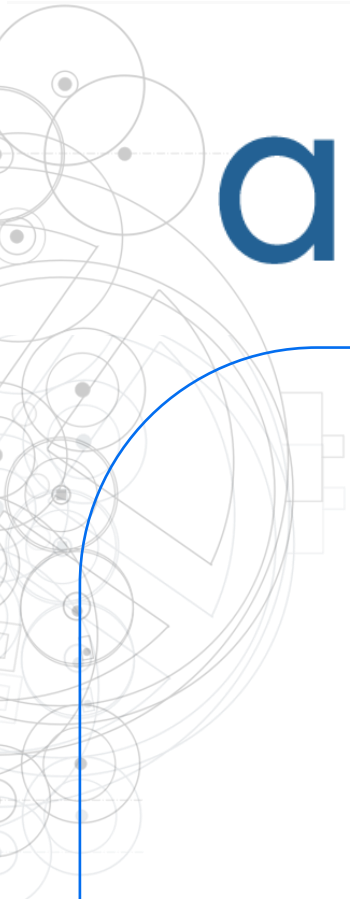


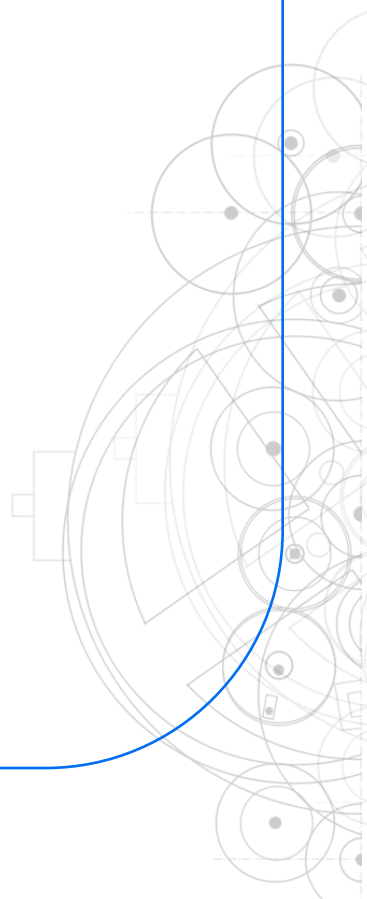


alphatrusthc

20

SUSTAINABILITY REPORT

24





Signatory of:



The Net Zero Asset  
Managers initiative



ALPHA TRUST HOLDINGS S.A.

Tax Registration Number 094317734 KE.FO.DE of Attica, General Electronic Commercial Registry: 882401000

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## 2024 at a Glance – Performance Summary

### Assets under Management

**€1.86 bn** (+16% vs. 2023)

### Turnover

**€9.20 mn** (+9% vs. 2023)

### Pre-tax profits

**€2.38 mn** (+32% vs. 2023)

### Total Dividends 2009-2025

**€21.90 mn**

including FY2024

- ☒ Strengthened presence among retail investors
- ☒ Entry into Private Equity fund Catapult Growth Partners A.K.E.S.
- ☒ Further improvement in profit margins (excluding performance fees)

### Oil consumption (litres)

**0**

### Total energy consumption (MWh)

**+22%** (vs. 3-year average)

### Electricity consumption (MWh)

**+13%** (vs. 3-year average)

### Direct and indirect CO<sub>2</sub>e emissions (tCO<sub>2</sub>e)

**-2%** (vs. 3-year average)

### Personnel (as of 31/12)

**50** (~ 3-year average)

**90% ATHEX ESG  
Transparency Score**

## Report Parameters

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The Sustainability Report (“the Report”) of ALPHA TRUST HOLDINGS S.A. (hereinafter “ALPHA TRUST HOLDINGS” or “the Company”) is published annually [GRI 2-3-a] and provides an overview of the Company’s non-financial performance, complementing its Annual Financial Report.

The Sustainability Report and the Annual Financial Report of the Company refer to the same reporting period but differ in publication timing. The data for the Sustainability Report are often not available at the publication date of the Annual Financial Report, which is required to be published by 30 April of the following fiscal year.

The Sustainability Report is available on the Company’s official website<sup>1</sup> [www.atrust.gr](http://www.atrust.gr) [GRI 2-3-b] [GRI 2-3-c].

### Principles of Report Preparation

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The Report has been prepared in accordance with the Global Reporting Initiative (GRI Standards), the Ten Principles of the United Nations Global Compact, and the key indicators of the Sustainability Accounting Standards Board (SASB).

### Scope of the Report

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The Report covers the data of the ALPHA TRUST Group, including:

The parent company ALPHA TRUST HOLDINGS S.A., and

Its subsidiaries ALPHA TRUST Mutual Fund and Alternative Investment Management S.A. (hereinafter “ALPHA TRUST”) and ALPHA TRUST Luxembourg S.à r.l. [GRI 2-2-a] [GRI 2-2-b].

It refers to the year 2024, covering the period from 1 January 2024 to 31 December 2024 [GRI 2-3-a], and constitutes the fourth Sustainability Report of the ALPHA TRUST Group.

### Report Structure

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The Report’s structure aims to present quantitative and qualitative data on the sustainability performance of the ALPHA TRUST Group, focusing on environmental, social, and governance (ESG) issues, in accordance with the international GRI Standards.

### Sources of Information

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The information and data included in the Report are collected by the Company through internal recording procedures and management information systems.

Where processed data are presented, the calculation method is disclosed in accordance with GRI guidelines.

To define the content of the Report, a materiality assessment was conducted to identify and prioritise significant topics, taking into account the requirements and expectations of stakeholders.

The results of this process are presented in the section “Sustainable Development.”

### Project Team

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The preparation of the Report was assigned to the Group’s Sustainability Team, which is responsible for the collection and processing of the relevant information and data.

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<sup>1</sup> <https://atrust.gr/koinoniki-ipeuthinotita/ekthesi-viosimotitas/>

### Changes Compared with Previous Editions

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The 2024 Sustainability Report does not present any material differences compared with the 2023 Report. The changes are mainly limited to the updating of information and performance data [GRI 2-4-a-i] [GRI 2-4-a-ii].

### Submission and Approval of the Report

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The Report is submitted to the Company's Board of Directors for review and approval. After approval, it is published on the Company's corporate website and is available at: <https://www.atrust.gr/>.

### External Assurance

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The Company recognises the importance of external assurance in strengthening the transparency and reliability of the information disclosed in the Report. In this context, the Company assigned the independent firm ANRAS P.C. to carry out the external assurance for the year 2024, covering the scope of work described in the section "Independent External Assurance Report."

The Independent External Assurance Report is included in this publication under the section "Independent Assurance Statement" [GRI 2-5-a] [GRI 2-5-b].

### Communication

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We invite you to participate in the evaluation of the 2024 Sustainability Report.

Your feedback is very important to us and will contribute to the continuous improvement of the Report, ensuring that it addresses the needs and interests of all stakeholders.

You may submit your comments and suggestions through the online evaluation form, available at the following link: [Evaluation of the 2024 Sustainability Report](#).

For any clarification or additional information, please contact:

Ms Theodora Roka

Sustainability Integration Manager



21 Tatoiou Street, 145 61 Kifissia,  
Greece



[d.roka@alphatrust.gr](mailto:d.roka@alphatrust.gr)



<https://www.atrust.gr/>

[GRI 2-3-d]

## Message from Management

Dear friends and partners,

In 2024, we consistently continued our efforts to systematically document and present our strategy, actions, and results in the field of sustainable development — a journey we began in 2021. The fourth Sustainability Report of the ALPHA TRUST Group transparently reflects our progress, reaffirming our unwavering commitment to integrating the principles of environmental, social, and corporate governance (ESG) into every aspect of our operations.

The year 2024 was a positive one for the Group, marked by improvement across all key indicators. The Company now stands at the highest point in its 38-year history, both in terms of the breadth and quality of its clientele and the maturity of its people and systems. Yet, our pursuit of improvement remains a daily and equally intense challenge.

We remain firmly committed to combating climate change through initiatives that reduce our environmental footprint. The digitalisation of our physical archives and the adoption of electronic signatures for all corporate documents have significantly reduced paper usage. At the same time, our new electronic platform facilitates automated client transactions, enhancing efficiency and transparency in our business processes.

Our people, clients, and partners are invaluable allies on this journey. Our aim is to foster both an environmentally responsible mindset and a strong corporate culture, built on fairness, respect, and teamwork, ensuring the growth and well-being of our employees.

In the area of products and services, we continue to strengthen the integration of ESG criteria into our investment decisions. Since 2022, we have offered an investment product that combines a targeted strategy with environmental, social, and governance characteristics.

In 2024, we once again participated actively in the public dialogue promoting and advancing sustainability issues.

Since its establishment, ALPHA TRUST has promoted social responsibility and solidarity. Each year since 2000, we have published a book distributed to libraries and selected audiences. We choose works that may not have received the attention they deserve, shedding light on issues related to Greece.

Our inclusion in the ATHEX ESG Index of the Athens Stock Exchange recognises the Group's high level of adoption of sustainability and transparency practices.

Furthermore, for the second consecutive year, the 2024 Sustainability Report underwent independent assurance of selected data, in line with international best practices, confirming the accuracy and transparency of our information.

With our experience, expertise, and infrastructure, we are ready to meet the challenges of the future. The ALPHA TRUST Group remains firmly committed to building a sustainable future, fostering a workplace culture based on fairness, respect, and collaboration.

Chris Aesopos,  
Chief Executive Officer  
ALPHA TRUST HOLDINGS  
[GRI 2-22]

# 1. Group Profile

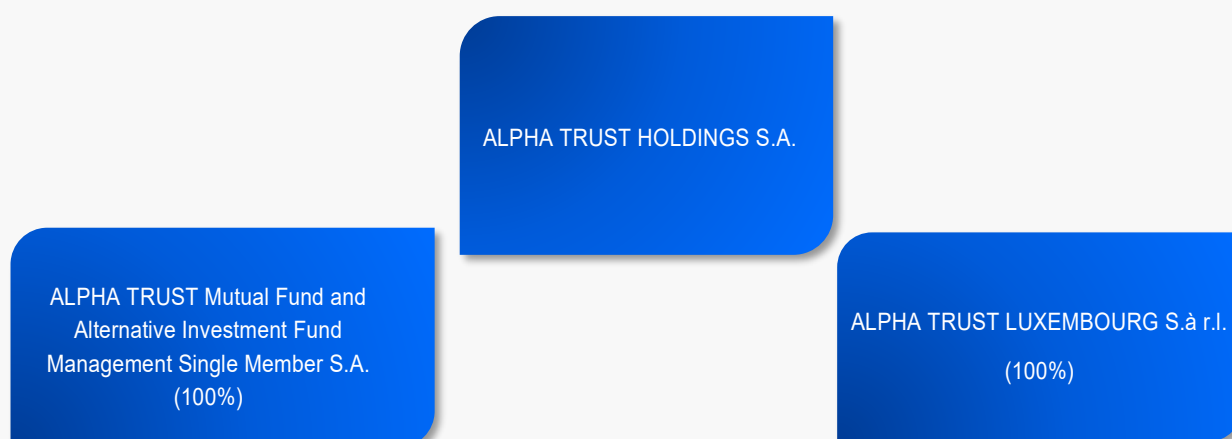
## 1.1 Group Identity and Structure

ALPHA TRUST HOLDINGS S.A. (hereinafter referred to as “ALPHA TRUST HOLDINGS”) is a holding company and the parent company of the ALPHA TRUST Group [GRI 2-1-a]. The Company’s registered office is in the Municipality of Kifissia [GRI 2-1-c].

ALPHA TRUST began its activity in the Greek market in 1987 as a Financial Advisors company under the name “ALPHA TRUST INVESTMENT SERVICES SOCIÉTÉ ANONYME” (ALPHA TRUST A.E.P.E.Y.) and, from 2014, under the name “ALPHA TRUST Mutual Fund and Alternative Investment Management S.A.” (ALPHA TRUST AEDAKOEE) [GRI 2-1-b].

On 18 December 2023, ALPHA TRUST completed its corporate transformation via the demerger of its asset-management division and its conversion into a Holding Company. The demerged company, ALPHA TRUST AEDAKOEE, continues to be the Group’s main activity pillar, employing almost all people while the Holding Company retains real-estate ownership and certain other advisory and support activities. The Company provides to its subsidiaries — ALPHA TRUST AEDAKOEE and ALPHA TRUST Luxembourg S.à r.l. — as well as to third parties, a range of administrative, financial, organisational, operational, and advisory services, including support, servicing, and information.

The ALPHA TRUST Group structure after the corporate transformation is as follows [GRI 2-1-d]:



**ALPHA TRUST MUTUAL FUND AND ALTERNATIVE INVESTMENT FUND MANAGEMENT SINGLE MEMBER S.A.** (ALPHA TRUST): The largest and oldest independent asset manager of private and institutional investors in Greece. It specialises in the management of pension funds and mutual funds of insurance organisations. The company manages 14 Mutual Funds, covering a wide range of investment needs, investing in both money and capital markets in Greece and abroad.

**ALPHA TRUST LUXEMBOURG S.à r.l.:** Founded in October 2017 and started operations in November of the same year. Headquartered in Luxembourg and operates two investment vehicles.

ALPHA TRUST HOLDINGS is listed on the Athens Stock Exchange (ATHEX)<sup>2</sup>.

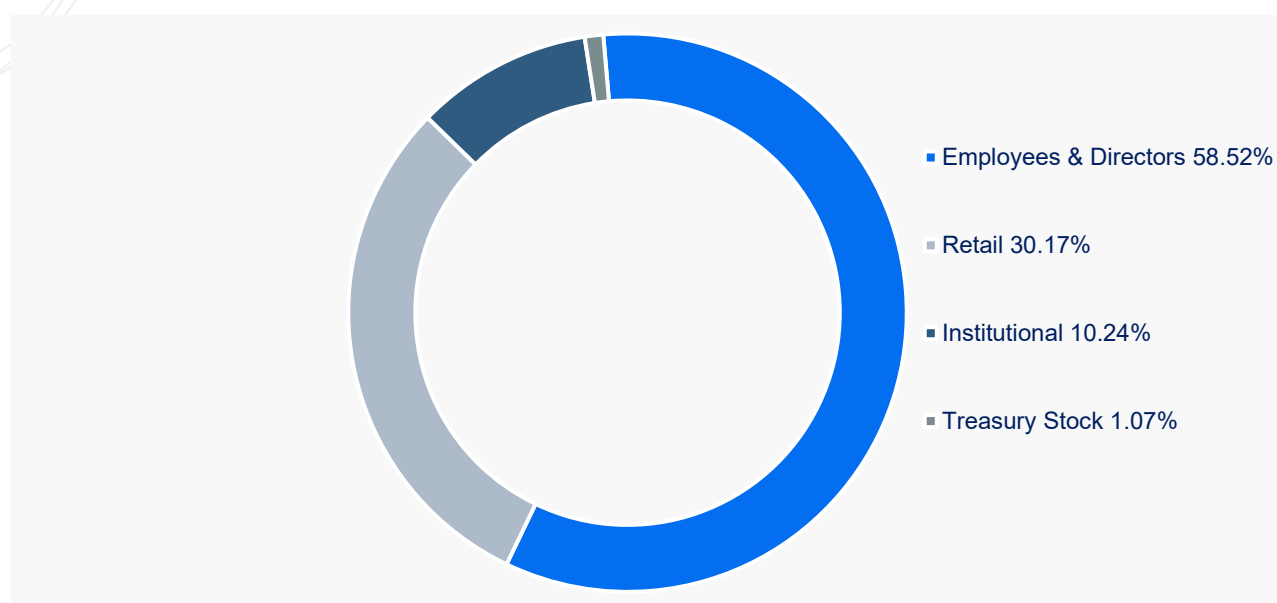
<sup>2</sup> <https://www.athexgroup.gr/en/market-data/issuers/1186>

## 1.2 Shareholding Structure

The parent company of the ALPHA TRUST Group, ALPHA TRUST HOLDINGS S.A., is listed on the Athens Stock Exchange (ATHEX). From 1 August 2008 to 4 July 2022, the Company was listed on the Alternative Market. From 5 July 2022, it has been traded on the Main Market of the Athens Stock Exchange. All shares of the Company are common, registered, and carry full voting rights.

As of 31 December 2024, the share capital of the Company amounted to €1,121,092, divided into 3,114,144 common registered shares, with a nominal value of €0.36 each.

The Company's shareholding structure as of 31 December 2024 was as follows:



Data as of 31/12/2024

### 1.3 The Values that Guide Us

At the ALPHA TRUST Group, our dedication to achieving our clients' goals and expectations is combined with the commitment to create lasting value for shareholders, employees, our partners and wider society.

Our values are the heart of our identity and express our purpose. These values, which reflect our beliefs and philosophy, guide our relationship with clients and shape the experience of our people. We faithfully follow these values—fully aligned with our operating model—as our long-term compass to provide services with added value.



#### Vision

We envision a future where achieving investors' goals and expectations coexists harmoniously with creating value for shareholders, employees, partners and wider society.

#### Mission

Our mission is to recognize the real needs and expectations of investors and build long-term relationships of trust, providing services that deliver substantive value.

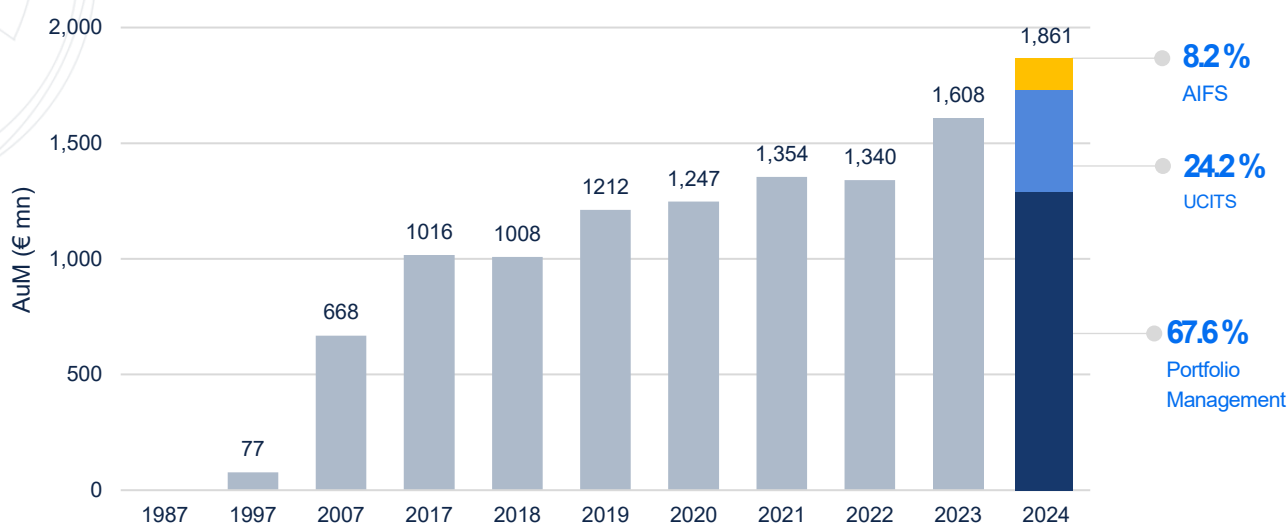
#### Purpose

Our purpose is to remain faithful to our values, ensure financial stability and prosperity for future generations and respond to society's needs and expectations.

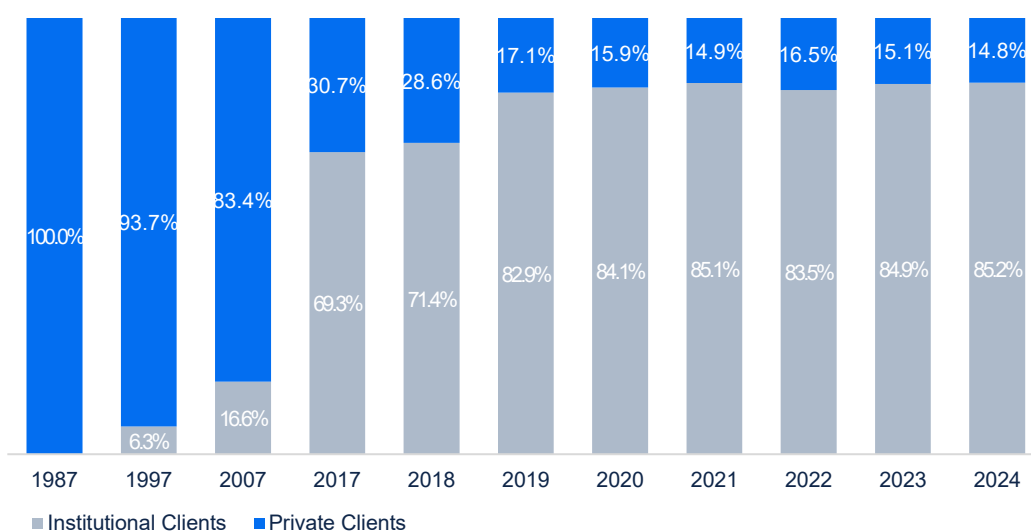
## 1.4 Investment Products & Services

The ALPHA TRUST Group subsidiary, ALPHA TRUST MUTUAL FUND AND ALTERNATIVE INVESTMENT FUND MANAGEMENT SINGLE MEMBER S.A. ("ALPHA TRUST"), thanks to its many years of experience, has been established as one of the most reliable asset-management companies in the Greek market. It has a comprehensive presence in the investment world, working closely with clients to choose the most appropriate investment solutions and creating significant added value. It serves both private individuals and institutional investors [GRI 2-6-a] [GRI 2-6-b-i].

### Evolution of Assets under Management (AuM)



### Evolution of Assets under Management (AuM) by Investor Type



Data as of 31/12/2024

## UCITS / Mutual Funds

UCITS / Mutual Funds provide access to the money and capital markets for a wide spectrum of investors. ALPHA TRUST invests in these markets in Greece and abroad and has been distinguished for years for its performance. As at the date of issue of this Report, ALPHA TRUST manages 14 Mutual Funds that cover a very broad range of investment needs: equity, balanced, bond, money market (MMF), as well as equity and balanced funds of funds.

The Mutual Funds managed by ALPHA TRUST include [GRI 2-6-a]:

| Mutual Funds           |                                                                                                                                                                                 |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Equity Fund - Greece   | <b>ALPHA TRUST HELLENIC Equity Fund</b><br><i>Hellenic Capital Market Commission Licence: 58th 31.10.1995/6A</i>                                                                |
|                        | <b>ALPHA TRUST APOLLO 11 GREEK EQUITY FUND</b><br><i>Hellenic Capital Market Commission Licence: 588th/ 06.12.2024</i>                                                          |
| Equity Fund - Global   | <b>ALPHA TRUST GLOBAL LEADERS Foreign Equity Fund</b> <sup>3</sup><br><i>Hellenic Capital Market Commission Licence: 134th/4.8.1999/6</i>                                       |
| Fund of Funds Equity   | <b>S&amp;B PENSION GLOBAL Equity Fund of Funds</b><br><i>Hellenic Capital Market Commission Licence: 57/16.6.2010</i>                                                           |
| Balanced Funds         | <b>ALPHA TRUST ECLECTIC Balanced Fund</b><br><i>Hellenic Capital Market Commission Licence: 29th/10.1.1995/5</i>                                                                |
|                        | <b>THE ECONOMISTS' OCCUPATIONAL PENSION BALANCED FUND</b><br><i>Hellenic Capital Market Commission Licence: 24/840/16.7.2008</i>                                                |
|                        | <b>INTERLIFE Balanced Fund</b><br><i>Hellenic Capital Market Commission Licence: 62/23.12.2003</i>                                                                              |
|                        | <b>THE OCCUPATIONAL PENSION BALANCED FUND OF POLICE-FIRE-PORT ASSOCIATION Institutional Share Class</b><br><i>Hellenic Capital Market Commission Licence: 256/2.6.2016</i>      |
|                        | <b>THE OCCUPATIONAL PENSION BALANCED FUND OF GEOTECHNICAL CHAMBER MEMBERS - Institutional Share Class</b><br><i>Hellenic Capital Market Commission Licence: 373rd/16.2.2021</i> |
| Fund of Funds Balanced | <b>TEA INTERAMERICAN Global Balanced Fund of Funds</b><br><i>Hellenic Capital Market Commission Licence: 175/21.6.2013</i>                                                      |
| Bond Fund - Greece     | <b>ALPHA TRUST Domestic Bond Fund</b><br><i>Hellenic Capital Market Commission Licence: 6th/29.3.1994/7B</i>                                                                    |
| Bond Fund - Global     | <b>ALPHA TRUST STRATEGIC BOND FUND</b><br><i>Hellenic Capital Market Commission Licence: 196th/11.10.2000/12a</i>                                                               |
|                        | <b>ALPHA TRUST   TRAPEZA ATTIKIS Target Maturity Bond Fund 2028</b><br><i>Hellenic Capital Market Commission Licence: 628th/ 11.04.2025</i>                                     |
| MMF VNAV               | <b>ALPHA TRUST Euro Money Market Fund (Standard VNAV MMF)</b><br><i>Hellenic Capital Market Commission Licence: 10th/ 14.8.1996/4</i>                                           |

UCITS OFFER NO GUARANTEED RETURN AND PAST PERFORMANCE DOES NOT GUARANTEE THE FUTURE ONE

<sup>3</sup> The Mutual Fund promotes, among other characteristics, environmental or social characteristics or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices and therefore, falls within the scope of Article 8 of Regulation (EU) 2019/2088.

### Strong Partnerships

ALPHA TRUST collaborates with leading internationally recognized asset-management houses for the representation and distribution of UCITS / Mutual Funds to its clients. Through these collaborations, it offers interested investors a wide collection of more than 1,000 products managed by the following houses [GRI 2-6-a]:

**BNP PARIBAS****Schroders****BlackRock®****J.P.Morgan**The logo for Invesco, featuring a blue stylized mountain peak icon and the word "Invesco" in blue.**Invesco****PIMCO****Goldman  
Sachs****Asset  
Management**The logo for Hereford Funds, featuring a blue square with the letters "HF" in white and the text "Hereford Funds" in blue.**HF Hereford Funds**

UCITS OFFER NO GUARANTEED RETURN AND PAST PERFORMANCE DOES NOT GUARANTEE THE FUTURE ONE

### Systematic Investment & Savings Program “Psila – Psila”

ALPHA TRUST offers the systematic investment–savings programme “**Psila – Psila**”, which enables investors, with their small change, to build over time a capital that will reach... high!

Participants can choose any of ALPHA TRUST’s Mutual Funds and change their choice whenever they wish—easily and without any charge.

[GRI 2-6-a]



✓ **ΕΥΚΟΛΟ:** 30 € ελάχιστη μηνιαία καταβολή ανά Αμοιβαίο Κεφάλαιο της ALPHA TRUST μέσω πάγιας εντολής από τραπεζικό λογαριασμό.

✓ **ΕΥΕΛΙΚΤΟ:** Προσαρμόζεται στις ανάγκες & τις οικονομικές σου δυνατότητες.

✓ **ΑΠΟΔΟΤΙΚΟ:** Ένα κεφάλαιο που φτάνει ψηλά σε βάθος χρόνου.

✓ **ΑΠΟΛΥΤΗ ΕΛΕΥΘΕΡΙΑ:** Δυνατότητα μερικής ή ολικής ρευστοποίησης καθώς και επαναδραστηριοποίησης του προγράμματος.

✓ **ΣΤΑ ΜΕΤΡΑ ΣΟΥ:** Ιδανικό για όσους θέλουν να δημιουργήσουν ένα κεφάλαιο για το μέλλον, χωρίς δεσμεύσεις & κρυφές χρεώσεις.

✓ **24ΩΡΗ ΠΑΡΑΚΟΛΟΥΘΗΣΗ** του επενδυτικού σου λογαριασμού μέσω της υπηρεσίας **myalphatrust**.

alphatrust

**Επένδυσε  
έξυπνα & εύκολα!**



ΟΙ ΟΣΕΚΑ ΔΕΝ ΕΧΟΥΝ ΕΓΓΥΗΜΕΝΗ ΑΠΟΔΟΣΗ ΚΑΙ ΟΙ ΠΡΟΗΓΟΥΜΕΝΕΣ ΑΠΟΔΟΣΕΙΣ ΔΕΝ ΔΙΑΣΦΑΛΙΖΟΥΝ ΤΙΣ ΜΕΛΛΟΝΤΙΚΕΣ

UCITS OFFER NO GUARANTEED RETURN AND PAST PERFORMANCE DOES NOT GUARANTEE THE FUTURE ONE

### Alternative Investment Funds

In 2017, ALPHA TRUST founded ALPHA TRUST LUXEMBOURG S.à r.l., a subsidiary in Luxembourg, and ALPHA TRUST FALCON INVESTMENT S.C.A. SICAV-SIF in which ALPHA TRUST LUXEMBOURG S.à r.l. is the general partner.

ALPHA TRUST FALCON INVESTMENT S.C.A. SICAV-SIF has been approved as a Luxembourg collective-investment Organisation, organized as a Specialized Investment Fund and set up in open-ended “umbrella” form. It has been certified as an Alternative Investment Fund (AIF) and is supervised by the Luxembourg Authority, the Commission de Surveillance du Secteur Financier (CSSF).

Alternative Investment Funds — Sub-funds [GRI 2-6-a]:

#### Alternative Investment Funds

##### FALCON REX INVESTMENT SUB-FUND

##### KESTREL INVESTMENT SUB-FUND

The logo for alphatrustlux, featuring the word 'alphatrust' in blue and 'lux' in orange.

### Private and Institutional Portfolio Management

ALPHA TRUST started its activity in 1987 with its sole service being the Management of Private Clients' Portfolios. It was in fact the first company in Greece to receive the relevant authorization.

### Private investors

ALPHA TRUST's Private Asset Management specializes in Discretionary Asset Management, while also providing Investment Advisory and Order Reception & Transmission services.

### Institutional investors

ALPHA TRUST holds a significant position in the management of institutional investors' funds, with emphasis on Occupational & Pension Funds as well as the management of insurance-company reserves.

Since 2008—and especially following the assignment of management of the Pension Branch reserves of the Professional Fund of Economists—the Company has received a series of new mandates.

Today, ALPHA TRUST has more than 20 institutional investors in its client base, among which is the portfolio investment company ALPHA TRUST-ANDROMEDA Investment Trust S.A. [GRI 2-6-a].

### Our key principles

- ✓ **Investment Discipline:** a structured investment process is followed with daily evaluation of investment conditions and portfolios.
- ✓ **Breadth & Expertise:** ALPHA TRUST's management team conducts its own research and market analysis and has also developed the FSM platform through which the team selects the best asset managers globally by sector, maintaining personal contact.
- ✓ **Risk–Return Relationship:** for each portfolio type, the key objective is to optimize risk–return and maintain low volatility through broad diversification across investment categories and instruments.
- ✓ **Full Transparency:** detailed information is provided on portfolio performance, including a detailed analysis of time-weighted comparative return as well as management fees and total third-party expenses.
- ✓ **Personalized Service:** ALPHA TRUST recognizes the real needs and goals of its investors and develops pioneering portfolios, maintaining the personal contact of its executives with our clients.
- ✓ **Independence & Impartiality:** ALPHA TRUST makes full use of the advantages of its independence, choosing the best investment placements without any restriction.
- ✓ **Long-term Relationships of Trust:** ALPHA TRUST creates portfolios not only for today but also for the next generations, taking into account expected income, seeking new sources of income from asset restructuring and especially from major positions created over time, and analyzing financial risks, considering the expected cost of living of family members.

Our goal is to create long-term value for our investors and partners, by building trust-based relationships and applying strategies that meet their expectations and needs. We are committed to providing consistent and responsible support, ensuring sustainable growth and the successful management of capital investment.

Our purpose is to enhance information for our partners and representatives. For this reason, for the past 22 years we have been organizing without interruption the Annual Fund Managers' Presentation, as well as specialized presentations for institutional investors and analysts.

Continuous communication and information—emphasizing transparency and responsibility—are the cornerstone of our relationship with clients and investors.

## Release of the Monthly Performance Report

[illegible]

**Εκλογές  
των Πολιτικών 2024:  
Δίνει η έκβασή τους για  
πόδα και τον κόσμο»**

**Παπακώστας  
Εφραίμης "Η Καθημερινή"**

**Ταυβακόκης  
ΑΛΦΑ ΤΕΚ**

A photograph showing two men in dark suits and ties seated on a stage. They are facing each other, engaged in conversation. Between them is a small, low, dark wooden table with a few items on it. The background is a large screen displaying the text of the panel discussion in Greek. The stage is lit, and the audience is visible in the foreground, out of focus.

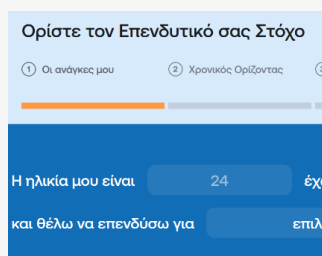
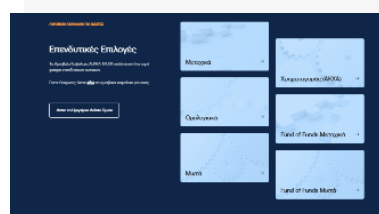
- Presentations to institutional investors and analysts



## Social Media



**www.alphatrust.gr**



| Fund Name                                   | Risk Level | Performance |
|---------------------------------------------|------------|-------------|
| ALPHA TRUST HELLINGBOY EQUITY FUND          | RISK 1     | 0.302719    |
| ALPHA TRUST ATLANTIC EQUITY FUND            | RISK 1     | 0.182719    |
| ALPHA TRUST GLOBAL LEADER EQUITY ESTIMOTECH | RISK 1     | 0.174719    |
| S.A. & P. INVESTMENT FUND                   | RISK 1     | 0.174719    |
| ALPHA TRUST ELECTRIC BALANCED FUND          | RISK 1     | 0.174719    |

**myalphatrust:** Your investment at a glance!

## 1.6 Business Excellence

2024 was a positive year for the ALPHA TRUST Group, with significant improvement across all key financial indicators. During the year, ALPHA TRUST HOLDINGS increased all major performance indicators:

- **Assets under Management** at year-end reached **€1.86 billion** versus **€1.61 billion** in 2023.
- **Revenue**: €9.19 million in 2024, up **8.53%** versus €8.47 million in 2023.
- **Earnings before Interest, Taxes, Depreciation and Amortization (EBITDA)**: €2.77 million, up **28.48%** versus €2.15 million in the prior year.
- **Net Profit after Tax from Continuing Operations**: €1.64 million, up **22.17%** compared to €1.34 million in 2023.

### Key financial ratios for the Group in 2024

- Gross Profit Margin: **66.89%**
- EBITDA Margin: **30.11%**
- Profit Margin before tax: **25.88%**
- Net Profit Margin: **17.90%**
- Return on Assets: **14.18%**
- Return on Equity: **21.90%**

### Summary Group Financial Data

Evolution of key financial figures over the last three years [GRI 201-4]

| Group (amounts in euro)       | 2024       | 2023       | 2022       |
|-------------------------------|------------|------------|------------|
| Total Equity                  | 7,518,948  | 7,229,606  | 6,548,663  |
| Total Assets                  | 11,610,905 | 10,812,042 | 10,549,858 |
| Revenue                       | 9,199,865  | 8,476,712  | 7,035,308  |
| Gross Profit                  | 6,153,842  | 5,495,353  | 4,142,849  |
| Gross Profit Margin           | 66.89%     | 64.83%     | 58.89%     |
| EBITDA                        | 2,769,749  | 2,155,615  | 1,159,150  |
| EBITDA Margin                 | 30.11%     | 25.43%     | 16.48%     |
| Profit before tax             | 2,381,003  | 1,798,415  | 759,007    |
| Profit Margin before tax      | 25.88%     | 21.22%     | 10.79%     |
| Profit after tax              | 1,646,870  | 1,347,962  | 515,046    |
| Net Profit Margin             | 17.90%     | 15.90%     | 7.32%      |
| Return on Equity (ROE)        | 21.90%     | 18.65%     | 7.86%      |
| Return on Assets (ROA)        | 14.18%     | 12.47%     | 4.88%      |
| Earnings per share            | 0.53       | 0.44       | 0.19       |
| Dividends and Capital Returns | 1,730,000  | 700,000    | 2,535,751  |
| Personnel                     | 50         | 53         | 47         |

Data as of 31/12/2024

## 1.7 Business Operating Model

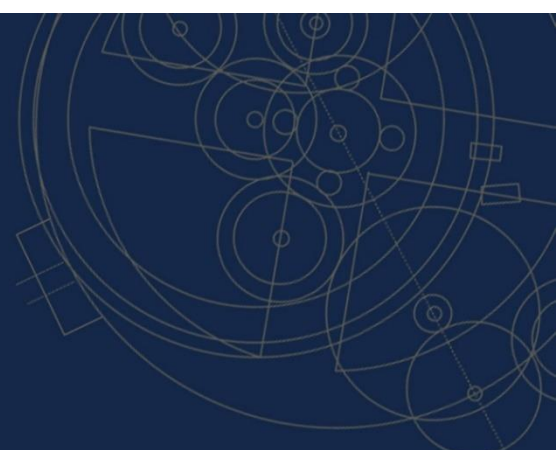
The operating model of the ALPHA TRUST Group has been developed based on international good business practices and its primary purpose is to create value for all stakeholders (shareholders, employees, clients, suppliers and society).

This model is presented below according to the internationally recognized methodological approach “Business Model Generation” by Alex Osterwalder and Yves Pigneur.



*Business Model Canvas generation by Alexander Osterwalder and Yves Pigneur*

ALPHA TRUST was the first company in Greece to be authorized for Private Clients Portfolio Management, establishing its position as a pioneer in asset management [GRI 2-6-b-ii].



# alphatrust

Διαχείριση Περιουσίας

από το 1987



## 2. Sustainable Development

### 2.1 Commitment to Sustainable Development

Recognizing the urgent challenges facing society, economies and the planet highlight the need for new, more sustainable business models.

Demand for investments that meet environmental, social and governance (ESG) criteria continues to rise, while regulatory and guidance frameworks are becoming stricter, requiring transparent and complete sustainability disclosures.

The ALPHA TRUST Group is committed to creating economic and non-financial value for all stakeholders, seeking a positive impact on the broader environment. It acknowledges its responsibility to integrate environmental and social factors into its operations and growth, guided by its values and mission.

The Group embraces the Ten Principles of the UN Global Compact, which promote human rights, labour standards, environmental protection and anti-corruption.

Since June 2020, ALPHA TRUST has been a signatory of the PRI (Principles for Responsible Investment), thus integrating those principles and becoming part of the global network for responsible investment [GRI 2-28].

The ALPHA TRUST Group actively participates in—and is gradually adopting—standards, frameworks and principles that promote Sustainable Development, specifically:

- ✓ It participates in the United Nations Global Compact (UNGC) as a “Participant.”
- ✓ It is a member of Global Compact Network Hellas (GCNH), the UNGC’s local network.
- ✓ It supports the international Task Force on Climate-related Financial Disclosures (TCFD) initiative.
- ✓ It participates in the “Principles for Responsible Investment” (PRI) initiative.
- ✓ It has joined the Net Zero Asset Managers Initiative (NZAM)<sup>4</sup>.

The Company acknowledges its contribution to the UN Sustainable Development Goals (SDGs).



<sup>4</sup> The Net Zero Asset Managers initiative is being re-evaluated; in the meantime, our participation remains under review.

## Sustainability Milestones

2020

Joined the PRI initiative as an Investment Manager Signatory



2021

Established the ESG Committee and adopted the ESG Investment Policy

Supported relevant sustainability initiatives

Integrated sustainability risks into the investment process

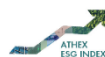


The Net Zero Asset Managers initiative



2022

Created a mutual fund with a targeted ESG investment strategy



Included in the ATHEX ESG Index

Issued the 1st Sustainability Report



2023

Net zero strategy NZAM targets submitted

Adopted a Sustainable Development Policy



ATHEX ESG Transparency Score

Issued the 2nd Sustainability Report



2024

Obtained limited external assurance on Sustainability Report information

Launched the process to record Scope 3 emissions



Maintained an ATHEX ESG Transparency Score

Issued the 3rd Sustainability Report.



## 2.2 Sustainability Governance

At ALPHA TRUST Group, sustainable development is an integral part of strategy and guides long-term decisions. To apply sustainability principles effectively, the Group has established the Sustainable Development Committee (ESG Committee) and the Sustainability Integration Department.

These structures ensure proper integration and monitoring of sustainable practices across all business activities.

### Sustainable Development Committee (ESG Committee)

ALPHA TRUST HOLDINGS has established the Sustainable Development Committee (ESG Committee) (hereinafter the "Committee") on environmental, social and corporate governance issues relevant to the Company's business activities ("ESG" issues or factors or criteria).

The Committee's main goal is to ensure that the Company integrates ESG topics in all business operations.

The Committee consists of at least three members appointed by the Board of Directors, either company employees with ESG expertise or third parties. The CEO and other company officers may attend meetings in an advisory capacity. Other committees of the company may assist in the work of the ESG Committee.

Illustrative (non-exhaustive) responsibilities include:

- \* Contributing to the overall framework for integrating ESG factors into the Company's operations.
- \* Monitoring ESG policies and procedures and their implementation.
- \* Monitoring the Company's sustainability progress; recommending improvement actions and ways to measure and track progress.
- \* Monitoring developments and general trends on ESG matters.
- \* Communicating ESG topics and training Company employees.
- \* Proposing and monitoring environmental initiatives (e.g., climate-change drivers, energy efficiency and sustainability of energy sources).

The Committee's operation and responsibilities are set out in detail in its Operating Regulation, drafted by the Committee and approved by the Board of Directors [GRI 2-12] [GRI 2-13] [GRI 2-16] [GRI 2-24-a-i].

### Sustainability Integration Department

The Company has established the Sustainability Integration Department, responsible for embedding Sustainable Development issues in operations in line with the strategic framework defined with Management. The Department works closely with the ESG Committee to implement sustainability strategies and provide detailed progress-monitoring data. Main responsibilities include:

- \* Coordinating the implementation of sustainability standards, principles and initiatives.
- \* Preparing monitoring and progress-evaluation reports.
- \* Proposing ways to improve sustainability performance.
- \* Tracking developments and trends in sustainability.
- \* Collaborating with stakeholders and informing employees.

The Department reports directly to the Company's Chief Executive Officer [GRI 2-12] [GRI 2-13] [GRI 2-24-a-i] [GRI 2-24-a-ii].

## 2.3 Sustainable Development Strategic Framework

The ALPHA TRUST Group's goal is to create long-term value and the transition to a sustainable future. The parent Company ALPHA TRUST HOLDINGS, as well as the Group's subsidiaries, acting consistently in the best interests of investors and society, recognize the responsibility to consider environmental, social, and governance-related factors in their operations.

To set guidelines for the adoption and integration of ESG factors into the Group's business operations, the Company has established the **Sustainable Development Policy** focusing on:

- \* Environmental Protection
- \* Human Rights and Labour Practices
- \* Strong Corporate Governance
- \* Social Responsibility
- \* Responsible Investments

The Company's Sustainable Development Policy covers all business activities of the Group and its subsidiaries, including their relationships with stakeholders. Strategic directions are fully aligned with the United Nations Sustainable Development Goals (SDGs).

This Policy shall be developed and revised, as necessary, by the ESG Committee and approved by the Board of Directors of the Company. For more information, the Policy is available at <https://atrust.gr/><sup>5</sup>.



<sup>5</sup> [https://atrust.gr/wp-content/uploads/2024/05/ALPHA-TRUST-HOLDINGS\\_SUSTAINABILITY-POLICY\\_V.01\\_EN.pdf](https://atrust.gr/wp-content/uploads/2024/05/ALPHA-TRUST-HOLDINGS_SUSTAINABILITY-POLICY_V.01_EN.pdf)

## 2.4 Pillars of Sustainable Development

The Sustainable Development Policy covers a range of issues related to the environment, society, and corporate governance. It is based on five fundamental pillars, which serve as guiding principles for the Group's operations. With these pillars as a foundation, the Group promotes an integrated and sustainable approach, fostering development that respects the environment and serves the public interest.

| Pillar                                   | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Environmental Protection</b>          | <p>ALPHA TRUST Group recognizes the importance of responsible operation and has prioritized reducing its environmental footprint. This is achieved through monitoring international standards for environmental protection and implementing best practices in the sector. All Group employees are informed about and actively participate in actions aimed at reducing the Group's environmental footprint.</p> <p>This approach focuses on various environmental action axes, including reducing electricity consumption, monitoring carbon emissions, and conserving natural resources.</p> <p>The Company takes into account international policies for environmental sustainability, such as the Principles of the UN Global Compact and the Sustainable Development Goals of Agenda 2030. Additionally, it is committed to promoting these principles with partners, business associates, and suppliers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Human Rights and Labour Practices</b> | <p>ALPHA TRUST HOLDINGS has established a Business Code of Conduct and Ethics aimed at further promoting ethical integrity, honesty, transparency, and proper professional behavior at all levels of the Company's hierarchy, in order to both safeguard the smooth functioning of the market and ensure that management is conducted in the interest of investors.</p> <p>This aforementioned Code adopts the 10 principles of the United Nations Global Compact, which aims to align businesses with the 10 globally accepted principles in the areas of human rights, labour practices, environment, and anti-corruption efforts.</p> <p>The Company respects and supports internationally recognized human rights. Within its sphere of influence, it protects these rights and ensures that any kind of violation or infringement is avoided. This includes avoiding child and forced labour, as well as adhering to principles to prevent discrimination in the workplace. Additionally, it ensures equal opportunities for all, respects human dignity, and sets high ethical standards. It provides a quality work environment with opportunities for development and career advancement, offering continuous training in high-level technical knowledge and specialization.</p> <p>The Company ensures that all employees and professional collaborators working at its facilities operate in a safe and healthy work environment, in accordance with the law.</p> |
| <b>Strong Corporate Governance</b>       | <p>ALPHA TRUST HOLDINGS fully aligns with the current legislative framework and guiding principles for corporate governance, while simultaneously implementing best practices and voluntary standards aimed at excellence and continuous protection of the interests of shareholders, clients, employees, and all stakeholders. The objective of this framework is the smooth and effective operation of the Company and its ongoing development with transparency and reliability.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                | <p>The Company has adopted and implements the Hellenic Corporate Governance Code (HCG CODE) for listed companies. It has an Internal Operating Regulation which is posted on the Company's website (<a href="https://atrust.gr/">https://atrust.gr/</a>). Additionally, the Company has adopted Codes and a series of Policies and Procedures to ensure transparency and strong governance, including but not limited to: Business Code of Conduct and Ethics, Employee Code of Conduct, Anti-Fraud, Bribery, and Corruption Policy, Whistleblowing Policy, Policy (I) Prevention and Combating of Violence and Harassment in the Workplace &amp; (II) Management of Internal Complaints for Incidents of Violence and Harassment, Remuneration Policy for the BoD members, Privacy Protection Policy.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Social Responsibility</b>   | <p>As part of its contribution to the broader community, ALPHA TRUST Group implements a series of multifaceted sponsorship initiatives, either by consistently supporting the work of charitable foundations or by initiating sponsorship in new programs, supporting culture, education, vulnerable social groups, etc.</p> <p>Through these initiatives and actions, the Group strengthens its relationships with the communities in which it operates and promotes sustainable and resilient development for all.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Responsible Investments</b> | <p>The subsidiary of ALPHA TRUST Group, ALPHA TRUST, acting consistently in the best interests of investors and society, recognizes the responsibility to take into account environmental, social, and governance factors (ESG) in its investment process and operation.</p> <p>To set guidelines for the adoption and integration of ESG factors in investment decision-making and active ownership, ALPHA TRUST has established and maintains an ESG Investment Policy on environmental, social, and corporate governance issues related to its business activities. It has set up the ESG Committee on ESG issues related to its activities, the members of which are appointed by the Company's Board of Directors, and the Company's Chief Investment Officer is mandatorily involved. The Company's ESG Investment Policy is available on its website (<a href="https://www.alphatrust.gr/en/the-company/sustainability">https://www.alphatrust.gr/en/the-company/sustainability</a>) and is updated without notice whenever deemed appropriate or necessary.</p> <p>ALPHA TRUST, recognising the importance of responsible investment decisions based on ESG criteria, joined the "Principles for Responsible Investment" (PRI) initiative as "Investment Manager Signatory" in June 2020. By joining the PRI initiative, ALPHA TRUST adopts the Principles for Responsible Investment.</p> |

## 2.5 Policies and Commitments for Sustainable Development

Sustainable development has become a central issue in the business world, with shareholders, investors, and employees expecting companies to demonstrate their commitment to a sustainable future. Developing and implementing corporate Sustainability policies is now essential for any enterprise that seeks to ensure its resilience and meet rising societal expectations.

The ALPHA TRUST Group has created—and is further developing—a comprehensive framework of policies that guides all business activities, ensuring responsible operations and ongoing alignment with its sustainability commitments [GRI 2-23-e].

The Group's key policies and codes, designed to implement its strategy and to identify, prevent, and mitigate existing and potential adverse impacts related to the material Sustainability topics presented in this Report, include <sup>6</sup>:

- \* Internal Operating Regulation
- \* Code of Conduct and Business Ethics
- \* Code of Conduct for Employed Persons
- \* Regulatory Compliance Policy
- \* Training Policy for Board members and other executives
- \* Evaluation Policy and Procedure of the Company's Internal Control System (ICS)
- \* Policy against fraud, bribery and corruption
- \* Policy (I) Prevention and Combating of Violence and Harassment at Work & (II) Management of Internal Complaints of Incidents of Violence and Harassment
- \* Procedure for the assessment of employed persons
- \* Policy and procedure for preventing and dealing with conflict of interest situations (Law 4706)
- \* Whistleblowing Policy
- \* Privacy Policy, Cookies Policy
- \* Sustainable Development Policy

In addition, the subsidiary ALPHA TRUST has established the following policies <sup>7</sup>:

- Active Ownership & Voting Policy
- ESG Investment Policy
- Information Security Policy
- Acceptable Use of Information Systems Policy
- Information Security Incident Reporting

The commitments of the ALPHA TRUST Group are based on internationally recognized standards, such as the United Nations Universal Declaration of Human Rights, the Principles of the UN Global Compact, the recommendations of the TCFD initiative, the Sustainable Development Goals of the 2030 Agenda, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines, as well as the GRI Standards for the disclosure of sustainability information.

These policies not only meet the requirements for transparency and accountability but also strengthen the Group's commitment to operate with social and environmental responsibility, contributing to the shaping of a sustainable future

<sup>6</sup> <https://atrust.gr/i-etaireia/etairiki-diakivernisi/kanonismoi-politikes/>

<sup>7</sup> <https://www.alphatrust.gr/el/h-etaireia/etairikh-diakubernhsh/kodikis-kai-politikes>

### Remediation of Adverse Impacts

The Company's policies focus both on preventive management and on addressing adverse impacts arising from its activities. Where feasible and necessary, the Company undertakes initiatives to design and implement preventive action plans.

In particular, policies such as the Code of Ethics and Business Conduct and the Policy on (i) Prevention and Addressing of Violence and Harassment at Work and (ii) Management of Internal Reports of Incidents of Violence and Harassment underscore the Company's commitment to remedying any adverse impacts, with a particular emphasis on the protection and respect of human rights [GRI 2-23-a] [GRI 2-25-a].

The Code of Ethics and Business Conduct affirms the Company's commitment to the protection and respect of human rights. Within its sphere of influence, the Company supports and respects the protection of human rights and ensures that any form of violation or infringement is avoided. This includes, among other things, the prohibition of child and forced labour and adherence to principles of non-discrimination in the workplace. The Code—together with the related procedures and measures—applies to all “engaged persons,” which, for the purposes of the Code, include the members of the Board of Directors of ALPHA TRUST HOLDINGS and its committees, as well as natural or legal persons engaged by the Company under an employment or works/service contract, or any other form of cooperation, for the achievement of the corporate purpose. The Company also expects third parties entrusted with the performance of its critical and important functions to adopt the principles set out in the Code of Ethics and Business Conduct, and it encourages other partners, advisers, and business counterparties to do the same [GRI 2-23-b].

### Mechanisms of Receipt and Management of Complaints

ALPHA TRUST has established clear and transparent mechanisms for the receipt and management of complaints, with the aim of the immediate and fair handling of issues from clients or other interested parties.

These mechanisms ensure that all the complaints are recorded, evaluated, and resolved with impartiality and confidentiality, while the necessary corrective measures are taken for any violations or problems.

The process of support includes multiple channels of communication, such as telephone support, e-mail, or physical presence, with the Customer Service Department undertaking the initial evaluation and monitoring. ALPHA TRUST commits to the continuous improvement and monitoring of the effectiveness of these mechanisms, ensuring the adherence to the highest standards of responsibility.

Specifically, the procedures of the Company's Client Service Department, which constitute an annex to the Internal Operating Regulation that has been approved by the Board of Directors, define with clarity the steps for the examination and settlement of the complaints of the Company's Mutual Fund (M/F) clients. In parallel, in the procedures of Sales of Retail Clients, which have also been approved by the Board of Directors, the procedure of management of complaints and claims is defined, ensuring consistent and smooth handling of every issue. Additionally, the Regulation of the Shareholders' Service Unit and Corporate Announcements provides for the receipt of complaints from the shareholders, their submission to the Managing Director of the Company, and the arrangement for sending a written response within a reasonable period [GRI 2-25-b].

### Internal Reports–Disclosures Policy (Whistleblowing Policy) — Complaints Mechanism

The Company has established and implements Internal Reports–Disclosures Policy (Whistleblowing Policy), which defines the basic principles and procedures for the management of complaints that concern violations of the Internal Operating Regulation, of the corporate policies, or of the applicable legislation. The Policy ensures a framework of protection for the complainants, providing guarantees of secrecy, confidentiality, possibility of anonymity, as well as protection against retaliation. The implementation of the Policy strengthens the transparency and promotes the responsible corporate governance, ensuring that any violations are reported and are addressed immediately and fairly [GRI 2-26-b] [GRI 2-26-a].

The Codes of Ethics and Policies are communicated to all the employees, regardless of level, as well as to the suppliers and partners of the Company (where it is relevant). The communication is carried out via e-mail, while the policies are available in the Greek language on the Company's intranet and, to a large extent, on its official website [GRI 2-23-c] [GRI 2-23-f].

## 2.6 Responsible Investments

ALPHA TRUST's goal is to create long-term value and the transition to a sustainable future. The Company, acting consistently in the best interest of investors and society, recognizes the responsibility to consider environmental, social and governance (ESG) factors in its investment process and operation.

The Company has established and maintains an **ESG Investment Policy**<sup>8</sup> (or "Responsible Investment Policy") on environmental, social, and corporate governance issues, ("ESG" issues or factors or criteria) related to the Company's business activities. The purpose of the ESG Investment Policy is to set guidelines for the adoption and integration of ESG factors in investment decision-making and active ownership.

The Scope of the ESG Investment Policy applies to the entire investment activity as well as the Company's risk measurements. The Policy applies to UCITS & AIFs managed by the Company, as well as to the portfolios of institutional and private investors under management.

ALPHA TRUST, with its joining in June 2020 to the United-Nations-supported initiative Principles for Responsible Investment – PRI (Principles for Responsible Investment), constitutes part of the global network of Responsible Investments<sup>9</sup>.

### ALPHA TRUST supports the Principles for Responsible Investment

Recognizing the importance of making responsible investment decisions based on ESG criteria, ALPHA TRUST became a signatory to the "Principles for Responsible Investment" (PRI) initiative as an "Investment Manager Signatory" in 2020. By joining the PRI initiative, ALPHA TRUST commits to the following principles of responsible investment:

- ✓ Incorporation of ESG issues into investment analysis and decision-making processes.
- ✓ Active ownership and incorporation of ESG issues into our ownership policies and practices.
- ✓ Seeking appropriate disclosure on ESG issues by the entities in which the company invests.
- ✓ Promotion of acceptance and implementation of the principles within the investment industry.
- ✓ Collaboration for the enhancement of the corporate effectiveness in the implementation of the principles.
- ✓ Submission of a Transparency Report regarding the activities and implementation progress of principles.



<sup>8</sup> [esg-ependutikh-politikh\\_en.pdf](#)

<sup>9</sup> <https://www.unpri.org/signatory-directory/alpha-trust/-5892.article>

## ESG Investment Approach

The integration of ESG criteria (environmental, social and corporate governance criteria) effectively complements the existing investment process of ALPHA TRUST and aims to formulate an integrated investment policy that, in addition to adapting to regulatory requirements, creates the responsible investment management framework. The above criteria are part of the quantitative and qualitative analysis of investments made both at company level and at sector or country level.

In the context of this process, ALPHA TRUST actively seeks investments in sectors and businesses with a positive impact on ESG issues. The **Sustainability Risk Policy** that the Company has established and maintains defines how the ESG criteria are integrated into the investment strategy and process.

## Transparency of Remuneration Policy and of Voting Rights Policy in relation to the integration of sustainability risks

ALPHA TRUST has established and maintains Remuneration Policy in accordance with the provisions of Directive 2009/65/EU on UCITS and the Regulation supplementing Directive 2011/61/EU on AIFMs. The remuneration policy is consistent with and promotes sound and effective risk management – explicitly including sustainability risk – and does not encourage excessive risk-taking and/or risk-taking which is inconsistent with the risk profiles, funds' rules or instruments of incorporation of the UCITS and AIFs that the Company manages. Details regarding the Remuneration Policy are disclosed on the Company's website <sup>10</sup>.

## Active Ownership Practices

### Active Participation

Constructive dialogue with companies is a key part of ALPHA TRUST's investment process, especially in domestic investment choices. The aim is to better understand and assess the business model, strategy, management quality, significant risks and opportunities, including those related to ESG issues of the companies and industries in which they operate. Through dialogue with company management, visits, regular meetings and/or teleconferences, among others, the Company encourages the disclosure of information on ESG issues, improving performance, reducing the risk profile, and developing more sustainable business practices.

### Voting rights

ALPHA TRUST has established and maintains an Active ownership and of Voting Rights Policy in which - among other things - declares the corporate governance practices of issuers that are acceptable to the Company and provides for the handling of any conflict-of-interest issues that may arise, as well as the keeping of relevant records and the provision of additional details of actions taken on the basis of this Policy. Details of the Active Participation and Voting Rights Policy are retained on the Company's website <sup>11</sup>.

<sup>10</sup> <https://www.alphatrust.gr/h-etaireia/etairikh-diakubernhsh/kodikes-kai-politikes>

<sup>11</sup> <https://www.alphatrust.gr/h-etaireia/etairikh-diakubernhsh/kodikes-kai-politikes>

### ALPHA TRUST GLOBAL LEADERS Foreign Equity Fund

In 2022, for the purpose of promoting sustainability, ALPHA TRUST created an investment product with a targeted investment strategy and environmental, social, and corporate governance characteristics (ESG).

The Mutual Fund **ALPHA TRUST GLOBAL LEADERS Foreign Equity Funds** Hellenic Capital Market Commission Licence: 134th/4.8.1999/6) amended its Fund's Rules and its name (on the basis of approval decision no. 408/25-2-2022 of the Hellenic Capital Market Commission) and falls within Article 8 of Regulation (EU) 2019/2088, as promotes, among other characteristics, environmental or social characteristics or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices.

The Mutual Fund (M/F) integrates ESG criteria (environmental, social, and corporate governance) into the investment evaluation, which are taken into account together with the other parameters (financial and other fundamental elements) for investment decision-making. Although it does not have sustainable investments as its objective, it promotes environmental or social characteristics in accordance with the Company's ESG Investment Policy and its Policy on Active Ownership and Exercise of Voting Rights.

In the evaluation, investments with positive ESG impact, low sustainability risk, and significant growth prospects are preferred, while issuers with a low ESG score and negative impacts on sustainability are excluded. In addition, social and environmental impact and corporate governance are monitored through active ownership and the exercise of voting rights.

In order to meet the environmental and/or social characteristics that it promotes, the Mutual Fund will place at least 75% of its investments in instruments and products that have a moderate or high "ESG score," as reflected in the ESG score provided by a third-party recognized data provider.

For the achievement of the environmental or social characteristics that the Mutual Fund promotes, no specific reference index has been designated.

It is noted that, by decision no. 640/23.5.2025 of the Head of the Entities Directorate of the Hellenic Capital Market Commission, the name of the UCITS under management was modified from "ALPHA TRUST GLOBAL LEADERS ESG Foreign Equity Fund" to "ALPHA TRUST GLOBAL LEADERS Foreign Equity Fund" (removal of the term "ESG") in the context of compliance with ESMA guidelines (no. ESMA34-1592494965-657) and the maintenance of the risk/return profile, while at the same time strengthening strategic flexibility and the integration of ESG criteria.

Further information is available on the Company's website <sup>12</sup>.



UCITS OFFER NO GUARANTEED RETURN AND PAST PERFORMANCE DOES NOT GUARANTEE THE FUTURE ONE

<sup>12</sup> <https://www.alphatrust.gr/en/mutual-funds/alpha-trust-global-leaders/r/overview>

## 2.7 Our Commitment to Human Rights

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The ALPHA TRUST Group demonstrates an ongoing and consistent commitment to protecting and promoting human rights within its sphere of influence. We respect and support internationally recognized human rights and maintain zero tolerance for child labour, forced labour, and discrimination—both in the workplace and across the broader social environment.

Recognizing the inherent value of every individual, we have taken preventive measures to ensure that our operations and investments comply with the highest human-rights standards. As part of this commitment, we completed a detailed human-rights gap analysis in collaboration with the UNGC Hellas local network. This assessment identified potential areas for improvement and confirmed our commitment to the continuous enhancement of our human-rights practices.

Our active participation in the United Nations Global Compact (UNGC) and our registration as a “participant” reinforce the Company’s transparent and responsible approach to sustainability and human rights. By aligning with the UNGC principles, we underscore our commitment to fostering an environment that combines profitability with social responsibility.

ALPHA TRUST Group’s approach to human rights—together with our engagement in global initiatives and responsiveness to external assessments—places us among the companies that advance human rights and sustainable development [GRI 404-1].

## 2.8 Supply Chain Responsibility

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At the ALPHA TRUST Group, we consider that every point of contact in our operational process — from data providers to software suppliers — is critical to achieving a sustainable future.

For this reason, we seek to ensure that our partners and suppliers align with the values and principles of sustainable development. We focus on building relationships with partners who prioritize ethical and sustainable practices, thereby safeguarding our reputation and promoting positive change across the broader financial ecosystem [GRI 2-6-b-ii].

## 2.9 Participation in Initiatives and Organisations

The ALPHA TRUST Group actively participates in domestic and international initiatives and Organisations that aim to promote Sustainable Development and address related challenges. Among these are:

|                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Signatory of:</p>  <p><b>PRI</b> Principles for Responsible Investment</p> | <p>Since 2020, ALPHA TRUST has supported the PRI initiative, integrating the principles of Responsible Investment and strengthening its commitment to sustainable investments through the application of ESG criteria<sup>13</sup>.</p>                                                                           |
| <p><b>WE SUPPORT</b></p>  <p>UN GLOBAL COMPACT</p>                            | <p>Since 2021, ALPHA TRUST HOLDINGS participates as a “Participant” in the UN Global Compact (UNGC)<sup>14</sup> and as a “Member” in the Global Compact Network Hellas. Through this participation, it promotes the principles of sustainable development and supports social and environmental initiatives.</p> |
| <p><b>TCFD</b></p> <p>TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES</p>                                                                                  | <p>The Company supports the international TCFD initiative, which focuses on improving transparency regarding climate-related risks and opportunities, enhancing Organisations’ ability to manage climate issues<sup>15</sup>.</p>                                                                                 |
| <p><b>The Net Zero Asset Managers initiative</b></p>                                                                                                           | <p>Since 2023, ALPHA TRUST participates in the Net Zero Asset Managers Initiative (NZAM), committing to reduce its carbon footprint<sup>16</sup>.</p>                                                                                                                                                             |
| <p><b>SUSTAINABLE DEVELOPMENT GOALS</b></p>                                                                                                                    | <p>The ALPHA TRUST Group contributes actively to the achievement of the UN Sustainable Development Goals (SDGs) by integrating sustainable practices into its business activities.</p>                                                                                                                            |
| <p><b>ΣΕΒ</b></p>  <p>ΕΛΛΗΝΙΚΗ ΟΜΟΣΠΟΝΔΙΑ ΕΠΙΧΕΙΡΗΣΕΩΝ</p>                  | <p>As a member of SEV (Hellenic Federation of Enterprises), ALPHA TRUST supports the Federation’s initiatives to promote and disseminate the principles of sustainable development and works to integrate them into business activities.</p>                                                                      |
| <p><b>ΕΟΕ</b></p> <p>ΕΛΛΗΝΙΚΗ ΟΜΟΣΠΟΝΔΙΑ ΕΠΙΧΕΙΡΗΣΕΩΝ</p>                                                                                                      | <p>The Chief Executive Officer of ALPHA TRUST, Chris Aesopos, has been President of EOE (Hellenic Fund and Asset Management Association — HFAMA) since 2020 and participates actively in promoting the principles of sustainable development in the sector of collective investments.</p>                         |
| <p><b>IIGCC</b></p> <p>The Institutional Investors Group on Climate Change</p>                                                                                 | <p>In 2023, ALPHA TRUST participated in the International Investors Group on Climate Change (IIGCC) initiative</p>                                                                                                                                                                                                |

[GRI 2-28]

<sup>13</sup> <https://www.unpri.org/signatory-directory/alpha-trust-/5892.article>

<sup>14</sup> [www.unglobalcompact.org/what-is-gc/participants/149347-ALPHA-TRUST](http://www.unglobalcompact.org/what-is-gc/participants/149347-ALPHA-TRUST)

<sup>15</sup> [Supporters | Task Force on Climate-Related Financial Disclosures \(fsb-tcf.org\)](https://www.taskforceonclimate-relatedfinancialdisclosures.org/)

<sup>16</sup> <https://www.netzeroassetmanagers.org/signatories/alphatrust/>

## 2.10 Systematic Management of Sustainability Topics

ALPHA TRUST HOLDINGS has adopted a comprehensive approach to managing environmental, social, and corporate governance (ESG) topics.

To ensure the effective implementation of Sustainability principles, the Company has established an **ESG Committee**, which guides and monitors the execution of the Company's sustainability strategy. The **Sustainability Integration Department** works closely with the ESG Committee, implementing Sustainability initiatives and providing detailed data and reports to track the Group's progress.

The management of sustainability matters is also coordinated by the **Sustainability Team**, comprising executives representing various Group Divisions as well as members of the Board of Directors, to enable timely updates and decision-making on ESG issues. The Sustainability Integration Manager coordinates the Team, which plays a critical role in collecting and organizing data and in drafting the annual Sustainability Report.

Specifically, the Sustainability Team is responsible for the following:

The development and implementation of the annual action plan for each Sustainable Development pillar



The collection, Organisation and checking/control of the data of the annual Sustainability Reports



The determination of the strategic priorities for the development of practices for each Sustainable Development pillar



The coordination of the related actions



The management of the Group's ESG matters.



## 2.11 Dialogue with Stakeholders

At the ALPHA TRUST Group, we recognize the important contribution of stakeholders to shaping our sustainability strategy and decision-making. We are committed to actively integrating their views and concerns into our initiatives and into the Group's process for identifying material topics. Our goal is to ensure that our actions respond to stakeholder needs and expectations, pursuing open and meaningful dialogue [GRI 2-29-a-ii].

Transparency, accountability, and the continual improvement of our initiatives are central objectives for us. We acknowledge the importance of trust and are dedicated to fostering a sustainability culture that benefits everyone.

As part of materiality identification, the Company has carried out a detailed internal analysis, industry benchmarking, and a review of the broader context to identify and prioritize stakeholder groups. Based on criteria such as relevance to the Group, impact on our activities, and level of influence, we have identified ten key stakeholder groups. This approach has enabled us to better understand stakeholder needs and expectations and to embed them into our Sustainable Development strategy [GRI 2-29-a-i].

The table below presents the main topics of interest to each stakeholder group, as well as the communication channels through which these topics are recorded and communicated [GRI 2-29-a-ii].

| Stakeholders                                                                                                            | Communication Channels                                                                                                                                                                                                                                  | Key Topics                                                                                                                                                                                                                                                                                                         | Frequency           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <br>Shareholders                       | <ul style="list-style-type: none"> <li>Shareholder Service &amp; Corporate Announcements Unit</li> <li>General Meetings</li> <li>Periodic meetings/presentations</li> </ul>                                                                             | <ul style="list-style-type: none"> <li>Value maximization (capital gains &amp; dividends)</li> <li>Integrity &amp; legal compliance</li> <li>transparency &amp; business ethics</li> <li>CSR</li> <li>effective risk management</li> </ul>                                                                         | Ongoing / as needed |
| <br>Employees                        | <ul style="list-style-type: none"> <li>Intranet/ internal communications</li> <li>open-door policy</li> <li>annual appraisals</li> <li>satisfaction surveys</li> <li>anonymous reporting</li> <li>corporate events/initiatives</li> </ul>               | <ul style="list-style-type: none"> <li>Recognition &amp; reward</li> <li>meritocracy &amp; fairness</li> <li>development, career, training</li> <li>health &amp; safety</li> <li>equal opportunities &amp; zero discrimination</li> <li>pay &amp; benefits</li> <li>work-life balance</li> </ul>                   | Daily               |
| <br>Retail & Institutional Investors | <ul style="list-style-type: none"> <li>Investment account reporting</li> <li>digital platform</li> <li>emails</li> <li>Phones</li> <li>conference calls, call center</li> <li>in-person meetings</li> <li>briefings</li> <li>industry events</li> </ul> | <ul style="list-style-type: none"> <li>Risk-adjusted performance</li> <li>integrity</li> <li>high transparency &amp; accountability</li> <li>zero tolerance for fraud, bribery &amp; corruption</li> <li>reliable services</li> <li>confidentiality &amp; data protection</li> <li>transaction security</li> </ul> | Daily               |
| <br>Network of Agents                | <ul style="list-style-type: none"> <li>Phone</li> <li>periodic meetings</li> <li>web conferences; briefings</li> <li>market &amp; economy updates</li> </ul>                                                                                            | <ul style="list-style-type: none"> <li>Investment products aligned with investor needs</li> <li>competitive benefits &amp; incentives package</li> </ul>                                                                                                                                                           | Daily               |
| <br>Suppliers                        | <ul style="list-style-type: none"> <li>Meetings at Group or supplier premises;</li> <li>Phone</li> <li>email</li> </ul>                                                                                                                                 | <ul style="list-style-type: none"> <li>Ethical &amp; responsible business</li> <li>human-rights respect</li> <li>environmental protection</li> <li>anti-corruption &amp; anti-bribery</li> <li>economic development</li> </ul>                                                                                     | Daily               |

| Stakeholders                                                                                                             | Communication Channels                                                                                                                                            | Key Topics                                                                                                                                                                                | Frequency |
|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
|  <b>Local community</b>                 | <ul style="list-style-type: none"> <li>Public dialogue</li> <li>company visits</li> <li>Web Conferences</li> </ul>                                                | <ul style="list-style-type: none"> <li>Promoting sustainable development</li> <li>human-rights respect</li> <li>environmental protection</li> </ul>                                       | Periodic  |
|  <b>State &amp; regulators</b>          | <ul style="list-style-type: none"> <li>Phone</li> <li>email</li> <li>meetings</li> <li>digital platforms (public services, tax, banks, HCMC, Exchange)</li> </ul> | <ul style="list-style-type: none"> <li>Compliance with policies and regulations</li> <li>integrity &amp; transparency</li> </ul>                                                          | Periodic  |
|  <b>Financial-institution community</b> | <ul style="list-style-type: none"> <li>Meetings</li> <li>digital platform</li> </ul>                                                                              | <ul style="list-style-type: none"> <li>Transaction security</li> <li>data protection</li> <li>creditworthiness</li> <li>competitive fees</li> <li>integrity &amp; transparency</li> </ul> | Periodic  |
|  <b>Analysts</b>                        | <ul style="list-style-type: none"> <li>Email</li> <li>web conferences</li> <li>events &amp; presentations</li> </ul>                                              | <ul style="list-style-type: none"> <li>High level of competitive information</li> </ul>                                                                                                   | Periodic  |
|  <b>Media</b>                         | <ul style="list-style-type: none"> <li>Email</li> <li>events &amp; presentations</li> </ul>                                                                       | <ul style="list-style-type: none"> <li>Reliable, accurate, timely, objective information</li> </ul>                                                                                       | Daily     |

**Common channels:**

Annual Financial Report, Sustainability Report, corporate website.

Press Releases, Mass Media, and Social Media.



In 2021, ALPHA TRUST carried out an extensive analysis to identify the material topics related to its activities, focusing on the pillars of Sustainable Development. The process included recording and assessing the Group's most significant issues, examining both the potential impact of each issue and stakeholder pressure.

The stages of the process include:

1. **Identification and understanding of Material Topics:** Conducting industry research and analysis, combined with the Company's strategic priorities and SASB guidance.
2. **Assessment and prioritization:** Documenting the issues' impacts on society and the environment, as well as assessing their effects on the Company's value.
3. **Validation and review:** Management review and approval of the topics, ensuring consistency with strategic priorities.

For 2024, the ESG Committee of ALPHA TRUST HOLDINGS updated the Company's material topics, which are presented below. Linking the identified material topics to the UN Sustainable Development Goals (SDGs) enables monitoring of performance against the goals most relevant to the Company's activities [GRI 3-1-a] [GRI 3-1-b] [GRI 3-2-a] [GRI 3-2-b].

## SUSTAINABILITY REPORT 2024

### 2.13 Performance Monitoring & Evaluation (Selected KPIs)

The ALPHA TRUST Group has developed a monitoring and evaluation system to manage and improve its performance in critical areas of Sustainable Development. This system enables accurate measurement of progress against defined targets, strengthening the achievement of the Sustainable Development Goals (SDGs). The performance indicators for 2023 and 2024 are presented below:

| SDG                                                                                                                                                                                                                                                                                                                                                                                                                              | Material Topic                       | Indicator                                                  |      | 2023                                  | 2024                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------|------|---------------------------------------|---------------------------------------|
|  <br>                                                                                        | Creation of Economic Value           | Assets under Management                                    | € bn | 1.61                                  | <b>1.86</b>                           |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                      | Dividends                                                  | € m  | 0.7                                   | <b>1.7</b>                            |
|  <br> <br> | Customer/Investor Satisfaction       | Disclosure via Sustainability Report                       | #    | 2 <sup>nd</sup> Sustainability Report | 3 <sup>rd</sup> Sustainability Report |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                      | Share capital owned by employees & Management              | %    | <b>57.77</b>                          | <b>58.52</b>                          |
|  <br>                                                                                                                                                                   | Health, Safety & Well-being          | Employee incidents leading to time off (LTI)               | #    | 0                                     | <b>0</b>                              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                      |                                                            |      |                                       |                                       |
|                                                                                                                                                                                                                                                            | Transparency & Anti-corruption       | New hires trained on Anti-fraud/Bribery/Corruption Policy  | %    | 100%                                  | <b>100%</b>                           |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                      | Complaints or fines                                        | €    | 0                                     | <b>0</b>                              |
|  <br>                                                                                                                                                                   | Corporate culture & work environment | Employees with >20 years at Group                          | %    | 41.51                                 | <b>42.00</b>                          |
|  <br>                                                                                                                                                                   | Diversity & equal opportunities      | Women in Senior Management                                 | %    | 20                                    | <b>40</b>                             |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                      | Women as % of total employees                              | %    | <b>54.72</b>                          | <b>56.00</b>                          |
|                                                                                                                                                                                                                                                            | Regulatory compliance                | Share of training programs on systems/policies/regulations | %    | 11                                    | <b>32</b>                             |

| SDG                                                                                                                                                                                                                                                                                                                                                                                                                                       | Material Topic                       | Indicator                                                                                            |                    | 2023                                    | 2024                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------------------------------|--------------------|-----------------------------------------|----------------------------------------------|
|  <br>                                                                                                                                                                                  | Training & development               | Employees appraised                                                                                  | %                  | 98                                      | <b>98</b>                                    |
|                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      | Investment in employee training                                                                      | €                  | 5,263                                   | <b>7,798</b>                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      | Number of seminars                                                                                   | #                  | 23                                      | <b>31</b>                                    |
|                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      | Average training hours per employee                                                                  | #                  | 13.4                                    | <b>9.2</b>                                   |
|                                                                                                                                                                                                                                                                         | Product & service innovation         | First in Greece licensed for Private Client Portfolio Management.<br>first with Morningstar™ ratings |                    | digital UCITS platform (retail & agent) | digital UCITS platform (retail & agent)      |
|  <br>                                                                                               | Climate Change                       | Direct & Indirect emissions (location based)                                                         | tCO <sub>2</sub> e | 47.45                                   | <b>48.90</b>                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      | Participation in climate initiatives                                                                 |                    | UNGC<br>PRI<br>NZAM<br>IIGCC            | <b>UNGC<br/>PRI<br/>NZAM (U/R)<br/>IIGCC</b> |
|  <br>                                                                                                                                                                            | Energy efficiency & air emissions    | Energy consumption within the Organisation                                                           | MWh                | 122.02                                  | <b>160.96</b>                                |
|  <br>                                                                                                                                                                            | Digitalization & data security       | Digitization of physical archive                                                                     | %                  | >90                                     | <b>&gt;90</b>                                |
|                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      | Completion of B2B digital platform                                                                   | #                  | B2B & Retail                            | <b>B2B &amp; Retail</b>                      |
|  <br> <br> | Integration of Sustainability Topics | Portfolios (AuM) assessed for Sustainability Risk                                                    | %                  | 100                                     | <b>100</b>                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      | Coverage of AuM considered in Sustainability Risk assessment                                         | %                  | 80                                      | <b>81</b>                                    |
|                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      | AuM with above-average ESG performance                                                               | %                  | 94                                      | <b>95</b>                                    |

| SDG                                                                                                                                                                                                                                                                                                                                     | Material Topic      | Indicator                                          |      | 2023   | 2024          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------------------------------|------|--------|---------------|
|                                                                                                                                                                                                                                                                                                                                         |                     | PRI Transparency Report submitted                  | #    | 2023   | <b>2024</b>   |
|     | Social contribution | Donations/sponsorships to non-profit Organisations | €    | 27,630 | <b>40,147</b> |
|                                                                                      | Waste management    | Hazardous waste                                    | tons | 0      | <b>0</b>      |
|                                                                                                                                                                                                                                                                                                                                         |                     | Share of waste sent for recycling                  | %    | 100    | <b>100</b>    |

This report highlights the ALPHA TRUST Group's performance in the defined areas of Sustainable Development and guides the continuous improvement of its strategy.

## 2.14 Our Targets for a Sustainable Future

The ALPHA TRUST Group's commitment to sustainable development is expressed through the strategic goals it sets for the future. These goals provide clear direction for our actions, promote responsible entrepreneurship, and encourage continual improvement. Through our ESG goals, the Group recognizes emerging challenges and opportunities, ensuring resilience and competitiveness in a constantly changing world. Our long-term goals reflect our commitment to sustainability, transparency, and sustainable growth. Our aim is to combine financial success with social responsibility and environmental commitment, creating a balance that benefits all stakeholders.

| ESG Target |                                                                                                      | Year | Status | Impacts                                                                                                                                                                                                                                                                                                                                                                     | Material Topic                                                                                                                                                                                                               |
|------------|------------------------------------------------------------------------------------------------------|------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1          | Training 100% of employees on ESG topics                                                             | 2025 | ✓      | <ul style="list-style-type: none"> <li>Promotion of sustainable business practices</li> <li>Informed and sensitized employees/citizens on sustainability issues</li> <li>Strengthening corporate culture</li> <li>Improved Company reputation and market value</li> <li>Increased job satisfaction through participation in social and environmental improvement</li> </ul> | <ul style="list-style-type: none"> <li>Creation of Economic Value</li> <li>Climate Change</li> <li>Diversity &amp; Equal Opportunities</li> <li>Transparency &amp; Anti-Corruption</li> <li>Regulatory Compliance</li> </ul> |
| 2          | Active engagement with portfolio companies to implement ESG practices                                | 2030 | ✓      | <ul style="list-style-type: none"> <li>Reduction of investment risks</li> <li>Improvement of working and social conditions</li> <li>Emissions reduction and better management of natural resources</li> </ul>                                                                                                                                                               | <ul style="list-style-type: none"> <li>Integration of Sustainability Topics</li> </ul>                                                                                                                                       |
| 3          | Develop the approach for measuring adverse impacts of investment decisions on sustainability factors | 2030 | ✓      | <ul style="list-style-type: none"> <li>Reduced operating costs</li> <li>Workplace flexibility</li> <li>Reduced paper consumption and waste</li> <li>Reduced energy consumption and emissions</li> </ul>                                                                                                                                                                     | <ul style="list-style-type: none"> <li>Integration of Sustainability Topics</li> </ul>                                                                                                                                       |
| 4          | Further digitisation of services                                                                     | 2025 | ✓      | <ul style="list-style-type: none"> <li>Reduced operating costs</li> <li>Workplace flexibility</li> <li>Reduced paper consumption and waste</li> <li>Reduced energy consumption and emissions</li> </ul>                                                                                                                                                                     | <ul style="list-style-type: none"> <li>Customer/Investor Satisfaction</li> </ul>                                                                                                                                             |
| 5          | Office equipment upgrade across the Organisation                                                     | 2023 | ✓      |                                                                                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>Digitalization &amp; Data Security</li> </ul>                                                                                                                                         |
| 6          | Train 100% of employees on health & safety                                                           | 2025 | ✓      | <ul style="list-style-type: none"> <li>Reduced risks of accidents and injuries</li> <li>Strengthened safety culture</li> <li>Increased employee satisfaction</li> </ul>                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>Training &amp; Development</li> <li>Health, Safety &amp; Well-being</li> </ul>                                                                                                        |
| 7          | Reduce environmental footprint                                                                       | 2030 | ✓      | <ul style="list-style-type: none"> <li>Contribution to tackling climate change and conserving natural resources for future generations</li> <li>Emissions reduction and energy savings leading to lower operating costs</li> <li>Lower CO<sub>2</sub>e emissions and greater environmental efficiency through e-mobility</li> </ul>                                         | <ul style="list-style-type: none"> <li>Climate Change</li> <li>Energy Savings &amp; Air Emissions</li> <li>Waste Management</li> </ul>                                                                                       |
| 8          | Electrification of the corporate fleet and installation of charging points at Company facilities     | 2025 | ✓      |                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                              |
| 9          | Develop a Net-zero strategy                                                                          | 2022 | ✓      |                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                              |
| 10         | Maximize value for shareholders and the broader society                                              | 2050 | ✓      | <ul style="list-style-type: none"> <li>Job creation</li> <li>Support for local communities</li> <li>Contribution to economic development in a responsible and sustainable manner</li> </ul>                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>Creation of Economic Value</li> <li>Corporate Culture &amp; Work Environment</li> <li>Product &amp; Service Innovation</li> <li>Social Contribution</li> </ul>                        |
| 11         | Alignment with the goals of the Paris Agreement                                                      | 2050 | ✓      | <ul style="list-style-type: none"> <li>Reduction of environmental footprint</li> <li>Promotion of environmental protection practices</li> </ul>                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>Climate Change</li> <li>Energy Savings &amp; Air Emissions</li> </ul>                                                                                                                 |

Achieved  In progress  Under review 

## 2.15 Distinctions

The ALPHA TRUST Group has repeatedly demonstrated its commitment to excellence, as evidenced by the numerous distinctions it has received in its field.

In 2024, ALPHA TRUST was once again honored with significant awards at the HRIMA Business Awards, organized for the 21st consecutive year by HRIMA magazine in partnership with ethosEVENTS and the financial portal banks.com.gr.

The HRIMA Business Awards are a landmark institution, recognized by the business and investment community. Their aim is to highlight companies that contribute to the development of the Greek economy and the capital markets, rewarding their performance and contribution to the economic sector.



In 2024, ALPHA TRUST won first prize in the “Best Asset & Wealth Management Company” category, confirming its position as a leading firm in wealth management.



In 2024, ALPHA TRUST HOLDINGS won first prize for the second consecutive year in the “Corporate Governance” category, underscoring its excellence in management and corporate strategy.

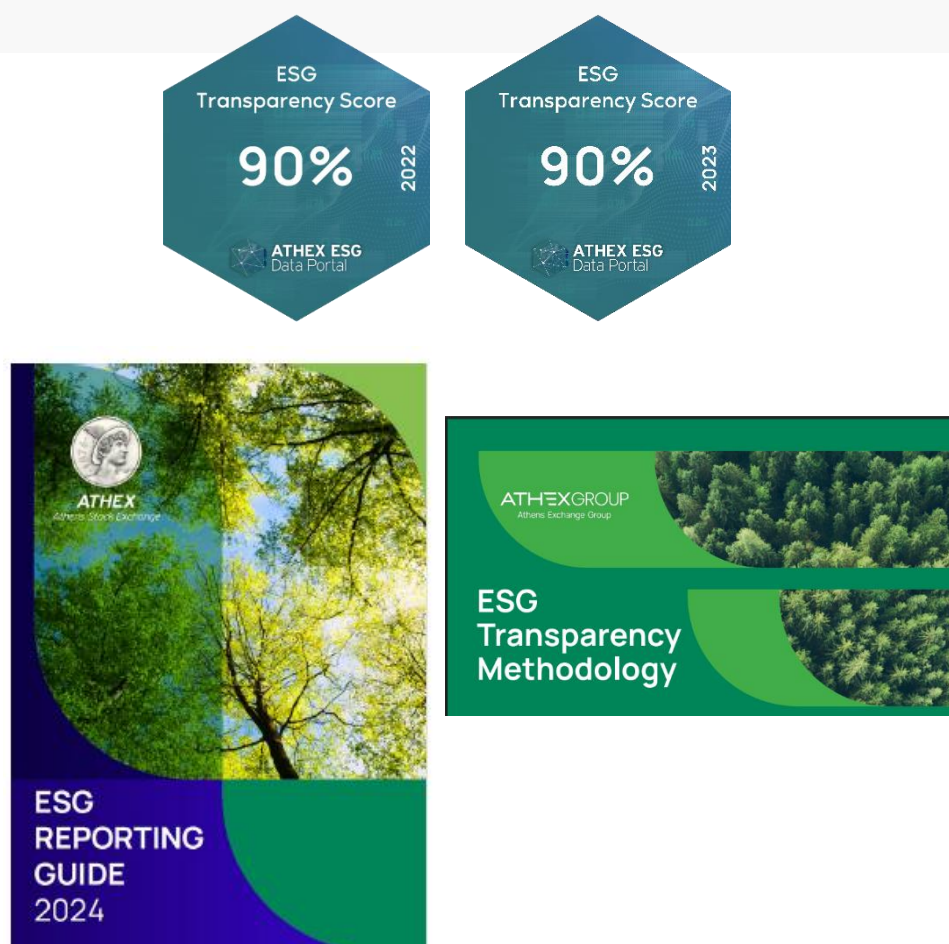


## 2.16 Our inclusion in the ATHEX ESG Index

In 2023, **ALPHA TRUST HOLDINGS** achieved a 90% score on the Athens Exchange (ATHEX) “ESG Transparency Score” following an in-depth evaluation across Environment, Social, and Corporate Governance. The data were recorded in the **ATHEX ESG Data Portal**, placing the Company among the leading Athens Exchange-listed companies in the Greek market.

The Company’s high score is based on the “**ESG Transparency Methodology**”<sup>17,18</sup> which measures how transparently companies report against the indicators of the ATHEX ESG Reporting Guide. The assessment examines Core, Advanced, and Sector-Specific indicators, as well as the publication of a sustainability report. In total, 59 indicators with 113 sub-metrics are evaluated; for each sector, at least 84 measurements are taken into account—based on the **ATHEX ESG Reporting Guide**.

ALPHA TRUST HOLDINGS’ inclusion in the **ATHEX ESG Index** was confirmed for the **third consecutive year** during the regular review of the Athens Exchange Equity Market Indices on **November 20, 2024**<sup>19</sup>. This distinction reaffirms the Company’s commitment to sustainability and transparency, strengthening its position as a pioneer in Sustainable Development in the Greek market



<sup>17</sup> [ESG Transparency Methodology](#)

<sup>18</sup> [https://www.athexgroup.gr/sites/default/files/2025-06/ESG-GUIDE-EN\\_14052025.pdf](https://www.athexgroup.gr/sites/default/files/2025-06/ESG-GUIDE-EN_14052025.pdf)

<sup>19</sup> [Semi-annual Review of the ATHEX Stock Market Indices.](#)

## 2.17 Promoting Sustainability

The ALPHA TRUST Group actively supports initiatives that advance sustainable development, equality, and diversity in the financial sector. In this context, it participated in the World Federation of Exchanges' global "Ring the Bell for Gender Equality" initiative.

Ms. Nota Zagari, Head of Greek Equities at ALPHA TRUST, took part in a discussion organized by the Athens Exchange Group titled "Investing in Women: The Importance of Women's Participation in the Financial Sector." She shared her experience and views on strengthening women's presence and leadership in the field, highlighting good practices and innovative approaches <sup>20</sup>.



<sup>20</sup> (6) Post | LinkedIn

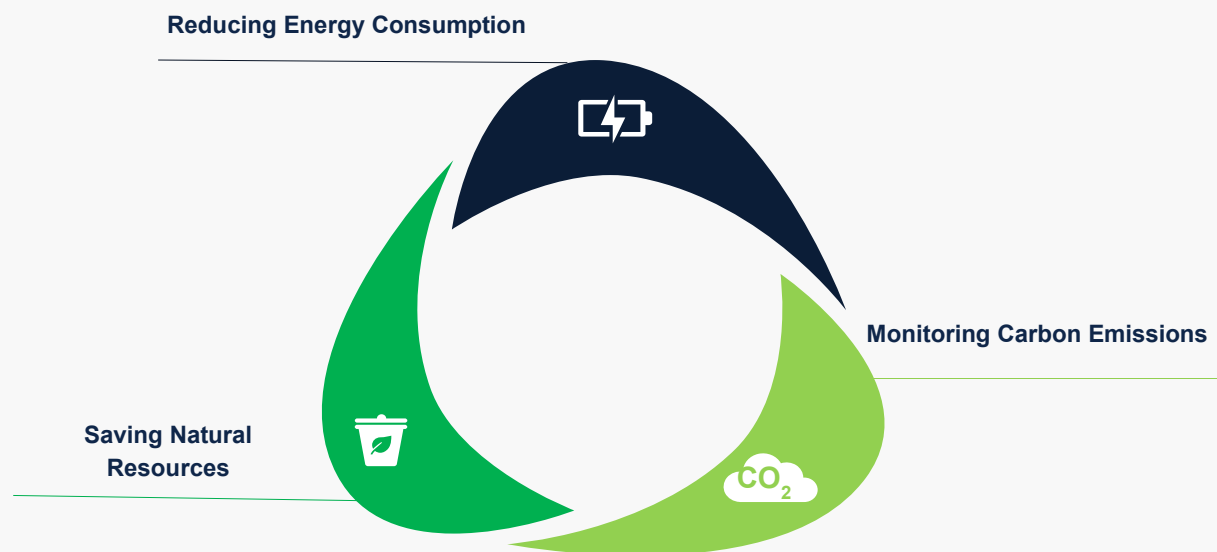
### 3. Environment

Guided by sustainable development and responsible operations, the ALPHA TRUST Group has set environmental protection as a key priority. It monitors international developments and standards in environmental protection and adopts industry's best practices to continuously reduce its environmental footprint.

Employees are informed on environmental responsibility and actively participate in initiatives aimed at reducing their environmental impacts — strengthening the Group's commitment to promoting sustainable development.

#### Pillars of Environmental Action

The Group's environmental initiatives focus on the following pillars:



### 3.1 Energy Consumption

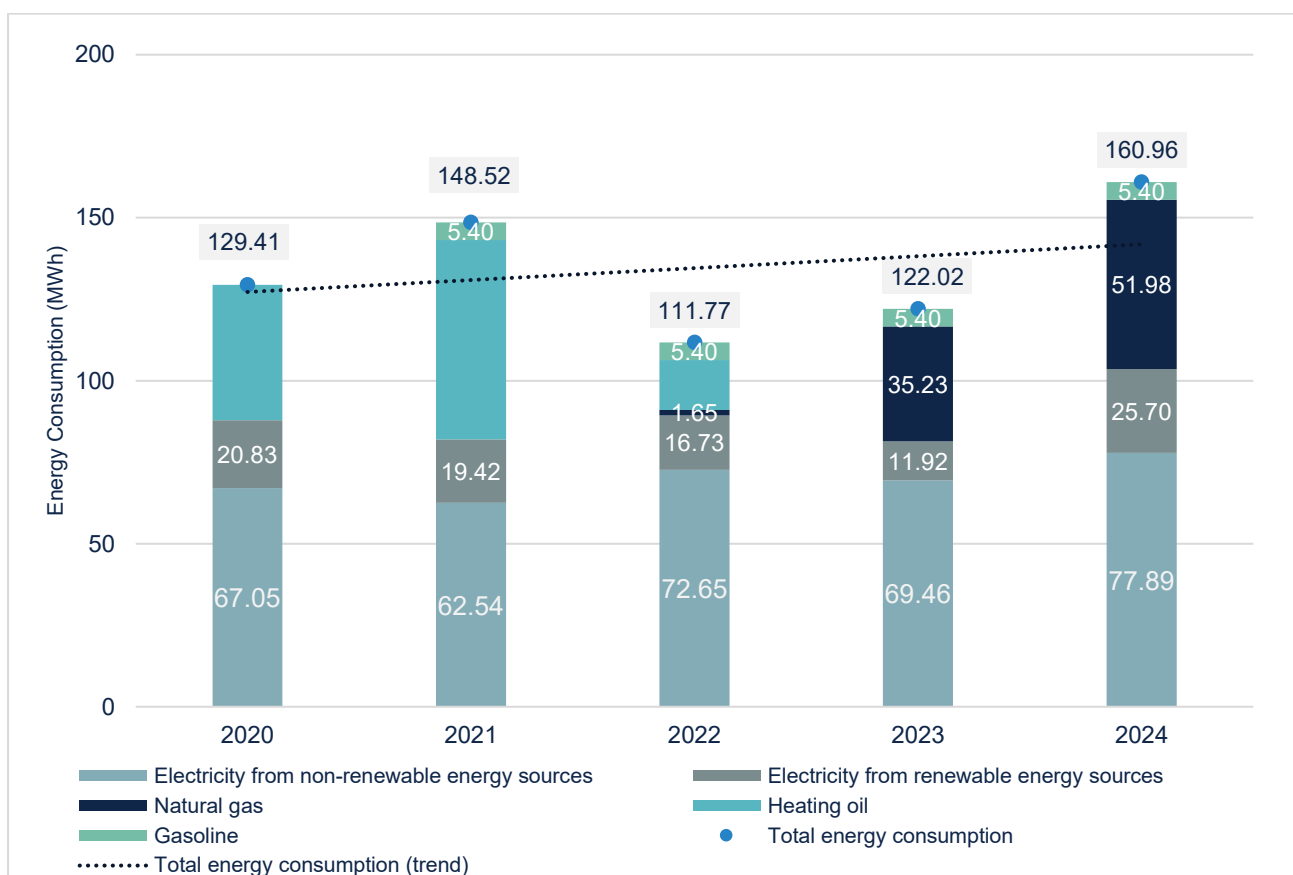
ALPHA TRUST Group systematically monitors energy consumption at its facilities, including the offices at 21 Tatoiou and 1 Aristeidou, in Kifisia [GRI 3-3-e-i]. Continuous monitoring allows the identification of optimization opportunities and the implementation of targeted actions to reduce the Group's energy footprint.

#### Total Energy Consumption

In 2024, Group's total energy consumption reached 160.96 MWh, an increase of 31.92% compared with the previous year<sup>21</sup>. This increase is due to the return to normal working conditions, higher energy needs caused by extreme weather, and greater use of chargers for the Group's electric-vehicle fleet.

To address this, targeted energy-saving measures are being implemented and strengthened to reduce the Group's energy footprint [GRI 3-3-e-i] [GRI 3-3-e-iii].

#### Total energy consumption within the Organisation (MWh<sup>22</sup>) [GRI 302-1]



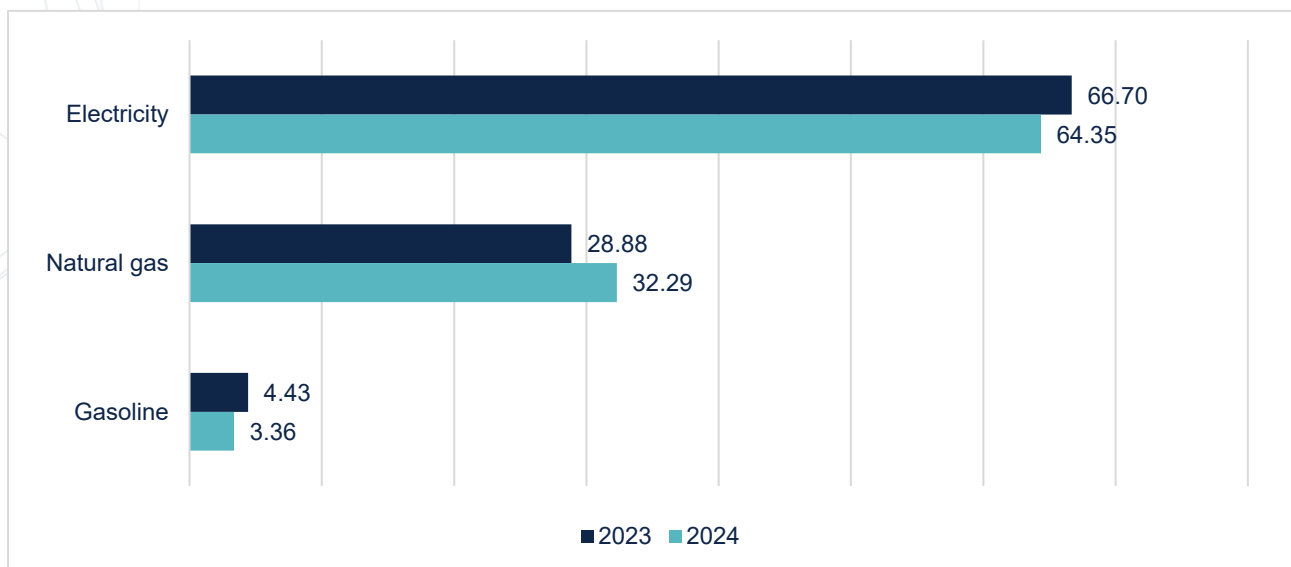
<sup>21</sup> The indicators and amounts referred to in this chapter may present slight differences compared to the corresponding figures that have been published for the year 2024 in other reports, such as the Company's "ANNUAL CONSOLIDATED AND CORPORATE FINANCIAL REPORT." This is observed because, during the drafting of this Report, a more detailed recording and calculation of the Company's total consumption was carried out, regarding the consumption of fossil fuels for heating as well as the consumption of its vehicles, for greater accuracy. At the same time, the updated emission factors of the country's energy mix for 2024 (ΔΑΠΕΕΠ, 2025) were used, while for the calculation of total GHG emissions the relevant tool of the Ministry of Environment and Energy (ΥΠΕΝ) was also used. The above changes and this methodology enhance transparency in the future recording, comparison, and disclosure of the Company's relevant environmental indicators.

<sup>22</sup> Total energy consumption = Energy consumption from non-renewable sources + Energy purchased for consumption + Energy produced – Energy sold.

### Energy Consumption by Source

In 2024, the Group's main energy source was electricity, which covered 64.35% of total consumption, down from 66.70% in 2023. At the same time, the increase in the use of natural gas continued, accounting for 32.29% of total consumption (compared to 28.88% in 2023), as it was used as a secondary energy source at the headquarters. In addition, the Company's gasoline-powered corporate vehicle (motorcycle) consumed 3.36% of total energy. It is noteworthy that since 2023 the use of oil has been completely eliminated.

#### Energy consumption by source within the Organisation (%)



### Energy Consumption from Electricity

Electricity is the Group's primary energy carrier, covering needs for lighting, air conditioning, heating (via heat pumps at the headquarters), and the operation of information systems. In 2024, an increase of 27.29% in electricity consumption was recorded compared to 2023. The increase is due to the return to full operation, increased needs resulting from extreme weather events, and the use of electric vehicle charging stations. At the same time, interventions to improve energy efficiency continue, with the aim of reducing consumption.

The historic building at 21 Tatoiou Street, which houses the Group's headquarters, presents challenges for energy upgrades due to its listed status. Despite these constraints, the Company has implemented a series of interventions within regulatory limits.

Recognizing the importance of e-mobility, the Company has installed electric vehicle charging stations on its premises, providing employees with the ability to charge their hybrid and electric cars.

### Energy Consumption Transformation

The Company made significant progress in reducing its dependence on fossil fuels, eliminating the use of oil entirely since 2023, compared to 13.72% of the total energy mix in 2022. This change was achieved by replacing oil-fired boilers with heat pumps at the headquarters.

At the same time, the use of natural gas as a secondary energy source increased, reaching 32.29% of total consumption in 2024, up from 28.88% in 2023. This increase is linked to the installation of heat pumps, which utilize natural gas as a secondary fuel for heat production.

The Company's long-term objective is to reduce the use of natural gas and increase the penetration of renewable energy sources. Despite the complete elimination of oil for heating, backup generators running on oil remain in operation, with minimal to near-zero consumption.

### Transformation of the Vehicle Fleet

The ALPHA TRUST Group has made e-mobility a priority, aiming to reduce its environmental footprint and enhance energy efficiency. In this context, the Group is implementing an ambitious programme to renew its fleet with electric and hybrid vehicles.

Since 2023, a significant part of the fleet has consisted of electric and hybrid vehicles, contributing to reduced fuel consumption and pollutant emissions. Specifically, 83% of our fleet now consists of electric and hybrid vehicles. At the end of 2023, out of a total of 21 vehicles, 14 were electric or hybrid, while at the end of 2024 the number of electric and hybrid vehicles had increased to 19 out of a total of 23 vehicles.

In addition, the Group is investing in the development of charging infrastructure, installing charging stations at its facilities. Monitoring energy consumption during charging is carried out via separate meters, allowing the assessment of electric vehicle performance and the optimization of energy management.

The Group applies the ISO 14064-1:2018 approach, excluding from the calculation of Scope 1 and Scope 2 emissions the emissions from vehicles provided to employees <sup>23</sup>.

Fuel consumption from the Company's gasoline-powered corporate vehicle (motorcycle) accounted for 3.36% of total energy consumption for 2024 [GRI 3-3-e-i] [GRI 3-3-e-iii].



## 3.2 Energy Efficiency

Energy efficiency is a central pillar of our strategy for sustainable development. By investing in energy efficiency, we contribute not only to the protection of the environment but also to strengthening our Company's competitiveness.

To assess the effectiveness of our energy initiatives, we use a set of energy intensity indicators. These indicators allow us to monitor the evolution of energy consumption in relation to other relevant indicators, identify areas that require improvement, and compare our performance with other companies in the sector.

Our goal is the continuous improvement of our energy performance, gradually reducing energy consumption and increasing the effectiveness of our initiatives.

#### Energy consumption intensity [GRI 302-3]

| Energy Intensity Indicator | Unit of measurement            | 2024   | 2023   | 2022   |
|----------------------------|--------------------------------|--------|--------|--------|
| Total Energy Consumption   | kWh / square meters of offices | 175.73 | 133.21 | 132.12 |
| Total Energy Consumption   | kWh / € million revenue        | 17,496 | 14,394 | 15,887 |

<sup>23</sup> The energy consumption and the emissions generated by vehicles provided as a benefit to the Company's employees do not fall under Categories 1 and 2 (Scope 1 & 2) of greenhouse gas (GHG) emissions, in accordance with ISO 14064-1:2018, and therefore are not counted in the total energy consumption arising directly from the Company's activities.



### 3.3 Greenhouse Gas Emissions Inventory

The ALPHA TRUST Group monitors and analyzes its carbon footprint based on the methodology of the GHG (Greenhouse Gas) Protocol, which provides an internationally recognized framework for measuring greenhouse gas emissions <sup>24</sup>.

As part of the emissions assessment, the Group focuses on the following areas:

#### Direct CO<sub>2</sub> Emissions (Scope 1)

Direct CO<sub>2</sub> emissions come from sources owned or controlled by the Group. They include:

- \* the use of oil and, since 2023, exclusively natural gas for heating its offices.
- \* the use of fuels for the operation of the corporate vehicle.

#### Indirect CO<sub>2</sub> Emissions Related to Energy (Scope 2)

Indirect CO<sub>2</sub> emissions arise from the generation of electricity consumed by the Group and supplied by external providers. At ALPHA TRUST Group, these indirect emissions arise exclusively from the use of electricity in its activities in Greece.

The calculation of indirect emissions is performed using two methods:

**Location-Based:** This method uses average emission factors associated with the national energy mix for electricity generation.

**Market-Based:** This method uses the emission factors defined by electricity suppliers on a contractual basis.

#### Other Indirect CO<sub>2</sub> Emissions (Scope 3)

Other indirect CO<sub>2</sub> emissions (Scope 3) concern emissions that occur outside the Group's activities and are not included in Scope 2. These include:

Upstream emissions: Those related to the production of goods and services used by the Group.

Downstream emissions: Those arising from the use and disposal of the Group's products.

The Group remains committed to accurately recording and reducing its emissions, with the goal of improving its environmental performance and complying with international sustainability standards.

<sup>24</sup> <https://ghgprotocol.org/>

## Our Carbon Footprint

The ALPHA TRUST Group recognizes the urgent need to address climate change and remains firmly committed to reducing its environmental footprint.

In 2024, greenhouse gas emissions from the Group's activities (Scopes 1 & 2) amounted to 48.90 tCO<sub>2</sub>e<sup>25</sup>, showing a slight increase compared to 2023, when they stood at 47.45 tCO<sub>2</sub>e. This relative stabilization reflects the Group's progress in optimizing energy efficiency and systematically managing emission sources.

Specifically, the increase in direct emissions (Scope 1) is mainly due to the use of natural gas as a secondary energy source for heating the headquarters, as part of the transition to cleaner forms of energy since 2023, when the use of oil was completely eliminated. In addition, during the year, refrigerant was replaced in the Cooling and Air-Conditioning Systems.

By contrast, indirect emissions (Scope 2) decreased to 38.16 tCO<sub>2</sub>e, reflecting the decarbonization of the electricity mix and the optimization of energy consumption.

Overall, the five-year period 2020–2024 shows stabilization and progressive improvement in the Group's energy efficiency.

The Group remains dedicated to implementing targeted initiatives to curb emissions, strengthening its contribution to the global effort to address climate change [GRI 305-5].

It is noted that the calculation includes gases: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). [GRI 305-1].

### Direct and Indirect Carbon Emissions (tCO<sub>2</sub>e)



<sup>25</sup> Methodology: Calculations based on the Ministry of Environment and Energy (YPIEN) and specifically the following: [ENERGY MIX 2024](#), [Emission factors for the year 2024](#) and [National Climate Law tool for calculating emissions](#).

### Direct Emissions (Scope 1)

In 2024, direct emissions increased, mainly due to higher natural gas consumption for heating at the Group's headquarters and the full restart of activities after the pandemic. The use of oil has been completely phased out since 2023; therefore, no emissions from oil were recorded. During the year, refrigerant was replaced in the Cooling and Air-Conditioning Systems.

The Group has already implemented actions to reduce emissions, such as systematic monitoring of energy consumption and informing and raising employees' awareness on energy-saving issues.

The emission factors used for calculating direct emissions come from official sources [GRI 3-3-e-i].

#### Direct Emissions (Scope 1) in tonnes of CO<sub>2</sub> equivalent [GRI 305-1]

| Emissions tCO <sub>2</sub> e          | 2024         | 2023        | 2022        |
|---------------------------------------|--------------|-------------|-------------|
| <b>Total Direct Emissions</b>         | <b>10.74</b> | <b>6.79</b> | <b>5.86</b> |
| Stationary combustion sources         | 7.96         | 5.35        | 4.42        |
| Transport (Mobile combustion sources) | 1.43         | 1.44        | 1.44        |
| Refrigerants                          | 1.35         | 0.00        | 0.00        |

### Indirect Emissions (Scope 2)

The reduction in indirect emissions (Scope 2) continued in 2024, despite the increase in purchased electricity consumption. This is mainly due to the use of electricity from suppliers with a cleaner and more renewable energy mix, as a result of the ongoing decarbonization of the national energy mix [GRI 3-3-e-i].

#### Indirect Emissions (Scope 2) in tonnes of CO<sub>2</sub> equivalent [GRI 305-2]

| Emissions tCO <sub>2</sub> e              | 2024  | 2023  | 2022  |
|-------------------------------------------|-------|-------|-------|
| Total Indirect Emissions (Location-based) | 38.16 | 40.66 | 47.74 |
| Total Indirect Emissions (Market-based)   | 28.21 | 29.80 | n/a   |
| Electricity (CO <sub>2</sub> : 100%)      | 100%  | 100%  | 100%  |

### Other Indirect Emissions (Scope 3)

Scope 3 emissions arise from activities not directly included in our business operations but related to the supply chain and significantly affect our overall carbon footprint. They are a significant component of our environmental performance and are therefore closely monitored.

#### Other Indirect Emissions (Scope 3) in tonnes of CO<sub>2</sub> equivalent [GRI 305-3]

| Category                             | 2024             | 2023            | 2022  |
|--------------------------------------|------------------|-----------------|-------|
| <b>C6. Business Travel</b>           | 37.30            | 16.21           | 3.20  |
| <b>C7. Employee Commuting</b>        | 29.17            | 34.35           | 42.80 |
| <b>C15. Investments</b> (% coverage) | 121,748 (53.32%) | 90,329 (53.08%) | n/a   |

## Business Travel

In 2024, emissions from business travel amounted to 37.30 tCO<sub>2</sub>e, showing an increase compared to 2023. This increase reflects the return to the systematic conduct of in-person meetings and travel after the pandemic <sup>26</sup>.

## Employee Commuting

The Group records emissions arising from employees' commuting using privately owned or leased vehicles that run on gas, gasoline, or diesel. In 2024, a further decrease was observed; however, these emissions still constitute a significant share of total indirect emissions.

## Investments

The largest share of Scope 3 emissions comes from investments. ALPHA TRUST is committed to measuring, assessing, and reducing the carbon footprint of its investment portfolio. The goal is for 50% of the Assets under Management, where there is an ability to influence, to be aligned with the net-zero target by 2030, and 100% by 2050. The Company intends to expand coverage as soon as more comprehensive Scope 1, 2, and 3 emissions data become available for investee companies. Participation in the Net Zero Asset Managers initiative confirms our commitment to the decarbonization strategy. However, due to the current review of the initiative's operating framework, our participation is under review until the relevant procedures are completed <sup>27</sup>.

The Group is also committed to monitoring and recording Scope 3 indirect emissions in the remaining categories beyond the above [GRI 3-3-e-i].

## Scope 1 & 2 Emissions Intensity

In 2024, the intensity of direct emissions (Scope 1) increased, reflecting the increased use of natural gas. By contrast, the intensity of indirect emissions (Scope 2) decreased further, thanks to the use of electricity from suppliers with a cleaner and more renewable energy mix. The intensity indicators—both per square meter of offices (tCO<sub>2</sub>e/m<sup>2</sup>) and per million euros of revenue (tCO<sub>2</sub>e/€ million)—show an overall improvement in the Group's carbon footprint management.

### Scope 1 & 2 Emissions Intensity [GRI 305-4]

| Indicator                                              | Unit of measurement                  | 2024        | 2023 | 2022 |
|--------------------------------------------------------|--------------------------------------|-------------|------|------|
| Direct emissions intensity (Scope 1)                   | tCO <sub>2</sub> e/m <sup>2</sup>    | <b>0.01</b> | 0.01 | 0.01 |
|                                                        | tCO <sub>2</sub> e/€ million revenue | <b>1.17</b> | 0.80 | 0.83 |
| Indirect emissions intensity (Scope 2) location based  | tCO <sub>2</sub> e/m <sup>2</sup>    | <b>0.04</b> | 0.04 | 0.06 |
|                                                        | tCO <sub>2</sub> e/€ million revenue | <b>4.15</b> | 4.80 | 6.79 |
| Indirect emissions intensity (Scope 2) market based    | tCO <sub>2</sub> e/m <sup>2</sup>    | <b>0.03</b> | 0.03 | n/a  |
|                                                        | tCO <sub>2</sub> e/€ million revenue | <b>3.07</b> | 3.52 | n/a  |
| Direct & indirect emissions intensity (location based) | tCO <sub>2</sub> e/m <sup>2</sup>    | <b>0.05</b> | 0.05 | 0.06 |
|                                                        | tCO <sub>2</sub> e/€ million revenue | <b>5.32</b> | 5.60 | 7.62 |

<sup>26</sup> The estimation of emissions was based on the information for each flight from the website: <https://www.google.com/travel/flights/>. The emissions reported are the "typical emissions" for each route according to the above source.

<sup>27</sup> <https://www.netzeroassetmanagers.org/signatories/>

### 3.4 Conservation of Natural Resources

At ALPHA TRUST Group, we are committed to the responsible and efficient management of natural resources, aiming to reduce consumption and waste, with particular emphasis on cutting plastic use. We apply recycling practices for consumables, paper, batteries, and electronic devices. In addition, we collaborate with NGOs and competent bodies to recycle and reuse computers and radiators/heating units, in order to extend their life cycle.

In 2024, the Group proceeded with the confidential destruction and recycling of a total of 0.72 tons of non-hazardous waste, covering all waste generated.

#### Digitization and Paper Reduction

We have completed the digitisation of physical archives and developed an electronic platform for fully automated transactions with clients, achieving a significant reduction in paper use. At the same time, we adopted electronic signatures for all corporate documents, while the sending of statements (e-statements) and newsletters via email has been steadily increasing over the past two years, reducing printed communications (envelopes, postal mail). In addition, the paper used is FSC-certified, ensuring responsible forest management and reinforcing our commitment to sustainable practices.

#### Water Consumption

As part of rational resource management, the Group promotes the sustainable use of water in all its activities. In 2024, water consumption amounted to 858 m<sup>3</sup>, an increase compared to 2023 (808 m<sup>3</sup>), due to the return to full office operations and increased staff presence.

A similar trend was observed in water consumption intensity indicators, both per square meter of office space and per million euros of Group revenue.

#### Water Consumption

| Indicator                                           | Unit of measurement               | 2024  | 2023  | 2022   |
|-----------------------------------------------------|-----------------------------------|-------|-------|--------|
| Water consumption quantity                          | m <sup>3</sup>                    | 858   | 808   | 728    |
| Water consumption intensity (per m <sup>2</sup> )   | (m <sup>3</sup> /m <sup>2</sup> ) | 0.94  | 0.88  | 0.86   |
| Water consumption intensity (per € million revenue) | ( m <sup>3</sup> / € million)     | 93.29 | 95.29 | 103.48 |

With a view to the continuous improvement of environmental performance, the Group is examining the adoption of additional awareness and monitoring measures so that consumption remains at sustainable levels, even under full operating conditions.

#### Wastewater Discharge and Biodiversity

In 2024, ALPHA TRUST Group did not discharge wastewater containing pollutants. At the same time, it does not operate in areas designated as “sensitive biodiversity areas”; therefore, there is no environmental footprint in zones of high biodiversity value.

The assessment of natural resource management demonstrates significant progress in waste reduction and curbing paper use, driven primarily by digitisation and enhanced recycling. Although there is a slight increase in water consumption due to the return to normal operating conditions, our ongoing objective remains its further reduction. Overall, our strategy for the rational use of natural resources and environmental protection remains steady, with a long-term orientation toward sustainable development.



#### We make battery recycling a habit!

At our Company's headquarters, a special AFIS battery recycling bin has been installed.

### 3.5 Risks and opportunities from climate change

Climate change is one of the most significant challenges of the 21st century, profoundly affecting global economies, societies, and ecosystems. For businesses and investors, climate change entails both significant risks and substantial opportunities.

The ALPHA TRUST Group recognizes and assesses the following climate-related risks and opportunities:

**Transition Risks:** These relate to the need to comply with environmental regulations and stakeholder expectations. Risks include fines, sanctions, reputational damage, loss of customers, reduced competitiveness, and increased operating costs. At the same time, compliance with regulations and the adoption of sustainable technologies offer opportunities to improve the company's reputation and expand its customer base.

**Physical Risks:** These relate to risks of material damage from the direct impacts of climate change, such as extreme weather events. Consequences may include operational disruptions, constraints on activities, and increased operating costs. However, there are opportunities to mitigate these risks through preventive actions and adaptation strategies.

**Other Risks:** These include the loss of value of portfolio companies, which may lead to a reduction in Assets under Management (AuM). Nevertheless, with careful investment management, there are opportunities to reduce these risks and improve investment performance.

Within the framework of its sustainability strategy, the ALPHA TRUST Group has developed and continually evolves a comprehensive system for managing environmental impacts, aiming to reduce its environmental footprint and promote a sustainable future. Our key actions include:

- \* Active involvement of the Board of Directors in overseeing climate change issues, supported by the Audit, Risk and Sustainable Development Committee.
- \* Implementation of a Code of Ethics and Conduct to ensure responsible management and compliance.
- \* Adoption of a Sustainability Policy and an ESG Policy covering operations and investment processes.
- \* Participation in and support of initiatives for environmental protection, with the aim of promoting sustainability.
- \* Ongoing monitoring of regulatory developments to ensure compliance at the corporate level.
- \* Systematic assessment and optimization of energy performance indicators to reduce the carbon footprint and manage natural resources sustainably.
- \* Promotion of energy-saving initiatives to reduce emissions from transport and buildings, as well as to enhance sustainable mobility.

In summary, climate change presents significant challenges but also opportunities for the ALPHA TRUST Group. Our sustainability strategy focuses on managing climate-related risks and seizing opportunities for innovation, reputation, and competitiveness. Through continuous monitoring, regulatory compliance, and the implementation of innovative initiatives, we are committed to contributing to the preservation of the environment and to creating a more sustainable future [GRI 2-25].

## 3.6 ESG Performance Indicators | Environment

| Indicator description |                                                                    | Unit                                  | 2024   | 2023   | 2022   | 2021   |
|-----------------------|--------------------------------------------------------------------|---------------------------------------|--------|--------|--------|--------|
| Environment           |                                                                    |                                       |        |        |        |        |
| Energy                | Amount of energy consumed within the Organisation                  | MWh                                   | 160.96 | 122.02 | 111.77 | 148.52 |
|                       | Electricity consumption                                            | MWh                                   | 103.59 | 81.38  | 89.38  | 81.96  |
|                       | Heating oil consumption                                            | MWh                                   | 0.00   | 0.00   | 15.34  | 61.16  |
|                       | Natural gas consumption                                            | MWh                                   | 51.98  | 35.23  | 1.65   | 0      |
|                       | Corporate vehicle gasoline consumption                             | MWh                                   | 5.40   | 5.40   | 5.40   | 5.40   |
|                       | Energy consumption from electricity                                | %                                     | 64     | 67     | 80     | 55     |
|                       | Energy consumption from heating oil                                | %                                     | 0      | 0      | 14     | 41     |
|                       | Energy consumption from natural gas                                | %                                     | 32     | 29     | 1      | 0      |
|                       | Energy consumption from corporate vehicle gasoline                 | %                                     | 3      | 4      | 5      | 4      |
|                       | Energy consumption intensity                                       | kWh/m <sup>2</sup>                    | 175.73 | 133.21 | 132.12 | 175.56 |
|                       | Energy consumption intensity                                       | kWh/ € million revenue                | 17,496 | 14,394 | 15,887 | 15,229 |
|                       | Electricity consumption intensity                                  | kWh/m <sup>2</sup>                    | 113.08 | 88.84  | 105.65 | 96.88  |
|                       | Electricity consumption intensity                                  | kWh/€ million revenue                 | 11,259 | 9,600  | 12,704 | 8,404  |
|                       | Heating oil consumption intensity                                  | kWh/m <sup>2</sup>                    | 0.00   | 0.00   | 18.13  | 72.29  |
|                       | Heating oil consumption intensity                                  | kWh/€ million revenue                 | 0.00   | 0.00   | 2,181  | 6,271  |
|                       | Energy from renewable sources                                      | %                                     | 24.81  | 14.65  | 18.72  | 23.70  |
|                       | Energy from renewable sources                                      | MWh                                   | 25.70  | 11.92  | 16.73  | 19.42  |
|                       | Energy from non-renewable sources                                  | MWh                                   | 77.89  | 69.46  | 72.65  | 62.54  |
|                       | Total energy produced                                              | MWh                                   | 0      | 0      | 0      | 0      |
|                       | Energy produced from renewable sources                             | %                                     | 0      | 0      | 0      | 0      |
| GHG Emissions         | Total direct emissions (Scope 1)                                   | tCO <sub>2</sub> e                    | 10.74  | 6.79   | 5.86   | 17.74  |
|                       | Stationary combustion sources                                      | tCO <sub>2</sub> e                    | 7.96   | 5.35   | 4.42   | 16.30  |
|                       | Transport (mobile combustion sources)                              | tCO <sub>2</sub> e                    | 1.43   | 1.44   | 1.44   | 1.44   |
|                       | Refrigerants                                                       | tCO <sub>2</sub> e                    | 1.35   | 0.00   | 0.00   | n/a    |
|                       | Direct GHG emissions intensity (Scope 1)                           | tCO <sub>2</sub> e/m <sup>2</sup>     | 0.01   | 0.01   | 0.01   | 0,02   |
|                       | Direct GHG emissions intensity (Scope 1)                           | tCO <sub>2</sub> e/ € million revenue | 1.17   | 0.80   | 0.83   | 1.82   |
|                       | Total indirect emissions (Scope 2) — location-based                | tCO <sub>2</sub> e                    | 38.16  | 40.66  | 47.74  | 35.88  |
|                       | Indirect GHG emissions intensity (Scope 2) — location-based        | tCO <sub>2</sub> e/m <sup>2</sup>     | 0.04   | 0.04   | 0.06   | 0.04   |
|                       | Indirect GHG emissions intensity (Scope 2) — location-based        | tCO <sub>2</sub> e/ € million revenue | 4.15   | 4.80   | 6.79   | 3.68   |
|                       | Total indirect emissions (Scope 2) — market-based                  | tCO <sub>2</sub> e                    | 28.21  | 29.80  | n/a    | n/a    |
|                       | Indirect GHG emissions intensity (Scope 2) — market-based          | tCO <sub>2</sub> e/m <sup>2</sup>     | 0.03   | 0.03   | n/a    | n/a    |
|                       | Indirect GHG emissions intensity (Scope 2) — market-based          | tCO <sub>2</sub> e/ € million revenue | 3.07   | 3.52   | n/a    | n/a    |
|                       | Direct & indirect emissions (Scope 1+2) — location-based           | tCO <sub>2</sub> e                    | 48.90  | 47.45  | 53.60  | 53.62  |
|                       | Direct & indirect emissions intensity (Scope 1+2) — location-based | tCO <sub>2</sub> e/m <sup>2</sup>     | 0.05   | 0.05   | 0.06   | 0.06   |
|                       | Direct & indirect emissions intensity (Scope 1+2) — location-based | tCO <sub>2</sub> e/ € million revenue | 5.32   | 5.60   | 7.62   | 5.50   |

| Indicator description |                                                                             | Unit                                  | 2024       | 2023      | 2022   | 2021  |
|-----------------------|-----------------------------------------------------------------------------|---------------------------------------|------------|-----------|--------|-------|
|                       | Direct & indirect emissions (Scope 1+2) — market-based                      | tCO <sub>2</sub> e                    | 38.95      | 36.59     | n/a    | n/a   |
|                       | Direct & indirect emissions intensity (Scope 1+2) — market-based            | tCO <sub>2</sub> e/m <sup>2</sup>     | 0.04       | 0.04      | n/a    | n/a   |
|                       | Direct & indirect emissions intensity (Scope 1+2) — market-based            | tCO <sub>2</sub> e/ € million revenue | 4.23       | 4.32      | n/a    | n/a   |
|                       | Total other indirect emissions (Scope 3) — categories 6, 7, 15              | tCO <sub>2</sub> e                    | 121,814.67 | 90,379.97 | n/a    | n/a   |
|                       | Coverage of in-scope AuM                                                    | %                                     | 53.32      | 53.08     | n/a    | n/a   |
|                       | Scope 3 emissions intensity — categories 6, 7, 15                           | tCO <sub>2</sub> e/m <sup>2</sup>     | 132.99     | 98.67     | n/a    | n/a   |
|                       | Scope 3 emissions intensity — categories 6, 7, 15                           | tCO <sub>2</sub> e/€ million revenue  | 13,241     | 10,662    | n/a    | n/a   |
|                       | Scope 3 category 15 intensity                                               | tCO <sub>2</sub> e / € million AuM    | 101.03     | 88.87     | n/a    | n/a   |
|                       | Total greenhouse gas emissions — location-based                             | tCO <sub>2</sub> e                    | 121,863.57 | 90,427.42 | n/a    | n/a   |
|                       | Total greenhouse gas emissions — market-based                               | tCO <sub>2</sub> e                    | 121,853.62 | 90,416.56 | n/a    | n/a   |
| Water                 | Water consumption                                                           | m <sup>3</sup>                        | 858        | 808       | 728    | 872   |
|                       | Water consumption per                                                       | m <sup>3</sup> /m <sup>2</sup>        | 0.94       | 0.88      | 0.86   | 1.03  |
|                       | Water consumption per                                                       | m <sup>3</sup> / € million revenue    | 93.28      | 95.29     | 103.48 | 89.41 |
| Waste                 | Total hazardous waste                                                       | tn                                    | 0          | 0         | 0      | 0     |
|                       | Total non-hazardous waste                                                   | tn                                    | 0.72       | 0.06      | 2.34   | 7.51  |
|                       | Waste by treatment type — Recycling                                         | %                                     | 100        | 100       | 100    | 100   |
|                       | Waste by treatment type — Composting                                        | %                                     | 0          | 0         | 0      | 0     |
|                       | Waste by treatment type — Incineration                                      | %                                     | 0          | 0         | 0      | 0     |
|                       | Waste by treatment type — Landfill                                          | %                                     | 0          | 0         | 0      | 0     |
|                       | Radioactive waste                                                           | tn                                    | 0          | 0         | 0      | 0     |
|                       | Total wastewater discharge containing pollutants                            | m <sup>3</sup>                        | 0          | 0         | 0      | 0     |
| Other                 | Sensitive biodiversity areas                                                | #                                     | 0          | 0         | 0      | 0     |
|                       | Removals & mitigation projects financed via carbon credits — Removals       | tCO <sub>2</sub> e                    | 0          | 0         | 0      | 0     |
|                       | Removals & mitigation projects financed via carbon credits — Carbon credits | tCO <sub>2</sub> e                    | 0          | 0         | 0      | 0     |

## 4. Society

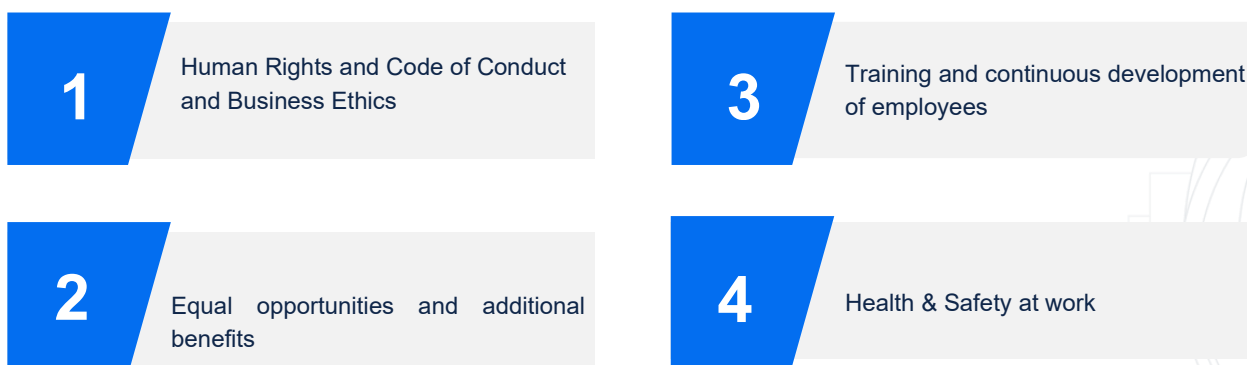
### 4.1 Human Capital as a Priority

Since its establishment, our Company has developed a strong work culture based on values such as fairness, respect, and collegiality. Our primary concern is to provide a safe and meritocratic working environment that encourages all employees to operate in a spirit of fair play and mutual respect. At the same time, we ensure equal opportunities for all and respect for human dignity, setting high ethical standards. We promote and support relationships based on dedication and mutual trust [GRI 2-7].

#### Our People



The main pillars we focus on regarding our employees' matters are



## 4.2 Human Rights and Code of Conduct and Business Ethics

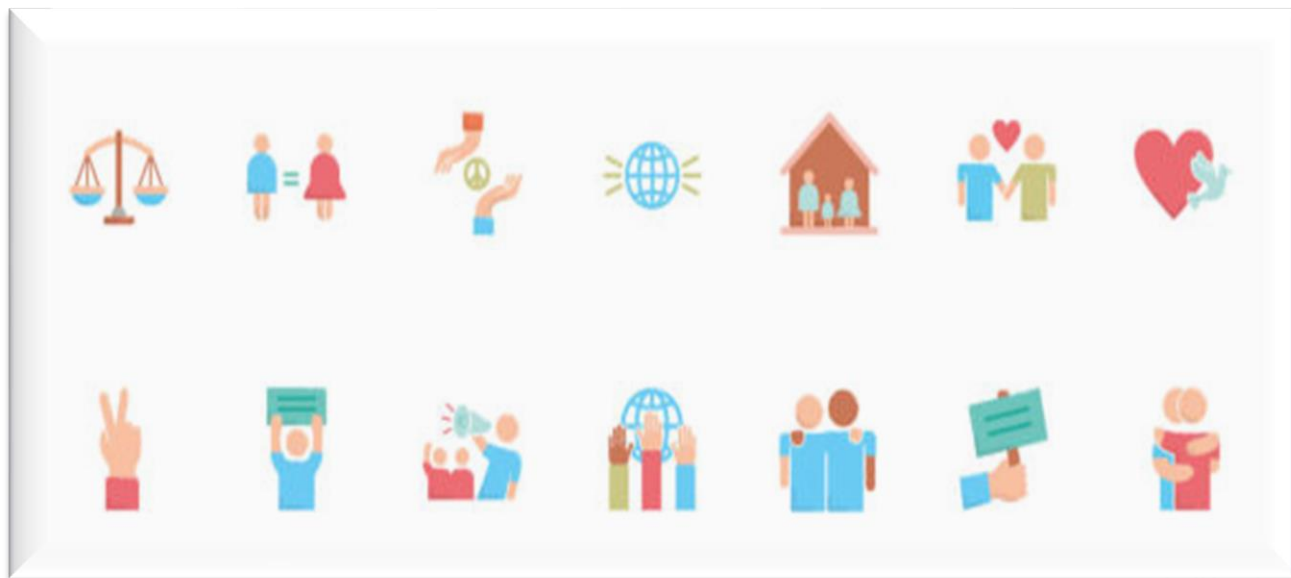
At ALPHA TRUST Group, we place the utmost respect on the principles of human rights, recognizing their fundamental importance for safeguarding the dignity and respect of every individual. We are committed to upholding human and labour rights within the scope of our activities, ensuring that our practices are always aligned with international standards and ethical principles.

The Group's responsibility toward these rights is inextricably linked to the accountability of our employees. Every member of our team is expected to adhere to our Code of Conduct and Business Ethics, which serves as a guide to ensure that our actions and decisions are always in line with our commitment to responsible operations. The Code sets out the key principles, rules, and values that define the framework of corporate activities and our everyday behavior.

The aim of the Code is to strengthen ethical integrity, honesty, transparency, and proper professional conduct at all levels of the Company, contributing to the smooth functioning of the market and ensuring that management activities are carried out for the benefit of investors.

The Code of Conduct and Business Ethics adopts the 10 principles of the UN Global Compact, which seeks to align businesses with these globally accepted principles.

ALPHA TRUST Group maintains a strict policy against any form of violence in the workplace. We believe that every individual has the right to work in a safe environment. Acts of violence, threats, or intimidation are not tolerated under any circumstances and are dealt with the utmost seriousness to protect the well-being of our employees. We prohibit all forms of harassment (including all forms of sexual harassment), bullying, rudeness, disrespect, as well as indecent remarks. In addition, the Group prohibits any form of threats or violence during professional activities, whether inside or outside its premises, and has adopted a policy against Violence and Harassment, while implementing an anonymous reporting mechanism.



### 4.3 Training and Continuous Development of Employees

The ALPHA TRUST Group is committed to providing a supportive work environment that promotes the professional advancement and development of its employees. To achieve this goal, it offers high-quality specialized training through training programs, seminars, and certifications.

Our strategy focuses on the continuous development of employees' professional skills, aiming to strengthen their career paths and to meet the evolving needs of the sector. Through a comprehensive evaluation system, we identify and analyze training needs, providing the necessary tools and opportunities for continuous growth.

We seek to enhance employee performance and satisfaction while ensuring our constant adaptation to the modern demands of the market and corporate objectives.



Data as of 2024

### Employee Appraisal

The Group implements a structured and comprehensive appraisal system, conducted annually for all employees, regardless of level. The appraisal process is fair, impartial, and well-documented, based on measurable and qualitative criteria that reflect each employee's performance.

The appraisal contributes to achieving corporate goals, identifies talent that can take on greater responsibilities in the future, and recognizes potential skills gaps. As a result, we propose targeted training and improvement programs.

**98%**

Employees appraised in 2024

#### 4.4 Attraction and Retention of Employees

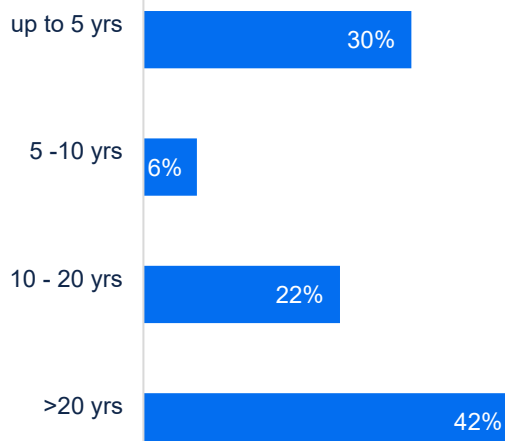
The primary objective of the ALPHA TRUST Group is to attract and retain capable and talented employees who contribute substantially to its long-term growth and to the achievement of our strategic goals.

The Group is committed to operating responsibly, implementing recruitment and retention policies based on objective and meritocratic criteria.

Notably, 42.00% of our employees have been with the Group for more than 20 years, highlighting the long-standing commitment and mutual trust between employees and the organisation. At the same time, the Group records an employee turnover rate of 11.65%, indicating the stability and satisfaction of our human capital.

These figures confirm the success of our strategies for retaining valuable human resources, as well as our commitment to creating a positive, supportive, and growth-oriented working environment.

##### Percentage distribution of employees by years of service at ALPHA TRUST



## 11.65%

Employee turnover rate in 2024

#### Communication and strengthening relationships

Cultivating a positive climate of cooperation and mutual trust is a central objective of the ALPHA TRUST Group. To achieve this goal, the “Open-Door Policy” has been developed and implemented, promoting open and honest communication at all levels of the Group.

Two-way communication and open dialogue between Management and employees are reinforced through a comprehensive internal communication system. This system enables the exchange of valuable information and ideas, strengthens teamwork, and promotes collaboration. The main internal communication channels of the ALPHA TRUST Group include:

\* Open-Door Policy: Encourages open communication among all staff levels.

\* Electronic Communication: Updates via corporate emails from the Human Resources department.

\* Established Meetings: Regular meetings between Management and department heads.

\* Direct Communication: Regular meetings and open discussions with employees.

\* Corporate Events: Events that promote integration and ongoing communication among employees.

\* Internal Reporting System (Whistleblowing): Provides employees with the ability to anonymously report any concern or irregularity.

These communication channels ensure a continuous flow of information, strengthen staff participation and engagement, and contribute to the creation of a supportive and collaborative working environment.

### Employee Benefits

The ALPHA TRUST Group provides a range of additional benefits to its employees, aiming to improve their quality of life and support their families. The updated compensation policy in effect is intended to ensure a decent standard of living for our people while rewarding their consistency and performance.

The benefits include:

- ✓ Group Life and Health Insurance Coverage
- ✓ Voluntary Group Pension Plan
- ✓ Incentives for participation in an Investment–Savings Program
- ✓ Provision of meal vouchers
- ✓ Training & Education Program
- ✓ Recreational events and gifts for employees' children
- ✓ Recognition of employees' children's excellence / Provision of monetary awards
- ✓ Childbirth allowance

Our benefits strategy demonstrates our commitment to creating a supportive and positive working environment, rewarding the dedication and contribution of our employees.

### Diversity and Equal Opportunities

At ALPHA TRUST Group, we regard diversity as a source of strength and inclusion as a fundamental commitment. Integrating a diverse workforce enables us to harness a wide range of perspectives, strengthening innovation and promoting our success. We are committed to creating an environment where every individual feels valued and respected, contributing with their unique knowledge and skills.

Our commitment to inclusion ensures that every voice is heard and every perspective is carefully considered. We encourage diversity at all levels of the workplace and focus on the evaluation and development of our people, without discrimination based on race, gender, religion,

age, possible disability, sexual orientation, nationality, political beliefs, trade unionism, or social origin.

Our commitments to equal opportunities are strictly upheld at every stage of the process, from the recruitment of new employees to their continuous professional development. The evaluation of our employees is based exclusively on their experience, abilities, personality, and qualifications, ensuring fair and objective opportunities for all.

#### 4.5 Health & Safety at work

At ALPHA TRUST Group, given the nature of our activities, employee health and safety risks are limited in both frequency and severity. Nevertheless, the safety and well-being of our people remain a priority.

We invest in creating an environment of trust and support and are particularly flexible when an employee faces health issues that may affect performance. In such cases, we offer additional leave days or remote-work options, ensuring there is no negative impact on the employee's compensation.

In addition, the Group provides employees with Group Life & Health Insurance coverage, which includes a broad range of medical services and preventive checkups. The programme enhances employee health and well-being, emphasizing the importance of prevention through regular screenings and awareness.

This approach strengthens the relationship of trust and understanding between the Group and our employees, while promoting a health-and-safety culture that supports the well-being of our people.

##### *Health & Safety Statistics*

| Indicator                                             | 2024 | 2023 |
|-------------------------------------------------------|------|------|
| Number of Employee Incidents Leading to Absence (LTI) | 0    | 0    |
| Lost Time Injury Severity Rate (LTISR)                | 0    | 0    |
| Lost Time Injury Frequency Rate (LTIFR)               | 0    | 0    |
| Employee Absenteeism Rate (AR)                        | 0    | 0    |

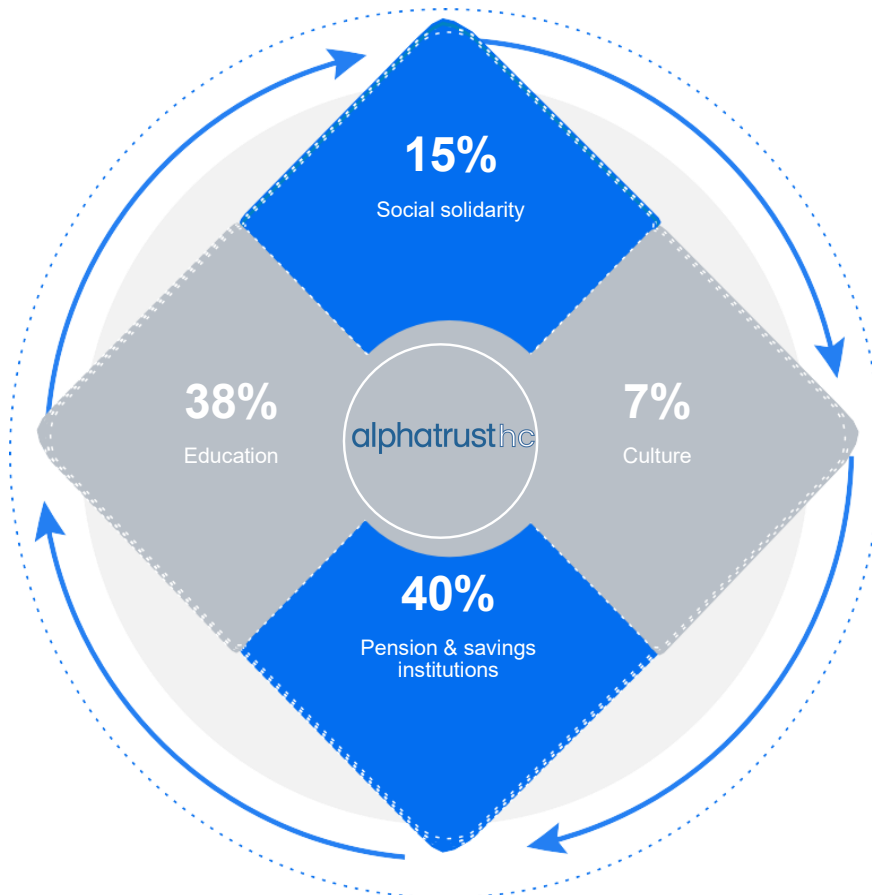
#### 4.6 Social Responsibility

The driving force behind ALPHA TRUST Group's charitable actions comes from our people—employees, shareholders, partners, and clients—who have been our heart and soul for nearly 40 years. Our vision for the future is inextricably linked to our commitment to social responsibility and contribution.

At ALPHA TRUST Group, we are committed to creating value for society not only through our business activities but also through a wide range of social initiatives. Since our establishment, we have carried out annual actions that include sponsorships to social Organisations, scholarships, and support for research, conferences, and cultural events.

Our contribution to society is an integral part of our corporate identity and an area of special focus for both management and employees. With a strong sense of responsibility, we strive to maximize our positive impact and contribute to the sustainable development of the communities in which we operate.

Our sponsorship activities for 2024 focused on the following pillars



## 4.7 Our Actions

Our social contribution is expressed through a wide range of initiatives focused on strengthening education and personal development. We recognize the educational process as a critical factor for improving our society and invest in initiatives that create opportunities and reward excellence. Our actions include the following:

### Strengthening Education

At ALPHA TRUST Group, we place particular emphasis on education and youth development, recognizing Education as a critical factor in personal and professional life. We seek to enhance knowledge and skills through initiatives that include awards for excellence, scholarships, and sponsorships to educational Organisations and institutions.

### Student Internships

ALPHA TRUST has established an internship programme that hosts university students, providing educational opportunities in areas such as mutual fund management, sales, accounting, and marketing. Through this initiative, we strengthen their professional skills and contribute to their development.

### Rewarding Excellence

Annual scholarships are awarded to the children of our employees who excel academically. ALPHA TRUST Group has instituted monetary awards for outstanding pupils and students in our employees' families, promoting excellence and reinforcing the value of education.

### Awards of Diligence at the University of the Aegean

Since 2020, we have been rewarding the top student each year of the Department of Financial and Management Engineering at the University of the Aegean. Recognizing academic performance and potential is a top priority for us and an integral part of our social contribution in the field of education.



## Supporting Educational Initiatives through Sponsorships

We actively support educational structures and initiatives through sponsorships, aiming to promote economic and social well-being. Our support seeks to create positive change and expand opportunities for younger generations.

Indicatively, we provide financial support to the following Organisation:

|                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>INSTITUTO<br/>XPHMATOIKONOMIKOY<br/>ANABHΤΙΣΜΟΥ</p> | <p><b>Support for the Institute for Financial Literacy</b></p> <p>The ALPHA TRUST Group supports the Institute for Financial Literacy, advancing the dissemination of financial knowledge and combating financial illiteracy.</p>                                                                                                                                                                                      |
|                                                         | <p><b>Deree Career Days</b></p> <p>We actively participate in the Career Days of the American College of Greece (Deree). During the event, students have the opportunity to speak with ALPHA TRUST Group executives, learn about current developments in the job market, and explore prospects for a successful career. Information is also provided on internship opportunities in the Group's specialized areas.</p> |
|                                                       | <p><b>Institute of Finance &amp; Financial Regulation, University of Piraeus</b></p> <p>The Institute's mission is to bridge the gap between academia and the financial sector. It focuses on areas such as asset management, asset valuation, risk management, banking, and regulatory policy.</p>                                                                                                                    |
|                                                       | <p><b>Youth Entrepreneurship Association</b></p> <p>The Association's ongoing vision is to support young people in creating their own jobs. This is achieved through global experiential and collaborative learning programs that promote entrepreneurship and innovation.</p>                                                                                                                                         |
|                                                       | <p><b>"Margarita" Special Education Laboratory</b></p> <p>We support the "Margarita" Special Education Laboratory through in-kind donations and initiatives for the development of innovative educational programs.</p>                                                                                                                                                                                                |

### Promoting the Pension System and the Value of Saving

At ALPHA TRUST Group, promoting the pension system and the value of saving is a fundamental priority. These institutions contribute in the long term to improving living standards and ensuring a stable future for every citizen.

With the “Psila–Psila” systematic investment–savings programme, we offer the opportunity to build a meaningful capital with a minimal initial amount, starting from just one euro per day—the spare “change.”

The pension and savings programs we promote enable people to secure additional income for a better quality of life in retirement, without having to change their habits or lifestyle.

ALPHA TRUST Group recognizes the importance of these institutions for prosperity and financial security and supports the operation of Occupational Pension Funds through sponsorships, such as for organizing conferences of the Hellenic Association of Occupational Pension Funds.



## Promoting Social Solidarity

At ALPHA TRUST Group, promoting social solidarity is a core value. We systematically support vulnerable social groups, non-profit Organisations, and social structures, aiming to improve quality of life.

### Supporting Social Organisations

Since our founding, we have substantially contributed to the work of institutions and Organisations such as “FLOGA,” EPSYPE, ELEPAP, “The Smile of the Child,” the Aghia Sofia Children’s Hospital, as well as the local community through the Municipality of Kifisia.

### Food Assistance for People in Need

Through partnerships with leading food companies, such as UNILEVER and 3 Alfa, we support low-income families across Attica. Since 2012, we have provided food to the Athens Municipality Homeless Reception Center. Since 2014, we have also supported the Special Vocational Education Laboratory of Piraeus (EEEEK Piraeus) with donations of food and technological equipment twice a year for the families of the school’s students.

### Support for the “ELPIDA” Association Charity Sailing Race

Our long-standing sponsorship of the “ELPIDA” Association’s charity sailing race contributed to the construction of the “ELPIDA” Children’s Oncology Hospital. Distinguished figures have participated in this support, including Mr. Ioannis Marangoudakis, President of the Hellenic Offshore Racing Club, Olympic gold medalists Sofia Bekatorou and Emilia Tsoulfa, and ocean sailor Ellen MacArthur.

### Aegean Team

We support the Aegean Team, contributing to infrastructure projects that improve living conditions, education, and medical care on Greece’s remote Aegean islands.



## Promoting Culture

At ALPHA TRUST Group, we are committed to promoting culture and safeguarding our cultural heritage. We support activities and events related to music, the visual arts, the performing arts, and literature, as well as initiatives that preserve and showcase our history.

### Support for Cultural Activities

We support events of the Athens College–Psychico College Scholarship Program, as well as exhibitions and educational programs of the Goulandris Museum of Natural History. To support the Benaki Museum and the Gennadius Library — American School of Classical Studies at Athens, ALPHA TRUST organized art exhibitions marking the 20th and 30th anniversaries of its founding.

### Promoting Intellectual Enrichment

We believe opportunities for intellectual enrichment should be encouraged. For this reason, we organize theatrical performances and other cultural events for the children of our employees, aiming to strengthen their engagement with art and culture.





#### 4.8 Book Publications- ALPHA TRUST

As part of promoting culture, since 2000 we have published one book annually, which we make available to libraries and send to a selected audience, including prominent figures.

Our publications focus mainly on works that have not received the recognition they deserve, with particular emphasis on books that offer new perspectives and knowledge on Greek subjects.

To date, our library includes 28 titles.

For 2024, the book we published was “*Around the World with Jason*” by Giorgos Gritsis.

Ο Γύρος του Κόσμου με τον  
Ιάσονα

Γιώργος Γκρίτσης

**Διαβάστε εδώ**



ΓΙΩΡΓΟΣ ΓΚΡΙΤΣΗΣ

Additionally, the English edition: **Naxos, excerpt from the book The Cyclades or Life among the insular Greeks**, James Theodore Bent."

Naxos, excerpt from the book  
The Cyclades or Life among  
the insular Greeks  
James Theodore Bent

J. Theodore Bent, B.A. Oxon  
**NAXOS**



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## 4.9 ALPHA TRUST Publications

The Greek Portolans — The original manuscript texts of the 16th and 17th centuries (2000)

Alexander Con. Ionides, A GRAND- FATHER'S TALE (2002)

Count Peter Gamba, LORD BYRON'S LAST JOURNEY TO GREECE (2004)

•Four Years in the Government Exploring Expedition under Captain Charles Wilkes, 1838–1842, G.M. Kalvokoresis (Vol. I & II) (2006)

Summary of Voyages, Panagiotis Potagos (Vol. I & II) (2008)

Sir Basil Zaharoff: The Mysterious Man of Europe, Dr. Richard Lewinson (2010)

•In the Footsteps of Odysseus, Göran Schildt (2012)

The Journey of Joy, Savvas Georgiou (2014)

Thefts, Stephanos Th. Xenos (2016)

Lafcadio Hearn as They Knew Him, Elizabeth Bisland – Setsuko Koizumi (2018)  
Rambles In Greece, John Pentland Mahaffy (2018)

Island Trails, Theodore Stephanides (2020)  
Wanderings in Greece, George Cochrane (Vol. I & II) (2020)

Life of Constantine Gerakis, Memoirs of Fr. de Béze (2022)

**Around the World with Jason, Giorgos Gritsis (2024)**

2000

Panhellenic Album of the National Centennial 1821–1921: Volume A (2001)  
Christopher Wordsworth, GREECE, Historical, pictorial and descriptive (2001)

Dimitrios Vikelas, My Life (2003)

Henry Schliemann, ILIOS, THE CITY AND THE COUNTRY OF THE TROJANS (2005)

Himalaya, N.A. Tombazis (2007)

A Hunter's Story, K.I.Ph. Ionidis (2009)

2010

George of the Ridge, Georgios Kritikós & Richard Viner (2011)

In the Mountains of Greece, H.N.F. Kitto (2013)

Aegean Days, J. Irving Manatt (2015)

The Odyssey of the Crab, Penny Minev (2017)  
Greek Journey Lincoln and Margaret McVeagh (2017)

Essay on Some Points of Resemblance Between the Ancient and Modern Greek, F. S. North Douglas (2019)  
Wanderings In Greece, George Cochrane (2019)

2020

Greeks Abroad, Alexandros A. Pallis (2021)

Journey to Turkey and Greece, Fr. Robert de Dre (2023)

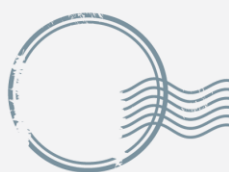
**Naxos, excerpt from the book The Cyclades or Life among the insular Greeks, James Theodore Bent (2024)**

## Ο ΓΥΡΟΣ ΤΟΥ ΚΟΣΜΟΥ ΜΕ ΤΟΝ ΙΑΣΟΝΑ

Γιώργος Γκρίτσας



«Ο Γιώργος Γκρίτσας δεν κάνει  
δικό του ταξίδι. Κάνει ταξίδι όλην μας.  
Όλην εμάς που θέλαμε να τοημέσουμε  
κάτι τέτοιο, όμως οι συνθήκες της ζωής  
δεν μας έδωσαν την ευκαιρία.  
Τ' όνειρό μας αυτό και η πραγματοποίησή του  
από κείνον μας ενώνει.  
Μας κάνει ένα ΑΪΙΟΣ»!  
Σάββας Γεωργίου



Σκανάρετε το QR  
για να διαβάσετε  
το βιβλίο

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## 4.10 ESG Performance Indicators | Society

| Indicator description                   |                                                                         | Unit | 2024  | 2023 | 2022  | 2021  |
|-----------------------------------------|-------------------------------------------------------------------------|------|-------|------|-------|-------|
| Society                                 |                                                                         |      |       |      |       |       |
| Employee Data<br>[GRI 2-7]<br>[GRI 2-8] | Total employees (31/12)<br>(all based in Attica)                        | #    | 50    | 53   | 47    | 49    |
|                                         | Total female employees <sup>28</sup>                                    | #    | 28    | 29   | 26    | 26    |
|                                         | Percentage of female employees                                          | %    | 56    | 55   | 55    | 52    |
|                                         | Percentage of women in managerial positions <sup>29</sup>               | %    | 40    | 20   | 20    | 20    |
|                                         | Employees aged <30                                                      | #    | 0     | 2    | 4     | 5     |
|                                         | Employees aged 30-50                                                    | #    | 18    | 24   | 23    | 27    |
|                                         | Employees aged >50                                                      | #    | 32    | 27   | 20    | 17    |
|                                         | Female employees aged <30                                               | #    | 0     | 0    | 2     | 2     |
|                                         | Female employees aged 30-50                                             | #    | 14    | 15   | 15    | 18    |
|                                         | Female employees aged >50                                               | #    | 14    | 14   | 9     | 6     |
|                                         | Full-time employees                                                     | #    | 50    | 53   | 47    | 49    |
|                                         | Part-time employees                                                     | #    | 0     | 0    | 0     | 0     |
|                                         | Permanent contracts                                                     | #    | 50    | 53   | 47    | 49    |
|                                         | Fixed-term contracts                                                    | #    | 0     | 0    | 0     | 0     |
|                                         | Collective labour agreements                                            | %    | 100   | 100  | 100   | 98.0  |
|                                         | Third-party personnel (cleaning & security)                             | #    | 3     | 3    | 3     | 0     |
|                                         | Full-time female employees                                              | #    | 28    | 29   | 26    | 26    |
|                                         | Part-time female employees                                              | #    | 0     | 0    | 0     | 0     |
|                                         | Female employees on permanent contracts                                 | #    | 28    | 29   | 26    | 26    |
|                                         | Female employees on fixed-term contracts                                | #    | 0     | 0    | 0     | 0     |
|                                         | New hires                                                               | #    | 2     | 7    | 3     | 11    |
|                                         | Female new hires                                                        | #    | 0     | 4    | 3     | 6     |
|                                         | Employee departures                                                     | #    | 6     | 2    | 5     | 6     |
|                                         | Dismissals                                                              | #    | 2     | 2    | 1     | 1     |
|                                         | Resignations                                                            | #    | 4     | 0    | 4     | 5     |
|                                         | Female departures                                                       | #    | 2     | 2    | 3     | 2     |
|                                         | Voluntary turnover rate                                                 | %    | 7.77  | 0.00 | 8.33  | 10.87 |
|                                         | Involuntary turnover rate                                               | %    | 3.88  | 4.00 | 2.08  | 2.17  |
|                                         | Employee turnover rate                                                  | %    | 11.65 | 4.00 | 10.42 | 13.04 |
|                                         | Female employee turnover rate                                           | %    | 7.02  | 7.27 | 11.54 | 8.51  |
| Education and Employee Development      | Employees trained                                                       | #    | 17    | 39   | 27    | 16    |
|                                         | Female employees trained                                                | #    | 12    | 10   | 15    | 7     |
|                                         | Total training hours                                                    | #    | 461   | 711  | 456   | 381   |
|                                         | Total training hours — women                                            | #    | 430   | 592  | 265   | 237   |
|                                         | Average training hours per employee                                     | #    | 9.2   | 13.4 | 9.7   | 7.8   |
|                                         | Average training hours per female employee                              | #    | 15.3  | 20.4 | 10.2  | 9.1   |
|                                         | Average training hours per male employee                                | #    | 1.4   | 5.0  | 3.5   | 2.7   |
|                                         | Average training hours per employee in top 10% by total compensation    | #    | 5.0   | 8.8  | 16.0  | 11.6  |
|                                         | Average training hours per employee in bottom 90% by total compensation | #    | 9.7   | 13.9 | 9.0   | 7.3   |
|                                         | Environmental training hours                                            | %    | 4     | 34   | 15    | 13    |

<sup>28</sup> The number of employees is reported as of year-end<sup>29</sup> Managerial positions are defined as those within the top 10% of remuneration.

| Indicator description                                  |                                                                                                                                       | Unit  | 2024    | 2023    | 2022    | 2021    |
|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|-------|---------|---------|---------|---------|
|                                                        | Regulatory/compliance training hours                                                                                                  | %     | 32      | 11      | 85      | 87      |
|                                                        | Total training expenditure                                                                                                            | €     | 7,798   | 5,263   | 9,102   | 14,274  |
|                                                        | Employees appraised                                                                                                                   | #     | 49      | 52      | 47      | 48      |
|                                                        | Female employees appraised                                                                                                            | #     | 28      | 29      | 27      | 26      |
| Occupational Health & Safety (employees) <sup>30</sup> | Lost Time Injury Frequency Rate (LTIFR) employees                                                                                     | #     | 0       | 0       | 0       | 0       |
|                                                        | Women                                                                                                                                 | #     | 0       | 0       | 0       | 0       |
|                                                        | Men                                                                                                                                   | #     | 0       | 0       | 0       | 0       |
|                                                        | Lost Time Injury Severity Rate (LTISR) — employees                                                                                    | #     | 0       | 0       | 0       | 0       |
|                                                        | Women                                                                                                                                 | #     | 0       | 0       | 0       | 0       |
|                                                        | Men                                                                                                                                   | #     | 0       | 0       | 0       | 0       |
|                                                        | Employee absenteeism rate (AR)                                                                                                        | %     | 0       | 0       | 0       | 0       |
|                                                        | Women                                                                                                                                 | %     | 0       | 0       | 0       | 0       |
|                                                        | Men                                                                                                                                   | %     | 0       | 0       | 0       | 0       |
|                                                        | Occupational diseases                                                                                                                 | #     | 0       | 0       | 0       | 0       |
|                                                        | Women                                                                                                                                 | #     | 0       | 0       | 0       | 0       |
|                                                        | Men                                                                                                                                   | #     | 0       | 0       | 0       | 0       |
|                                                        | Number of fatalities                                                                                                                  | #     | 0       | 0       | 0       | 0       |
|                                                        | Women                                                                                                                                 | #     | 0       | 0       | 0       | 0       |
|                                                        | Men                                                                                                                                   | #     | 0       | 0       | 0       | 0       |
| Sustainable Economic Activity                          | Sustainable economic activity - % of sustainable turnover (Alignment & Eligibility)                                                   | %     | 0       | 0       | n/a     | n/a     |
|                                                        | Sustainable economic activity — % of sustainable CapEx (Alignment & Eligibility)                                                      | %     | 0       | 0       | n/a     | n/a     |
|                                                        | Sustainable economic activity — % of sustainable OpEx (Alignment & Eligibility)                                                       | %     | 0       | 0       | n/a     | n/a     |
| Pay Gap                                                | Gender pay gap <sup>31</sup>                                                                                                          | %     | 36.43   | 39.92   | 58.20   | 46.36   |
|                                                        | Gender pay gap by level — executives                                                                                                  | %     | 30.00   | 45.37   | n/a     | n/a     |
|                                                        | Gender pay gap by level — non-executives                                                                                              | %     | 43.99   | 20.19   | n/a     | n/a     |
|                                                        | CEO compensation                                                                                                                      | €     | 206,307 | 170,552 | 208,830 | 212,472 |
|                                                        | Ratio of CEO total annual compensation to median total annual compensation of all employees <sup>32</sup>                             | Ratio | 4.5:1   | 3.4:1   | 4.5:1   | 4.2:1   |
|                                                        | Ratio of % increase in CEO total annual compensation to median % increase in total annual compensation of all employees <sup>33</sup> | %     | 1.33    | 0.74    | 1.07    | n/a     |
|                                                        | Variable compensation — variable pay as a % of total compensation for executives                                                      | %     | 12.14   | 1.33    | 4.26    | 16.36   |

<sup>30</sup> LTIFR rate: (number of incidents / total hours worked) × 10<sup>6</sup> | LTISR rate: (number of days absent due to an accident / total hours worked) × 10<sup>6</sup> | AR: (total days of absence / total days worked).

<sup>31</sup> The gender pay gap is calculated as the difference between the average gross salary of male employees and that of female employees, expressed as a percentage of the average gross salary of male employees.

<sup>32</sup> The ratio of the Company CEO's total annual compensation to the median total annual compensation of all Group employees has been calculated using the mean total annual compensation of all employees instead of the median.

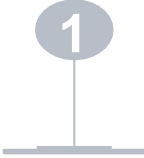
<sup>33</sup> The ratio of the percentage increase in the Company CEO's total annual compensation to the median percentage increase in the total annual compensation of all Group employees has been calculated using the mean percentage increase of all employees instead of the median.

## 5. Corporate Governance

ALPHA TRUST HOLDINGS fully complies with the applicable legislative framework and corporate-governance guidance, while also adopting best practices and voluntary standards. Our objective is operational excellence and the ongoing protection of the interests of shareholders, clients, employees and other stakeholders. The governance framework aims at sound and effective functioning, promoting transparency and reliability [GRI 2-9].

### 5.1 Governance Framework

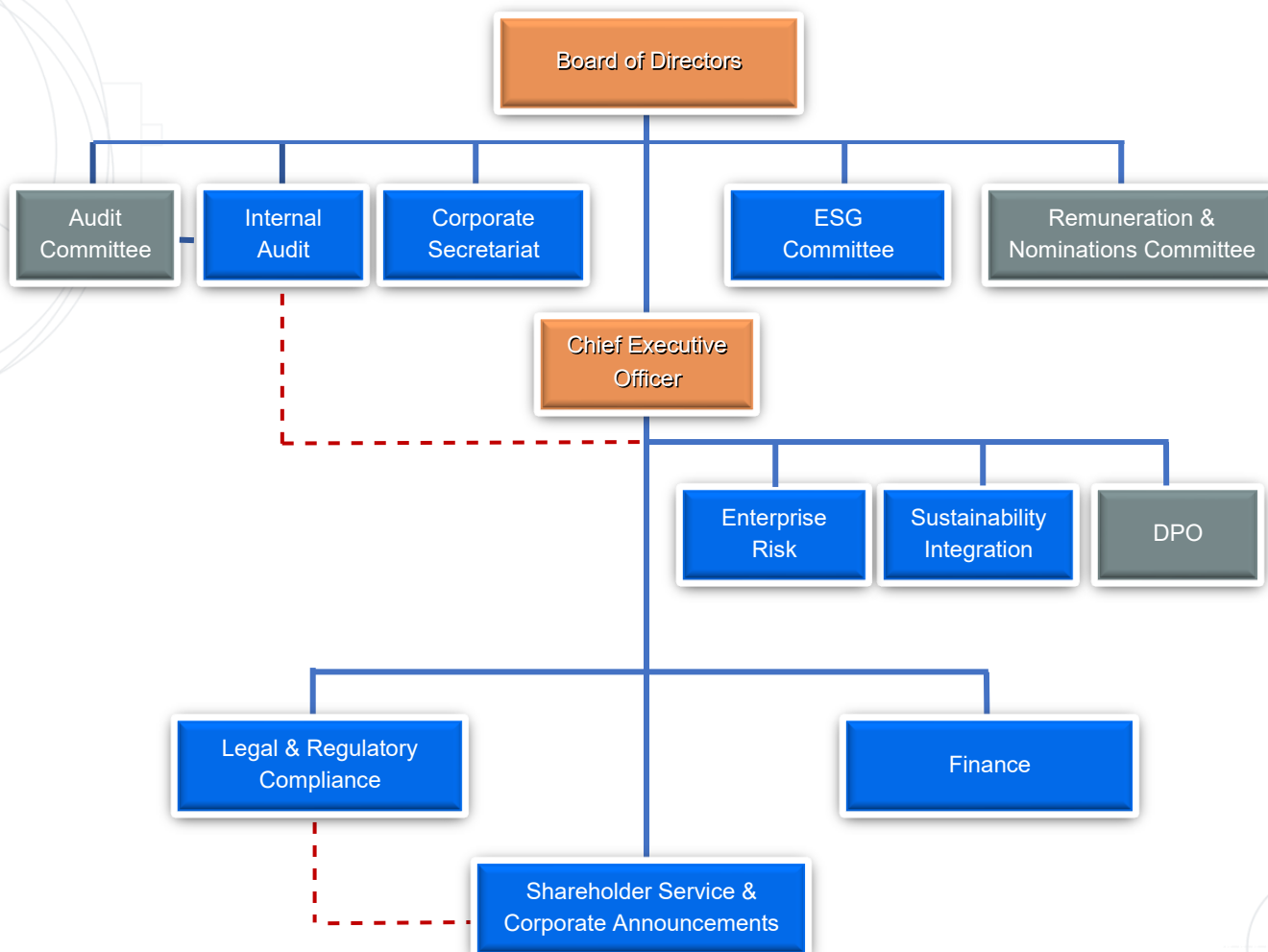
This section presents the core elements of ALPHA TRUST HOLDINGS' corporate governance. Detailed information is available in the "Corporate Governance Statement" of the 2024 Annual Financial Report <sup>34</sup>, on the Corporate Governance section of our official website, and in the Remuneration Policy.

|                                                                                     |                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <p><b>Governing Bodies</b></p> <p>ALPHA TRUST HOLDINGS has established governing bodies in line with law and corporate needs. These include the Board of Directors and its Committees, which are responsible for strategic direction, management and oversight—ensuring compliance with legal requirements and internal policies.</p> |
|  | <p><b>Codes, Policies and Procedures</b></p> <p>The Company has adopted codes of conduct, policies and procedures that strengthen transparency and good governance. These rules and practices ensure integrity in business activities, protect shareholder interests and drive continuous improvement in operations.</p>              |
|  | <p><b>ESG Governance</b></p> <p>At ALPHA TRUST Group, processes for managing environmental, social and governance (ESG) matters support the Company's sustainability and transparency. These processes are embedded in daily operations and strategy, promoting responsible practices and ongoing development.</p>                    |
|  | <p><b>Participation</b></p> <p>Shareholders participate in the Company's governance through the General Meeting, where they elect the Board of Directors and take part in key decisions that shape strategy and operations.</p>                                                                                                       |

<sup>34</sup> <https://atrust.gr/wp-content/uploads/2025/04/FS-31-12-2024-Alpha-Trust-Holdings-final.pdf>

## 5.2 Organisational Chart

The Organisational chart presents the Company's Organisational structure, depicting the Organisational units and the reporting and oversight relationships among them. Below is the Company's Organisational chart.



### Governing Bodies

The General Meeting of the shareholders of ALPHA TRUST HOLDINGS constitutes the supreme body of the Company. It has the exclusive responsibility, among other things, for electing the members of the Board of Directors—except for the appointment of the first Board of Directors pursuant to the Articles of Association and the election, pursuant to the Articles, of directors to replace those who have resigned, died, or otherwise lost their capacity. At the same time, it reviews the management's actions and decides on the discharge of the Board of Directors from any liability.

### 5.3 Board of Directors

ALPHA TRUST HOLDINGS is governed by a Board of Directors of three (3) to eleven (11) members, classified as executive or non-executive. Members are elected by the General Meeting for a three-year term, automatically extended until the first Annual General Meeting following its expiry. Members—shareholders or not—are always eligible for re-election and may be removed at any time.

The current Board of Directors of the Company was elected by the General Meeting of shareholders on 15/05/2024 for a term until 15/05/2027, which may be automatically extended until the immediately following Annual General Meeting of the Company after the end of its term.

The Board of Directors of ALPHA TRUST HOLDINGS consists of six (6) members distributed as follows: 2 executive (33%), 2 non-executive (33%), and 2 independent non-executive (33%). The Chair is an executive member and the Vice-Chair a non-executive member. Women account for 33% of the Board, underscoring the Company's commitment to gender equality and diversity in governance.

In 2024, the Board held 12 meetings, with all members except 2 attending all sessions. The composition of the Board as of December 31, 2024, is shown on the table below.

| Name                        | Position                | Executive     | Attendance | Participation rate |
|-----------------------------|-------------------------|---------------|------------|--------------------|
| Faidon-Theodoros Tambakakis | Chair of the BoD        | Executive     | 11/12      | 92%                |
| David-Phillip Gibbs         | Vice-Chair of the BoD   | Non-executive | 12/12      | 100%               |
| Christodoulos Aesopos       | Chief Executive Officer | Executive     | 12/12      | 100%               |
| Stefanos Karaiskakis        | Member, Independent     | Non-executive | 11/12      | 92%                |
| Agni Levi                   | Member, Independent     | Non-executive | 12/12      | 100%               |
| Angeliki Chatzidaki         | Member                  | Non-executive | 12/12      | 100%               |



## 33%

of the Board of Directors  
consists of women



## 12

Board of Directors  
meetings



## 100%

Percentage of Board of Directors  
members attending more than  
90% of meetings

The Company has a Suitability Policy for the members of the Board of Directors (the "Suitability Policy"). A Diversity Policy is also in place to promote diversity and to form a broad-based group of Board members [GRI 2-9-a] [GRI 2-9-c-i] [GRI 2-9-c-ii].

The Company has established and maintains an ESG Policy as part of its overall strategy and has also set up an ESG Committee, whose members include members of the Board of Directors. As provided in the Company's Suitability Policy for Board members, when selecting candidates, renewing terms, or replacing a Board member, consideration is given to the assessment of individual and collective suitability, as well as recognition of and alignment with the Company's culture, values, business model, and overall strategy. It is also stipulated that all areas of knowledge required for the Company's business activities—together with an understanding of issues recognized internationally as highly critical, such as environment, social responsibility, and corporate governance—must be collectively covered by the Board, with sufficient expertise among its members [GRI 2-12].

## 5.4 Codes, Policies and Procedures

By decision of its Board of Directors dated 25/11/2021, ALPHA TRUST HOLDINGS has adopted and applies the Hellenic Corporate Governance Code (HCGC) for listed companies, in accordance with Art. 4 of HCMC Decision No. 2/905/3.3.2021, prepared under the auspices of the Hellenic Corporate Governance Council (ESED), as in force.

The Company has an Internal Operating Regulation (IRO), drawn up in accordance with the provisions of Law 4706/2020, the 2021 HCGC of ESED, as well as its Articles of Association, as amended and in force, and the overall legislative and regulatory framework governing its operation. The IRO entered into force pursuant to the Board of Directors' decision of 17.12.2021 and is posted on the Company's website <https://atrust.gr/> and on the Company intranet. It includes a concise presentation of the specific provisions, as stipulated in Article 14 of Law 4706/2020.

Through the IRO, the Company aims to regulate its Organisation and operation in a manner that ensures business integrity, transparency of business activity, oversight of Management and, in particular, the process of taking management decisions and compliance with the legal frameworks governing the Company.

During 2024, the Company complied with the provisions of the HCGC, with the deviations referred to in the 2024 Financial Statements (Section VI.2), and it intends to adopt appropriate policies and proposals in order to minimize the existing deviations from the provisions of said Code.

ALPHA TRUST HOLDINGS has adopted Codes and a series of Policies and Procedures that promote transparency and sound governance. The main ones are as follows:

|                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Rules of Procedure of the Audit Committee                                                                                                                             |
| Rules of Procedure of the Remuneration and Nominations Committee                                                                                                      |
| Rules of Procedure of the ESG Committee                                                                                                                               |
| Rules of Procedure of the Internal Audit Unit                                                                                                                         |
| Rules of Procedure of the Shareholders' Service and Corporate Announcements Unit                                                                                      |
| Procedures of the Sustainability Integration Department                                                                                                               |
| Policy for the Recruitment and Evaluation of Senior Management Executives                                                                                             |
| Procedure for the Notification of Transactions by Persons Discharging Managerial Responsibilities and Persons Closely Associated with Them                            |
| Related Party Transactions Policy                                                                                                                                     |
| Policy and Procedure for the Prevention and Management of Conflicts of Interest (Law 4706)                                                                            |
| Code of Conduct and Business Ethics                                                                                                                                   |
| Regulatory Compliance Policy                                                                                                                                          |
| Procedure for the Management of Inside Information and Proper Public Disclosure                                                                                       |
| Training Policy for members of the Board of Directors and other executives                                                                                            |
| Policy and Procedure for the Evaluation of the Company's Internal Control System (ICS)                                                                                |
| Suitability Policy for Members of the Board of Directors                                                                                                              |
| Remuneration Policy for Members of the Board of Directors                                                                                                             |
| Code of Conduct for Employees                                                                                                                                         |
| Anti-Fraud, Anti-Bribery and Anti-Corruption Policy                                                                                                                   |
| Procedure for the Appraisal of Employees                                                                                                                              |
| Policy (I) for the Prevention and Combating of Violence and Harassment at Work & (II) for the Handling of Internal Complaints on Incidents of Violence and Harassment |
| Internal Reporting – Disclosures Policy (Whistleblowing Policy)                                                                                                       |
| Sustainable Development Policy                                                                                                                                        |

## 5.5 Board Committees

The Board of Directors of ALPHA TRUST HOLDINGS is supported by two core committees: the **Audit Committee** and the **Remuneration and Nominations Committee**. In addition, the Company has established the Sustainable Development Committee on environmental, social, and corporate governance (ESG) matters related to its business activities.

The composition, responsibilities, and rules of procedure of the Board committees are presented in detail on the Company's official website <sup>35</sup> [GRI 2-9-b] [GRI 2-16-a].

### Audit Committee

The Audit Committee has been established and operates in accordance with Article 44 of Law 4449/2017, as in force, as well as the relevant guidelines and decisions of the supervisory authorities. The Committee consists of at least three (3) members. Its members are appointed by the Board of Directors when it is a board committee, or by the General Meeting of shareholders when it is an independent committee. The type of Committee, its term of office, the number and capacities of its members are decided by the General Meeting.

The purpose of the Committee is to support the Board of Directors in:

- a) monitoring the financial reporting process to ensure its integrity;
- b) monitoring the effectiveness of the Company's Internal Control System (ICS), quality assurance, and risk management, as well as the operation and evaluation of the Internal Audit Unit it oversees;
- c) monitoring the statutory audit of the annual financial statements, and in particular the performance thereof;
- d) overseeing the operation of the Regulatory Compliance and Risk Management Unit.

Composition of the Audit Committee:

| Name                   | Position on the Committee                                                        |
|------------------------|----------------------------------------------------------------------------------|
| Apostolos Papadopoulos | Committee Chair, third party – independent                                       |
| Agni Levi              | Committee Member, independent and non-executive member of the Board of Directors |
| Michail Papparis       | Committee Member, third party                                                    |

### Remuneration and Nominations Committee

The Remuneration and Nominations Committee is established pursuant to Article 10 of Law 4706/2020 and reports to the Board of Directors. It consists of at least three (3) non-executive members, the majority of whom, including the Committee Chair, are independent. If the Chair has not been appointed by the BoD or the GM, they are appointed by the Committee itself at its constitutive meeting. The term of the Committee members is equal to the term of the BoD. In any case, the term of the Committee's independent non-executive members may not exceed nine (9) years, in accordance with Article 9 of Law 4706/2020. The Chair of the BoD may be appointed as a member of the Committee, without (a) participating in the determination of his own remuneration and (b) chairing the Committee if he is not independent.

The Committee's purposes include, among others:

- a) proposing to the BoD suitable candidates for the position of Board member, for acquiring the status of BoD member, based on the Suitability Policy and the procedure approved by the Company's General Meeting of shareholders;
- b) supporting the BoD in designing and monitoring the implementation of the Company's key corporate governance principles and policies;

<sup>35</sup> <https://atrust.gr/i-etaireia/etairiki-diakivernisi/dioikitiko-simvoulia/>

c) ensuring the design and monitoring of the Remuneration Policy and the Remuneration Report for BoD members, as well as the Company's employee remuneration policy.

Composition of the Remuneration and Nominations Committee:

| Name                 | Position on the Committee                                                        |
|----------------------|----------------------------------------------------------------------------------|
| Agni Levi            | Committee Chair, independent and non-executive member of the Board of Directors  |
| Stefanos Karaiskakis | Committee Member, independent and non-executive member of the Board of Directors |
| David-Phillip Gibbs  | Committee Member, Vice-Chair of the Board of Directors and non-executive member  |

### Sustainable Development Committee (ESG Committee)

The Sustainable Development Committee of ALPHA TRUST HOLDINGS has been established with the aim of setting guidelines for integrating environmental, social, and corporate governance (ESG) factors into the Company's operations.

The Committee is responsible for monitoring and evaluating ESG issues related to the Company's business activities. Its members are appointed by the Board of Directors and include at least three individuals, who may be either Company employees with ESG expertise or third parties.

The Committee meets at least four times a year, and decisions are taken by a simple majority of those present, provided there is a quorum (i.e., the presence of at least three members). Minutes are kept for all meetings.

Composition of the ESG Committee

| Name                                     | Position on the Committee                                          |
|------------------------------------------|--------------------------------------------------------------------|
| Angeliki Chatzidaki                      | Committee Chair, Board member                                      |
| Christodoulos Aesopos                    | Chief Executive Officer                                            |
| Theodora Roka                            | Sustainability Integration Manager                                 |
| Konstantinos Chatziioannou <sup>36</sup> | Head of Risk Monitoring & Performance Analytics Dept., ALPHA TRUST |

The ESG Committee reviewed the 2024 Sustainability Report and recommended its approval by the Board of Directors. The 2024 Sustainability Report was approved at the BoD meeting on 24 September 2025 and is available on the Company's website: <https://atrust.gr/en/sustainability/> [ GRI 2-14].

<sup>36</sup> At the time of publication of this report, the position is held by Mr. Symeon Theofanidis.

## 5.6 Evaluation of the Board of Directors and its Committees

The BoD and its Committees collectively, as well as the Chair and the BoD members individually, are evaluated annually regarding the effective fulfillment of their duties. The results are discussed by the BoD, where any areas for improvement are identified.

BoD members were asked to complete evaluation questionnaires of the Board and its members, which were prepared and subsequently assessed by the Remuneration and Nominations Committee, taking into account, among other things, members' participation in Board meetings, their contribution to issues that arose during the year, and their dedication to achieving the Company's objectives, while also considering members' CVs, the declarations they submitted, and other information available to it. Reviewing the recommendation of the above committee and the information presented to it, the BoD proceeded to evaluate the individual and collective suitability of its members.

The general conclusions of the evaluation were that the BoD is composed of members with the necessary knowledge, skills, and experience, and that it possesses the required balance of qualifications and knowledge, diversity, and the appropriate size to exercise its responsibilities and perform its work without impediment. It was further ascertained that the requirements set by law, the Corporate Governance Code, and the Company's Suitability Policy are met. In addition, it was deemed that the Board shows the necessary consistency with regard to the Organisation of its operation, in particular the annual number of meetings and the time available.

With regard to the Remuneration and Nominations Committee and the Audit Committee, the BoD—taking into account the self-assessment of the former and the recommendations submitted before it during fiscal year 2024—considers that both fulfilled their roles effectively, while their members acted individually with integrity and a strong sense of responsibility.

## 5.7 Internal Audit Systems

ALPHA TRUST HOLDINGS applies robust Internal Control Systems for effective risk management and compliance assurance, through independent units that monitor and improve corporate processes.

### Internal Audit Function

The Company has an Internal Audit Unit organized and operating in accordance with Law 4706/2020, relevant regulatory provisions, and other standards. It is an independent and objective unit with assurance and advisory activity designed to add value and improve the Company's processes. It contributes to achieving corporate objectives by providing a systematic and structured approach to evaluating and improving the effectiveness of control, risk management, and corporate governance systems.

### Regulatory Compliance Function

The Company has appointed a Regulatory Compliance Officer to ensure compliance with the legislative, regulatory, and supervisory framework governing it, with particular emphasis on the principles and rules of corporate governance. The Regulatory Compliance Officer implements the Company's Regulatory Compliance Policy, which defines their responsibilities and sets out the framework for action. The Officer is supervised by the Head of the Legal & Regulatory Compliance Department and reports to the Company's Chief Executive Officer.

### Risk Management (Enterprise Risk)

Risk management is the responsibility of the Company's BoD. The Risk Management Function's core mission is to identify, measure, and address risks associated with the Company's activities, processes, and systems. The Company has appointed a Risk Management Officer who, in the context of their independence, reports to the Chief Executive Officer and the BoD on matters within their remit.

## 5.8 Integrity and Ethical Standards

The Company is committed to operating with integrity. We follow ethical business practices and conduct our activities with transparency and reliability. We believe that the Company's growth and success must be based on the excellence of its products and services. Bribery or any other unethical practice is strictly prohibited at our Company. We do not tolerate corruption, money laundering, bribery, or any other unethical or illegal activity. Our performance and competitiveness develop exclusively through lawful practices.

## Prevention of Fraud, Bribery, and Corruption

The Company applies the highest standards of transparency and accountability and adopts a zero-tolerance approach to fraud, bribery, and corruption. It fosters a culture of honesty and integrity and is wholly opposed to any form of fraud, bribery, or corruption. We do not permit any form of bribery or any other professional practice that could create the impression of improper influence. Corruption in any form is under no circumstances tolerated by ALPHA TRUST HOLDINGS and is expressly prohibited by our Internal Operating Regulation. We have defined ways for employees and other stakeholders to raise concerns regarding suspected fraud or corruption. We have adopted an Anti-Fraud, Anti-Bribery and Anti-Corruption Policy, as well as an Internal Reporting–Disclosures (whistleblowing) Policy with specific protections for reporting persons.

## INFORMATION MANAGEMENT

### Data protection

Across all business processes, we guarantee the protection of privacy, in compliance with applicable law. All business information and other proprietary information concerning the Company, financial data, shareholders, clients, suppliers, and partners must be treated as confidential. Such information should not be disclosed to persons or Organisations outside ALPHA TRUST HOLDINGS, nor to personnel who are not appropriately authorized. Personnel of ALPHA TRUST HOLDINGS, during their employment and after its termination, must not disclose confidential information to third parties and must handle business and confidential information with the utmost discretion.

### Inside information

Inside information includes all non-public information that investors would consider material in making investment decisions. The handling of such information must be strictly confidential and not accessible to third parties. It is prohibited to acquire, sell, or recommend the purchase or sale of securities based on the aforementioned information.

### Information Systems Security

The availability and integrity of the Company's Information Systems are of fundamental importance. Personal and professional data are protected against unauthorized access, loss, or manipulation using all technically available means, in accordance with applicable national law.

Fraud, bribery, and corruption in any form are not tolerated by the ALPHA TRUST Group.

In 2024 there were no incidents of fraud, bribery or corruption.



## 5.9 Participation

ALPHA TRUST HOLDINGS promotes participation as a core value of its culture, enhancing the Company's effectiveness and the sense of individual responsibility. A significant percentage of the share capital (58.52% as of 31/12/2024) is held by personnel and their families, creating a unique dynamic in the Company's governance.

The allocation of shares as part of the variable compensation (bonus) package strengthens employees' commitment to the Company's objectives, which focus on creating value for clients and shareholders. Through the General Meeting of shareholders, employees participate indirectly in decision-making and in the Company's strategic planning.

Participation ensures the diffusion of the Company's core values—Ethos, Integrity, Excellence, Responsibility, and Sustainability—throughout the workforce and safeguards these values for future generations of employees.

## 5.10 ESG Performance Indicators | Corporate Governance

| Indicator description |                                                                                                         | Unit     | 2024     | 2023     | 2022     | 2021     |
|-----------------------|---------------------------------------------------------------------------------------------------------|----------|----------|----------|----------|----------|
| Corporate Governance  |                                                                                                         |          |          |          |          |          |
| Board of Directors    | Board members — total                                                                                   | #        | 6        | 6        | 7        | 7        |
|                       | Executive Board members — total                                                                         | #        | 2        | 2        | 3        | 3        |
|                       | Executive Board members — share                                                                         | %        | 33.33    | 33.33    | 42.86    | 42.86    |
|                       | Non-Executive Board members — total                                                                     | #        | 2        | 2        | 4        | 4        |
|                       | Non-Executive Board members — share                                                                     | %        | 33.33    | 33.33    | 57.14    | 57.14    |
|                       | Independent, Non-Executive Board members — total                                                        | #        | 2        | 2        | 2        | 2        |
|                       | Independent, Non-Executive Board members — share                                                        | %        | 33.33    | 33.33    | 28.57    | 28.57    |
|                       | Women on the Board — total                                                                              | #        | 2        | 2        | 2        | 2        |
|                       | Women on the Board — share                                                                              | %        | 33.33    | 33.33    | 28.57    | 28.57    |
|                       | Average age of Board members                                                                            | #        | 62       | 61       | n/a      | n/a      |
|                       | Average Board tenure (years) <sup>37</sup>                                                              | #        | 3.83     | 2.83     | n/a      | n/a      |
|                       | Age band: 30-50 members                                                                                 | #        | 1        | 1        | 1        | n/a      |
|                       | Age band 51-60 — members                                                                                | #        | 2        | 2        | 3        | n/a      |
|                       | Age band 60+ — members                                                                                  | #        | 3        | 3        | 3        | n/a      |
|                       | Board meetings — number                                                                                 | #        | 12       | 27       | 34       | n/a      |
|                       | Board members attending <75% of meetings — number                                                       | #        | 0        | 0        | 0        | n/a      |
|                       | Board Chair is Executive                                                                                | (yes/no) | yes      | yes      | yes      | yes      |
|                       | Average training hours per Board member                                                                 | #        | 1.25     | 1.42     | 2.57     | 1.43     |
|                       | Remuneration & Nominations Committee members — total                                                    | #        | 3        | 3        | 3        | 3        |
|                       | Audit Committee members — total                                                                         | #        | 3        | 3        | 3        | 3        |
|                       | Sustainable Development Committee members — total                                                       | #        | 4        | 4        | 5        | 5        |
|                       | Total members of Board Committees                                                                       | #        | 10       | 10       | 9        | 9        |
|                       | Board-committee members — Men                                                                           | %        | 70       | 70       | n/a      | n/a      |
|                       | Board-committee members — Women                                                                         | %        | 30       | 30       | n/a      | n/a      |
|                       | Variable remuneration — variable pay as % of executive total remuneration <sup>38</sup>                 | %        | 14.87    | 15.81    | n/a      | n/a      |
|                       | Business-ethics violations — monetary losses (€)                                                        | €        | 0        | 0        | 0        | 0        |
|                       | Business-ethics violations — number of cases                                                            | #        | 0        | 0        | 0        | 0        |
|                       | Confirmed non-compliance with regulations and law (financial, environmental, labour & social)           | #        | 0        | 0        | 0        | 0        |
|                       | Confirmed incidents of corruption and bribery                                                           | #        | 0        | 0        | 0        | 0        |
|                       | ESG bonds issued                                                                                        | €        | 0        | 0        | 0        | 0        |
|                       | Activities in fossil fuels, chemicals, controversial weapons, tobacco cultivation & production (yes/no) | (yes/no) | no       | no       | no       | no       |
|                       | Annual financial statements — publication date                                                          | Date     | 11/04/25 | 23/04/24 | 10/04/23 | 28/02/22 |

<sup>37</sup> The average tenure of the Board members has been calculated based on the term of the current Board of Directors as of 31 December 2024 and 31 December 2023 for the years 2024 and 2023, respectively.

<sup>38</sup> The indicator has been calculated on the basis of the Chief Executive Officer's remuneration.



## 6. Independent Assurance Statement

### Independent External Assurance Report

ALPHA TRUST HOLDINGS (hereinafter called the “Company”) assigned to ANRAS PC the provision of independent limited assurance for selected elements that are presented in the Sustainability Report that the Company prepared for the time period 2024 (hereinafter called the “Report”). The elements that are the subject of the audit are described in the paragraph Scope of Work.

### Scope of Work

The external limited assurance audit includes the following:

- Audit of the published information and disclosures that are included in the Report, as required as a precondition in order to confirm that the Report has been prepared “In Accordance” (“In accordance”) with the requirements of the GRI Universal Standards 2021.
- Audit of the published indicators that are included in the Report in the “ATHEX 2024 Content Index” and are calculated according to the “ATHEX ESG Reporting Guide 2024” of the Athens Stock Exchange and more specifically of the basic (core), advanced (advanced) and the sector-specific (sector-specific) indicators SS-E1-1, SS-S7-1, SS-S10-1, SS-G1-1, SS-G3-1.

### Implementation Criteria

The audit that was carried out was based on the audit of compliance with the following:

- GRI Universal Standards 2021
- GRI Topic Standards

Additionally, it takes into account the principles of the AA1000AS v3 standard which are the following:

- Inclusivity – Dialogue and communication with the interested parties,
- Materiality – Identification and prioritization of the material topics that concern the sustainability performance by the interested parties,
- Responsiveness – Response to the material sustainability topics and to the related impacts
- Impact – Monitoring, measurement and accountability for the influence of the company’s activities on the wider ecosystem

### Methodology

The tasks that we carried out within the framework of the project are the following:

- Review of the coverage of the requirements of preparation of the Report “In Accordance” (“In Accordance”) with the requirements of the GRI Universal Standards 2021, as these are defined in the guideline standard GRI 1: Foundation 2021.
- Review of the procedures and the methodology that was applied for the identification and the evaluation of the material sustainable development topics that are included in the Report.
- Understanding of the basic structures, the systems, the internal procedures, the policies and the control points that the Company maintains and applies and the way of depiction in the Report. The audit was done on a sample basis, with the purpose of the examination and verification of the evidence.
- Conduct of verification auditing procedures for the disclosures and GRI indicators that are referred to in the “GRI Content Index”
- Conduct of verification auditing procedures for the indicators that are referred to in the “ATHEX 2024 Content Index” that was prepared according to the “ATHEX ESG Reporting Guide 2024” of the Athens Stock Exchange.
- Conduct of interviews and discussions with members of the ESG committee and key participants in the process.

## Independence

The work for the provision of independent limited assurance for the Report that the Company prepared was carried out by an independent team of sustainability assurance professionals. ANRAS PC did not participate in the preparation of any statements or data that are included in the Report except for this Assurance Statement. ANRAS PC maintains full impartiality toward the interested members.

## Limitations

The scope of the review was limited to the activity of ALPHA TRUST HOLDINGS.

The assurance commitments of ANRAS PC are based on the assumption that the data and the information that are provided to us by the Company as part of our review are true, complete and free from material inaccuracies.

Our work concerns the assurance of data and information of the period 1 January 2024 – 31 December 2024 and we did not provide assurance for data or information of a previous reporting period that are presented in the Report.

## Responsibilities of the Company and of the External Assurance Body

The management of the company is responsible for the accuracy and completeness of the data and the reports that are presented in the Report. The responsibility of ANRAS PC is to carry out the tasks that are described in the paragraph “Scope of Work” and to express its conclusions within the framework of the external assurance work, as described in the present document.

## Conclusions

Based on our work carried out for the elements that are described in the paragraph “Scope of Work” we arrive at the following conclusions:

-It did not come to our attention elements that would lead us to the conclusion that the Report has not been prepared “In Accordance” (“In Accordance”) with the requirements of the GRI Universal Standards 2021, as these are defined in the guideline standard GRI 1: Foundation 2021 and are depicted in the “GRI Content Index”.

-It did not come to our attention elements that would lead us to the conclusion that the elements of the indicators that were calculated on the basis of the “ESG Information Disclosure Guide 2024” of the Athens Stock Exchange, as defined in the paragraph “Scope of Work” and are presented in the “ATHEX 2024 Content Index”, contain material inaccuracies.

Also, regarding the principles of AA1000AS v3, nothing has come to our attention that would lead us to the conclusion that in the preparation of the Report the principles of inclusivity, materiality, responsiveness and impact have not been taken into account.

For ANRAS PC

Σοφία Μάρκου



## 7. GRI Content Index

The Sustainability Report has been prepared in accordance with the GRI Standards, as presented in the table below. In addition to references to this Report, the table includes references to the ALPHA TRUST HOLDINGS [Annual Report 2024](#), the Company's website and other published documents.

|                                   |                                                                                                                                                     |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Statement of Use                  | ALPHA TRUST HOLDINGS has prepared the 2024 Sustainability Report in accordance with the GRI Standards for the period from 01/01/2024 to 31/12/2024. |
| GRI 1 used                        | GRI 1: Foundation 2021                                                                                                                              |
| Applicable GRI Sector Standard(s) | None                                                                                                                                                |

| GRI Standard/<br>Other source      | Disclosure                                                   | Location                                                                                                                           | Omissions                                                                                                                                             |        |             | GRI<br>Sector<br>Standard<br>reference<br>number |
|------------------------------------|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|--------------------------------------------------|
|                                    |                                                              |                                                                                                                                    | Requirement(s)<br>omitted                                                                                                                             | Reason | Explanation |                                                  |
| General Disclosures                |                                                              |                                                                                                                                    |                                                                                                                                                       |        |             |                                                  |
| GRI 2: General<br>Disclosures 2021 | 2-1 Organisational details                                   | 1.1 Group Identity and Structure<br>1.2 Shareholding Structure<br>1.3 The Values that Guide Us                                     | A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available. |        |             |                                                  |
|                                    | 2-2 Entities included in the sustainability report           | Report Parameters                                                                                                                  |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-3 Reporting period, frequency and contact point            | Report Parameters                                                                                                                  |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-4 Restatements of information                              | Report Parameters                                                                                                                  |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-5 External assurance                                       | Report Parameters<br>6. Independent Assurance Statement                                                                            |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-6 Activities, value chain and other business relationships | 1.4 Investment Products & Services<br>1.5 Client / Investor at the Center                                                          |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-7 Employees                                                | 4.1 Human Capital as a Priority<br>4.10 ESG Performance Indicators   Society                                                       |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-8 Workers who are not employees                            | 4.10 ESG Performance Indicators   Society                                                                                          |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-9 Governance structure and composition                     | 5.1 Governance Framework<br>5.2 Organisational Chart<br>5.3 Board of Directors<br><a href="#">Annual Report 2024</a> (pages 30-49) |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-10 Nomination and selection of the highest governance body | 5.6 Evaluation of the Board of Directors and its Committees<br><a href="#">Annual Report 2024</a> (pages 48-49)                    |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-11 Chair of the highest governance body                    | 5.3 Board of Directors<br>5.10 ESG Performance Indicators   Corporate Governance<br><a href="#">Annual Report 2024</a> (page 39)   |                                                                                                                                                       |        |             |                                                  |
|                                    | 2-12 Role of the highest governance                          | 2.2 Sustainability Governance                                                                                                      |                                                                                                                                                       |        |             |                                                  |

| GRI Standard/<br>Other source | Disclosure                                                                  | Location                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Omissions                 |                                     |                                    | GRI<br>Sector<br>Standard<br>reference<br>number |
|-------------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-------------------------------------|------------------------------------|--------------------------------------------------|
|                               |                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Requirement(s)<br>omitted | Reason                              | Explanation                        |                                                  |
|                               | body in overseeing the management of impacts                                | 5.3 Board of Directors                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                           |                                     |                                    |                                                  |
|                               | <b>2-13</b> Delegation of responsibility for managing impacts               | 2.2 Sustainability Governance                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                           |                                     |                                    |                                                  |
|                               | <b>2-14</b> Role of the highest governance body in sustainability reporting | ESG Committee;<br><a href="#">Annual Report 2024</a><br>(pages 6,48)                                                                                                                                                                                                                                                                                                                                                                                                                 |                           |                                     |                                    |                                                  |
|                               | <b>2-15</b> Conflicts of interest                                           | Conflict of Interest Prevention & Management Policy<br><a href="https://atrust.gr/wp-content/uploads/2024/02/Conflict%20of%20Interest%20Prevention%20&amp;%20Management%20Policy%20(Appendix%2012).pdf">https://atrust.gr/wp-content/uploads/2024/02/Conflict of Interest Prevention &amp; Management Policy (Appendix 12).pdf</a><br><br><a href="#">Annual Report 2024</a><br>(pages 18-19, 40-42)                                                                                 |                           |                                     |                                    |                                                  |
|                               | <b>2-16</b> Communication of critical concerns                              | 2.2 Sustainability Governance<br>5.5 Board Committees/ ESG Committee                                                                                                                                                                                                                                                                                                                                                                                                                 | 2-16 b                    | Information unavailable/ incomplete | Information currently/ unavailable |                                                  |
|                               | <b>2-17</b> Collective knowledge of the highest governance body             | 5.3 Board of Directors<br><a href="#">Annual Report 2024</a><br>(pages 19-20)                                                                                                                                                                                                                                                                                                                                                                                                        |                           |                                     |                                    |                                                  |
|                               | <b>2-18</b> Evaluation of the performance of the highest governance body    | 5.6 Evaluation of the Board of Directors and its Committees<br><a href="#">Annual Report 2024</a><br>(page 18)                                                                                                                                                                                                                                                                                                                                                                       |                           |                                     |                                    |                                                  |
|                               | <b>2-19</b> Remuneration policies                                           | <b>a. Remuneration Policy</b><br><a href="https://atrust.gr/wp-content/uploads/2024/05/Remuneration%20Policy%20(Appendix%2019).pdf">https://atrust.gr/wp-content/uploads/2024/05/Remuneration Policy (Appendix 19).pdf</a><br><br><b>b. Remuneration Report 2024</b><br><a href="https://atrust.gr/wp-content/uploads/2025/04/Remuneration%20Report%202024.pdf">https://atrust.gr/wp-content/uploads/2025/04/Remuneration Report 2024.pdf</a>                                        |                           |                                     |                                    |                                                  |
|                               | <b>2-20</b> Process to determine remuneration                               | <b>a. 2024 Remuneration Report</b><br><a href="https://atrust.gr/wp-content/uploads/2025/04/Remuneration%20Report%202024.pdf">https://atrust.gr/wp-content/uploads/2025/04/Remuneration Report 2024.pdf</a><br><br><b>b. AGM Decisions &amp; Voting Results</b><br><a href="https://atrust.gr/wp-content/uploads/2025/05/20250522%20AGM%20Decisions%20&amp;%20Voting%20Results.pdf">https://atrust.gr/wp-content/uploads/2025/05/20250522 AGM Decisions &amp; Voting Results.pdf</a> |                           |                                     |                                    |                                                  |
|                               | <b>2-21</b> Annual total compensation ratio                                 | 5.10 ESG Performance Indicators   Corporate Governance                                                                                                                                                                                                                                                                                                                                                                                                                               |                           |                                     |                                    |                                                  |

| GRI Standard/<br>Other source     | Disclosure                                              | Location                                                                                                                                                                                                         | Omissions                                                                                                                                             |                                    |                                   | GRI<br>Sector<br>Standard<br>reference<br>number |
|-----------------------------------|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-----------------------------------|--------------------------------------------------|
|                                   |                                                         |                                                                                                                                                                                                                  | Requirement(s)<br>omitted                                                                                                                             | Reason                             | Explanation                       |                                                  |
|                                   | 2-22 Statement on sustainable development strategy      | Message from Management                                                                                                                                                                                          |                                                                                                                                                       |                                    |                                   |                                                  |
|                                   | 2-23 Policy commitments                                 | 2.1 Commitment to Sustainable Development<br>2.5 Policies and Commitments for Sustainable Development<br>2.7 Our Commitment to Human Rights<br>5.4 Codes, Policies and Procedures                                |                                                                                                                                                       |                                    |                                   |                                                  |
|                                   | 2-24 Embedding policy commitments                       | 2.5 Policies and Commitments for Sustainable Development                                                                                                                                                         |                                                                                                                                                       |                                    |                                   |                                                  |
|                                   | 2-25 Processes to remediate negative impacts            | 2.5 Policies and Commitments for Sustainable Development / Grievance Mechanisms<br>3.5 Risks and opportunities from climate change                                                                               | 2-25 d-e                                                                                                                                              | Information unavailable/incomplete | Information currently unavailable |                                                  |
|                                   | 2-26 Mechanisms for seeking advice and raising concerns | Whistleblowing Policy<br><a href="https://atrust.gr/wp-content/uploads/2024/03/Whistleblowing-Policy-(Appendix-24).pdf">https://atrust.gr/wp-content/uploads/2024/03/Whistleblowing-Policy-(Appendix-24).pdf</a> |                                                                                                                                                       |                                    |                                   |                                                  |
|                                   | 2-27 Compliance with laws and regulations               | 5.1 Governance Framework<br>5.4 Codes, Policies and Procedures<br>5.10 ESG Performance Indicators   Corporate Governance                                                                                         |                                                                                                                                                       |                                    |                                   |                                                  |
|                                   | 2-28 Membership associations                            | 2.1 Commitment to Sustainable Development<br>2.9 Participation in Initiatives and Organisations                                                                                                                  |                                                                                                                                                       |                                    |                                   |                                                  |
|                                   | 2-29 Approach to stakeholder engagement                 | 2.11 Dialogue with Stakeholders                                                                                                                                                                                  |                                                                                                                                                       |                                    |                                   |                                                  |
|                                   | 2-30 Collective bargaining agreements                   | 4.10 ESG Performance Indicators   Society                                                                                                                                                                        |                                                                                                                                                       |                                    |                                   |                                                  |
| Material topics                   |                                                         |                                                                                                                                                                                                                  |                                                                                                                                                       |                                    |                                   |                                                  |
| GRI 3:<br>Material Topics<br>2021 | 3-1 Process to determine material topics                | 2.11 Dialogue with Stakeholders<br>2.12 Materiality Analysis Process                                                                                                                                             | A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available. |                                    |                                   |                                                  |
|                                   | 3-2 List of material topics                             | 2.12 Materiality Analysis Process<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)                                                                                                                    |                                                                                                                                                       |                                    |                                   |                                                  |
| Economic performance              |                                                         |                                                                                                                                                                                                                  |                                                                                                                                                       |                                    |                                   |                                                  |

A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.

| GRI Standard/<br>Other source                         | Disclosure                                                                                  | Location                                                                                                                                                                                           | Omissions                 |                                     |                                   | GRI<br>Sector<br>Standard<br>reference<br>number |
|-------------------------------------------------------|---------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-------------------------------------|-----------------------------------|--------------------------------------------------|
|                                                       |                                                                                             |                                                                                                                                                                                                    | Requirement(s)<br>omitted | Reason                              | Explanation                       |                                                  |
| <b>GRI 3:<br/>Material Topics<br/>2021</b>            | <b>3-3</b> Management of material topics                                                    | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.14 Our Targets for a Sustainable Future                                                             | 3-3 e.iv, f               | Information unavailable /incomplete | Information currently unavailable |                                                  |
| <b>GRI 201:<br/>Economic<br/>Performance<br/>2016</b> | <b>201-1</b> Direct economic value generated and distributed                                | 1.6 Business Excellence Annual Report 2024                                                                                                                                                         |                           |                                     |                                   |                                                  |
|                                                       | <b>201-3</b> Defined benefit plan obligations and other retirement plans                    | -                                                                                                                                                                                                  | The disclosure as a whole | Not applicable                      |                                   |                                                  |
|                                                       | <b>201-4</b> Financial assistance received from government                                  | -                                                                                                                                                                                                  | The disclosure as a whole | Not applicable                      |                                   |                                                  |
| <b>Environment</b>                                    |                                                                                             |                                                                                                                                                                                                    |                           |                                     |                                   |                                                  |
| <b>Climate Change</b>                                 |                                                                                             |                                                                                                                                                                                                    |                           |                                     |                                   |                                                  |
| <b>GRI 3:<br/>Material Topics<br/>2021</b>            | <b>3-3</b> Management of material topics                                                    | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f               | Information unavailable/ incomplete | Information currently unavailable |                                                  |
| <b>GRI 201:<br/>Economic<br/>Performance<br/>2016</b> | <b>201-2</b> Financial implications and other risks and opportunities due to climate change | 3.5 Risks and opportunities from climate change                                                                                                                                                    | 201-2 a. iii, iv, v       | Information unavailable/ incomplete | Information currently unavailable |                                                  |
| <b>Energy efficiency &amp; air emissions</b>          |                                                                                             |                                                                                                                                                                                                    |                           |                                     |                                   |                                                  |
| <b>GRI 3:<br/>Material Topics<br/>2021</b>            | <b>3-3</b> Management of material topics                                                    | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f               | Information unavailable/ incomplete | Information currently unavailable |                                                  |
| <b>GRI 302:<br/>Energy 2016</b>                       | <b>302-1</b> Energy consumption within the Organisation                                     | 3.1 Energy Consumption<br>3.6 ESG Performance Indicators   Environment                                                                                                                             | 302-1 e                   | Information unavailable/ incomplete | Information currently unavailable |                                                  |
|                                                       | <b>302-2</b> Energy consumption outside of the Organisation                                 | -                                                                                                                                                                                                  | The disclosure as a whole | Information unavailable/ incomplete | Information currently unavailable |                                                  |

| GRI Standard/<br>Other source      | Disclosure                                                                                   | Location                                                                               | Omissions                 |                |                                                                                           | GRI<br>Sector<br>Standard<br>reference<br>number |
|------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|---------------------------|----------------|-------------------------------------------------------------------------------------------|--------------------------------------------------|
|                                    |                                                                                              |                                                                                        | Requirement(s)<br>omitted | Reason         | Explanation                                                                               |                                                  |
|                                    | <b>302-3</b> Energy intensity                                                                | 3.2 Energy Efficiency<br>3.6 ESG Performance Indicators   Environment                  |                           |                |                                                                                           |                                                  |
|                                    | <b>302-4</b> Reduction of energy consumption                                                 | 3.1 Energy Consumption<br>3.6 ESG Performance Indicators   Environment                 |                           |                |                                                                                           |                                                  |
|                                    | <b>302-5</b> Reductions in energy requirements of products and services                      | -                                                                                      | 302-5 a, b, c             | Not applicable | The nature of Group's products and services does not entail specific energy requirements. |                                                  |
| <b>GRI 305:<br/>Emissions 2016</b> | <b>305-1</b> Direct (Scope 1) GHG emissions                                                  | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |                           |                |                                                                                           |                                                  |
|                                    | <b>305-2</b> Energy indirect (Scope 2) GHG emissions                                         | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |                           |                |                                                                                           |                                                  |
|                                    | <b>305-3</b> Other indirect (Scope 3) GHG emissions                                          | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |                           |                |                                                                                           |                                                  |
|                                    | <b>305-4</b> GHG emissions intensity                                                         | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |                           |                |                                                                                           |                                                  |
|                                    | <b>305-5</b> Reduction of GHG emissions                                                      | 3.6 ESG Performance Indicators   Environment                                           |                           |                |                                                                                           |                                                  |
|                                    | <b>305-6</b> Emissions of ozone-depleting substances (ODS)                                   | 3.6 ESG Performance Indicators   Environment                                           |                           |                |                                                                                           |                                                  |
|                                    | <b>305-7</b> Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions | 3.6 ESG Performance Indicators   Environment                                           |                           |                |                                                                                           |                                                  |
| <b>Waste management</b>            |                                                                                              |                                                                                        |                           |                |                                                                                           |                                                  |

| GRI Standard/<br>Other source              | Disclosure                                                                                                                                                                                                                                                          | Location                                                                                                                                                                                           | Omissions                                                  |                                                                              |                                                                                                                                                | GRI<br>Sector<br>Standard<br>reference<br>number |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
|                                            |                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                    | Requirement(s)<br>omitted                                  | Reason                                                                       | Explanation                                                                                                                                    |                                                  |
| <b>GRI 3:<br/>Material Topics<br/>2021</b> | <b>3-3</b> Management of material topics                                                                                                                                                                                                                            | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f                                                | Information unavailable/incomplete                                           | Information currently unavailable                                                                                                              |                                                  |
| <b>GRI 306: Waste<br/>2020</b>             | <b>306-1</b> Waste generation and significant waste-related impacts<br><b>306-2</b> Management of significant waste-related impacts<br><b>306-3</b> Waste generated<br><br><b>306-4</b> Waste diverted from disposal<br><br><b>306-5</b> Waste directed to disposal | 3.4 Conservation of Natural Resources<br><br>3.4 Conservation of Natural Resources<br><br>3.4 Conservation of Natural Resources<br>3.6 ESG Performance Indicators   Environment<br>-<br><br>-      | The disclosure as a whole<br><br>The disclosure as a whole | Information unavailable/incomplete<br><br>Information unavailable/incomplete | Currently, the Group does not track the diversion of waste.<br><br>Currently, the Group does not track the waste that is directed to disposal. |                                                  |
| <b>Society</b>                             |                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                    |                                                            |                                                                              |                                                                                                                                                |                                                  |
| <b>Customer/Investor Satisfaction</b>      |                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                    |                                                            |                                                                              |                                                                                                                                                |                                                  |
| <b>GRI 3:<br/>Material Topics<br/>2021</b> | <b>3-3</b> Management of material topics                                                                                                                                                                                                                            | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f                                                | Information unavailable/incomplete                                           | Information currently unavailable                                                                                                              |                                                  |
| <b>Group Indicators</b>                    | Participation                                                                                                                                                                                                                                                       | 1.1 Group Identity and Structure<br>1.2 Shareholding Structure<br>5.9 Participation                                                                                                                |                                                            |                                                                              |                                                                                                                                                |                                                  |
| <b>Health, Safety &amp; Well-being</b>     |                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                    |                                                            |                                                                              |                                                                                                                                                |                                                  |
| <b>GRI 3:<br/>Material Topics<br/>2021</b> | <b>3-3</b> Management of material topics                                                                                                                                                                                                                            | 2.3 Sustainable Development                                                                                                                                                                        | 3-3 e.iv, f                                                | Information unavailable/incomplete                                           | Information currently unavailable                                                                                                              |                                                  |

| GRI Standard/<br>Other source                           | Disclosure                                                                                                                 | Location                                                                                                                                                               | Omissions                 |                                    |                                   | GRI<br>Sector<br>Standard<br>reference<br>number |
|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|-----------------------------------|--------------------------------------------------|
|                                                         |                                                                                                                            |                                                                                                                                                                        | Requirement(s)<br>omitted | Reason                             | Explanation                       |                                                  |
|                                                         |                                                                                                                            | Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future |                           |                                    |                                   |                                                  |
| <b>GRI 403:<br/>Occupational Health and Safety 2018</b> | <b>403-1</b> Occupational health and safety management system                                                              | 4.5 Health & Safety at work<br>4.10 ESG Performance Indicators   Society                                                                                               |                           |                                    |                                   |                                                  |
|                                                         | <b>403-2</b> Hazard identification, risk assessment, and incident investigation                                            | 4.5 Health & Safety at work<br>4.10 ESG Performance Indicators   Society                                                                                               |                           |                                    |                                   |                                                  |
|                                                         | <b>403-3</b> Occupational health services                                                                                  | -                                                                                                                                                                      | The disclosure as a whole | Information unavailable/incomplete | Information currently unavailable |                                                  |
|                                                         | <b>403-4</b> Worker participation, consultation, and communication on occupational health and safety                       | -                                                                                                                                                                      | The disclosure as a whole | Information unavailable/incomplete | Information currently unavailable |                                                  |
|                                                         | <b>403-5</b> Worker training on occupational health and safety                                                             | -                                                                                                                                                                      | The disclosure as a whole | Information unavailable/incomplete | Information currently unavailable |                                                  |
|                                                         | <b>403-6</b> Promotion of worker health                                                                                    | 4.5 Health & Safety at work                                                                                                                                            |                           |                                    |                                   |                                                  |
|                                                         | <b>403-7</b> Prevention and mitigation of occupational health and safety impacts directly linked by business relationships | 4.5 Health & Safety at work                                                                                                                                            |                           |                                    |                                   |                                                  |
|                                                         | <b>403-8</b> Workers covered by an occupational health and safety management system                                        | 4.5 Health & Safety at work<br>4.10 ESG Performance Indicators   Society                                                                                               |                           |                                    |                                   |                                                  |
|                                                         | <b>403-9</b> Work-related injuries                                                                                         | 4.5 Health & Safety at work<br>4.10 ESG Performance Indicators   Society                                                                                               |                           |                                    |                                   |                                                  |
|                                                         | <b>403-10</b> Work-related ill health                                                                                      | -                                                                                                                                                                      | The disclosure as a whole | Information unavailable/incomplete | Information currently unavailable |                                                  |
| <b>Corporate culture &amp; work environment</b>         |                                                                                                                            |                                                                                                                                                                        |                           |                                    |                                   |                                                  |
| <b>GRI 3:<br/>Material Topics 2021</b>                  | <b>3-3</b> Management of material topics                                                                                   | 2.3 Sustainable Development Strategic Framework                                                                                                                        | 3-3 e.iv, f               | Information unavailable/incomplete | Information currently unavailable |                                                  |

| GRI Standard/<br>Other source                        | Disclosure                                                                                                      | Location                                                                                                                                                                                           | Omissions                 |                                    |                                   | GRI<br>Sector<br>Standard<br>reference<br>number |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|-----------------------------------|--------------------------------------------------|
|                                                      |                                                                                                                 |                                                                                                                                                                                                    | Requirement(s)<br>omitted | Reason                             | Explanation                       |                                                  |
|                                                      |                                                                                                                 | 2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future                                                    |                           |                                    |                                   |                                                  |
| <b>Group Indicators</b>                              | Percentage of employees working in the Group for over 20 years                                                  | 4.4 Attraction and Retention of Employees                                                                                                                                                          |                           |                                    |                                   |                                                  |
| <b>Diversity &amp; equal opportunities</b>           |                                                                                                                 |                                                                                                                                                                                                    |                           |                                    |                                   |                                                  |
| <b>GRI 3: Material Topics 2021</b>                   | <b>3-3</b> Management of material topics                                                                        | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f               | Information unavailable/incomplete | Information currently unavailable |                                                  |
| <b>GRI 401: Employment 2016</b>                      | <b>401-1</b> New employee hires and employee turnover                                                           | 4.10 ESG Performance Indicators   Society                                                                                                                                                          |                           |                                    |                                   |                                                  |
|                                                      | <b>401-2</b> Benefits provided to full-time employees that are not provided to temporary or part-time employees | 4.4 Attraction and Retention of Employees                                                                                                                                                          |                           |                                    |                                   |                                                  |
|                                                      | <b>401-3</b> Parental leave                                                                                     | -                                                                                                                                                                                                  | The disclosure as a whole | Information unavailable/incomplete | Information currently unavailable |                                                  |
| <b>GRI 405: Diversity and Equal Opportunity 2016</b> | <b>405-1</b> Diversity of governance bodies and employees                                                       | 5.3 Board of Directors<br>4.10 ESG Performance Indicators   Society<br>5.10 ESG Performance Indicators   Corporate Governance                                                                      |                           |                                    |                                   |                                                  |
|                                                      | <b>405-2</b> Ratio of basic salary and remuneration of women to men                                             | 4.10 ESG Performance Indicators   Society<br>5.10 ESG Performance Indicators   Corporate Governance                                                                                                |                           |                                    |                                   |                                                  |
| <b>Training &amp; development</b>                    |                                                                                                                 |                                                                                                                                                                                                    |                           |                                    |                                   |                                                  |
| <b>GRI 3: Material Topics 2021</b>                   | <b>3-3</b> Management of material topics                                                                        | 2.3 Sustainable Development Strategic Framework                                                                                                                                                    | 3-3 e.iv, f               | Information unavailable/incomplete | Information currently unavailable |                                                  |

| GRI Standard/<br>Other source                  | Disclosure                                                                                        | Location                                                                                                                                                                                           | Omissions                 |                                    |                                           | GRI<br>Sector<br>Standard<br>reference<br>number |
|------------------------------------------------|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|-------------------------------------------|--------------------------------------------------|
|                                                |                                                                                                   |                                                                                                                                                                                                    | Requirement(s)<br>omitted | Reason                             | Explanation                               |                                                  |
|                                                |                                                                                                   | 2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future                                                    |                           |                                    |                                           |                                                  |
| <b>GRI 404:</b><br>Training and Education 2016 | <b>404-1</b> Average hours of training per year per employee                                      | 2.7 Our Commitment to Human Rights<br>4.3 Training and Continuous Development of Employees<br>4.10 ESG Performance Indicators   Society                                                            |                           |                                    |                                           |                                                  |
|                                                | <b>404-2</b> Programs for upgrading employee skills and transition assistance programs            | 4.3 Training and Continuous Development of Employees                                                                                                                                               | 404-2 b                   | Not applicable                     | The programs referred to are not provided |                                                  |
|                                                | <b>404-3</b> Percentage of employees receiving regular performance and career development reviews | 4.10 ESG Performance Indicators   Society                                                                                                                                                          |                           |                                    |                                           |                                                  |
| <b>Product &amp; service innovation</b>        |                                                                                                   |                                                                                                                                                                                                    |                           |                                    |                                           |                                                  |
| <b>GRI 3:</b><br><b>Material Topics 2021</b>   | <b>3-3</b> Management of material topics                                                          | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f               | Information unavailable/incomplete | Information currently unavailable         |                                                  |
| <b>Group Indicators</b>                        | Innovative certifications                                                                         | 2.13 Performance Monitoring & Evaluation (Selected KPIs)                                                                                                                                           |                           |                                    |                                           |                                                  |
| <b>Social Contribution</b>                     |                                                                                                   |                                                                                                                                                                                                    |                           |                                    |                                           |                                                  |
| <b>GRI 3:</b><br><b>Material Topics 2021</b>   | <b>3-3</b> Management of material topics                                                          | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f               | Information unavailable/incomplete | Information currently unavailable         |                                                  |

| GRI Standard/<br>Other source             | Disclosure                                                                            | Location                                                                                                                                                                                           | Omissions                 |                                    |                                   | GRI<br>Sector<br>Standard<br>reference<br>number |
|-------------------------------------------|---------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|-----------------------------------|--------------------------------------------------|
|                                           |                                                                                       |                                                                                                                                                                                                    | Requirement(s)<br>omitted | Reason                             | Explanation                       |                                                  |
| <b>Group Indicators</b>                   | Corporate social responsibility (CSR) initiatives                                     | 4.6 Responsible Investments<br>4.7 Our Actions<br>4.8 Book Publications- ALPHA TRUST<br>4.9 ALPHA TRUST Publications<br>4.10 ESG Performance Indicators   Society                                  |                           |                                    |                                   |                                                  |
| <b>Corporate Governance</b>               |                                                                                       |                                                                                                                                                                                                    |                           |                                    |                                   |                                                  |
| <b>Transparency &amp; Anti-corruption</b> |                                                                                       |                                                                                                                                                                                                    |                           |                                    |                                   |                                                  |
| <b>GRI 3: Material Topics 2021</b>        | <b>3-3</b> Management of material topics                                              | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f               | Information unavailable/incomplete | Information currently unavailable |                                                  |
| <b>GRI 205: Anti-corruption 2016</b>      | <b>205-1</b> Operations assessed for risks related to corruption                      | 5.8 Integrity and Ethical Standards<br>3.4. Risk Management<br><a href="#">Annual Report 2024</a>                                                                                                  |                           |                                    |                                   |                                                  |
|                                           | <b>205-2</b> Communication and training about anti-corruption policies and procedures | 4.10 ESG Performance Indicators   Society                                                                                                                                                          |                           |                                    |                                   |                                                  |
|                                           | <b>205-3</b> Confirmed incidents of corruption and actions taken                      | 2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>5.10 ESG Performance Indicators   Corporate Governance                                                                                 |                           |                                    |                                   |                                                  |
| <b>Regulatory compliance</b>              |                                                                                       |                                                                                                                                                                                                    |                           |                                    |                                   |                                                  |
| <b>GRI 3: Material Topics 2021</b>        | <b>3-3</b> Management of material topics                                              | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future | 3-3 e.iv, f               | Information unavailable/incomplete | Information currently unavailable |                                                  |
| <b>Group Indicators</b>                   | Total incidents of non-compliance                                                     | 2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>5.10 ESG Performance                                                                                                                   |                           |                                    |                                   |                                                  |

| GRI Standard/<br>Other source               | Disclosure                                                    | Location                                                                                                                                                                                                                         | Omissions                 |                                           |                                         | GRI<br>Sector<br>Standard<br>reference<br>number |
|---------------------------------------------|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|-------------------------------------------|-----------------------------------------|--------------------------------------------------|
|                                             |                                                               |                                                                                                                                                                                                                                  | Requirement(s)<br>omitted | Reason                                    | Explanation                             |                                                  |
|                                             |                                                               | Indicators  <br>Corporate<br>Governance                                                                                                                                                                                          |                           |                                           |                                         |                                                  |
| <b>Digitalization &amp; Data Security</b>   |                                                               |                                                                                                                                                                                                                                  |                           |                                           |                                         |                                                  |
| <b>GRI 3:<br/>Material Topics<br/>2021</b>  | <b>3-3</b> Management of<br>material topics                   | 2.3 Sustainable<br>Development<br>Strategic<br>Framework<br>2.4 Pillars of<br>Sustainable<br>Development<br>2.13 Performance<br>Monitoring &<br>Evaluation (Selected<br>KPIs)<br>2.14 Our Targets for<br>a Sustainable<br>Future | 3-3 e.iv, f               | Information<br>unavailable/<br>incomplete | Information<br>currently<br>unavailable |                                                  |
| <b>Group Indicators</b>                     | Percentage of records<br>digitized                            | 2.13 Performance<br>Monitoring &<br>Evaluation (Selected<br>KPIs)                                                                                                                                                                |                           |                                           |                                         |                                                  |
| <b>Integration of Sustainability Topics</b> |                                                               |                                                                                                                                                                                                                                  |                           |                                           |                                         |                                                  |
| <b>GRI 3:<br/>Material Topics<br/>2021</b>  | <b>3-3</b> Management of<br>material topics                   | 2.3 Sustainable<br>Development<br>Strategic<br>Framework<br>2.4 Pillars of<br>Sustainable<br>Development<br>2.13 Performance<br>Monitoring &<br>Evaluation (Selected<br>KPIs)<br>2.14 Our Targets for<br>a Sustainable<br>Future | 3-3 e.iv, f               | Information<br>unavailable/<br>incomplete | Information<br>currently<br>unavailable |                                                  |
| <b>Group Indicators</b>                     | AuM with sustainability<br>risk metrics & Active<br>Ownership | 2.6 Responsible<br>Investments<br>2.13 Performance<br>Monitoring &<br>Evaluation (Selected<br>KPIs)                                                                                                                              | 3-3 e.iv, f               | Information<br>unavailable/<br>incomplete | Information<br>currently<br>unavailable |                                                  |

## 8. ATHEX ESG Reporting Guide 2024 Content Index

The table below lists references to sections of the Report and to other available documents, in accordance with the **ATHEX ESG Reporting Guide 2024** (Athens Stock Exchange Non-Financial Information Disclosure Guide 2024).

| 2024 ID                          | 2024 Sub - ID | Metric                                                                                                                                    | Reference                                                                              |
|----------------------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| ESG Category: <b>Environment</b> |               |                                                                                                                                           |                                                                                        |
| C-E1                             | C-E1-1        | Scope 1 emissions - Total amount of direct emissions (Scope 1)                                                                            | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |
| C-E1                             | C-E1-2        | Scope 1 emissions - GHG intensity of Scope 1 emissions                                                                                    | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |
| C-E2                             | C-E2-1        | Scope 2 emissions - Total amount of indirect emissions (Scope 2) - Location based approach                                                | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |
| C-E2                             | C-E2-2        | Scope 2 emissions - GHG intensity of Scope 2 emissions - Location based approach                                                          | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |
| C-E2                             | C-E2-3        | Scope 2 emissions - Total amount of indirect emissions (Scope 2) - Market based approach                                                  | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |
| C-E2                             | C-E2-4        | Scope 2 emissions - GHG intensity of Scope 2 emissions - Market based approach                                                            | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |
| C-E3                             | C-E3-1        | Energy consumption and production - Total amount of energy consumed within the organisation                                               | 3.1 Energy Consumption<br>3.6 ESG Performance Indicators   Environment                 |
| C-E3                             | C-E3-2        | Energy consumption and production - Percentage of electricity consumed                                                                    | 3.1 Energy Consumption<br>3.6 ESG Performance Indicators   Environment                 |
| C-E3                             | C-E3-3        | Energy consumption and production - Percentage of renewable energy consumed                                                               | 3.1 Energy Consumption<br>3.6 ESG Performance Indicators   Environment                 |
| C-E3                             | C-E3-4        | Energy consumption and production - Total amount of energy produced                                                                       | 3.6 ESG Performance Indicators   Environment                                           |
| C-E3                             | C-E3-5        | Energy consumption and production - Percentage of renewable energy produced                                                               | 3.6 ESG Performance Indicators   Environment                                           |
| A-E1                             | A-E1-1        | Scope 3 emissions - Total amount of other indirect emissions (Scope 3)                                                                    | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |
| A-E1                             | A-E1-2        | Scope 3 emissions - GHG intensity of Scope 3 emissions                                                                                    | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment |
| A-E2                             | A-E2-1        | Climate change risks and opportunities - Discussion of climate change-related risks and opportunities that can affect business operations | 3.5 Risks and opportunities from climate change                                        |
| A-E3                             | A-E3-1        | Waste management - Total amount of hazardous waste                                                                                        | 3.4 Conservation of Natural Resources<br>3.6 ESG Performance Indicators   Environment  |
| A-E3                             | A-E3-2        | Waste management - Total amount of non-hazardous waste                                                                                    | 3.4 Conservation of Natural Resources<br>3.6 ESG Performance Indicators   Environment  |
| A-E3                             | A-E3-3        | Waste management - Percentage of waste by type of treatment - Recycled                                                                    | 3.4 Conservation of Natural Resources<br>3.6 ESG Performance Indicators   Environment  |
| A-E3                             | A-E3-4        | Waste management - Percentage of waste by type of treatment - Composted                                                                   | 3.4 Conservation of Natural Resources<br>3.6 ESG Performance Indicators   Environment  |
| A-E3                             | A-E3-5        | Waste management - Percentage of waste by type of treatment - Incinerated                                                                 | 3.4 Conservation of Natural Resources<br>3.6 ESG Performance Indicators   Environment  |
| A-E3                             | A-E3-6        | Waste management - Percentage of waste by type of treatment - Landfilled                                                                  | 3.4 Conservation of Natural Resources<br>3.6 ESG Performance Indicators   Environment  |
| A-E3                             | A-E3-7        | Waste management - Total amount of radioactive waste                                                                                      | 3.6 ESG Performance Indicators   Environment                                           |
| A-E4                             | A-E4-1        | Total amount of effluent discharge containing polluting substances                                                                        | 3.6 ESG Performance Indicators   Environment                                           |
| A-E5                             | A-E5-1        | Biodiversity sensitive areas - Description of the impact of business operations on biodiversity sensitive areas                           | 3.4 Conservation of Natural Resources<br>3.6 ESG Performance Indicators   Environment  |

| 2024 ID                      | 2024 Sub - ID | Metric                                                                                                                       | Reference                                                                                                                                      |
|------------------------------|---------------|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| A-E6                         | A-E6-1        | Climate change policy                                                                                                        | 3.5 Risks and opportunities from climate change<br><a href="#">Sustainable Development Policy</a>                                              |
| A-E7                         | A-E7-1        | Removals and carbon credits - GHG removals and storage                                                                       | 3.6 ESG Performance Indicators   Environment                                                                                                   |
| A-E7                         | A-E7-2        | Removals and carbon credits - Carbon credits                                                                                 | 3.6 ESG Performance Indicators   Environment                                                                                                   |
| A-E8                         | A-E8-1        | Total GHG emissions - Total GHG emissions location based                                                                     | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment                                                         |
| A-E8                         | A-E8-2        | Total GHG emissions - Total GHG emissions market based                                                                       | 3.3 Greenhouse Gas Emissions Inventory<br>3.6 ESG Performance Indicators   Environment                                                         |
| SS-E1                        | SS-E1-1       | Transition plan - Disclosure of transition plan for climate change mitigation                                                | 2.14 Our Targets for a Sustainable Future<br>3.3 Greenhouse Gas Emissions Inventory<br>3.5 Risks and opportunities from climate change         |
| <b>ESG Category: Society</b> |               |                                                                                                                              |                                                                                                                                                |
| C-S1                         | C-S1-1        | Stakeholder engagement - Discussion of organisation's main stakeholders and analysis of key stakeholder engagement practices | 2.11 Dialogue with Stakeholders                                                                                                                |
| C-S2                         | C-S2-1        | Percentage of female employees                                                                                               | 4.1 Human Capital as a Priority<br>4.10 ESG Performance Indicators   Society                                                                   |
| C-S3                         | C-S3-1        | Percentage of women at top management level                                                                                  | 4.1 Human Capital as a Priority<br>4.10 ESG Performance Indicators   Society                                                                   |
| C-S4                         | C-S4-1        | Employee turnover - Percentage of full-time employee voluntary turnover                                                      | 4.4 Attraction and Retention of Employees<br>4.10 ESG Performance Indicators   Society                                                         |
| C-S4                         | C-S4-2        | Employee turnover - Percentage of full-time employee involuntary turnover                                                    | 4.4 Attraction and Retention of Employees<br>4.10 ESG Performance Indicators   Society                                                         |
| C-S4                         | C-S4-3        | Employee turnover - Total employee turnover                                                                                  | 4.4 Attraction and Retention of Employees<br>4.10 ESG Performance Indicators   Society                                                         |
| C-S5                         | C-S5-1        | Employee training - Average training hours of employees at top management level                                              | 4.3 Training and Continuous Development of Employees<br>4.10 ESG Performance Indicators   Society                                              |
| C-S5                         | C-S5-2        | Employee training - Average training hours of the rest employee categories                                                   | 4.3 Training and Continuous Development of Employees<br>4.10 ESG Performance Indicators   Society                                              |
| C-S5                         | C-S5-3        | Employee training - Average training hours - Women                                                                           | 4.3 Training and Continuous Development of Employees<br>4.10 ESG Performance Indicators   Society                                              |
| C-S5                         | C-S5-4        | Employee training - Average training hours - Men                                                                             | 4.3 Training and Continuous Development of Employees<br>4.10 ESG Performance Indicators   Society                                              |
| C-S6                         | C-S6-1        | Human rights policy - Description of human rights policy and fundamental principles                                          | 2.7 Our Commitment to Human Rights<br>4.2 Human Rights and Code of Conduct and Business Ethics                                                 |
| C-S7                         | C-S7-1        | Percentage of employees covered by collective bargaining agreements                                                          | 4.10 ESG Performance Indicators   Society                                                                                                      |
| C-S8                         | C-S8-1        | Value chain - Discussion of supplier screening using ESG criteria                                                            | 2.8 Supply Chain Responsibility                                                                                                                |
| C-S8                         | C-S8-2        | Value chain - Policies to manage material impacts, risks and opportunities related to workers in the value chain             | 2.5 Policies and Commitments for Sustainable Development<br><a href="#">Internal Operating Regulation/ Code of Conduct and Business Ethics</a> |
| A-S1                         | A-S1-1        | Sustainable economic activity - Percentage of sustainable turnover - Alignment                                               | 4.10 ESG Performance Indicators   Society                                                                                                      |
| A-S1                         | A-S1-2        | Sustainable economic activity - Percentage of sustainable CapEx - Alignment                                                  | 4.10 ESG Performance Indicators   Society                                                                                                      |
| A-S1                         | A-S1-3        | Sustainable economic activity - Percentage of sustainable OpEx - Alignment                                                   | 4.10 ESG Performance Indicators   Society                                                                                                      |
| A-S1                         | A-S1-4        | Sustainable economic activity - Percentage of sustainable turnover - Eligibility                                             | 4.10 ESG Performance Indicators   Society                                                                                                      |
| A-S1                         | A-S1-5        | Sustainable economic activity - Percentage of sustainable CapEx - Eligibility                                                | 4.10 ESG Performance Indicators   Society                                                                                                      |

| 2024 ID                                   | 2024 Sub - ID | Metric                                                                                                                                            | Reference                                                                                                                                                                                                                                                                       |
|-------------------------------------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A-S1                                      | A-S1-6        | Sustainable economic activity - Percentage of sustainable OpEx - Eligibility                                                                      | 4.10 ESG Performance Indicators   Society                                                                                                                                                                                                                                       |
| A-S2                                      | A-S2-1        | Total amount of monetary expenditure on employee training                                                                                         | 4.3 Training and Continuous Development of Employees<br>4.10 ESG Performance Indicators   Society                                                                                                                                                                               |
| A-S3                                      | A-S3-1        | Percentage of difference between male and female earnings                                                                                         | 4.10 ESG Performance Indicators   Society                                                                                                                                                                                                                                       |
| A-S4                                      | A-S4-1        | CEO pay ratio - Total CEO pay                                                                                                                     | 4.10 ESG Performance Indicators   Society                                                                                                                                                                                                                                       |
| A-S4                                      | A-S4-2        | CEO pay ratio - Ratio of CEO to median employee earnings                                                                                          | 4.10 ESG Performance Indicators   Society                                                                                                                                                                                                                                       |
| SS-S7                                     | SS-S7-1       | Marketing practices - Description of approach in providing transparent product and service information including marketing and labeling practices | 1.5 Client / Investor at the Center                                                                                                                                                                                                                                             |
| SS-S10                                    | SS-S10-1      | ESG integration in business activity - Description of approach to incorporation of ESG factors in business activity                               | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.5 Policies and Commitments for Sustainable Development<br>2.6 Responsible Investments<br><a href="#">ESG Investment Policy</a><br><a href="#">Sustainable Development Policy</a> |
| <b>ESG Category: Corporate Governance</b> |               |                                                                                                                                                   |                                                                                                                                                                                                                                                                                 |
| C-G1                                      | C-G1-1        | Board composition - ESG related qualifications of the board members                                                                               | 5.3 Board of Directors<br><a href="#">Annual Report 2024(7.1BoD Composition)</a>                                                                                                                                                                                                |
| C-G1                                      | C-G1-2        | Board composition - Classification of the Chairman of the Board                                                                                   | 5.3 Board of Directors<br>5.10 ESG Performance Indicators   Corporate Governance<br><a href="#">Annual Report 2024(7.1BoD Composition)</a>                                                                                                                                      |
| C-G1                                      | C-G1-3        | Board composition - Percentage of female board members                                                                                            | 5.3 Board of Directors<br>5.10 ESG Performance Indicators   Corporate Governance<br><a href="#">Annual Report 2024(7.1BoD Composition)</a>                                                                                                                                      |
| C-G1                                      | C-G1-4        | Board composition - Percentage of non-executive board members                                                                                     | 5.3 Board of Directors<br>5.10 ESG Performance Indicators   Corporate Governance<br><a href="#">Annual Report 2024(7.1BoD Composition)</a>                                                                                                                                      |
| C-G1                                      | C-G1-5        | Board composition - Percentage of independent non-executive board members                                                                         | 5.3 Board of Directors<br>5.10 ESG Performance Indicators   Corporate Governance<br><a href="#">Annual Report 2024(7.1BoD Composition)</a>                                                                                                                                      |
| C-G1                                      | C-G1-6        | Board composition - Number of board members                                                                                                       | 5.3 Board of Directors<br>5.10 ESG Performance Indicators   Corporate Governance<br><a href="#">Annual Report 2024(7.1BoD Composition)</a>                                                                                                                                      |
| C-G1                                      | C-G1-7        | Board composition - Average age of board members                                                                                                  | 5.3 Board of Directors<br>5.10 ESG Performance Indicators   Corporate Governance                                                                                                                                                                                                |
| C-G1                                      | C-G1-8        | Board composition - Average tenure of board members                                                                                               | 5.3 Board of Directors<br>5.10 ESG Performance Indicators   Corporate Governance                                                                                                                                                                                                |
| C-G2                                      | C-G2-1        | Sustainability oversight - Description of approach to sustainability oversight                                                                    | 2.2 Sustainability Governance<br>2.10 Systematic Management of Sustainability Topics<br>5.2 Organisational Chart                                                                                                                                                                |
| C-G3                                      | C-G3-1        | Materiality - Description of the materiality assessment process and material topics                                                               | 2.11 Dialogue with Stakeholders<br>2.12 Materiality Analysis Process                                                                                                                                                                                                            |
| C-G3                                      | C-G3-2        | Materiality - Approach                                                                                                                            | 2.13 Performance Monitoring & Evaluation (Selected KPIs)<br>2.14 Our Targets for a Sustainable Future                                                                                                                                                                           |
| C-G4                                      | C-G4-1        | Sustainability policy - Description of sustainability policy and fundamental principles                                                           | 2.3 Sustainable Development Strategic Framework<br>2.4 Pillars of Sustainable Development<br>2.9 Participation in Initiatives and Organisations<br><a href="#">Sustainable Development Policy</a>                                                                               |
| C-G5                                      | C-G5-1        | Business ethics policy - Description of business ethics policy and fundamental principles                                                         | 2.5 Policies and Commitments for Sustainable Development<br><a href="#">Code of Conduct and Business Ethics</a><br>5.8 Integrity and Ethical Standards                                                                                                                          |
| C-G6                                      | C-G6-1        | Data security policy - Description of data security policy and fundamental principles                                                             | 2.5 Policies and Commitments for Sustainable Development                                                                                                                                                                                                                        |

| 2024 ID | 2024 Sub - ID | Metric                                                                                                                                                       | Reference                                                                                                                                            |
|---------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
|         |               |                                                                                                                                                              | 5.4 Codes, Policies and Procedures                                                                                                                   |
| C-G7    | C-G7-1        | Sustainability reporting - Basis for preparation of sustainability reporting                                                                                 | Report Parameters                                                                                                                                    |
| C-G7    | C-G7-2        | Sustainability reporting - List all its entities included in the sustainability reporting                                                                    | Report Parameters                                                                                                                                    |
| C-G8    | C-G8-1        | Annual financial statements - Date of publication                                                                                                            | 5.10 ESG Performance Indicators   Corporate Governance                                                                                               |
| A-G1    | A-G1-1        | Strategy, business model and value chain - Discussion of strategy, business model and value chain                                                            | 1.1 Group Identity and Structure<br>1.4. Investment Products & Services<br>1.7 Business Operating Model<br>2.16 Our inclusion in the ATHEX ESG Index |
| A-G1    | A-G1-2        | Strategy, business model and value chain - Activity in fossil fuel sector, chemical production, controversial weapons, cultivation and production of tobacco | 5.10 ESG Performance Indicators   Corporate Governance                                                                                               |
| A-G2    | A-G2-1        | Business ethics violations - Total amount of monetary losses as a result of business ethics violations                                                       | 5.10 ESG Performance Indicators   Corporate Governance                                                                                               |
| A-G2    | A-G2-2        | Business ethics violations - Total number of business ethics violations                                                                                      | 5.10 ESG Performance Indicators   Corporate Governance                                                                                               |
| A-G3    | A-G3-1        | ESG targets - Short-term targets associated with strategic ESG objectives                                                                                    | 2.14 Our Targets for a Sustainable Future                                                                                                            |
| A-G3    | A-G3-2        | ESG targets - Medium-term targets associated with strategic ESG objectives                                                                                   | 2.14 Our Targets for a Sustainable Future                                                                                                            |
| A-G3    | A-G3-3        | ESG targets - Long-term targets associated with strategic ESG objectives                                                                                     | 2.14 Our Targets for a Sustainable Future                                                                                                            |
| A-G4    | A-G4-1        | Percentage of CEO's variable pay                                                                                                                             | 5.10 ESG Performance Indicators   Corporate Governance                                                                                               |
| A-G5    | A-G5-1        | External assurance - Discussion of external assurance on reported ESG information - Scope of information covered                                             | 6. Independent Assurance Statement                                                                                                                   |
| A-G5    | A-G5-2        | External assurance - Discussion of external assurance on reported ESG information - Level of assurance                                                       | 6. Independent Assurance Statement                                                                                                                   |
| A-G6    | A-G6-1        | ESG bonds                                                                                                                                                    | 4.10 ESG Performance Indicators   Society                                                                                                            |
| A-G7    | A-G7-1        | Integration of sustainability-related performance in incentive schemes - Incentive schemes and remuneration policies linked to sustainability matters        | -                                                                                                                                                    |
| SS-G1   | SS-G1-1       | Whistleblower policy - Description of whistleblower policies and procedures                                                                                  | 5.8 Integrity and Ethical Standards<br><a href="#">Whistleblowing Policy</a>                                                                         |
| SS-G3   | SS-G3-1       | Systemic risk management - Description of systems, processes and mechanisms to reduce contributions to systemic risks and improve safeguards                 | <a href="#">Annual Report 2024</a> (7. Risk Management)                                                                                              |
| SR-1-1  | SR-1          | Sustainability Statement/Report – Publication                                                                                                                | Report Parameters                                                                                                                                    |
| SR-1-2  | SR-2          | Sustainability Statement/Report – Date of the Publication                                                                                                    | 30/09/2025                                                                                                                                           |



# alphatrusthc

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