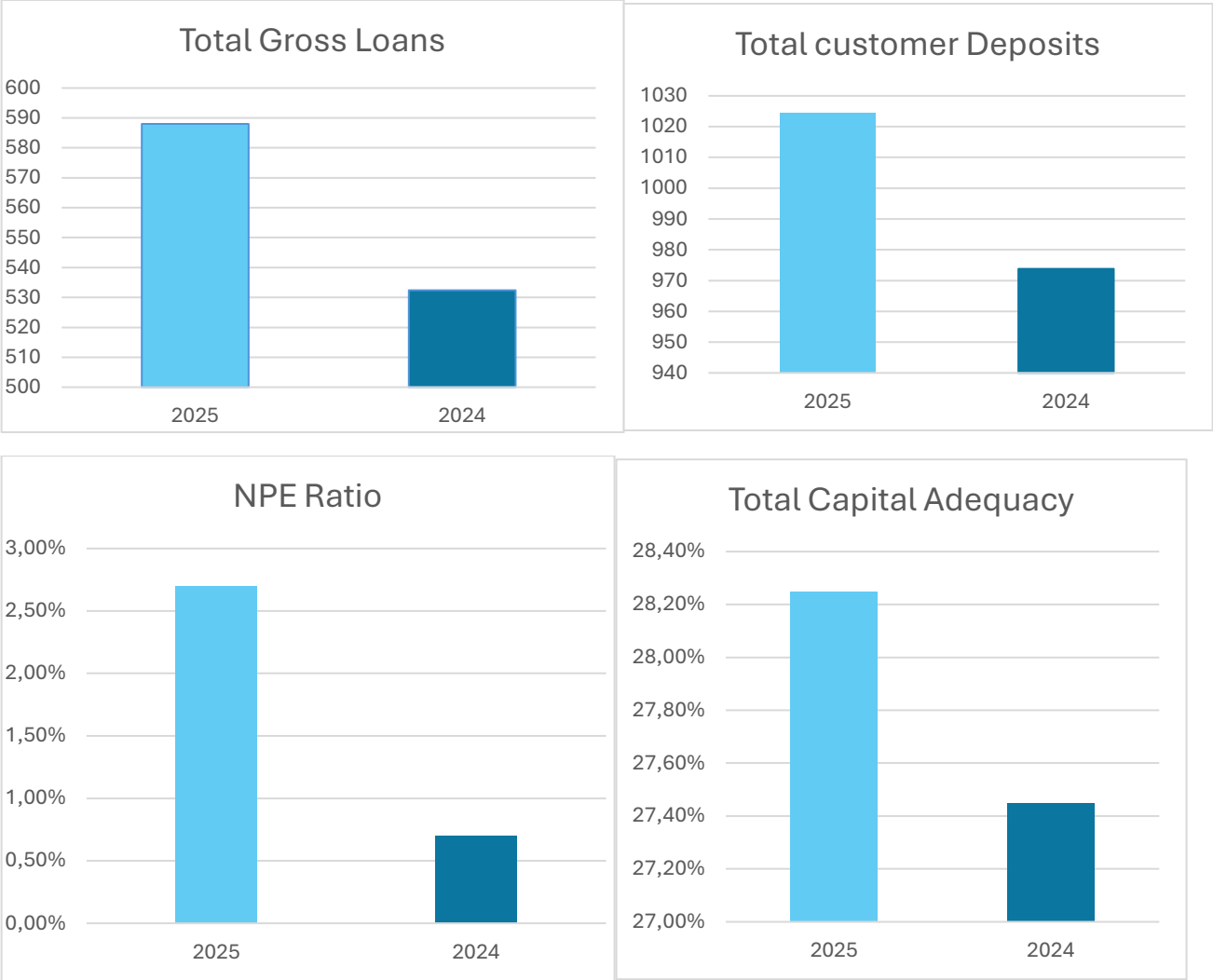
Figure: Balance sheet comparison (2025 vs 2024)

Table 3: ABBank's Financial Review (Financial Ratios)

Financial ratios	2025	2024
Cost to Income	46.37%	39.63%
NPE Ratio	2.70%	0.70%
Common Equity Tier 1 (CET 1)	28.25%	27.64%
Total Capital Adequacy	28.25%	27.64%

Figure: Financial ratios comparison (2025 vs 2024)

Financial Review



In line with **GRI 201-1**, ABBank discloses the direct economic value generated and distributed during the reporting period, providing stakeholders with a transparent view of the Bank's economic contribution and financial resilience.

During 2025, ABBank remained profitable, with net profit of **€13.2 million**, despite lower revenue generation compared with 2024. Total operating income amounted to **€39.1 million**, compared with **€41.9 million** in 2024, reflecting lower net interest income and fee-related income versus the exceptionally strong prior year.

At the same time, the Bank maintained cost discipline, with total operating expenses improving to **€18.1 million** from **€19.3 million** in 2024. This supported ABBank's ability to preserve solid earnings and continue creating value for shareholders, employees, customers and the wider economy.

Balance sheet growth remained positive in 2025. Total assets increased to **€1,215.3 million** from **€1,151.0 million**, while total gross loans rose to €588.0 million from €532.4 million. Customer deposits also strengthened to **€1,024.5 million**, underlining continued client confidence and a stable funding base.

Capital and asset quality indicators remained robust. The Bank reported a **CET1 ratio of 28.25%** and **Total Capital Adequacy of 28.25%**, while the **NPE ratio stood at 2.70%**. Although asset quality metrics were weaker than in 2024, ABBank continued to operate from a position of strong capitalization and prudent balance sheet management.

Direct economic value generated and distributed	2025 (€ millions)	2024 (€ millions)
	Direct economic value generated	
Revenues	39.10	48.80
	Economic value distributed	
Operating costs	5.50	5.30
Employee wages and benefits	9.80	10.30
Payments to providers of capital	-	-
Payments to government	3.90	10.10
Community investments	0.01	0.01
Total	19.21	25.71

3.4. Memberships and associations

3.4.1. Industry membership and participation

ABBank participates in selected industry bodies and professional associations in order to stay informed on sector developments, contribute to industry dialogue and support responsible banking practices.

3.4.2. Membership in Associations

ABBank participates in selected industry bodies, including the Hellenic Bank Association and the Hellenic Marine Environment Protection Association (HELMEPA). These memberships support dialogue on sector developments, responsible banking practices and environmental awareness, while also providing opportunities for collaboration and knowledge sharing.

Together, these activities reflect ABBank's intention to remain engaged with sector developments, strengthen professional networks and contribute to responsible banking and sustainability-related dialogue.

3.5. Awards and distinctions

ABBank strengthened its external market positioning by obtaining its first official credit ratings from international agencies. These assessments provide an independent view of the Bank's financial profile, governance arrangements and risk management discipline, and support transparency toward investors and other stakeholders.

Scope Ratings assigned ABBank a "BB" rating with a Stable Outlook, recognizing the Bank's solid capital position and strategic direction. This external validation reflects the institution's commitment to maintaining financial stability while advancing responsible banking practices.

S&P Global Ratings assigned ABBank a "BB rating with stable outlook", highlighting the Bank's capacity to meet its financial obligations and its improving risk profile. The Positive Outlook reflects a holistic evaluation of the Bank's operational resilience, governance effectiveness and forward-looking strategy.

4. Sustainable Development in AB Bank

In a world where environmental and social responsibility increasingly define business success, Aegean Baltic Bank stands at the forefront of positive change. We believe the financial sector has the power—and the obligation—to accelerate the transition to a sustainable future. That's why we're committed to empowering businesses that invest in cleaner, smarter, and more resilient solutions, while continuously reducing the environmental footprint of our own operations.

Our strategy is both clear and ambitious. We support the development of renewable energy source (RES) projects through responsible lending and investment, enabling our clients to translate sustainable initiatives into tangible, real-world impact. In parallel, we continue to enhance our internal practices to improve our environmental and social performance. This dual focus is aligned with the objectives of the EU Green Deal and reinforces our role as a catalyst for long-term, sustainable value creation.

Guided by global standards such as the UN Sustainable Development Goals, Aegean Baltic Bank fosters a workplace where fairness, inclusivity, and equal opportunity are non negotiable. Our policies reinforce a culture of respect and meritocracy, ensuring every employee can thrive and contribute to our shared mission.

For us, sustainability is far more than a regulatory requirement—it's a strategic direction and a promise. With strong governance and a deeply rooted sense of responsibility, we are building lasting value for our clients, our people, and the communities we proudly serve.

4.1. Sustainability Strategy

Aegean Baltic Bank supports the transition to a sustainable economy and views climate change and sustainability not only as challenges but also as opportunities for responsible growth. A core strategic priority is to align the Bank's operations with evolving environmental and social expectations, while ensuring strong governance and adherence to supervisory frameworks, international standards, and industry best practices.

To this end, the Bank is currently developing and implementing a comprehensive Sustainability Strategy based on two interlinked pillars:

- **Operational Sustainability Strategy:** focusing on the Bank's internal activities and footprint, aimed at minimizing environmental and social impacts from operations.
- **Sustainable Finance Strategy:** addressing the impacts of the Bank's lending and investment activities, helping clients transition to more sustainable business models.

This dual-pillar strategy enables Aegean Baltic Bank to drive measurable impact both internally and externally, by embedding sustainability into daily operations, decision-making processes, and financial activities.

4.2. Operational Sustainability Strategy

To support implementation of the Bank's Operational Sustainability Strategy, Aegean Baltic Bank has identified a set of targeted Key Performance Indicators (KPIs) that reflect its commitment to reducing its environmental footprint, enhancing workplace wellbeing and upholding responsible governance practices. These KPIs serve as measurable benchmarks for tracking progress across priority areas such as energy efficiency, emissions reduction, resource optimization, employee inclusion and ethical conduct. Together, they support the embedding of sustainability into the Bank's day-to-day operations and long-term strategic planning.

Table 5: ESG Key Performance Indicators (KPIs) and Targets

Pillar	KPI	Target
Environmental (E)	% of renewable energy consumed throughout the year	30% renewable energy by 2027 in our own operations, e.g. Contract with a provider for exclusive supply from RES
	Emissions Reduction per year	40% GHG Emissions Reduction (Scope 1,2) by 2030
	Tons of paper used per year	25% reduction in paper consumption by 2027
Social (S)	Employee retention rate e.g. <10% employee turnover /no of initiatives implemented	Support initiatives that promote flexibility, work-life balance and employee wellbeing
	No. of discrimination incidents throughout the year. Establishment of a complaint reporting procedure	Zero tolerance to violence, harassment and any type of discrimination
Governance (G)	Amount of monetary losses as a result of business ethics violations/ no. of incidents (zero incidents)	Zero tolerance to bribery incidents
	Dedicated ESG Training (no. of hours, increase to 15% of hour for ESG Training)	Build internal ESG Capacity (e.g. trainings)
	No. of whistleblowing incidents	Zero incidents of retaliation against whistleblowers

4.3. Sustainable Finance Strategy

At the same time, Aegean Baltic Bank is enhancing its approach to sustainable finance through a structured set of Key Performance Indicators (KPIs), designed to ensure transparency, accountability, and measurable progress in sustainability.

By embedding sustainability into its daily operations and decision-making processes, Aegean Baltic Bank aims to contribute meaningfully to a resilient and inclusive future for its clients, employees, and stakeholders.

The specific thresholds and targets for the KPIs listed in the table below will be established upon finalization of the Bank's overall strategy and business approach.

Table 6 : ESG related Key Performance Indicators (KPI's)

KPI	Definition & Purpose
Green Asset Ratio (GAR)	Measures the percentage of loans and investments in environmentally sustainable activities, in line with the EU Taxonomy. GAR ensures that a defined proportion of ABBank's financial assets are in activities that substantially contribute to EU sustainability objectives.
Green Financing Proportion (Corporate Non-Shipping)	Tracks the percentage of corporate loans (non-shipping) allocated to renewable energy, energy efficiency, and green investments.
Carbon Intensity of Shipping Portfolio	Measures the carbon emissions performance of financed shipping assets, ensuring alignment with IMO decarbonization targets and EU Fit-for-55 regulations.
ESG Due Diligence Coverage	Monitors the percentage of corporate loans and commitments assessed for ESG compliance, ensuring environmental and social risks are mitigated.

4.4. ESG Governance at Aegean Baltic Bank

Aegean Baltic Bank has further enhanced its ESG governance framework to support the effective implementation of its Sustainability Strategy and to ensure continued alignment with regulatory expectations, supervisory guidance and evolving market practices. Through strengthened governance arrangements, the Bank seeks to reinforce accountability, improve oversight of sustainability-related matters, manage emerging ESG risks and support long-term value creation for its stakeholders.

To provide effective oversight and coordination of its ESG Strategy, the Bank has established a dedicated Sustainability Committee as part of its internal governance structure. Operating at management level, the Committee provides strategic guidance on ESG-related initiatives, monitors the integration of ESG considerations into the Bank's business model and supports alignment with applicable regulatory requirements, supervisory expectations and voluntary sustainability commitments.

The Sustainability Committee is responsible for reviewing the Bank's ESG Strategy, recommending ESG-related Key Performance Indicators and targets, and monitoring progress against defined sustainability objectives. It also contributes to the ongoing update of internal policies, procedures and risk management

frameworks, including the integration of climate-related and environmental risks in line with EU and national regulatory developments.

Within this governance framework, the ESG Coordinator has a central role in the implementation, coordination and monitoring of the Bank's sustainability initiatives. Reporting to the Deputy CEO, the ESG Coordinator supports the execution of ESG projects, coordinates the collection and monitoring of ESG data, and acts as Secretary of the Sustainability Committee. The role also supports employee awareness and training, sustainability reporting and communications, and engagement with auditors and relevant stakeholders to promote transparency, consistency and compliance in ESG-related matters.

The Sustainability Committee meets on a quarterly basis and reports biannually to the Board of Directors. Its composition includes senior representatives from key business, risk, control and support functions, promoting cross-functional collaboration, clear accountability and effective implementation of the Bank's ESG agenda across the organization.

4.5. ESG and CR&E Risk Management

Aegean Baltic Bank recognizes that climate-related and environmental (CR&E) risks are increasingly relevant to financial stability, portfolio resilience and long-term business performance. In line with supervisory expectations, including those of the European Central Bank, and with evolving market practices, the Bank has conducted a comprehensive qualitative materiality assessment to evaluate the potential impact of physical and transition climate risks on its activities and portfolios, with particular focus on the shipping and corporate SME sectors.

This assessment reflects the specific characteristics of the Bank's business model, including its established presence in shipping finance and its growing corporate lending portfolio. CR&E risk considerations are progressively embedded into the Bank's broader risk management framework, with key risk drivers such as regulatory developments, technological change, extreme weather events and biodiversity-related impacts assessed in relation to traditional risk categories, including credit, operational, liquidity and reputational risk.

By incorporating the outcomes of this analysis into its governance, strategy, risk appetite and risk management processes, ABBank aims to enhance decision-making, strengthen risk awareness and ensure that sustainability considerations are consistently reflected in the identification, assessment, monitoring and management of risks.

As part of its CR&E risk management roadmap, the Bank has completed a number of foundational initiatives, including:

- analysis of the business environment and relevant climate-related risk drivers;
- completion of a qualitative materiality assessment for CR&E risks;
- establishment of a Sustainable Finance Framework; and
- development and implementation of CR&E risk-related Key Performance Indicators.

This structured and forward-looking approach supports ABBank's continued alignment with regulatory expectations, enhances organizational resilience and contributes to the transition toward a more sustainable and low-carbon economy.

4.6. Sustainable Finance

Aegean Baltic Bank (AB Bank) has established a robust Sustainable Finance Framework that embeds Environmental, Social, and Governance (ESG) principles into every aspect of its financial activities. This framework underscores the Bank's commitment to accelerating the transition to a low carbon economy and aligns with the EU Taxonomy, the European Green Deal, and national sustainability priorities in Greece.

Through this approach, AB Bank places strategic emphasis on financing projects in renewable energy, energy efficiency, sustainable transportation, and other sectors aligned with the EU Taxonomy. At the same time, the Bank is progressively integrating ESG considerations into its credit risk assessments, due diligence processes, and portfolio management practices, ensuring that sustainability becomes a core driver of long term value creation.

SUSTAINABLE FINANCING					
Project Category	Sector	2025	2024	2023	2022
Renewable Energy Sources (RES)	P/V Parks	1,838,000			2,879,500
	Wind Parks	2,022,500	4,600,000	4,000,000	
	Total	3,860,500	4,600,000	4,000,000	2,879,500
Other projects related to Green Transition	P/V Installation		130,137	869,863	
	Energy efficiency upgrades	2,850,000	684,057	2,457,482	
	Renewable overdraft for production of Wind Turbines	1,500,000	1,500,000	1,400,000	1,400,000
	Total	4,350,000	2,314,194	4,727,345	1,400,000
	Total	8,210,500	6,914,194	8,727,345	4,279,500

4.7. Materiality analysis

4.7.1. Stakeholders' engagement

Stakeholder engagement is an essential part of ABBank's ESG approach. The Bank seeks to maintain open, two-way communication with stakeholders that influence, or are influenced by, its activities, in order to better understand expectations, identify material topics and strengthen accountability

Stakeholder Group	Cooperation framework	Means of communication
Board of Directors	The Board is responsible for climate-related risks	— Regular and ad-hoc meetings — Progress reports
Executive Management	The CEO has appointed the Sustainability Committee	— Regular and ad-hoc meetings
Shareholders and Investors	Timely reporting of accurate and complete information the Group's performance and strategy	— Annual General Meetings and Extraordinary General Meetings of Shareholders — Annual Financial Report and Annual Report -Sustainability — Disclosure of financial results on abb-bank.gr — Press release and Regulatory Announcements — Disclosure of information on abb-bank.gr
Employees	Timely information on issues concerning the Bank, the development and progress of skills, as well as employee engagement and benefits	— Meetings — HR processes
Government and Regulators	Compliance and harmonization with the supervisory and regulatory framework	— Meetings, cooperation and consultation with institutional representatives of regulatory authorities, consumer associations, the Bank of Greece, Hellenic Bank association, etc. — Provision of data information
Customers and Clients	Responsible information, customer service and provision of products and services with a deep sense of respect and transparency	— Meetings (whenever necessary) — Regular communication (calls, emails)
Suppliers & Partners	Cooperation based on transparent procedures and specified criteria to achieve mutually beneficial agreements. Communication with third party partners, to investigate further tailor-made business offerings	— Meetings (whenever necessary) — Regular communication (mobile phone, online using sharing collaboration tools) — Procurement policy

Stakeholder Engagement

We believe that cooperation and mutual benefit with all stakeholders is essential to our sustainable growth. We actively engage with our stakeholders to understand their expectations, address their concerns and create long-term value together.



4.7.2. Materiality assessment process

Materiality is a central element of ABBank's ESG approach. The Bank assesses the sustainability topics that are most relevant to its business model, stakeholders and risk profile in order to determine where its most significant economic, environmental and social impacts arise and where management attention should be focused.

The assessment process combines internal expertise, portfolio analysis, regulatory expectations and stakeholder input. It supports ABBank in identifying the topics that are most relevant to its operations and in integrating climate-related and broader ESG considerations into governance, risk management and reporting.

The table below summarizes the main steps of ABBank's materiality assessment approach and illustrates how identified risks and impacts inform the Bank's follow-up actions.

Table 1. The steps for materiality assessment process

Step 1	Identification of risk drivers	Institutions are expected to understand the impact of climate-related and environmental risks on the business environment in which they operate.
Step 2	Identification of exposures and determination of materiality	Depending on the type of exposure, institutions use different qualitative and quantitative approaches to assess the materiality of the risks.
Step 3	Determination of follow-up actions	Institutions are expected to annually assess material risks using internal criteria and adopt a strategic approach with comprehensive risk management tools, implementing specific follow-up actions based on identified material risks.

The 2025 assessment was supported by updated portfolio information and sector-level analysis, enabling improved visibility of transition and physical risk drivers across relevant exposures. The outcome supports a more targeted understanding of ABBank's sustainability-related priorities and risk landscape.

Table 1a. Potential Significance Ratings – Summary View

CR&E risk category	CR&E risk sub-category	Strategic risk ²	Market risk	Credit risk	Liquidity risk	Operational risk	Reputational risk
Transition risk	Policy and regulation	Medium	Low	High	Low	Medium	Medium
	Market sentiment	Low	Low	Medium	Low/Medium	Low	Low
	Technology	Low	Low	Low/Medium	Low	Medium	Low
Physical risk	Floods/sea level rises	Low	Low	Low/Medium	Low	Low	Low
	Droughts/extreme heat	Low	Low	Low/Medium	Low	Low	Low
	Storms/hurricanes	Low	Low	Low/Medium	Low	Low	Low
	Water stress	Low	Low	Low/Medium	Low	Low	Low
	Biodiversity loss and land usage	Low	Low	Low/Medium	Low	Low	Low

Table 1b. Summary View - Time Horizon of Impact³

Transition risk			
Risks assessed	Significance rating ⁴	Rank	Time Horizon of Impact ⁵
Credit Risk	High	5	S / M / L
Reputational Risk	Medium	3	M / L
Operational Risk	Medium	3	M / L
Strategic Risk	Low	1	S
	Medium	3	M / L
Liquidity Risk	Low/Medium	2	M / L
Market Risk	Low	1	M / L

Physical risk			
Risks assessed	Significance rating ⁶	Rank	Time Horizon of Impact ⁷
Strategic Risk	Low	1	S
	Medium	3	M / L
Credit Risk	Low/Medium	2	S / M / L
Operational Risk	Low	1	M / L
Reputational Risk	Low	1	M / L
Market Risk	Low	1	M / L
Liquidity Risk	Low	1	M / L

² Strategic risk rating is “Low” in Short-Term and “Medium” in Medium and Long-Term Time Horizons (see Tables below)

³ The "Time Horizon of Impact" column indicates the timeframe within which any impact from the identified risks may occur, regardless of their significance. Similarly, the "Significance Rating" column presents the results of the qualitative analysis conducted for each risk, assessing its relative importance.

⁴ Prudent approach to overall rating development applied by selecting highest rating across Transition and Physical risk sub-categories; see ratings table 1b above for granular split.

⁵ Time horizons align with the Bank's time horizon definitions i.e. Short Term 0-1 years; Medium Term 1 – 5 years and Long Term > 5 years. Time horizon(s) allocated are estimates only based on understanding gained through qualitative analysis.

⁶ Prudent approach to overall rating development applied by selecting highest rating across transition and physical risk sub-categories; see ratings table 1b above for granular split.

⁷ Time horizons align with the Bank's time horizon definitions i.e. Short Term 0-1 years; Medium Term 1 – 5 years and Long Term > 5 years. Time horizon(s) allocated are estimates only based on understanding gained through qualitative analysis.

Table 2. CR&E Risk Qualitative Materiality Assessment - Summary View

CR&E Risk Qualitative Materiality Assessment – Summary View ⁸			
CR&E Risk: Transition Risk - Policy and regulation; Market sentiment; Technology.			
Existing risks	Impact of Transition risk on existing risk	Significance rating ⁹	Time Horizon of Impact ¹⁰
Strategic risk	Regulatory and policy changes may require or force (if integration of CR&E factors in strategy is delayed) a change to the Bank's strategy. For example, the Bank may wish to align its strategy to support governmental initiatives to transition towards a lower carbon economy. Adapting the Bank's strategy may result in significant cost to the Bank and may require significant resources. Furthermore, pivoting the Bank's strategy as required, may take significant time. There is a risk that if meaningful consideration is not given to CR&E risk mitigation and government policy changes in the Bank's strategy development, that the Bank's business model may become unsustainable over time. A shifting market sentiment (permanent) may require strategy adaptation. The direction and pace of strategy adaptation will impact the bank's overall business. The strategy of the bank may be impacted by shifts in technology used by sectors that the bank finances, such as the shipping sector. Supporting (via financing) those companies that make the right technology decisions (follow the right technology) may decrease other prudential risks that the bank faces (such as credit risks).	Low	S
		Medium	M / L
Market risk	The transition to net zero could result in increased market volatility impacting the Bank in the form of either Interest Rate risk or Credit Spread risk. However, based on the nature of Bank's current exposures and an expectation that Regulatory Authorities would be keen to avoid causing sudden and/or significant market disruption, the impact on Market risk is considered low.	Low	M / L
Credit risk	Regulatory changes applicable to banks may impact Credit risk management and how Credit risk is assessed. Financial firms may be required to further integrate ESG factors (in addition to current guidance) in future years. Policy changes may impact the Credit risk profile of the Shipping loans portfolio by for example decarbonization cost as shipping companies may invest in alternative fuels, older ships that do not meet evolving environmental standards may become stranded, reducing their market value and thus the collateral value for secured loans or Non-compliance with stricter emissions standards or carbon pricing mechanisms could increase operational costs and default risks. For the shipping portfolio, as market sentiment shifts, customers, including large multinational corporations, are prioritizing green supply chains. Shipping firms unable to offer low-carbon solutions may lose business to greener competitors. Revenue decline for non-compliant firms could deteriorate their financial metrics, increasing the likelihood of credit downgrades or defaults. The non-shipping loans portfolio may be also impacted depending on the economic sector, the nature of the obligors' supply chain and the level of impact stemming to these from Transition risk. If market sentiment deteriorates because of the transition, this may impact the financial position of AB Bank's customers, both Shipping and Non-shipping, and result in an increase in ECL. For example, as market sentiment shifts, energy prices may soar and obligors with high energy dependency (manufacturing organisations) may suffer higher costs and a loss in profitability, thereby reducing their repayment capacity.	High	S / M / L

⁸ This table is to be reviewed in conjunction with the potential significance ratings – summary view table (Table 1a) and the detailed CR&E qualitative risk assessment tables (3a, 3b)

⁹ Prudent approach to overall rating development applied by selecting highest rating across Transition and Physical risk sub-categories; see ratings table 2 below for granular split.

¹⁰ Time horizons align with the Bank's time horizon definitions i.e. Short Term 0-1 year; Medium Term 1 – 5 years and Long Term > 5 years. Time horizon(s) allocated are estimates only based on understanding gained through qualitative analysis.

CR&E Risk Qualitative Materiality Assessment – Summary View ⁸

CR&E Risk: Transition Risk - Policy and regulation; Market sentiment; Technology.

Liquidity risk	Transition risks in regulation, market sentiment, and technology impact the liquidity of banks by influencing access to funding, collateral valuation, and market stability. Regulatory changes, such as stricter CR&E requirements, may require higher liquidity outflows and limit access to capital, particularly for non-green issuances. Negative market sentiment can lead to deposit withdrawals, reduced investor demand for non-ESG-compliant securities, and increased refinancing risks. Moreover, technological shifts may lead to significant withdrawals or usage of cash by all customers of the Bank, as they seek to invest in new technologies and implement necessary requirements.	Low/Medium	M / L
Operational risk	Transition risks significantly impact the Bank's operational risk management by requiring changes in processes, systems and operations to ensure compliance with evolving regulations and policies. The need to reduce the Bank's environmental footprint and disclose GHG emissions adds pressure, increasing exposure to risks until these adjustments stabilize. Deteriorating market sentiment may exacerbate unexpected threats, such as cyberattacks or declines in property values, further challenging operational resilience. Additionally, implementing new technologies to meet regulatory requirements introduces complexity, elevating risks during the transition period. Proactive planning and integration are essential to mitigate these operational vulnerabilities.	Medium	M / L
Reputational risk	Transition risks affect the Bank's reputational and liability risks. Stricter disclosure requirements increase scrutiny from stakeholders, raising reputational risks if disclosures are incomplete or unclear. Shifting market sentiment adds pressure, as delays in green product development or failure to meet emissions targets could harm customer trust and loyalty. At the same time, climate-related lawsuits are becoming more common, increasing the need for transparency.	Medium	M / L

CR&E Risk Qualitative Materiality Assessment – Summary View

CR&E Risk: Physical risk - Floods/sea level rises; Droughts/extreme heat; Storms/hurricanes; Water stress; Biodiversity and land usage

Existing risks	Impact of Physical risk on existing risk	Significance rating	Time Horizon of Impact
Strategic risk	The increasing frequency and intensity of physical risks, such as floods, heatwaves, and biodiversity loss, pose challenges for the Bank's strategy. Clients operating in vulnerable sectors or regions may face heightened financial and operational difficulties, which could translate into loan defaults or reduced portfolio value for the Bank. A strategy that fails to account for these threats at the client level risks exposes the Bank to avoidable losses. Comprehensive assessment of the client portfolio, with a focus on resilience to physical risks, is essential to safeguard the Bank's financial stability and adapt to these growing challenges effectively.	Low	S
		Medium	M / L
Market risk	Climate-induced events can indirectly affect market risk by impacting the broader economy. These events may weaken sovereign credit ratings, change borrowing needs, and increase credit spreads, leading to drops in bond values and asset prices. While the exact type of physical risk matters less for market risk, the knock-on effects on the economy and credit ratings are key.	Low	M / L
Credit risk	Events such as flooding, extreme heat, storms, and water stress pose challenges to the Bank's credit risk management. Vulnerable obligors may face reduced revenue or increased costs due to operational disruptions, insurance gaps, or necessary adaptations, impacting their loan repayment capacity. Similarly, declining property and collateral values, particularly in flood-prone or water-stressed regions, increase Loss Given Default (LGD). For the shipping sector, climate-related disruptions may increase operational costs and affect profitability and repayment ability. Comprehensive evaluation of credit exposures to these risks is essential to maintain portfolio resilience and manage Expected Credit Losses (ECL). The Low/Medium significance rating reflects a portfolio-level assessment, combining the lower sensitivity of shipping exposures with the higher vulnerability observed in non-shipping sectors, including real estate and certain domestic SME activities.	Low/Medium	S / M / L

CR&E Risk Qualitative Materiality Assessment – Summary View

CR&E Risk: Physical risk - Floods/sea level rises; Droughts/extreme heat; Storms/hurricanes; Water stress; Biodiversity and land usage

Liquidity risk	While the direct impact on liquidity risk is relatively low, extreme weather events, like floods or storms, can disrupt the Bank's ability to raise funds or liquidate assets under unstable market conditions. Indirectly, these disruptions can trigger increased customer withdrawals or liquidity demands, particularly in vulnerable regions or industries.	Low	M / L
Operational risk	Natural disasters including floods, extreme heat, storms, and biodiversity loss can significantly impact the Bank's operational resilience. These risks may disrupt business operations, trigger Business Continuity Plans (BCPs), or impair IT infrastructure, particularly data centers in vulnerable areas. Chronic physical risks could also lower the value of Bank-owned properties over time. Extreme weather may strain third-party suppliers and service continuity, while droughts or heatwaves could affect workforce availability and increase cooling costs for critical facilities. Adapting operations and infrastructure to withstand these risks is crucial to maintaining business continuity and minimizing operational disruptions.	Low	M / L
Reputational risk	Flooding, extreme heat, storms, and biodiversity loss can expose the Bank to reputational risks if not properly managed. Frequent disruptions to operations, unaddressed vulnerabilities in the portfolio, or poor planning for physical risks could damage the Bank's reputation and erode customer trust. If the Bank is perceived as failing to support Greece's climate goals or to address its own emissions targets, it may be seen as contributing to climate change, further harming its reputation and market share.	Low	M / L

Materiality Assessment

Our materiality assessment helps us identify and prioritize the most significant environmental, social and governance (ESG) topics for our bank and our stakeholders. It guides our sustainability strategy and reporting, in line with the GRI Standards.



Our Material Topics



Climate Change & Environment



People & Human Capital



Responsible Banking



Business Ethics & Governance



Community Development

5.Environment

ABBank recognizes that, although its direct operational footprint is limited compared with heavy industries, it still has a responsibility to manage energy use, emissions and resource consumption efficiently. The Bank therefore seeks to improve the environmental performance of its operations while also supporting the transition to a lower-carbon economy through sustainable financing activities.

The banking sector is not considered one of the industries with high environmental impact in terms of electricity demand required for its operations. Compared to energy-intensive sectors such as manufacturing or heavy industry, its overall carbon footprint from power consumption is relatively low, primarily driven by office buildings, and digital infrastructure. Additionally, no fossil fuels are used, and all electricity required for the efficient operation of our facilities is reliably supplied from external sources. The following is an analysis and presentation of metrics by category.

5.1. Energy Consumption

The Bank doesn't use fossil fuels to meet its operational demands; it runs entirely on electricity. Our goal is to emphasize renewable energy sources that can produce better outcomes in the near future, as energy consumption is now at relatively low levels.

Total energy consumption in 2025 remained unchanged compared to 2024, while 75% of the energy used was generated from renewable sources.

Table 10: Electricity Consumption of Aegean Baltic Bank

Disclosure 302-1: Energy consumption within the organization	Units	2025	2024
Electricity consumption	MWh	762.93	762,2
% of electricity consumed	%	100%	100%
% of renewable energy consumed	%	75%	0%
Total energy consumption within the organization	MWh	762.93	762

5.2. Greenhouse gas Emissions (Scope 2)

Based on measurements conducted following the GHG Protocol standard, total greenhouse gas emissions have been calculated at 280.77 tones, arising from Scope 2 sources (indirect emissions from purchased electricity for operations). The calculations are based on the appropriate emission factor for the nation's electrical system, which was released by the Ministry of Environment and Energy.

The transition to renewable energy sources is one of the Bank's key priorities in its effort to reduce its carbon footprint. In this context, the Bank has set a target to reduce its emissions by 40% by 2030. At the same time, demonstrating its environmental awareness, the Bank goes beyond its regulatory obligations by providing leased vehicles to certain senior staff, the majority of which are hybrid or electric, aiming to minimize environmental impact

5.3. GhG Emissions' Intensity

Table 11: GHG Emissions of Aegean Baltic Bank

Disclosure 305-1: Direct (Scope 1) GHG emissions	Units	2025	2024	2023
Disclosure 305-2: Energy indirect (Scope 2) GHG emissions				
Direct (Scope 1) GHG emissions	tCO2	0	0*	2,03
Indirect (Scope 2) GHG emissions	tCO2	280.77	278,67	254,42
Total	tCO2	280.77	278,67	256,45

**As stated above, no fuels are consumed for heating or cooling purposes, and as a result, no Scope 1 emissions are produced As part of our ongoing commitment to environmental sustainability, we have taken decisive steps to reduce our carbon footprint and support the transition to a low-emission economy. Recognizing the critical role of transportation in environmental performance, we have prioritized the modernization of our corporate fleet.*

By the end of 2025, 92.3% of our vehicles have been replaced with hybrid or fully electric vehicles, contributing to lower greenhouse gas emissions, improved energy efficiency, and reduced reliance on fossil fuels. This transition reflects our ecological awareness and our dedication to aligning business operations with environmental best practices.

Our investment in clean mobility solutions not only supports regulatory compliance and futureproofing but also promotes a culture of environmental responsibility across the organization.

5.4. Water Consumption

Since water is only used for hygienic purposes (toilets, sinks, and cleaning) and is not connected to technical or manufacturing operations, Aegean Baltic Bank consumes a small amount of water. Because of this, water use has a very small overall environmental impact.

Despite the fact that there are presently no active rules in place to reduce usage, we annually review pertinent data from water bills in order to spot any unusual patterns or odd increases that might be connected to waste or damage.

If the measurements indicate that it is essential, we are looking at the prospect of implementing important cost-cutting measures in the future, including installing flow reducers or increasing staff awareness.

In our opinion, managing natural resources, even when their use is restricted, is an integral component of an ethical environmental policy and an aspect of transparency in the context of the ESG framework.

Table 12: Water Consumption of Aegean Baltic Bank

GRI 303 Water and Effluents			
Disclosure 303-3: Water withdrawal	Units	2025	2024
Total water consumption	m3	280	1.170
Total water recycled	m3		
% of water recycled			
Total	m3	280	1.170

6. Society

At ABBank, the social pillar is closely linked to long-term value creation, workforce resilience and responsible customer relationships. Our social approach focuses on employee wellbeing, inclusion, development, customer trust and targeted support for the communities in which we operate.

We invest in employee wellbeing, development and equal opportunity, while also supporting broader social needs through partnerships, donations and community engagement. Our aim is to maintain a respectful, inclusive and resilient workplace culture and to create positive impact beyond our direct operations.

By supporting its people and contributing to society through targeted actions, ABBank seeks to foster a more inclusive, resilient and trusted operating environment.

The materiality analysis conducted in 2025 highlighted a number of key social issues that the Bank recognizes as priorities and on which it focuses its actions:

- **Workforce well-being**

We prioritise the well-being of our employees as a key driver of our long-term success.

- **Training**

We continuously invest in the training and development of our people to enhance their skills.

- **Equality**

We are committed to a fair, inclusive and discrimination-free work environment that promotes equal opportunities for all.

6.1. ABBank's Employees

ABBank fosters a fair, safe and inclusive working environment. Comprehensive HR policies and dedicated prevention measures support respect for human rights, employee well-being and the prevention of workplace violence, harassment and discrimination.

6.1.1. Workforce Profile and Diversity

ABBank recognises diversity as a key contributor to organisational resilience and performance. The Bank is committed to upholding human rights throughout its operations, emphasising nondiscrimination, equal treatment and respect for personal dignity. We strive to maintain an inclusive work environment that embraces differences, promotes equality and supports the needs of all employees. Our culture is built on fairness, empowerment and mutual respect. To ensure accountability, ABBank has implemented a structured disciplinary process, detailed below.

6.1.2. Gender Balance

Within this framework, ABBank places particular emphasis on gender equality, ensuring fair representation across all organisational levels and actively promoting equal pay between men and women. The strong participation of women in the Bank's workforce reflects ABBank's long standing commitment to women's inclusion and to creating equal opportunities for all employees.

To enhance transparency and accountability, key diversity and inclusion indicators are systematically monitored and disclosed in the tables below, demonstrating our dedication to meritocracy and equal access to professional development. By addressing the needs of a diverse workforce and promoting equality, ABBank strengthens its organisational culture and reinforces its capacity to attract and retain talent within a modern, dynamic and resilient working environment.

Based on 2025 data, the total number of employees at ABBank increased, accompanied by a rise in the number of women—from 72 in 2024 to 73 in 2025. Women continue to represent the majority of the workforce, with 73 female employees compared to 57 male employees in 2025.

Table 13: Employee gender distribution

Disclosure 2-7: Employees	2025			2024		
	Male	Female	Total	Male	Female	Total
Permanent	57	73	130	56	72	128
Temporary	0	0	0	0	0	0
Non-Guaranteed Hours	0	0	0	0	0	0
Full time	57	73	130	56	72	128
Part Time	0	0	0	0	0	0
Total	57	73	130	56	72	128

In 2025, the Bank maintained an almost balanced gender representation at middle management level, with women accounting for 49.15% and men for 50.85% of employees in this category. Female representation remained particularly strong within the general workforce, where women represented 67.69% of employees, slightly below the 68.85% recorded in 2024 but still reflecting a strong level of gender diversity across the

broader employee base. At senior management level, however, all six positions were held by men in 2025, compared with one woman among eight senior management employees in 2024. This indicates that while ABBank demonstrates strong female participation across the wider workforce and near parity in middle management, gender representation at senior leadership level remains an area for continued focus. The Bank remains committed to promoting equal opportunities, inclusive employment practices and merit-based career development, with the objective of supporting more balanced representation across all organizational levels over time.

Table 14: Diversity of governance bodies and employee by gender

GRI 405 Diversity and Equal Opportunity	2025					2024				
	Male	Female	Total	% Male	% Female	Male	Female	Total	% Male	% Female
Number of employees in senior management	6	0	6	100,00%	0,00%	7	1	8	87,50%	12,50%
Number of employees in Middle management	30	29	59	50,85%	49,15%	30	29	59	50,85%	49,15%
Number of employees in General Workforce	21	44	65	32,31%	67,69%	19	42	61	31,15%	68,85%

6.1.3. Gender pay gap and age distribution

In 2025, ABBank maintained equal pay conditions between men and women in both middle management and general employee categories, confirming its commitment to the principle of equal treatment. Notably, women in middle management positions earned more than their male counterparts, highlighting a positive shift toward pay equity. This proves the Bank's structured and consistent approach to ensuring equal pay for equal work.

Table 15: Gender Pay Gap

GRI 405 Diversity and Equal Opportunity	2025			2024		
	Men	Women	Ratio	Men	Women	Ratio
Senior Management	14.607,88	0	N/A	17.108,57	11.800,00	0,69
Middle Management	4.688,33	5.027,59	1,07	4.688,33	5.027,59	1,07
Employees	2.483,33	2.378,41	0,96	2.481,58	2.388,10	0,96

Regarding age distribution, ABBank's workforce is primarily concentrated in the 30–50 age group, particularly across middle management and general workforce positions. Senior management is mainly

composed of employees over 50, reflecting the Bank’s accumulated experience, institutional knowledge and continuity. At the same time, the limited representation of younger employees in senior roles highlights an opportunity to further strengthen succession planning, talent development and workforce renewal initiatives, supporting future leadership capacity and long-term organisational resilience.

Table 16: Diversity of governance bodies and employees by age

GRI 405 Diversity and Equal Opportunity	2025				2024			
	<30 years old	30-50 years old	>50 years old	Total	<30 years old	30-50 years old	>50 years old	Total
Number of employees in Senior Management	0	2	4	6	0	1	7	8
Number of employees in Middle Management	0	31	28	59	0	33	26	59
Number of employees in General Workforce	4	46	15	65	5	43	13	61

6.1.4. Recruitment and Retention

New Hires and Turnover

At ABBank, strengthening our human resources with skilled and talented professionals is a strategic priority and a cornerstone of achieving the Bank’s business objectives. In alignment with our broader commitment to supporting young talent and facilitating educational integration, ABBank also provides student internship opportunities and may participate in OAED employment programmes, depending on operational needs. Recruitment is guided by the principles of meritocracy and full compliance with applicable labour legislation.

The hiring process is conducted with transparency and objectivity, ensuring that new employees embody the Bank’s values and contribute meaningfully to its success. ABBank’s recruitment framework encompasses workforce planning, attraction, selection, hiring, onboarding and placement, ensuring that new staff are aligned with organisational needs and strategic priorities.

Employee development and support are further enhanced through the adoption of modern working practices. The Hybrid Work Model—combining on site and remote work—promotes work life balance, responds to contemporary employee needs and contributes to a positive work experience. Remote work is particularly beneficial for employees who are parents, offering greater flexibility in managing family responsibilities and supporting a healthier work life balance.

In 2025, ABBank recorded a decrease in new hires, employing 8 new staff members compared to 21 in 2024. This adjustment reflects the Bank’s efforts to align its workforce with evolving operational requirements. The increase in recruitment within the under 30 and over 50 age groups indicates a more balanced and inclusive approach to human resource development.

Table 17: Total number of newly hired employees in ABBank

Disclosure 401-1: New employee hires and employee turnover	2025			2024		
	Male	Female	Total	Male	Female	Total
Total hires (< 30 years old)	0	1	1	2	2	4
Total hires (30-50 years old)	4	3	7	7	6	13
Total hires (> 50 years old)	0	0	0	0	4	4
Total	4	4	8	9	12	21

The 2025 turnover data indicate a slight improvement in employee retention compared with 2024, with total departures decreasing from 8 to 7. The distribution of turnover across age groups provides useful insight into workforce dynamics and areas for targeted HR action. Overall, the 2025 turnover profile indicates stable workforce dynamics, with improvements in key age groups and no signs of elevated attrition. These trends support ABBank's commitment to meritocracy, employee well-being and long-term talent retention, while also informing future HR strategies aimed at sustaining a resilient and engaged workforce.

Table 18: Employee turnover for 2025

Disclosure 401-1: New employee hires and employee turnover	2025			2024		
	Male	Female	Total	Male	Female	Total
Employee turnover (<30 years old)	0	1	1	1	0	1
Employee turnover (30 - 50 years old)	2	1	3	1	5	6
Employee turnover (>50 years old)	2	1	3	1	0	1
Total	4	3	7	3	5	8

6.1.5. Training and development

ABBank actively supports employee training to enhance skills, knowledge and mindset aligned with its strategic goals, while also fostering personal growth and job satisfaction.

Table 19: Training Hours per Employee (per gender)

Disclosure 404-1: Average hours of training per year per employee (per gender)	2025	2024
Average training hours per female employee	9,10	15,35
Total training hours per female employee	499,10	660,00
Average training hours per male employee	8,80	28,20
Total training hours per male employee	228,50	620,50
Average training hours per employee	9,00	19,70

ABBank consistently supports and approves training requests that are relevant to an employee's current role, reinforcing its commitment to continuous professional development.

The HR Department manages all training logistics, maintains detailed records, organises training material into a subject based intranet library, and monitors funding opportunities available through EU programmes and the Greek Public Employment Service (OAED).

As part of its ongoing investment in human capital, ABBank implemented an extensive range of training programmes in 2025, designed to upgrade employee skills and support their transition into new or evolving market requirements. Training activities covered a broad spectrum of topics, including:

- Internal audit, risk management and compliance — such as assurance mapping, IT General Controls and ESG auditing, strengthening staff preparedness in accountability and regulatory compliance.
- Digital skills and data analytics — including programmes in Data Analytics, DevOps, Business Intelligence and Data Analyst Certification, contributing to the Bank's digital transformation.
- ESG and sustainable development — with training on ESG implementation, climate risk management and sustainability integration.
- Legal, accounting and maritime sector expertise — addressing specialised organisational and market needs.
- Human resources and employment law topics — including developments in labour policy and talent attraction.

Training duration ranged from 1 to 55 hours, with participation primarily from middle management. A significant share of participants were women, reinforcing ABBank's commitment to equal opportunities and empowerment through lifelong learning.

In 2025, ABBank recorded a significant decrease in average training hours per employee, falling from 19.70 hours in 2024 to 9.00 hours. This shift reflects a return to more typical training levels following the exceptionally high investment in long duration and certification programmes implemented in 2024.

6.1.6. Gender based trends

The data show that training participation remained balanced between genders, with only marginal differences in average hours:

- Female employees: 9.10 hours (down from 15.35 in 2024)
- Male employees: 8.80 hours (down from 28.20 in 2024)

Although both groups experienced a decline, the reduction is more pronounced among male employees, who had benefited disproportionately from long duration programmes in 2024. The 2025 figures therefore indicate a more even distribution of training opportunities across genders.

The 2025 training profile shows:

- A strategic recalibration from high volume, long duration programmes (2024) to more focused training activities.
- Continued strong engagement from middle management, reinforcing their central role in operational performance and compliance.

- A more balanced distribution of training hours between middle management and employees, compared to the disproportionate spike in employee training in 2024.
- A temporary pause in senior management training, following the intensive ESG and governance sessions delivered the previous year.

These trends confirm ABBank's commitment to continuous learning, skills development and strategic workforce planning, while demonstrating adaptability in aligning training investments with evolving organisational priorities

Table 20: Average hours of training per year per employee category

Disclosure 404-1: Average hours of training per year per employee category		
	2025	2024
Average training hours for Senior Management	0,00	7,50
Total training hours for Senior Management	0,00	15,00
Average training hours for Middle Management	9,10	12,40
Total training hours for Middle Management	435,60	521,00
Average training hours for Employees	8,80	35,45



6.1.7 Employee engagement and communication

At ABBank, we recognise that our people are the driving force behind the organisation's progress and long term success. Our goal is to maintain a high quality working environment that nurtures strong, meaningful and lasting relationships among employees.

In this context, ABBank has adopted an employee retention policy designed to cultivate a workplace that promotes long term commitment, satisfaction and professional fulfilment. To achieve this, the Bank implements a set of targeted strategies, including:

- **Building trust** through encouragement, guidance and continuous support
- **Maintaining open communication** across all organisational levels, enabling employees to express concerns and share ideas freely
- **Providing fair and competitive compensation** that reflects each employee's contribution and value
- **Recognising and rewarding performance** at both individual and team level
- **Promoting continuous professional development** by strengthening skills, knowledge and competencies

ABBank actively encourages employees to contribute to a culture of collaboration and mutual support, recognising that their engagement is essential to the Bank's ongoing progress. Through open dialogue with supervisors and senior management, staff are invited to share thoughts, concerns and constructive suggestions.

6.1.8 Performance Management System

To further reinforce its commitment to employee development and alignment with organisational objectives, ABBank has implemented a comprehensive Performance Management System (PMS). The system is designed to promote continuous improvement in employee performance while providing the support necessary to achieve expected results. It also functions as a structured channel for feedback and communication between employees and management, fostering clarity, reflection and shared accountability.

The PMS is built around the following core objectives:

- **Embedding a performance driven culture** across the Bank
- **Aligning individual performance** with ABBank's strategic priorities
- **Strengthening teamwork and collaboration** among colleagues and between staff and management
- **Supporting effective talent and capability management** throughout the organisation
- **Promoting professional growth and career development** for all employees

Through this structured approach, ABBank ensures that performance management is not only a tool for evaluation, but a mechanism for continuous learning, empowerment and alignment with the Bank's long term vision.

6.1.9 Employee reward system

ABBank applies a balanced and transparent remuneration policy that combines fixed and variable pay, ensuring equal opportunities for all employees. Fixed remuneration is determined based on objective criteria such as role, experience and seniority, ensuring fairness and consistency across the organisation.

At the same time, **performance and individual contribution are recognised through variable remuneration**, including bonuses, which are awarded according to the achievement of objectives, overall contribution and prevailing business conditions. This approach strengthens talent retention and supports a culture of motivation, accountability and fair reward.

ABBank also places strong emphasis on the **professional development and career progression** of its people, ensuring equal opportunities for growth. Initiatives such as internal promotions and job rotation help employees expand their skills, gain new experiences and advance within the organisation.

Through these practices, ABBank aims to maintain an inclusive environment where **meritocracy, respect and continuous skills development** guide the employee experience and support long term organisational success.

6.1.10 Employees' Services

As part of its commitment to fostering a supportive, engaging and people centred work environment, ABBank offers a comprehensive range of benefits designed to enhance employee well being, financial security and work-life balance. These initiatives reflect the Bank's dedication to its workforce and contribute to long term satisfaction, motivation and retention.

- **Staff loans** — ABBank provides personal loans to employees to help address unforeseen personal or family related expenses. Eligible after one year of service, employees may request amounts up to five times their gross monthly salary, repayable over 36, 48 or 60 months. Repayments are capped at 25% of net monthly income. Early repayment is permitted without penalty, and full settlement is required upon resignation or retirement unless otherwise approved by Management.
- **Pension Plan** — The Bank offers a voluntary pension scheme in partnership with NN, available to all permanent staff after six months of employment. Complementing the national social security system (EFKA), the plan is non contributory by default but allows optional contributions from both the Bank and employees. Full vesting is achieved after 10 years of participation.
- **Nursery School Allowance** — To support working parents, ABBank covers two thirds of nursery school expenses, up to €231 per child per month, based on valid receipts. The benefit applies until the child enters primary school.
- **Summer Camp Allowance** — The Bank provides financial support for children aged 6 to 15 to attend summer camps, covering up to €724 per child annually upon submission of supporting documentation.
- **Meal Vouchers** — Employees receive annual meal vouchers valued at €1,800. New employees receive the benefit on a pro rata basis depending on months of service.
- **Gym Facilities** — ABBank offers access to an on site fitness centre, available to all employees during non working hours (08:00–09:30 and 16:30–19:00), supporting physical well being and healthy lifestyle habits.

6.2 Policies

6.2.1 Human Resources Policy and Procedures Manual

Within the framework of its workforce management, ABBank has established a Human Resources Policy, which aims to:

1. Maintain a close-knit, “family-like” working environment
2. Enable the Bank to attract and retain high-calibre employees
3. Instil sound principles and dedication among all staff by ensuring that all individuals:
4. Are fairly employed, motivated, and remunerated
5. Are presented with equitable talent development opportunities
6. Are properly, equally, and indiscriminately managed

In addition, an HR Manual has been developed to outline the Bank’s policies across the various phases of the employer-employee relationship. It also defines how these policies are implemented through formalized procedures.

The Policy Manual serves as a key tool for supervision and the promotion of accountability, and is designed to ensure understanding, efficiency, consistency, and transparency for all staff.

6.2.2 Policy against Violence and Harassment in the Workplace

The Bank applies a zero-tolerance policy toward any form of violence and harassment that occurs in the course of work, is related to work, or arises from it. This includes gender-based violence and harassment, as well as sexual harassment, all of which are strictly prohibited for every associate of the Bank.

The purpose of this policy is to create and establish a working environment that respects, promotes, and safeguards human dignity and the right of every individual to a world of work free from violence and harassment.

ABBank also supports employees to safely report any incidents of violence or harassment. Any employee who has experienced (or believes they have experienced) violence and/or harassment, as well as any person who becomes aware of such incidents, may report them immediately and without delay to the Bank’s Human Resources Department (via email: HR@ab-bank.com)

If reporting to Human Resources is not possible, the complaint may be submitted directly to the Bank’s Legal Department (via email: legal@ab-bank.com), either anonymously or with identification.

Until the incident is fully investigated, the Human Resources Department may take temporary protective measures.

The Bank is committed to fully investigating all reported incidents and will not retaliate nor permit retaliation against any person who, in good faith, reports a potential violation of the law or this Policy.

6.3 Health and Safety

Given the nature of ABBank's operations, the absence of labour-intensive tasks, and the low exposure to occupational hazards, the Bank does not maintain a formal Occupational Health & Safety Management System, nor does it conduct structured risk assessments.

Nevertheless, the Bank fully complies with all requirements set by the relevant regulatory authorities (Ministry of Labor, Ministry of Health, and Ministry of Civil Protection) and has in place physical security measures to ensure a safe working environment. Employees are also encouraged to report any concerns or suggest improvements that may further enhance workplace safety and comfort.

Regarding employee training on occupational health and safety, a seminar was held focusing on the Bank's annual building evacuation drill. The purpose was to ensure that staff are familiar with and able to follow the procedures established by the Bank in the event of environmental, physical, or other emergency situations. This evacuation drill was the only occupational health and safety training activity conducted during the reporting period.

6.3.1 Health and Safety Benefits for employees

Given that ABBank cares about its employees, we offer a comprehensive framework of health services and support. These provisions are designed to maintain a safe and healthy working environment and to prevent work-related health risks.

Life, Health and Disability Insurance

All employees are covered by a comprehensive Life and Disability Insurance plan at no cost to them. In addition, the Medical Insurance plan covers both employees and their family members. The plan's booklet is available on the Bank's intranet platform and can be consulted by all staff at any time.

Occupational Health Doctor

The Bank employs the services of an Occupational Health doctor, who visits the Bank's premises twice per month in accordance with Greek labour legislation. All employees have free access to medical consultation. As of 2024, the doctor is also authorised to prescribe medical examinations and medication when needed.

Preventive Medical Check-ups

The Bank has partnered with Hygeia Group and Bioiatriki to offer an annual comprehensive health check-up to all employees who wish to participate, free of charge.

Vaccinations and Emergency Health Measures

As part of its prevention policy, ABBank provides free flu vaccinations to employees who choose to receive them.

In cases of extraordinary health situations (e.g., COVID-19, seasonal flu), the Occupational Health doctor provides guidance and protective instructions for staff and their families.

Additionally, on site blood tests for preventive purposes are conducted under the national health program "Prolamvano".

Psychological Support

ABBank offers a 24/7 psychological support hotline to all employees and their family members, ensuring access to professional help whenever needed, through Hellas EAP.

Flexibility in Health-related Situations

ABBank also demonstrates considerable flexibility in addressing employees' urgent or unexpected personal or family health issues, aiming to support work-life balance and offer assistance during critical times.

6.3.2 Injuries

The 2025 health and safety data confirm that ABBank continues to operate in a low risk environment, consistent with the nature of banking activities. As in previous years, the Bank recorded no fatalities and no high consequence work related injuries, demonstrating the effectiveness of its safety protocols and preventive measures.

Table 21: Types and rates of injury and fatalities at work

Disclosure 403-9: Types and rates of injury and fatalities at work for:	2025			2024		
	All employees	All workers who are not employees but whose work and/or workplace is controlled by the organization	Total	All employees	All workers who are not employees but whose work and/or workplace is controlled by the organization	Total
Number of hours worked	230.880	0	230.880	217.856	0	217.856
Number of fatalities as a result of work-related injuries	0	0	0	0	0	0
Rate of fatalities as a result of work-related injuries	0	0	0	0	0	0
Number of high-consequence work-related injuries	0	0	0	0	0	0
Rate of high-consequence work-related injuries	0	0	0	0	0	0
Number of recordable work-related injuries	0	0	0	1.00	0	1.00
Rate of recordable work-related injuries (TRIR)	0	0	0	0.91	0	0.91
Number of accidents with loss of working time ≥ 3 days (Lost Time Injury)	0	0	0	1.00	0	1.00
Lost Time Injury Rate (LTIR)	0	0	0	0.91	0	0.91

6.4 Social Responsibility

As part of our commitment to social responsibility and support for local communities, ABBank carried out targeted initiatives in 2025 through donations and sponsorships to non-profit organizations and charitable institutions.

Specifically, ABBank provided financial support to organizations such as:

- The Smile of the Child,
- Alma Zois,
- Piraeus Marine Club,
- the Holy Metropolis of N. Ionia & Philadelphia, as well as other care structures and professional associations,
- “Galilee” Palliative Care Center - Holy Metropolis of Mesogaia and Lavreotiki
- Hellenic Bank Association



6.5 Community engagement and social impact

The total net amount of these donations exceeded €11,500 in 2025. These actions form part of the Bank's broader social contribution agenda and support social cohesion, solidarity and sustainable development through targeted community initiatives

7 Governance

7.1 Corporate governance structure (material topic)

ABBank considers sound governance fundamental to resilience, accountability and sustainable value creation. Its governance framework supports effective oversight, prudent decision-making, regulatory compliance and the integration of ESG considerations into strategy, risk management and reporting.

Through clearly defined roles, internal controls and board oversight mechanisms, the Bank seeks to ensure that governance supports ethical conduct, effective risk management and the integration of ESG considerations into strategy and operations.

7.1.1 Board of Directors: Composition and Election

The Board of Directors (BoD) of ABBank is the highest governing body of the Bank, with its primary responsibility being the formulation of strategic direction and the oversight of overall operations. Elected by the General Meeting of Shareholders for a five-year term, the BoD is entrusted with the management of corporate affairs, the administration of assets and the representation of the Bank both in and out of court. It exercises any authority not explicitly assigned to the General Meeting, always acting in accordance with the Bank's Articles of Association, the applicable regulatory framework and international best practices. The members of the BoD possess professional integrity, independence and appropriate qualifications, thereby ensuring sound and prudent governance.

The Board's responsibilities extend across strategic planning, governance oversight, financial integrity, risk management, regulatory compliance and internal control. Through its decisions and delegated committee structures, it supports the Bank's prudent management and long-term sustainability.

More specifically, with regard to ESG, ABBank's BoD is responsible for the following:

- Overseeing the Bank's sustainability agenda, including key ESG risks, opportunities, priorities and reporting obligations
- Ensuring that ESG priorities are aligned with the Bank's business strategy and governance processes
- Reviewing ESG-related disclosures and supporting transparency in external reporting
- Maintaining regular communication with the relevant ESG governance bodies and management functions responsible for implementation

As of 3 November 2025, the Board comprised ten members, including executive, non-executive and independent non-executive representatives. This composition is designed to support effective oversight, balanced decision-making and the protection of long-term shareholder and stakeholder interests.

The primary objective of the members is to safeguard the Bank's long-term financial value and to prevent potential conflicts of interest.

Pursuant to art. 116 of Law 4548/2018 (hereinafter the "Company Law"), the General Assembly of Shareholders constitutes the supreme governing authority of the Bank and, as such, elects the BoD, without prejudice to the members

directly appointed by shareholders of the Bank. The Articles of Association of the Bank expressly set out the matters on which the General Meeting of Shareholders is exclusively competent to resolve, to the exclusion of other governing authorities.

BOARD MEMBERS	THEIR ROLE	AUDIT COMMITTEE	REMUNERATION & NOMINATION COMMITTEE	RISK MANAGEMENT COMMITTEE	GENDER	NATIONALITY
Dimitrios Kapotopoulos	Chairman, Independent, Non-Executive Member	-	-		Male	Hellenic
Theodoros Afthonidis	Vice-Chairman, Managing Director, Non-Executive Member	-	-		Male	Hellenic
Aristeidis Vourakis	Managing Director, Executive Member	-	-		Male	Hellenic
Anastasios Afthonidis	Deputy Managing Director, Executive Member	-	-		Male	Hellenic
Liam Greville Gallagher	Non-executive Member	-	Member	Member	Male	Irish and South African
Efstathia Presveia	Independent, Non-executive Member	-	-	Chair	Female	Hellenic
Lampros Theodorou	Non-executive Member	Member	-		Male	Hellenic
Claude Antoine Meyer	Independent, Non executive Member	Member	Chair		Male	Swiss
Georgios Xiradakis	Independent, Non executive member	-	Member	Member	Male	Hellenic
Despoina Xenaki	Independent, Non executive Member	Chair	Member	Member	Female	Hellenic

At the same time, the BoD establishes committees (Audit Committee, the Remuneration and Nomination Committee and the Risk Management Committee), to which it may delegate powers-typically of an advisory nature- on specialized matters. Through its decisions, the BoD contributes decisively to enhancing the Bank's long-term economic value, safeguarding the interests of all stakeholders and avoiding potential conflicts of interest.

7.1.2 AUDIT COMMITTEE

The Audit Committee of ABBank plays a central role in enhancing the transparency and integrity of the banking organization, supporting the BoD in the oversight of critical functions. Among its key responsibilities at the monitoring of the financial statements preparation process and related disclosures, the evaluation of the effectiveness of the Internal Control System, and the assurance of compliance with the applicable regulatory framework.

The Committee monitors the work of the external auditors, pre-approves their fees and non-audit services and ensures their independence and objectivity. At the same time, it oversees the operation of the Internal

Audit Division, assessing its performance and adequacy and approves the annual audit plan, placing emphasis on high-risk areas.

In addition, the Committee is responsible for evaluating the regulatory compliance system and managing matters related to legality, transparency, anti-money laundering and conflicts of interest while also supervising the whistleblowing system, ensuring the independent and effective investigation of incidents that may impact corporate integrity.

Audit Committee Membership & Attendance	
Size	The Audit Committee shall consist of three (3) members
Nomination & Appointment	Committee will be appointed by the BoD. All the members of the Committee should be financial literate
Chairmanship	The Chair is an independent, non-executive member, appointed by the Board
Composition	Members are non-executive, with a majority being independent
Term of Office	Aligned with the term of the BoD
Resignation & Re-election	Members may resign or be re-elected according to the term provisions
Attendance	Only Committee members attend meetings, other participants may be invited as needed

7.1.3 REMUNARATION COMMITTEE

The Remuneration and Nominations Committee of ABBank has as its main purpose the support of the Board of Directors on matters of remuneration policy, appointments and corporate governance contributing to the establishment of an effective and fair framework for attracting, retaining and evaluating high-performing executives.

Its responsibilities include the design, review and monitoring of the implementation of the Remuneration Policy, ensuring compliance with the regulatory framework, gender equality, the avoidance of excessive risk-taking and the alignment of remuneration with long-term performance.

In addition, the Committee ensures the existence of appropriate procedures for the evaluation, selection and succession of the members of the BoD and the Heads of Critical Functions, proposing suitable candidates, monitoring their suitability and effectiveness and coordinating the relevant policies.

At the same time, it oversees the development and implementation of performance evaluation policies, identifies key risks affecting the remuneration system and ensures the maintenance of transparency and governance adequacy in the Group's reward and management mechanisms.

Remuneration Committee Membership & Attendance	
Size	Comprised of 3 to 5 members
Nomination & Appointment	Members are appointed by the BoD
Chairmanship	The Chair is an independent, non-executive BoD member, appointed by the Board
Composition	All members are non-executive, the majority must be independent
Term of Office	Matches the term of the BoD
Resignation & Re-election	Members may resign or be re-elected in line with term provisions
Attendance	Only Committee members attend, other participants may be invited, CEOs may not attend when their remuneration is discussed

7.1.4 RISK MANAGEMENT COMMITTEE

The Risk Management Committee ("RMC") has as its main purpose to recommend and support the BoD regarding capital and liquidity management and the monitoring of the Bank's overall actual and future risk strategy and risk appetite, taking into account all types of risks, so as to ensure alignment with the business strategy, objectives, corporate culture and values and the available resources of the Bank.

Its responsibilities include assisting the BoD in overseeing the implementation of the Bank's risk strategy and Risk Appetite Framework ("RAF"), including the correspondent limits set, as well as overseeing, reviewing and monitoring management's implementation of approved capital and liquidity management strategies and strategies for all other material risks — including market, credit, operational (encompassing legal and ICT risk), compliance and reputational risk — in order to assess their adequacy against the approved risk strategy and risk appetite.

The RMC ensures the development of an internal risk management framework and its integration into the business decision-making process across all of the Bank's and its subsidiaries' activities, and ensures that proper risk methodologies and appropriate principles governing risk identification, forecasting, measurement, monitoring, control and mitigation are established, in accordance with the business strategy in force and the adequacy of the resources available.

The RMC also oversees and ensures the effective integration of ESG-related risks — including climate and environmental risks — into the Bank's overall risk management framework, risk appetite, risk strategy, risk management culture and overall business strategy, in line with regulatory expectations and best practices. Furthermore, it provides the BoD with recommendations on necessary adjustments to the risk strategy resulting from, inter alia, changes in the Bank's business model, market developments or recommendations made by the Risk Management Department ("RMD").

The RMC ensures that the BoD is duly informed of all risks to which the Bank is exposed, and reviews and recommends to the BoD for approval all significant risk policies, whilst operating or departmental policies, within the parameters of the approved risk frameworks, are approved by Management but reported to the RMC for oversight purposes.

Risk Management Committee(RMC) Membership & Attendance	
Size	Comprised of up to five (5) members, but no less than three (3) members
Nomination & Appointment	Members are appointed by the BoD, elected from among its own non-executive members, including at least one (1) independent, non-executive member. Members should have, individually and collectively, appropriate knowledge, skills and expertise in banking risk management and control practices.
Chairmanship	The Chair is appointed by the BoD and must be an independent, non-executive BoD member who is neither the Chair of the BoD nor the Chair of any other BoD committee. The BoD or the RMC may also appoint a Deputy Chair to substitute the Chair when needed.
Composition	All members are non-executive; at least one must be independent.
Term of Office	Matches the term of the BoD
Resignation & Re-election	A member wishing to resign shall deliver their resignation letter to the Chair of the RMC. If the Chair of the RMC wishes to resign, the resignation letter is delivered directly to the Chair of the BoD. Members may be re-elected, subject to the applicable term of office provisions.
Attendance	Only RMC members may attend meetings. However, any BoD member (including executive members), Senior Management members, other staff or external experts may participate without voting rights, where deemed necessary based on the agenda and following an invitation by the RMC's Chair. Significant issues shall be discussed in special meetings with Senior Executive Management.

7.2 Management Committees

ABBank has established a set of Management Committees, which report to Senior Executive Management, to ensure effective corporate governance, risk oversight and operational efficiency across critical functions. While these Committees serve the Bank's strategic and operational needs, they also contribute to the implementation of sustainability-related priorities and support the integration of ESG considerations into decision – making processes where relevant.

Table 26: ABBank's Management Committees

Credit Committee	Implements and monitors the credit policy and strategies of the Bank with regard to performing exposures / Reviews and monitors the Bank's overall performing credit exposures and / Approves all types of new credit exposures as well as annual reviews of existing
ANPL Committee	- Responsible for discussing and approving strategic, operational and management issues relating to NPEs and NPLs.
Appeals Committee	- Its mission is the impartial evaluation of borrowers' appeals objecting to their classification as "Non-Cooperative Borrowers", during the Arrears Resolution Process, as defined in the Code of Conduct.
ALCO (Asset & Liability Committee)	Ensures the effective implementation of the Bank's policy as regards risk and profitability / Establishes and implements the Bank's strategy and policy as to matters relating to the structuring and management of assets and liabilities, taking into account the regulatory framework, the market conditions, as well as the Business Plan and the risk appetite framework and limits approved by the BoD.
IT Steering Committee	Established by Senior Executive Management (SEM) to assist in overseeing the performance of Information Technology / Sets the tone and direction for IT processes and operations and monitors all significant IT projects and activities / Approves the IT strategic plans, the Information security program and other IT-related policies and procedures, promoting effective governance.
Emergency Team	Established and mandated by SEM to take action and reorganize Bank's overall activities that may be disrupted in case of emergency or extraordinary circumstances (e.g. severe weather conditions, etc.).
Budget & Business Plan Team	Established and mandated by SEM. The purpose of this team is to collect historical profitability data and evaluate the current financial environment and market trends, in order to prepare / propose: (1) the coming year's budget, (2) the 3 years Business Plan
Sustainability Committee	Provides strategic guidance on ESG matters and oversees the integration, monitoring and implementation of ESG related initiatives across the Bank, in alignment with supervisory expectations and corporate objectives.

7.3 Policies

This section outlines key Bank policies focused on the functioning of the Board of Directors and critical roles, aiming to promote transparency, good governance and regulatory compliance.

7.3.1 Remuneration Policy

This Policy applies to all Bank's staff, including the members of the Board of Directors of the Bank and the senior management. In so far as the Bank provides investment services, this Policy further applies to relevant persons in the provision of investment or ancillary services to clients.

- Bank Employees**

ABBank's Remuneration policy covers all key areas of employee compensation, with the aim of maintaining fair, transparent and good governance practices.

Salary: The salary is the annual gross amount agreed contractually between the Bank and the employee, reflecting their experience, responsibilities, education, and skills. It is reviewed annually between January and March.

Bonus payment: Bonus payments are performance based, not guaranteed, and dependent on individual, departmental and Bank-wide results, adjusted for risk. Decisions are made annually, alongside salary reviews and follow the Bank's Reward System.

Retirement payment: Retirement payment is granted to employees eligible for full retirement and is calculated based on years of service and annualized gross salary. The amount may be increased with Board approval.

Severance payment: Severance payment is calculated based on applicable labor law and may be increased at the Bank's discretion or by contractual agreement with Board approval. It reflects performance and does not reward failure or misconduct.

- **Board Members**

In line with Law 4548/2018 and the Bank's Articles of Association, the remuneration of BoD members (executive and non-executive) is fixed and reflects the time and effort dedicated to fulfilling their responsibilities within the Board and its Committees. It is not performance-based and does not include incentives.

The remuneration consists of an annual fee, paid monthly, aligned with the Bank's size and operational scope. Any remuneration not explicitly defined by law or the Articles of Association requires approval by the General Meeting of Shareholders, in accordance with this Policy.

No variable remuneration is granted to BoD members in their capacity as board members, eliminating potential conflicts of interest. Remuneration is reviewed on an annual basis.

7.3.2 Nomination and Suitability Policy

This Policy sets out the framework and guiding principles for the selection and appointment of members of the BoD and Heads of Critical Functions (HCFs), aiming to ensure a transparent, compliant, and fit-for-purpose process. It defines clear eligibility criteria for all candidates, including those proposed directly by shareholders in accordance with Article 79 of law 4548/2018, ensuring their suitability for the respective role as per the Banking Law and Bank of Greece Act 224.

The Policy also supports the Bank's commitment to a BoD composition that upholds high ethical standards, reflects an appropriate balance of knowledge, skills and experience and meets regulatory requirements regarding independence, sector-specific expertise, diversity, and clear allocation of responsibilities. The Remuneration and Nomination Committee ensures that all HCFs hold the necessary qualifications and that all individuals appointed to BoD or HCF positions demonstrate good reputation, honesty, integrity and independence of mind, appropriate to the complexity of their duties and their role within the Bank's governance structure.

7.3.3 Performance Evaluation Policy

This policy sets out the procedure for the biennial evaluation of the performance of each Board member individually and the Board Committees collectively. The assessment covers the preceding 24 months and is typically conducted in the fourth quarter, unless otherwise decided by the Board.

It ensures compliance with the applicable regulatory framework, promotes the effective operation of the Committees entrusted with specific responsibilities, and adopts best practices to support sound governance and straightforward management. The policy aims to enhance the effectiveness of the Board and its Committees, strengthen risk management and stakeholder confidence, and support succession planning.

The evaluation process is used constructively to optimize the functioning of the Board and its Committees and to identify and address any areas for improvement.

8 Customer Privacy and Information Protection

8.1 Cybersecurity

The global financial sector continues to face heightened cybersecurity risks, driven by the rapid increase in both the volume and sophistication of cyberattacks. Incidents such as cyber intrusions, online fraud, data breaches and unauthorized access to personal information have become increasingly common, particularly in the banking industry, due to the rise of skilled cybercriminals, technological advancements and the widespread use of digital channels for financial transactions.

ABBank places strong emphasis on cybersecurity, prioritizing the protection of transactions, data and personal information, as well as the resilience of its information and communication technology (ICT) systems against evolving cyber threats. To ensure that risks and controls are consistently and effectively managed, the Bank applies the three lines of defense (3LoD) model. The Information Security function, led by a Director level Information Security Officer, operates as part of the second line of defense and reports directly to the Board of Directors, while maintaining an administrative reporting line to the Chief Operating Officer.

Recognizing the increasing complexity of the digital landscape, ABBank has significantly strengthened its IT infrastructure over the past two years. Key enhancements include server and network upgrades, improved patch management processes, subscription to a cloud based email security platform complementing Microsoft 365 protections, and modernization initiatives such as Voice over IP telephony, renewal of network and security equipment, and deployment of secure printing solutions. A major upgrade of the core banking system has also been completed, with further migration planned, while critical systems—such as anti money laundering and IT monitoring platforms—have transitioned to more secure and scalable environments.

To further reinforce its cyber defense capabilities, ABBank has implemented advanced technologies, including AI driven threat detection, endpoint monitoring, SIEM optimization and regular penetration testing conducted by independent specialists. Physical and environmental safeguards at data centers have also

been enhanced. The Bank uses tools such as Qualys for vulnerability scanning and maintains robust vulnerability and patch management procedures. These efforts are complemented by external audits and the use of platforms such as Mitrtech Alyne, which assess IT maturity and the effectiveness of security controls.

Collectively, these initiatives demonstrate ABBank's strong commitment to maintaining high standards of data confidentiality, integrity and availability, thereby ensuring customer trust and regulatory compliance. Throughout the past year, the Bank continued to invest proactively in modern, efficient and cost effective security technologies and controls to address emerging risks, meet evolving regulatory requirements, minimize disruptions and safeguard systems and data from unauthorized access, misuse, accidental loss or damage.

8.2 IT and Information Security Initiatives

During the last year there was a significant investment in IT and Information Security indicating the Management's intention to modernize the Bank's IT infrastructure and to enhance the existing security controls.

The following parts of the IT infrastructure have been replaced by new solutions or upgraded:

- Core Banking upgrade and design improvements.
- Infrastructure to support TIPS.
- Upgrade of PSD2 infrastructure.
- Upgrade of Virtual Machine infrastructure.
- Replacement of Web Application Firewall with a modern cloud based solution with DDoS capabilities.
- Upgrade of debit card middleware infrastructure.
- Renewal of IT equipment (servers upgraded and end-of-support network equipment replaced).

The security posture of the Bank has improved significantly over the last year, as a result of the following activities related to cybersecurity.

- Full activation of Microsoft 365 Defender Suite and policy optimization.
- Deployment of a Managed Endpoint Detection and Response service to supplement antimalware protection with behaviour-based characteristics.
- Upgrade of firewalls both in the external and internal perimeter.
- Expansion of the vulnerability assessment platform to cover all the Bank's assets.
- Optimization of the external Security Operations Center and optimization of the Bank's Security Information & Event Management (SIEM) platform.
- Frequent penetration testing by external partners to cover all areas of IT and reduce the risk of compromise.
- Deployment of Defender for Identity to enhance the protection of Active Directory.
- Subscription to Mitrtech Alyne cloud platform to measure compliance with standards and regulations and IT Maturity level.
- Subscription to a new GRC platform and repository for the maintenance of DORA Register of Information to reduce third party risk.
- Deployment of a deception platform (Honeypot) on premise.

- Subscription to a digital risk protection platform.
- External IT Audits performed by independent third parties.

During 2025 Aegean Baltic Bank successfully managed all cybersecurity attacks, and as such there were:

- No business disruptions.
- No monetary losses.
- No cybersecurity incidents that needed to be reported to Authorities.

8.3 Personal Data Protection

All these initiatives demonstrate the Bank's strong commitment to safeguarding personal data and its strategic focus on delivering services that combine robust security with an exceptional customer experience, consistently placing customer trust and satisfaction at the centre of its operations.



9 Operating with Ethical Integrity

9.1 Code of Ethical Conduct

The Bank's Code of Ethical Conduct serves as a foundational document that guides the behavior of all members of the organization, including the Board of Directors, executives, and employees. It reflects our commitment to uphold the highest ethical standards in all aspects of our operations and decision-making.

The Compliance/AML Department is in charge of maintaining the Code, ensuring that it is regularly reviewed and updated to take into account new regulatory requirements, best practices in the sector, and internal Bank standards. It promotes a consistent ethical culture throughout the organization.

At the core of the Code lie the Bank's fundamental values:

- Truthfulness
- Compliance
- Honesty
- Integrity
- Diligence
- Confidentiality
- Trust, and ethical conduct.

These principles guide how we interact with our clients, partners, colleagues, and the broader community.

We are dedicated to maintaining information accuracy, protecting confidential data and operating without discrimination of any kind. The Code also highlights our obligation to preserve fairness in all interactions, communicate transparently and respect the rights of individuals.

In addition to upholding legal and regulatory compliance, the Bank promotes a culture of professionalism, respect, and accountability through the Code of Ethical Conduct, which is consistent with our long-term sustainability objectives.

9.2 Anti - bribery corruption Policy

The Bank remains committed to operating with the utmost integrity, accountability, and transparency standards. In order to do this, our Anti-Bribery and Corruption Policy provides precise guidelines for identifying, preventing, and dealing with any cases of corruption or bribery.

The Compliance/AML Department is in charge of owning and managing the policy and making sure that it is applied effectively at all organizational levels. Every employee is expected to act responsibly in each aspect of their work and to maintain the Bank's key values of transparency and integrity.

To raise awareness and encourage adherence to our anti-bribery standards, the Bank promotes broad channels of contact with internal and external stakeholders. We offer focused training programs since we understand how important it is to continuously reinforce ethical business practices through education.

These initiatives seek to promote a culture of ethical conduct, assist staff in recognizing and reducing possible hazards, and guarantee accurate recording and reporting of pertinent activities.

According to our policy, hospitality and gifts are only allowed when they are used to further or improve professional relationships or for other justifiable business goals; they are never allowed to be used as a way to illegally influence decision-making.

The Bank upholds a zero-tolerance approach to bribery and corruption by embedding these principles into day-to-day operations, thereby supporting sustainable business performance and long-term stakeholder trust.

Conflict of Interest Policy

The Bank acknowledges that preserving the trust of consumers, shareholders, and regulators depends on the prevention, early detection, and efficient handling of conflicts of interest. This policy lays out the fundamental ideas, the structure for identifying and handling conflicts of interest, and the duties and obligations of both the Bank and its employees.

The policy's objectives are to:

- Help staff members comprehend conflicts of interest and how they could occur while performing their jobs.
- Outline in detail the steps that must be taken in the event that a conflict of interest is discovered or could develop.
- Enhancing a culture of openness, responsibility, and honesty.

Employees are required to notify their immediate supervisor or the Compliance/AML Department of any current or potential conflicts of interest as part of the Bank's specialized framework for conflict identification and management.

Taking action to resolve or mitigate the conflict (e.g., separation of roles, shift of responsibilities, and refraining from specific activities). Employees of ABBank have an obligation to behave ethically, avoid engaging in any personal or professional activities that may compromise their neutrality, and seek advice whenever they are confused of how to respond to a situation.

For its part, the Bank has established internal procedures and controls in place, making sure that staff members are regularly informed and trained on conflicts of interest, and improving transparency and regulatory compliance.

9.3 Whistleblowing Policy

The Bank is committed to ethical business conduct, transparent communication and responsible corporate operation, which are validated through the submission of reports. The Whistleblowing Policy is designed to enable Bank employees to raise concerns about malpractices, irregularities or improper conduct, ensuring safety

maintaining the integrity, reputation and efficient operation of the Bank.

The ultimate responsibility for overseeing the implementation of this policy rests with the Board of Directors. The Bank, according to the regulatory framework, has appointed the person being responsible for receiving and monitoring the relative reports (referred to as the Y.P.P.A)

The Whistleblowing policy aims to provide a secure, confidential and easily accessible channel of communication for the purpose of reporting concerns. It also encourages the timely reporting of those incidents that are likely to compromise the Bank's compliance and/or ethics. It aims both to promote a culture of accountability and transparency and to protect the interests of stakeholders based on the current provisions of Law 4990/2022, which incorporates EU Directive 2019/1937 on the protection of persons reporting breaches of association law.

Employees have the possibility to report through specially designed channels (email, post). The Bank applies systematic reporting in order to monitor the effectiveness of the whistleblowing mechanisms and to systematically inform the Management.

For the last 4 years, no incident has occurred through the whistle-blowing channels which reflects the maturity of the Bank's ethical framework and the confidence of employees in its institutions.

9.4 AML Policy

The Bank is committed to preventing and combating money laundering in line with Greek and European legislation, including Law 4557/2018, as well as guidance issued by the European Banking Authority and the Bank of Greece.

The purpose of this Policy is to define the Bank's risk-based principles on AML & CTF, in compliance with the current regulatory and legal framework. Through the proper implementation of these principles it will insulate, to its greatest extent, the risk of being used unknowingly as a vehicle for Money Laundering and Terrorism Financing thus safeguarding its credibility, reliability and stability within the broader financial environment, as well as, among its customers.

Compliance / AML Department leads efforts to prevent and manage money laundering risks. The AML Section has the responsibility for the implementation of the AML/CFT and Sanctions Compliance Program, as well as the monitoring of its internal compliance, by ensuring that the procedures and systems implemented correspond to the legal and regulatory obligations of the Bank. The AML Section analyses potentially suspicious transactions/cases and reports them to the competent authorities. Additionally, the AML Section develops and defines Key Performance Indicators ("KPIs") and Key Risk Indicators ("KRIs") to monitor and measure the performance of the Bank's AML/CFT and Sanctions Compliance Program and its exposure in line with the associated risks. The AML policy is evaluated annually by the Audit Committee and is essential for safeguarding the Bank's credibility and strengthening regulatory compliance.

9.5 Customer Acceptance Policy

The Bank's Customer Acceptance Policy sets out the principles for establishing and maintaining customer relationships, in line with its risk appetite and regulatory obligations. It defines the types of customers with whom the Bank will, or will not, engage commercially.

The policy is built on strict Know Your Customer (KYC) principles, requiring the collection, verification, and ongoing updating of customer data, along with continuous transaction monitoring to ensure behavior aligns with expected profiles. A risk-based approach ensures enhanced due diligence for higher-risk cases and robust internal controls for AML, CTF, and sanctions compliance.

The main goals are to ensure compliance with identity and verification requirements, meet legal obligations, assess financial crime risks, protect the integrity of the financial system, and reduce reputational and regulatory risks.

9.6 Sanctions Policy

The Bank's Sanctions Policy, which is a crucial component of its larger compliance and risk management structure, is intended to make sure the organization stays away from any direct or indirect contact with people, organizations, or countries that have been sanctioned. Our steadfast dedication to global security, financial integrity, and legal compliance is reflected in the policy. This policy lays out clear expectations and obligations to prevent any conduct that could expose the Bank to sanctions-related risks, and it is enforceable on all employees and third parties acting on behalf of the Bank. Its goal is to shield the organization from unintentionally supporting criminal activities, such as the financing of terrorism, by facilitating forbidden contacts or transactions.

The Bank regularly conducts training to raise staff awareness and give them the tools they need to identify and report any suspicious or sanction-related activity through the proper internal channels in order to foster a strong compliance culture. These initiatives guarantee that any possible exposure is dealt with quickly and in compliance with protocols.

The Bank's complete cooperation with law enforcement and regulatory bodies is similarly reinforced by the Sanctions Policy, confirming our dedication to transparency, accountability, and international security principles. It also advances the Bank's overarching objectives that include sound corporate governance, efficient risk reduction, and the avoidance of financial and reputational damage.

10 Complaint Management and Customer Responsible Information

10.1.1 Customer Excellence

To ensure high-quality and accessible customer service, the Bank offers a range of support channels, including a contact form on its website, dedicated phone lines in the Headquarters and the Branch Network for general inquiries, and the physical addresses of its branches where customers can receive in-person assistance. A special helpline is also available for the immediate reporting of lost or stolen cards.

As part of its personalized approach to customer service, the Bank ensures that each customer is initially assisted by a designated Account Officer. If the matter cannot be resolved at this stage, it is escalated to the Relationship Manager for further handling. This structure reflects the Bank's commitment to tailored, effective service delivery.

The main goals of these support channels and procedures are to ensure compliance with identity and verification requirements, meet legal obligations, assess financial crime risks, protect the integrity of the financial system, and reduce reputational and regulatory risks.

For complaint management, customers are initially encouraged to contact their Relationship Manager or branch representative to seek immediate resolution. If the issue remains unresolved, customers can escalate the matter by formally submitting a complaint through the online form available on the bank's website or by email. The Complaints Management Function will investigate the case and provide a written response within the timeframe defined by regulatory standards. In case additional time is needed, the bank will inform the customer in writing of the reason for the delay and the expected date of response.

11 Appendix

11.1 GRI TABLE

GRI Standard	Disclosure	Description	Section Reference
GRI 2: General Disclosure 2021	2-1	Organisational details	3. ABB at a glance
	2-2	Entities included in the organization's sustainability reporting	3. ABB at a glance
	2-3	Reporting period, frequency and contact point	3. ABB at a glance
	2-4	Restatements of information	-
	2-5	External assurance	-
	2-6	Activities, value chain and other business relationships	4.7. Materiality Analysis
	2-7	Employees	6. Society
	2-8	Workers who are not employees	6. Society
	2-9	Governance structure and composition	7. Governance
	2-10	Nomination and selection of the highest governance body	7. Governance
	2-11	Chair of the highest governance body	7. Governance
	2-15	Conflicts of interest	9. Operating with ethical integrity
	2-16	Communication of critical concerns	9. Operating with ethical integrity
	2-17	Collective knowledge of the highest governance body	7. Governance
	2-18	Evaluation of the performance of the highest governance body	7. Governance
	2-19	Remuneration policies	7. Governance
	2-20	Process to determine remuneration	7. Governance
	2-21	Annual total compensation ratio	6. Society
	2-22	Statement on Sustainable Development Strategy	2. Message from the CEO
	2-23	Policy commitments	9. Operating with ethical integrity
	2-24	Embedding policy commitments	9. Operating with ethical integrity
	2-25	Processes to remediate negative impacts	9. Operating with ethical integrity
	2-26	Mechanisms for seeking advice and raising concerns	10. Complaint Management and Responsible Customer Information
	2-27	Compliance with laws and regulations	4.7. Materiality Analysis
	2-28	Membership associations	6. Society
	2-29	Approach to stakeholder engagement	4.7. Materiality Analysis
	2-30	Collective bargaining agreements	6. Society
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	5. Environment
	305-2	Energy indirect (Scope 2) GHG emissions	5. Environment
	305-3	Other indirect (Scope 3) GHG emissions	5. Environment
	305-4	GHG emissions intensity	5. Environment
	305-5	Reduction of GHG emissions	5. Environment
GRI 401: Employment 2016	401-1	New employee hires and employee turnover 401-2 Benefits for full-time vs part-time employees	6. Society
GRI 403: Occupational Health & Safety 2018	403-9	Work-related injuries	6. Society

GRI Standard	Disclosure	Description	Section Reference
GRI 404: Training and Education	404-1	Average hours of training per year per employee	6. Society
	404-1	Average hours of training per year per employee category	6. Society
GRI 406:Non-discrimination 2016	406-1	Discrimination incidents and corrective actions	6. Society
GRI 413:Local Communities 2016	413-1	Community engagement, impact assessments,	6. Society
GRI 205:Anti - corruption 2016	205-1	Risk assessments related to corruption	9.Operating with ethical integrity
	205-2	Training on anti-corruption policies and procedures	9.Operating with ethical integrity
	205-3	Confirmed incidents of corruption	9.Operating with ethical integrity
GRI 3:Material Topics 2021	3-1	Process to determine material topics	4.7. Materiality analysis
	3-2	List of material topics	4.7. Materiality analysis
	3-3	Management of material topics	4.7. Materiality analysis

11.2 SASB Table

SASB Topic	ABBank Approach	Report Reference
Data Security & Privacy	Customer data-protection and information-security framework, including cyber incident disclosure	Section 8: Customer Privacy and Information Protection
Data Security Governance	Governance and controls for identifying, monitoring and addressing cybersecurity risks	Sections 8.1-8.2: Cybersecurity and IT & Information Security Initiatives
Transparent Product Information & Fair Advice	Customer-information, service and complaint-handling approach	Section 10: Complaint Management and Customer Responsible Information
Business Ethics	Code of Ethical Conduct, anti-bribery controls and whistleblowing framework	Sections 9.1-9.3: Operating with Ethical Integrity
Employee Diversity & Inclusion	Workforce representation, equal opportunity and diversity monitoring	Sections 6.1.1-6.1.3: Workforce Profile, Gender Balance and Pay Gap
ESG in Credit Risk Analysis	Integration of ESG and CR&E considerations into risk management and sustainable financing	Sections 4.5-4.6: ESG and CR&E Risk Management; Sustainable Finance
Systemic Risk Management	Capital adequacy, balance-sheet resilience and risk-management governance	Sections 3.3 and 7: Economic Performance and Governance
Remuneration	Remuneration governance, fixed and variable pay principles and performance linkage	Section 7.3.1: Remuneration Policy
Fair Marketing & Customer Relationships	Customer acceptance, responsible service and complaint-management processes	Sections 9.5 and 10: Customer Acceptance Policy; Complaint Management