

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant: Piraeus Bank S.A (LEI: 213800OYHR1MPQ5VJL60)

Summary

Piraeus Bank S.A (LEI: 213800OYHR1MPQ5VJL60), hereinafter "Piraeus Bank", member of Piraeus Financial Holdings Group (hereinafter "Piraeus Group"), considers the principal adverse impacts of its investment decisions on sustainability factors. The present statement is the statement on principal adverse impacts on sustainability factors of Piraeus Bank. This statement on principal adverse impacts on sustainability factors covers the reference period from 1st January 2024 to 31 December 2024. The following information is provided in accordance with the Sustainable Finance Disclosure Regulation (SFDR) – Regulation (EU) 2019/2088 and the Delegated Regulation (EU) 2022/1288.

The PAI indicators are calculated taking into account the total Assets under Management (AUM) under the Discretionary Portfolio Management Service of Piraeus Bank. It's important to note that the consideration of PAIs depends on data availability and quality for all companies within our investment universe. Piraeus Bank reports on 20 principal adverse impact indicators—18 mandatory and 2 voluntary. Since the investments are not made directly in real estate assets, indicators 17 (Exposure to fossil fuels through real estate assets) and 18 (Exposure to energy-inefficient real estate assets) are not applicable.

Piraeus Bank has transitioned from publishing a consolidated statement on the Principal Adverse Impacts (PAIs) on sustainability factors, which previously incorporated data from its subsidiaries — Piraeus Asset Management Single Member Mutual Funds Management Company S.A. (LEI: 213800CF8C4B9AKV1Z96), hereinafter "Piraeus AM MFMC," and Iolcus Investments Alternative Investments Fund Managers Single Member S.A." (LEI: 213800WBLTVLFX5HGK92), hereinafter "Iolcus Investments." As of 2024, reporting has been disaggregated, and the Bank now reports only on its own Assets under Management (AUM) under the Discretionary Portfolio Management Service. Therefore, for the purpose of ensuring the comparability of the data, Piraeus Bank 2023 figures have been adjusted to reflect only its own respective AUM in the current statement. The initial consolidated statement remains available at: <https://www.piraeusbank.gr/en/support/sfdr>.

It is emphasized that during the reference period of this statement, there were (and still exist) limitations in the availability of ESG data. These limitations may affect the completeness, accuracy and/or comparability of the information required for the assessment of PAI indicators. Additionally, due to the aforementioned limitations, the percentage of eligible assets for which ESG data is available may be statistically insufficient to draw reliable conclusions (data coverage limitation).

These limitations currently hinder the definition of a specific process and/or the establishment of concrete objectives for the next reference period in terms of mitigating the respective principal adverse impacts.

Piraeus Bank continuously monitors developments in the field of sustainability data disclosure and seeks the gradual improvement of the availability and reliability of relevant information, in order to ensure compliance with regulatory requirements and enhance transparency for investors.

Piraeus Bank has outsourced the management of AUM of the discretionary portfolios to its subsidiaries Piraeus AM MFMC and Iolcus Investments (together called “investment manager”) and therefore relies on the investment manager to identify, quantify and report the indicators disclosed in this statement.

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies¹

Adverse sustainability indicator	Metric	Impact [year 2024]	Impact [year 2023] ²	Explanation/ Coverage ³ %	Actions taken, and actions planned and targets set for the next reference period
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CLIMATE AND OTHER ENVIRONMENT – RELATED INDICATORS

Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	90,609	127,532	Metric tonnes of carbon dioxide equivalent (CO ₂ e) allocated	<i>General approach</i> The investment manager conducts regular assessments of the portfolios under management to evaluate emissions and other
		Scope 2 GHG emissions	11,861	11,274		

¹ Please note that these indicators only apply to corporate assets, representing 44% (€1.3bn) of the AuM and represents the average of the four quarters of 2024.

² Impact as at 31/12/2023. For 2023 reporting, Piraeus is not in position to report average of impacts for 31 March, 30 June, 30 September, and 31 December 2023. Please refer to important notice at the end of this statement.

³ The average coverage (Avg Cov) disclosed in this statement reflects the proportion of eligible assets for which data is available and provided in this statement. Eligible assets refer to all investments (i.e., investee companies, or sovereign and supranational, or real estate assets, depending on the PAI), excluding derivatives, cash and cash equivalent.

		Scope 3 GHG emissions	417,003	230,311	based on EVIC ⁴ . Avg Cov %: 2023: 38% 2024: 40% The increase in emissions is likely due to the increase in our Asset under Management (AuM), improved Scope 3 reporting data, and market development.
		Total GHG emissions	519,469	369,176	
2. Carbon footprint	Carbon footprint		395.07	339.04	
3. GHG intensity of investee companies	GHG intensity of investee companies		652.96	653.04	GHG emissions per million generated in revenue, for scope 1, 2 and 3. Avg Cov %: 2023: 37%, 2024: 39%
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector		4.85% (%MV)	5.04% (%MV ⁵)	Avg Cov %: 2023: 38%, 2024: 40%
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as		Consumption 14.44% (%MV) Production 2.01% (%MV)	Consumption 15.10% (%MV) Production 2.29% (%MV)	Consumption Avg Cov %:2023: 29%, 2024: 30% Production Avg Cov %:2023: 3%, 2024: 3%

sustainability factors. Additionally, through the “Do No Significant Harm” (DNSH) principle, the following PAIs are examined and rated: PAI 1 – PAI 6.

Exclusions

Limiting and gradually reducing exposure to companies operating in the fossil fuel sector, giving priority to investments aligned with the transition to a low-carbon economy. The investment manager applies a group-wide investment filter to restrict investments with significant adverse impacts, including those related to fossil fuels.

A target has been established to reduce exposure to companies active in the fossil fuel sector by 1% during the next reference period, as part of the commitment to gradual decarbonization, at best effort.

⁴ EVIC represents the enterprise value including cash.

⁵ MV: Market Value

		a percentage of total energy sources				
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0.23	0.25	Avg Cov %: 2023: 27% 2024: 27%	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	1.28%	1.21%	Avg Cov %: 2023 & 2024 1%	This indicator will be monitored on a best-effort basis.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	8.36	8.43	Tons of emissions to water generated by investee companies per million EUR invested (allocated based on EVIC) Avg Cov %: 2023: 2%, 2024: 2%. Due to the low coverage of the PAI figure, small year-on-year changes can result in large differences. This is because minor changes in absolute terms appear significant when the	This indicator will be monitored on a best-effort basis.

					starting figures are small.	
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	-	-	Tons of hazardous and radioactive waste generated by investee companies per million EUR invested (allocated based on EVIC) Avg Cov: 2023&2024: 0%	This indicator will be monitored on a best-effort basis.

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY

Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	2.58 %	3.32 %	Avg Cov %: 2023: 36%, 2024: 38%	<i>General approach</i> The investment manager monitors all issuers in which it invests. If an issuer is found to be in violation of international standards and/or regulations (including the UN Global Compact, the OECD Guidelines, and the UN Guiding Principles on Business and Human Rights), it is assessed to determine whether it has implemented robust mechanisms to prevent future breaches. If the issuer falls below a
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	1.35	1.33	Avg Cov %: 2023: 36%, 2024: 38%	

					certain compliance score, a recommendation is made to avoid investing in or to divest from the issuer. <i>Active Ownership</i> If an issuer, in whose general meetings the investment manager participates, is involved in serious human rights or social issues and fails to demonstrate adequate due diligence, the investment manager will vote against the agenda item most directly related to the matter.
12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	3.28	2.40	Avg Cov %: 2023: 13%, 2024: 19%	Due to the low coverage of the PAI figure, small year-on-year changes can result in large differences. This is because minor changes in absolute terms appear significant when the starting figures are small. This indicator will be monitored on a best-effort basis due to limited data coverage. Given the insufficient data adequacy of the available figures, no reliable conclusions can be drawn at this stage, and

						therefore no specific targets will be set.
13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	10.0 %	9.2%	Avg Cov %: 2023: 33%, 2024: 35%	General approach The assessment of gender diversity on the board of directors is one of the core components of the investment process. If an issuer's board lacks gender diversity or falls short on key criteria such as tenure or skills, and the investment manager participates in the relevant general meeting in accordance with its Active Ownership Policy, it will vote in a manner consistent with the above approach to promoting gender diversity in the issuer's governing body.	
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.14 %	0.15 %	Avg Cov %: 2023: 36%, 2024: 38%	<i>General approach</i> Companies that are involved in controversial weapons ⁶ are not considered for investment for direct and/or indirect investment over a	

⁶ Issuers involved in the production, sale, storage of nuclear weapons of States that are non-parties to the Treaty on the Non Proliferation of Nuclear Weapons-
<https://disarmament.unoda.org/wmd/nuclear/npt/>

						specifically defined threshold.
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Indicators applicable to investments in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact [year 2024]	Impact [year 2023]	Explanation/ Coverage%	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	0.02	0.04	CO ₂ per GDP Avg Cov %: 2023: 29%, 2024: 17%	The investment manager has developed an internal model for assessing sovereign data. The analysis focuses on the country’s overall approach to climate change, sustainability, social issues (e.g. human rights violations or labor rights) and governance and corruption issues. Data are derived from Bloomberg and the World Bank Database (that provide rankings on political stability, voice and accountability, government

						effectiveness, rule of law, regulatory quality and control of corruption). Piraeus Bank's proprietary relative country scoring is also used on a complementary basis to reinforce data dynamics.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	13	10	Avg Cov %: 2023: 0.02%, 2024: 0.03%	We tend to refrain from investing in countries associated with significant human rights violations. However, due to very limited data coverage and the limitations of the look-through process, it is not feasible to adjust for figures that are considered statistically insignificant.

Indicators applicable to investments in real estate assets

Adverse sustainability indicator	Metric	Impact [year 2024]	Impact [year 2023]	Explanation/ Coverage e%	Actions taken, and actions planned and targets set for the
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					next reference period
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Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0	0	No direct investments in real estate assets	No direct investments in real estate assets
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	0	0	No direct investments in real estate assets	No direct investments in real estate assets

Other indicators for principal adverse impacts on sustainability factors

Furthermore, Piraeus Group has selected the following two additional climate and social indicators to monitor and report on:

Additional climate and other environment-related indicators

Adverse sustainability indicator	Adverse impact on sustainability factors (qualitative or quantitative)	Metric [year 2024]	Metric [year 2023]	Actions taken, and actions planned and targets set for the next reference period
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Indicators applicable to investments in investee companies

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Water, waste and material emissions	7. Investments in companies without water management policies	Share of investments in investee companies without water management policies	2.2%	3.6%	This indicator will be monitored on a best-effort basis.
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Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse sustainability indicator	Adverse impact on sustainability factors (qualitative or quantitative)	Metric [year 2024]	Metric [year 2023]	Actions taken, and actions planned and targets set for the next reference period
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Indicators applicable to investments in investee companies

Human Rights	9. Lack of human rights policy	Share of investments in entities without a human rights policy	1%	1%	This indicator will be monitored on a
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					best-effort basis.
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Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Piraeus Group introduced an SFDR Policy, the 5th Section of which describes Piraeus Group's alignment with respect to the requirements of SFDR Article 4 regarding the consideration of Principal Adverse Impacts (PAIs) of investment decisions on sustainability factors. The said Policy came into force from June 30, 2024 and can be found -as each time applicable- on the website of Piraeus Bank <https://www.piraeusbank.gr/en/support/sfdr>.

The indicators selected for the section "Other indicators for principal adverse impact" are nominated due to their significance of our evaluation process. Furthermore, these indicators provide sufficient data coverage and is expected to grow further.

Piraeus Group has set as a strategic goal sustainable development in banking and investments. It focuses on supporting SDG in order to promote renewable energy, to protect biodiversity and to contribute to climate change mitigation by assessing different scenarios based on physical and transition risks⁷. Additionally, it has established a set of basic guidelines on human rights⁸.

Piraeus Group has developed a dedicated Sustainable Finance Framework that serves as a guide for the classification of financial services and products as sustainable. Piraeus Group closely monitors the ongoing developments in the changing regulatory framework and appropriately adapts its investment policy and products, responding not only to the requirements of the supervisory authorities, but also to the increased interest of investors for products and services with sustainability goals.

The incorporation of ESG factors in the investment process is complementary to the existing statutory investment policy. The ESG assessment combines qualitative and quantitative methods that vary across different asset classes, regions and sectors.

Piraeus Group actively looks for investments in sectors/regions with a positive impact on ESG issues. Ideally, these investments:

- follow sustainability norms,
- create and maximize added value,
- exhibit outstanding performance,
- are led by excellent and accountable teams,

⁷ Annual Report 2024 - https://www.piraeusholdings.gr/-/jssmedia/Com/2024/Files/Investors/Financials/Financial-Results/12M/Annual-Financial-Report-of-PFH-2024_ENG.pdf

⁸ Piraeus Human Rights Policy - <https://www.piraeusholdings.gr/en/human-resources/human-resource-management/human-rights-policy>

- apply transparent governance policies, and
- have established processes with respect to human rights.

In order to identify the appropriate sustainability risks, the examination of material ESG factors has been incorporated into the decision-making process, the investment manager has adopted a mix of ESG Investment Strategies including:

- ESG Integration
- ESG Screening

The ESG Screening includes:

- Negative Screening (exclusions),
- Positive Screening,
- Norms-based Screening.

At Piraeus Bank, our objective is to mitigate the most substantial adverse effects of our investments. We have implemented an exclusion policy specifically addressing controversial weapons and norms-based violations.

Specifically, principle adverse impacts are taken into account as part of the pre-investment process through the application of exclusions (PAI 10,11,14) and as part of the requirements for the percentage of sustainable investments (PAI 4). PAIs are also taken into account through integration into investment analysis, security selection and the investment process.

Through the non-cause of significant harm, the following PAIs are examined and scored, PAI 1(Scope 1 Greenhouse Gas Emissions), PAI 1(Scope 2 Greenhouse Gas Emissions), PAI 1(Scope 3 Greenhouse Gas Emissions), PAI 2(Carbon Footprint), PAI 3(Greenhouse Gas Emissions Intensity), PAI 4(Share of Investments in Companies Active in the Fossil Fuel), PAI 5(Share of Energy Consumption and Production from Non-Renewable Sources), PAI 6(Energy Consumption Intensity by Sector of High Climate Impact), PAI 7(Activities with Negative Impacts on Biodiversity Sensitive Areas), PAI 8(Emissions to Water), PAI 9(Hazardous and Radioactive Waste), PAI 10(Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises), PAI 12(Unadjusted gender pay gap), PAI 13(Board Gender diversity), PAI 14(Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)).

The Taxonomy is a means of implementing the goals of the Paris Agreement; it is a regulatory tool that defines which economic activities are considered environmentally sustainable. It sets technical criteria for activities that: make a substantial contribution to environmental objectives (such as emissions reduction), do not cause significant harm to other environmental areas, and comply with minimum social safeguards.

Regarding the implementation and assessment of the Taxonomy for the Do No Significant Harm (DNSH) principle, the estimated success rates for DNSH across the six environmental objectives of the Taxonomy are examined:

1. Climate change mitigation,
2. Climate change adaptation,
3. Responsible use and protection of water and marine resources,
4. Transition to a circular economy,
5. Prevention and control of pollution,
6. Protection and restoration of biodiversity and ecosystems

Piraeus Group has selected the following two voluntary PAI indicators:

- Investments in companies without water management policies (Annex I Table 2 No. 7 - SFDR Delegated Regulation)
- Lack of human rights policy (Annex I Table 3 No. 9 - SFDR Delegated Regulation)

The selection of these two voluntary PAI indicators was based on several factors, such as data availability, data quality, applicability, and materiality from a sustainability perspective.

Governance

Responsible for the preparation, maintenance, and updating of the Principal Adverse Impact (PAI) statement of Piraeus on sustainability factors is the Piraeus Group Wealth and Asset Management pillar with regards to ownership, maintenance, and update. The ESG & Corporate Responsibility Committee approves this statement.

Data sources

Piraeus Bank has outsourced the management of AUM of the discretionary portfolios to its subsidiaries Piraeus AM MFMC and Iolcus Investments and therefore relies on the aforementioned investment managers to identify, quantify and report the indicators disclosed in this statement.

Engagement policies

The investment manager focuses on addressing long-term thematic issues that pose financial and material significance for the portfolios and may create potential sustainability risks. The emphasis is on themes that either directly impact the financial holdings or contribute to adverse sustainability outcomes. Once identified and analyzed, the investment team prioritizes key

issues to focus action upon. Should any discrepancies arise, particularly those with financial materiality or adverse sustainability consequences, there is prompt communication with the relevant company. Throughout the year, the investment manager takes actively part in regular/ extraordinary shareholder assemblies by direct or proxy voting. Furthermore, the investment manager is committed to addressing severe violations of international standards. The investment stance is active and could be re-evaluated anytime demonstrating the dedication to principled and responsible investing practices.

For more information, please visit Piraeus AM MFMC Voting Policy: <https://www.piraeusaedak.gr/enimerosi-ependiton/politikes>

And Iolcus Investments Voting Policy: <https://www.iolcus.gr/en/disclosure-of-the-requirements-of-regulation-eu-2019-2088-on-sustainability/>

References to international standards

In response to this challenging landscape, Piraeus Group has set sustainable development as a strategic goal in banking and investments. It focuses on supporting SDG to promote renewable energy, to protect biodiversity and to contribute to climate change mitigation by assessing different scenarios based on physical and transition risks. Additionally, it has established a set of basic guidelines on human rights.

Piraeus Group is a signatory to the UN Global Compact; sets targets according to Paris Climate Agreement; supports the SDGs; is a member of UNEP FI and founding signatory of the UN Principles for Responsible Banking (PRB); has signed the Women's Empowerment Principles (WEPs) and the UN Commitment for Financial Health and Inclusion; has sustainability policies in place and a sustainable finance framework; has a robust ESG structure; and discloses ESG performance (CSRD Sustainability statement, PRB, Impact Assessment, CDP, annual sustainability report, sustainability ratings, etc).

Additionally, Piraeus AM MFMC and Iolcus Investments are signatories to the UN Principles for Responsible Investment (PRI).

Historical comparison

Piraeus Bank has integrated sustainability indicators into its investment process to manage risk and mitigate negative impacts.

PAI indicator values can fluctuate with market volatility, asset volumes, and valuations, which could imply of improving or worsening impacts. Since data coverage and relevance may vary, interpretation is limited for the moment.

This year's report covers PAI indicators from 1 January to 31 December 2024. The selection of voluntary PAI indicators remains unchanged from the previous year.

IMPORTANT NOTICE

This Annual Statement by Piraeus Bank regarding the principal adverse impacts of investment decisions on sustainability factors is subject to various limitations. During the reference period of this Statement, there were (and continue to be) limitations in the availability of ESG data. These limitations may affect the completeness, accuracy, and/or comparability of the information required for the assessment of PAI indicators. Moreover, due to the aforementioned limitations, the percentage of eligible assets for which ESG data is available may be statistically insufficient to draw reliable conclusions (data coverage limitation). As a result, it is currently challenging to define a specific procedure and/or to set concrete objectives for the next reference period regarding the mitigation of the relevant principal adverse impacts.

The information presented under the column "Actions taken, actions planned, and targets set for the next reference period" in the tables above represents general approaches, formulated based on current conditions and expected developments in the legislative and regulatory framework concerning the anticipated improvement in the availability and quality of ESG data provided by issuers. Therefore, these approaches are based on variables that are beyond the control of Piraeus Bank and/or the investment manager and, as such, no assurance can be given that they will be fully or partially achieved.

In addition, not all companies/issuers disclose information on all sustainability factors. This Statement is based on an assessment using data from third-party providers and/or fundamental analysis to identify investments that adversely affect sustainability factors and cause significant harm. The data included in this Statement may be inaccurate or incomplete, and discrepancies may arise — particularly with respect to data provided by third parties. Piraeus Bank and/or the investment manager reserves the right to change its third-party data provider at any time, which may potentially affect the data and methodologies used for the same assets.

As third-party data providers' methodologies improve in the coming years, we plan to reevaluate the data quality to enable future reporting on such PAIs.

The information presented in this statement may undergo further updates, amendments, revisions, or discontinuations in subsequent publications by Piraeus Bank. These changes depend on factors such as data availability, fairness, adequacy, accuracy, reasonableness, completeness, and alterations in applicable circumstances, including shifts in relevant laws and regulations.

The methods of measurement used for determining non-financial metrics and data may consist of difficult modeling practices. Using various measurement procedures can lead to diverse results.

The use of non-financial metrics and data is influenced by the limited availability of relevant information. This data is not consistently disclosed by issuers, and when it is disclosed or collected from third-party providers, it may be incorrect, incomplete, or follow varying reporting methodologies.

This statement may contain information obtained from various third-party sources. It's important to note that Piraeus Bank and the investment manager have not reviewed or endorsed such information by including it or referring to it. Additionally, it's important to note that such third-party information may not have undergone independent verification.

Piraeus Bank does not provide any guarantee regarding the fairness, adequacy, accuracy, reasonableness, or completeness of such information. Additionally, no express or implied representation, warranty, or undertaking is made by Piraeus Bank, and it is not obligated to update or revise this information.