

The Non-financial Report has been prepared in accordance with the requirements of Law 4548/2018 and Circular 62784/2017 of the Department of Institutional Regulations and the General Commercial Register (GEMI) of the Companies and GEMI Division. In addition, international best practices in Non-Financial Reporting have been applied, utilizing recognized guidelines and reporting standards (such as the Global Reporting Initiative (GRI Standards) Guidelines. Relevant data for the calculation of ratios have been collected either by the systems of the Bank and its subsidiaries or from relevant files prepared by them.

Business Model

The bank's strategy and business model are governed by the principles and values as defined in the Code of Conduct and Ethics, while strategic decisions are taken based on the principles of corporate governance. The Bank adjusts and improves its strategy and ensures the alignment of its individual business actions towards achieving its strategy through the regular review and monitoring of key performance indicators in combination with the monitoring of the supervisory indicators submitted to the Bank of Greece at regular intervals.

The Bank's business model is optimized in order to pave the way for a profitable Bank that will continue to support the economy and society and continuously improve its performance.

Attica Bank has completed the first cycle of significant changes in the new transformation program and now aims to rapidly expand its operations and improve shareholder performance. Some of the key changes achieved involved the following sectors:

- The digital transformation of the Bank. The Bank is already in a phase of digitization of the services provided to its customers and the automation of its processes, in order to offer personalized and high quality services with speed and security. The impact that the pandemic had in our country has significantly accelerated progress in this area, as evidenced by the increased use of digital transactions since the beginning of the pandemic. This confirms the adequacy of the Bank's infrastructure, which has been systematically developed since the end of 2016, in order to be able to meet the needs of Attica Bank's customers.
- The redesign of the internal structures of the Bank, in the institutionalization of new ones and in the updating of existing regulations and policies, along with the upgrade of our service networks and IT infrastructures.

- The continuous adaptation of the organizational structure, staffing and staff training, in order to fit the size of the Bank, the strategic goals and the requirements of a modern credit institution.
- Conclusion of strategic alliances with reputable companies such as IBM, in the context of optimizing the Bank's internal infrastructure and in implementing the digital transformation program, and McKinsey in the context of reorganizing securitizations and developing an improved credit policy framework.

Main Pillars



Main Messages



In 2021, the Bank, having now achieved its stabilization at high liquidity levels and having planned capital raising actions, fully implemented its business development plan, while facing the adverse effects of the new wave of the pandemic.

Attica Bank's priority remains to successfully implement the plan in order to strengthen regulatory capital as well as increase its revenues, through the development of new products and its more efficient operation.

In this context and following the consolidation of its Balance Sheet, the Bank's Management proceeded with a share capital increase of EUR 240 million with a view to implementing the shareholders' agreement, as originally planned, thus achieving one of its main business objectives. It is pointed out that the share capital increase is the starting point for the Bank's growth course, which will contribute to the acceleration of the strengthening of its customer position and business activity.

The year 2022, with the maturity of the securitization assessment and their inclusion in the program "HERCULES 2", will be a milestone year for Attica Bank. The complete consolidation of the Balance Sheet is thus achieved and supervisory funds are released to be channeled to the development of the Bank's operations and the significant increase of its loan portfolio.

The strengthening of regulatory capital and the increase of deposits at high levels have led to a significant improvement in liquidity, which is a guarantee that Attica Bank will develop its business and contribute significantly to the implementation of its business plan.

At the same time, Attica Bank has adopted and applied the principles and objectives of sustainable banking, acquiring a clear environmental orientation through the financing of sustainable investments, strengthening its customers by offering financial tools to improve environmental impact and to develop environmental and ecological awareness projects. In addition, since December 17, 2021, it has been listed on the ESG index of the Athens Stock Exchange, thus sealing the steady course of recent years towards sustainable growth.

The Attica Bank Group is called upon to play its role in the Greek economy in the coming years. As the fifth Bank in the domestic banking market and with the flexibility of a sound financial institution, it will now be able to focus on strengthening the real economy by financing sound small and medium-sized enterprises, freelancers and individuals.

Achieving sustainable development, which is an integrated approach involving mutually reinforcing economic, social and environmental aspects, is becoming imperative at both international and European level, prompting an increasing number of companies to adopt practices, measure, disclose and manage the risks and opportunities of sustainable development.

In order to assess the role of companies in achieving sustainable development and in particular their ability to generate value in the long term and to draft effective strategies with a long-term horizon, factors concerning the environment, society and corporate governance (known as "ESG") are taken into account.

Based on the ATHEX GROUP ESG Information Disclosure Guide, the relevant ESG indices are divided into general indicators, which relate to the economy as a whole and to sectoral indicators. The general indicators are further divided into key ones, the disclosure of which is recommended to all companies and advanced ones, which focus on more complex ESG issues.

In this context, Attica Bank has entered the ESG index of ATHEX GROUP since 17 December 2021 and the table below summarizes the relevant indicators.

ESG category	ID	Indicator Description	Indicator Measurement Unit	2021			
				Value	Indicator Measurement Unit	Relevant Report	Source of Relevant Report
Environment	C-E1	Scope 1 (Direct emissions)	tons of CO2 equivalent	37.39	CO2 gr/km	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Environment	C-E2	Scope 2 (Indirect emissions)	tons of CO2 equivalent			31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Environment	C-E3	Energy consumption within the organization	MWh	4808	MWh	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Environment	C-E3	Consumption of electricity within the organization	% Percentage	100%		31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Environment	C-E3	Energy consumption within the organization from renewable sources	% Percentage	0.00%		31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Environment	A-E1	Scope 3 (Other indirect emissions)	Tons of CO2 equivalent			31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Environment	A-E2	Risks and opportunities from climate change	Quantitative			31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S1	Working women	% Percentage	53%	% Percentage	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S2	Women working in management positions	% Percentage	25.00%	% Percentage	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S3	Voluntary labor mobility indicator	% Percentage	12.19%	% Percentage	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S3	Non-voluntary labor mobility indicator	% Percentage	0.13%	% Percentage	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S4	Training of Employees - Employees among 10% of the highest paid employees	Number of hours	28.50	Number of hours	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S4	Training of Employees - Employees among 90% of the lowest paid employees	Number of hours	38.66	Number of hours	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S5	Human Rights Policy	Quantitative	YES	Quantitative	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S6	Collective Labor Agreements	% Percentage	100%	% Percentage	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	C-S7	Supplier Evaluation	Quantitative		Quantitative	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	A-S1	Participation of stakeholders	Quantitative		Quantitative	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	A-S2	Employee Training Expenses	In thousands of euros	236	In thousands of euros	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	A-S3	Gender-Based Salary Differences	% Percentage	25%	% Percentage	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	A-S4	Remuneration of CEO - employees ratio	% Percentage	9.09	% Percentage	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	A-S5	Income from sustainable products	% Percentage	1.21%	% Percentage	31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Society	SS-S7	Marketing practices	Quantitative		Quantitative	Corporate Governance Code	https://www.atticabank.gr/images/attica/files/corporate_governance/KW_DIKAS_ETAIRIKH_S_DIAKYBERNHSHS_1_6_07_2021.pdf
Society	SS-S10	Integration of ESG factors into business activities	Quantitative		Quantitative		

Corporate Governance	C-G1	Sustainable Development Supervision	Quantitative	YES		Attica Bank Website	https://www.atticabank.gr/el/group/vasimi-anaglyksi-kai-koioniki-efthvni
Corporate Governance	C-G2	Business Ethics Policy	Quantitative	YES		Attica Bank Website	https://www.atticabank.gr/images/attica/files/corporate-governance/KW-DIKAS-HTHIKIS-SYMPERIFORAS-KAI-DEONTOLOGIAS-20-08-2019.pdf
Corporate Governance	C-G3	Data Security Policy	Quantitative	YES		Attica Bank Website	https://www.atticabank.gr/el/pdpr-kanonismos-prostasiai-dedomemon
Corporate Governance	A-G1	Business Model	Quantitative	YES		31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Corporate Governance	A-G2	Material Issues	Quantitative	YES		31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Corporate Governance	A-G3	ESG Objectives (Short-term)	Quantitative	YES		31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Corporate Governance	A-G3	ESG Objectives (Medium-term)	Quantitative	YES		31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Corporate Governance	A-G3	ESG Objectives (Long-term)	Quantitative	YES		31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Corporate Governance	A-G4	Variable Fees	% Percentage	0%			
Corporate Governance	A-G5	External Assurance	Quantitative	YES		31/12/2021 Annual Financial Report	https://www.atticabank.gr/el/investors/investor-financial-results/periodical-financial-data?folder=2021
Corporate Governance	SS-G1	Violations of Business Ethics	In thousands of euros				
Corporate Governance	SS-G2	Policy for Reporting Malfunctions	Quantitative	YES		Code of Conduct and Ethics	https://www.atticabank.gr/images/attica/files/corporate-governance/KW-DIKAS-HTHIKIS-SYMPERIFORAS-KAI-DEONTOLOGIAS-20-08-2019.pdf
						Market Abuse Policy	https://www.atticabank.gr/images/attica/files/corporate-governance/POI-TIKI-GIA-TIN-PROPLISITIS-KATACHRISIS-AGORAS.pdf

Notifications pursuant to Article 8 of Regulation (EU) 2021/2178

Commission Delegated Regulation (EU) 2021/2178 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council specifies the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation.

Pursuant to paragraph 3 of Article 8 of Delegated Regulation (EU) 2021/2178, financial undertakings from 1 January 2022^{to} 31 December 2023 shall only disclose:

- (a) the proportion in their total assets of exposures to Taxonomy non-eligible and Taxonomy-eligible economic activities;
- (b) the proportion in their total assets of the exposures referred to in Article 7, paragraphs 1 and 2, i.e. exposures to central governments, central banks, supranational organizations and derivatives;
- (c) the proportion in their total assets of the exposures referred to in Article 7(3), i.e. exposures to undertakings not required to disclose non-financial information in accordance with Article 19a or Article 29a of Directive 2013/34/ EU; and

(d) the qualitative information referred to in Annex XI.

At the same time, credit institutions are required also to disclose the proportion of their trading portfolio and on demand inter-bank loans in their total assets.

As regards eligibility for taxonomy, the latter has been assessed for the following assets:

- Investment securities valued at amortized cost
- Investment securities valued at fair value through other comprehensive income
- Investments in subsidiaries and associates
- Real estate collateral acquired by credit institutions in exchange for debt write-off

The following assets are excluded from the assessment of eligibility for taxonomy:

- Interbank loans on demand
- Exposures to undertakings that are not required to publish a non-financial information report pursuant to Article 19a or Article 29a of Directive 2013/34/EU
- Investment securities held for trading

More specifically, eligible assets include loans EUR € 182 million to companies in the renewable energy sector and housing loans of EUR 382 million. For the assessment of the exposures regarding the eligibility for taxonomy, the Group used the company codes defined by the Statistical Categorization of Sectors of Economic Activity (STAKOD) as they are registered in the Bank's systems. For the assessment of companies that do not publish a non-financial information report, the Bank has included in this category loans to small and medium-sized undertakings, as well as loans to companies in the wider public sector.

Regarding the fiscal year ended 31 December 2021, the key performance indicators (KPI) are as follows:

<i>(Amounts in thousand €)</i>	Balance 31/12/2021	KPI of Taxonomy (% of total assets)
1. Eligible assets according to Taxonomy	563,597	15.37%
2. Non-eligible assets according to Taxonomy	2,368,861	64.62%
<i>of which exposure to derivatives</i>	1,077	0,03%
<i>of which exposure to companies without an obligation to publish an NFI report</i>	401,524	10.95%
<i>of which exposure to interbank loans on demand</i>	15,246	0.42%
3. Assets in central governments, central banks and supranational issuers	657,248	17.93%
4. Commercial portfolio	76,380	2.08%
Total assets according to the Consolidated Financial Position Statement on 31/12/2021 (1+2+3+4)	3,666,086	100%

A. Control and Compliance

Internal Audit

The Internal Audit Division, through the audits it conducts, evaluates the correct planning (adequacy) and finds the effective operation of the audit mechanisms that make up the Internal Audit System, providing its independent evaluation to the Audit Committee, and through it to the Board of Directors. It also provides advice on improving the design and operation of the Internal Audit System, both through its audit work and, through its advisory role, in its participation in project committees.

The Internal Audit Division, as a Service independent from the other Attica Bank units, is part of, and reports to, as regards its operation, directly to the Audit Committee and, through it, to the Board of Directors, for the purpose of preserving its independence. For administrative matters, only the Internal Audit Division reports to the Chief Executive Officer.

Regulatory Compliance & Corporate Governance

The purpose of the Regulatory Compliance & Corporate Governance Division lies in the prevention and effective management of non-compliance risks by Attica Bank with the regulatory framework that governs their operation each time, by establishing appropriate policies and processes and adopting risk identification, control and monitoring mechanisms. Particular emphasis is placed on compliance with the regulatory framework for preventing and tackling money laundering and terrorist financing. In addition, its purpose is to monitor

compliance with the principles and practices under which Attica Bank is organized, operated and managed, in order to safeguard and satisfy the legitimate interests of all those associated with the Bank.

Codes and policies

The table below presents Attica Bank’s core corporate governance policies. It is worth noting that all policies are available in a dedicated section of the Intranet (for the Bank and its subsidiaries). As soon as a new policy is adopted or an existing policy is revised, a relevant circular is posted on the Bank’s Intranet.

Key Codes, Compliance Policies and Regulations applied by Attica Bank
• Code of Conduct and Ethics of Attica Bank and the Group
• Corporate Governance Code
• Suitability and BoD Candidate Nomination and Remuneration Policy of Attica Bank
• Corporate Social Responsibility Policy of the Attica Bank Group
• Policy for Preventing Conflict of Interest between the members of the BoD and the chief executives of Attica Bank
• Policy and evaluation procedures of the Board of Directors & Committees
• Succession planning policy for the members of the Board of Directors and the top executives
• Training and professional development policy for the members of the Board of Directors
• Policy for Persons with Special Relationship with the Bank - Affiliates
• Attica Bank Remuneration Policy
• Complaints Management Policy
• AML and Reporting Policy
• Personal Data Processing Policy
• Attica Bank Outsourcing Policy
• Policy against violence and harassment
• Whistleblowing procedure

B. Sustainable banking operations

Climate change risk assessment is a key priority for Attica Bank. The Bank assesses forthcoming environmental policies, legal requirements and climate-related guidelines in order to effectively capture and manage any transitional risks.

Attica Bank aims to reduce the environmental footprint of its operations and infrastructure.

During the years 2020-2021, the Bank has already proceeded to the following actions:

- in the context of liquidation of unusable/non-functional equipment of the Bank, materials/objects/equipment with a total weight of 5,445 kg were brought for recycling. Examples include office equipment, air conditioners, safes, irons, fire lockers, etc.
- recycling of paper, plastic cards, toner of photocopiers and printing machines, lamps, electrical & electronic devices and security systems materials;
- use of organic detergents in the Bank's buildings;
- replacing simple bulbs with energy-saving bulbs;
- issuance of energy certificates for a number of stores and buildings.

In particular, during the year 2021, in order to further save energy and reduce energy requirements, the following actions took place:

- Shipping for safe disposal and recycling of 2,808 cartons and 10 metal file and document bins.
- Replacement of current lamps with energy saving LED lamps and luminaires in 9 stores and 4 administration buildings.
- Replacement of lamps in illuminated signs and luminaires with LED lamps in stores and offices of administration buildings.
- Replacement of lighting fixtures with LED in stores and office buildings.
- Replacement or modification, where possible, of old air-conditioning units with the ones using Freon R410a, not R22.

According to the aggregate data of annual electricity and water consumption for 2021, performance indicators were as follows:

- Electricity consumption: 4.7 GWh
- Water consumption: 4.4 ML
- Gas consumption: 100.5 MWH

Regarding energy consumption expenditure, according to the data for the year 2021 compared to the year 2020, the amounts spent per category, were as follows:

- Expenditure for electricity consumption: EUR 954,000 compared to EUR 869,438.02 in 2020.
- Expenditure for water supply: EUR 21,000 compared to EUR 35,401.31 in 2020.
- Expenditure for transport: EUR 70,382.71 compared to EUR 105,211.54 in 2020.
- Expenditure for natural gas: EUR 6,780.00 compared to EUR 0 in 2020.
- Expenditure for heating oil: EUR 0 compared to EUR 9,293.62 in 2020.

To further develop environmental and social responsibility, the Bank has taken actions and developed initiatives for:

- extending the no-paper policy throughout the bank's production process, by providing special incentives to the customers and by accelerating the implementation of electronic copies for accounts (E-Statement);
- using biodegradable materials throughout the bank's product chain, such as plastic for cards (from corn), forms, flyers, etc;
- systematic waste management and participating in the AFIS/recycling of batteries (31 kg) and Panhellenic Association for the Prevention of Traffic Accidents and Support for Disabled LOVE FOR LIFE / collection of plastic caps weighing 1 tonne.
- evaluating mechanical equipment to reduce energy consumption by means of targeted maintenance, replacements, upgrades;
- reducing energy consumption (operating time of air conditioners and other machines, lighting with LED lamps);
- installing photocells for lighting in all common areas and warehouses;
- the energy upgrade of buildings;
- the use of electric or hybrid cars;
- training on the relationship/role of financial institutions and climate change;
- adopting International Standards (Corporate Social Responsibility ISO 26000, Environmental Management System ISO 14001, Business Continuity ISO 22301).

Attica Bank is participating in the Program of the Ministry of Environment and Energy "Saving at Home II" (Cycle A, B and C "EXOIKONOMO-AUTONOMO") and will participate in the new program "EXOIKONOMO 2021" announced in December 2021, whose Implementing Body is the Technical Chamber of Greece and Financial Management Body is the Hellenic Development Bank S.A.

The Program is funded from the resources of the Recovery and Resilience Fund.

The Program design takes into account the integrated intervention of energy savings in the residential building sector (energy upgrade of residential houses of natural persons), and its main objectives are:

- reducing the energy needs of buildings;
- reducing pollutant emissions that contribute to the deterioration of the greenhouse effect;
- achieving a cleaner environment.

It also provides incentives:

- in the form of grants (direct aid);
- in the form of loans ("Save II" (Exikonomo II) Fund) with an interest rate subsidy.

In the context of the Bank's participation in the first Program Cycle, the Bank received 418 loan applications totaling € 2.8 million, 220 applications of which have been approved, corresponding to an amount of € 1.47 million. Out of the 217 signed loan agreements amounting to € 1.44 million (2 of which were signed in 2020), € 1.36 million have been disbursed to date (an amount of € 89 thousand was disbursed within 2020).

In the context of the Bank's participation in the second Program Cycle (with submission period for applications having started on 22/10/2019), the Bank received 220 loan applications totaling € 1.8 million, 79 applications of which have been approved, corresponding to an amount of € 643 thousand. Out of the 73 signed loan agreements amounting to € 569 thousand, an amount of € 481 thousand has been disbursed so far.

In the context of the Bank's participation in the third Cycle of the program "EXOIKONOMO-AUTONOMO" (with submission period for applications having started on 11/12/2020), the Bank received 1068 loan applications totaling € 6.58 million, 534 applications of which have been approved, corresponding to an amount of € 3.24 million. Out of the 493 signed loan agreements amounting to € 2.96 million (all signed within 2021) an amount of € 1.53 thousand has been disbursed so far.

The submission of loan applications for "EXOIKONOMO 2021" is expected to begin at the end of the first quarter of 2022.

C. Corporate Social Responsibility

Donations - Sponsorships - Volunteering

Through volunteering, and the planning of sponsorships and donations, Attica Bank participated in actions to strengthen Greek entrepreneurship in our country, support vulnerable social groups and promote research, technology and culture in 2021, too.

Specifically, through the sponsorship and donation program, it supported the local communities and proceeded with the donation of three (3) mobile houses for the accommodation of the families affected by the earthquakes in Thessaly. It financially supported the Holy Diocese of Fthiotida, for the heating needs of three (3) nursing homes, in the area of Lamia and Styliida.

It supported the organization of conferences and workshops in collaboration with companies, educational institutions and organizations. In short, it was a sponsor of the 2021 sustainability events of the National Technical University of Athens, while at the same time it participated as an official supporter of the “ELEVATE GREECE” action, an innovative action for mapping start-ups across the country. It sponsored the Competitiveness Council “COMPETE GREECE”, the Think Tank Hellenic Institute for Research and Development (ELINEKA) as well as public and private bodies. Also, recognizing the importance of defending our cultural heritage, Attica Bank has been a Corporate Member for a number of years and also a sponsor of the actions of the association “DIAZOMA”.

As a responsible corporate organization in 2021, it consistently supported once again the right of students to better education and offered free computers to schools and institutions throughout Greece, for their modernization and digital upgrade. Indicatively, computers were given to schools of the Prefecture of Corinth, to the Foundation of the Hellenic World, to the Special Primary School for the Deaf and Hard of Hearing of Argyroupolis, to the 37th Primary School of Thessaloniki, to a school in the area of Volos, to the 1st Kindergarten Dafnis, to a special school for the disabled in Piraeus etc. It was also a supporter of the Panhellenic Volunteering Contest “Quality Islands 2021”, in which non-governmental organizations were distinguished for their high voluntary contribution to society.

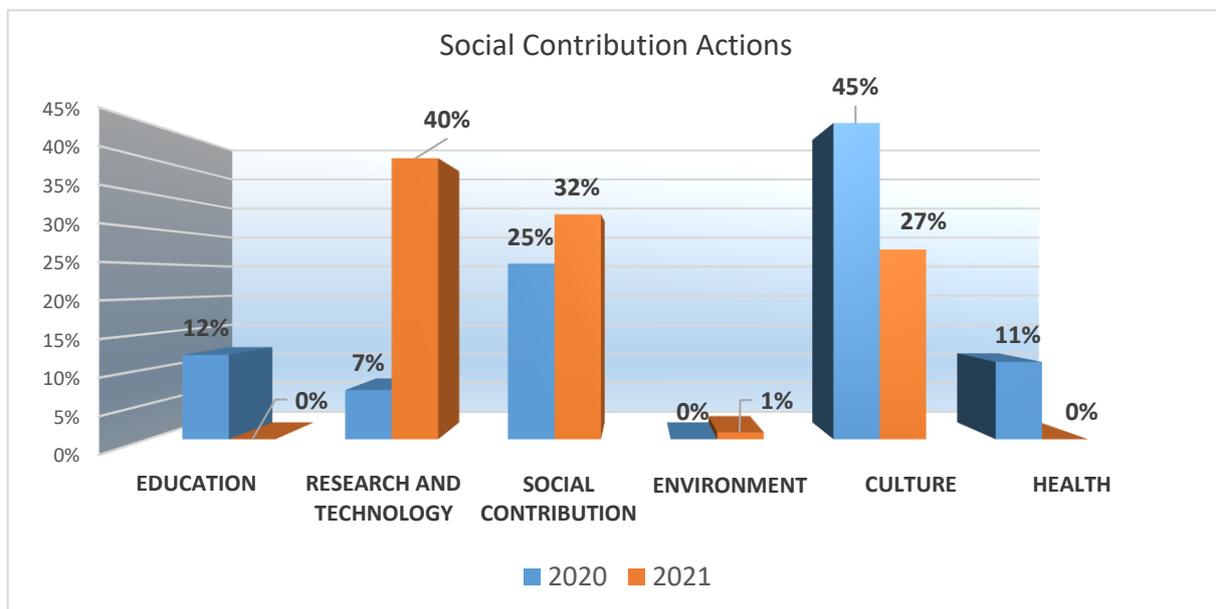
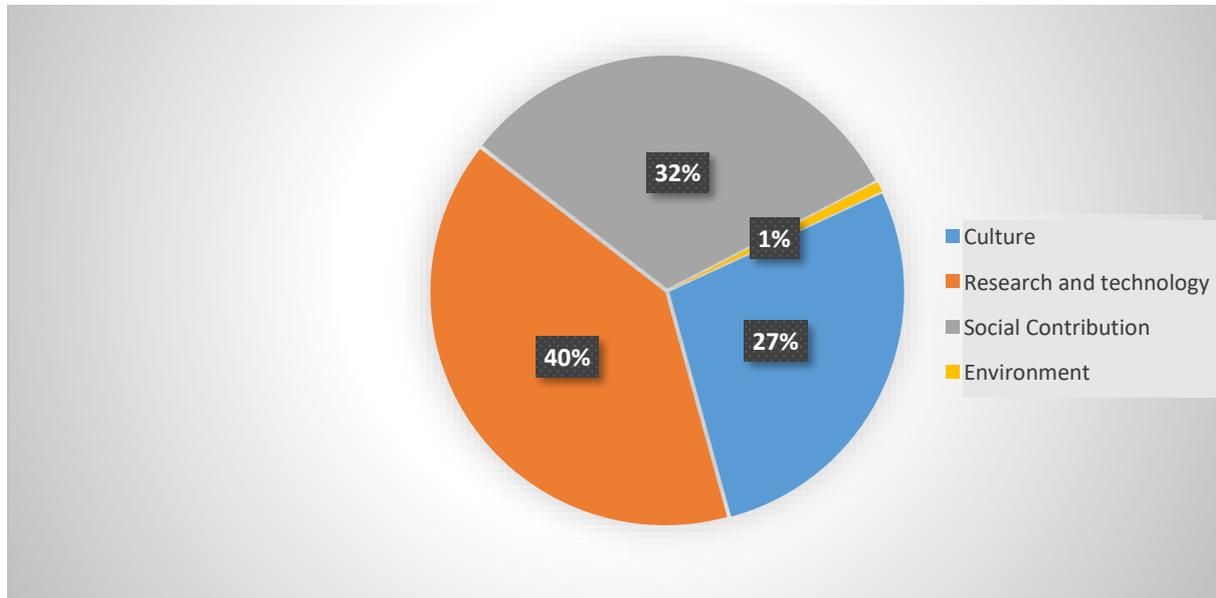
Last year, Attica Bank offered a donation to “Doctors Without Borders / Greek Department” for having achieved their social actions in providing free medical care to our fellow human beings who are in need.

Volunteering

As part of its corporate responsibility culture, Attica Bank promotes actions for the benefit of society with the voluntary participation of its employees. In 2021, it offered school supplies to the fire-affected primary school students of the Prefecture of Evia, with the assistance of the Association of Kindergarten Teachers of Chalkida. It also donated hospital equipment to the General Hospital of Chania, “Agios Georgios” through the action of materials recycling.

As a responsible “corporate citizen”, Attica Bank incorporates social responsibility in its strategy. Thus, all actions, either as sponsorships or as donations, constitute an investment and offer of the Bank to the society.

Sponsorships - Donations



Attica Bank complies with decisions that require that it must not cooperate with countries, companies or individuals who support terrorism or violate human rights. It does not, directly or indirectly, support political parties and organizations.

Also, Attica Bank, in the context of its initiatives on matters that benefit employees and society in general, has taken the following actions:

- planning for the creation of special corridors (ramps) for the access of disabled people to the buildings of Management and the stores of the Network.
- creation of a “Blood Bank” by organizing two blood donations per year, in collaboration with the relevant Association of Bank Employees;
- establishment of a training program for senior undergraduates/graduates and/or postgraduate students, to provide them with the necessary skills for their smooth integration in the labor market.

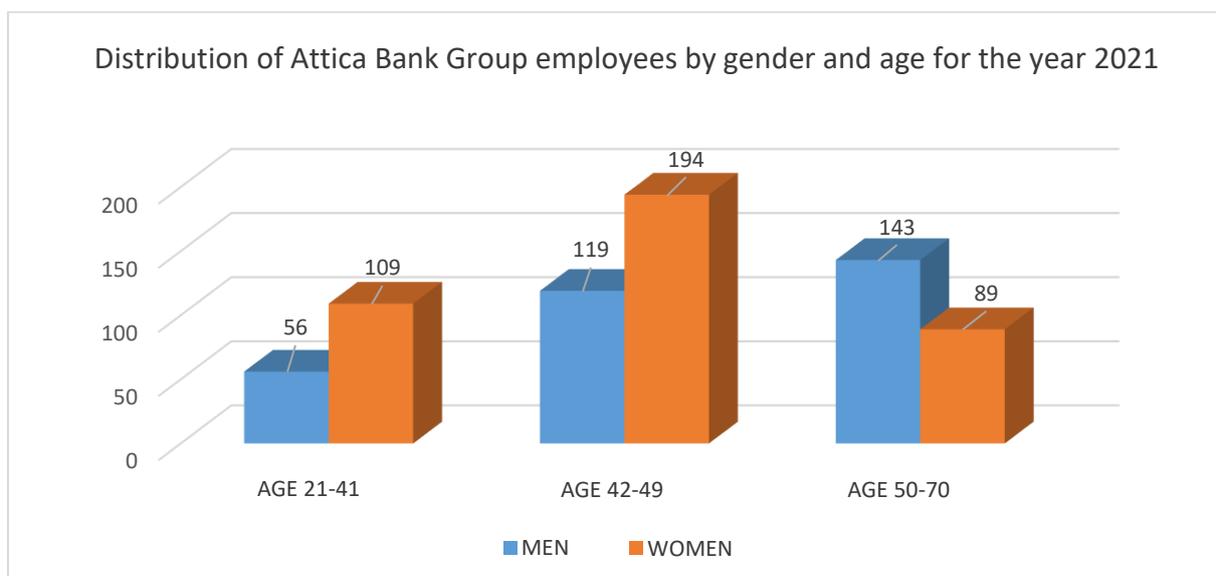
D. Work-related Matters

The employees of Attica Bank are the most important asset for achieving corporate goals. Attica Bank ensures the following in accordance with the Personnel Work Regulations and taking into account the guidelines of the Organization for Economic Co-operation and Development (OECD) on the operations and key employment contracts of the International Labor Organization (ILO):

- equal treatment and respect for staff diversity,
- professional development and training of staff,
- safe working conditions.

As at 31 December 2021, Attica Bank employed 710 people. The gender distribution of staff reflects the protection of equal opportunities advocated by Attica Bank, as the percentage of women is about 56% of the total number of employees.

Regarding the age distribution of the majority of the human resources gathered at Attica Bank, about 67% of the human resources are under 50 years old, while about 24% are up to 41 years old.



The Bank committed to the development and evolution of its human resources:

- It implements a meritocratic system for evaluating the performance, promotions and rewards of human resources. The aim is to recognize and reward the effort made by each employee.
- It invests in the continuous improvement of human resource skills by organizing training and development programs and providing educational opportunities based on current policies.
- It constantly ensures that good and safe working conditions are followed, especially given the extraordinary circumstances of the pandemic.
- It provides equal rights and opportunities to all, fostering a positive climate and strengthening the commitment of its employees.
- It uses flexible working hours to meet the needs of its employees to strengthen work-life balance.

Performance Management

Attica Bank recently updated its HR performance assessment system. The Human Resources Department is constantly implementing improvements in the new system, following the needs of business planning and incorporating new elements to maximize its efficiency. The main goals of the new approach to performance management were to improve performance towards business excellence, as well as to highlight and reward individual contribution through talent management. This new process is the main pillar of updating and further developing other management systems for the promotion and optimal utilization of human resources.

Equal opportunities

Attica Bank, with a sense of responsibility and taking into account the guidelines of the Organization for Economic Co-operation and Development (OECD) for the operations and key employment contracts of the International Labor Organization (ILO), supports and defends human rights and is committed to protecting them through of the Code of Conduct and Ethics. Attica Bank promotes equal opportunities, equal treatment and freedom of expression for its staff. It recognizes that diversity is a key component of a responsible business strategy and excludes all forms of discrimination, harassment or unprofessional behavior at work, while prohibiting any form of forced labor (e.g. compulsory overtime and threats of dismissal).

Respect for human rights is fundamental to the sustainable development of both Attica Bank and the societies in which it operates. Recognizing the risk of human rights violations, Attica Bank encourages the reporting thereof by establishing a confidential communication channel, the operation of which has been communicated to everyone in the staff, where any reports are evaluated and investigated by the Internal Audit Division.

Moreover, recognizing the risk of human rights abuses by third parties, Attica Bank fully complies with decisions prohibiting cooperation with countries, companies or individuals that support violence and terrorism.

Recognized human rights risks for Attica Bank include:

- Human rights violations (e.g. freedom of association, collective bargaining agreements, forced or compulsory labor, child labor, etc.).
- Lack or inefficient functioning of mechanisms for handling and resolving complaints related to human rights issues).
- Incidents of discrimination against Customers.

It keeps a firm stance against corruption and bribery and for this reason the Bank has issued a relevant Policy (AML and Reporting Policy) and has established relevant control mechanisms, in order to mitigate the relevant risks.

Framework of fees and benefits

Recognizing the dedication and contribution of human resources, Attica Bank implements modern reward systems. Specifically, the Revenue Policy has been established, which is harmonized with the overall operating policy of the Group and is part of its corporate governance. This policy is reviewed on an annual basis with the aim of attracting and retaining human resources, as well as achieving compliance with any legislative and supervisory restrictions, and aims to the following:

- Promoting Attica Bank's business strategy, goals and long-term interests and mobilizing human resources in this direction.
- Promoting good and effective management and covering committed or future risks while encouraging Attica Bank to take excessive risks.
- Contributing to the prevention or minimization of situations of conflict of interest or influence, which are to the detriment of risk management.

As part of providing an attractive payroll package, Attica Bank provides:

- life insurance and hospital care of its staff through a Group Insurance Policy;
- primary Healthcare Benefit Program, which includes a wide range of medical and dental procedures as well as examinations;
- rechargeable electronic feeding order;
- possibility to grant loans to staff, with a maximum amount of up to five (5) gross monthly salaries to cover emergencies;
- financial awards to employees' children when they excel, as well as those admitted to Greek universities and technology institutes.

Training and Development of Human Resources

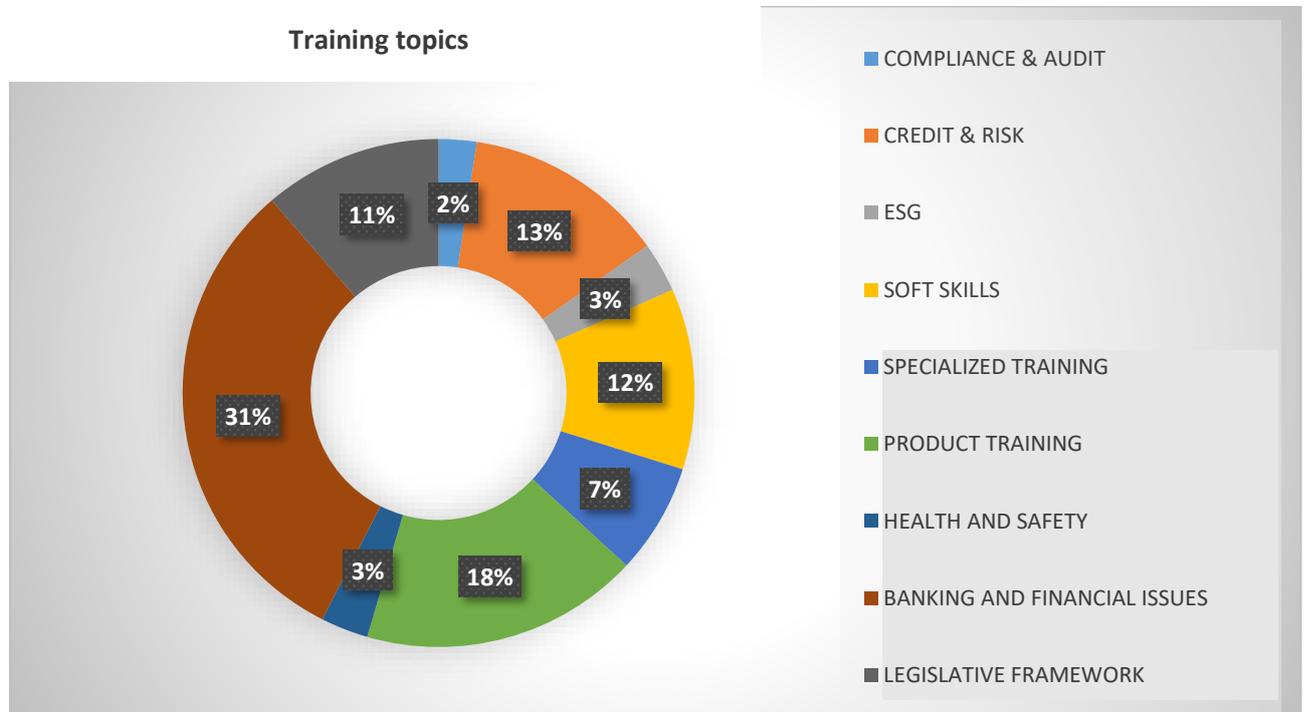
Attica Bank prepares and implements training planning in response to the needs of its business plan and aiming at:

- strengthening the commitment of its employees through their personal development;
- expanding the education of its human resources;
- development of vocational training and experience; and
- timely and smooth adaptation of knowledge and specialties to the new requirements of technology, organization and modern banking practice.

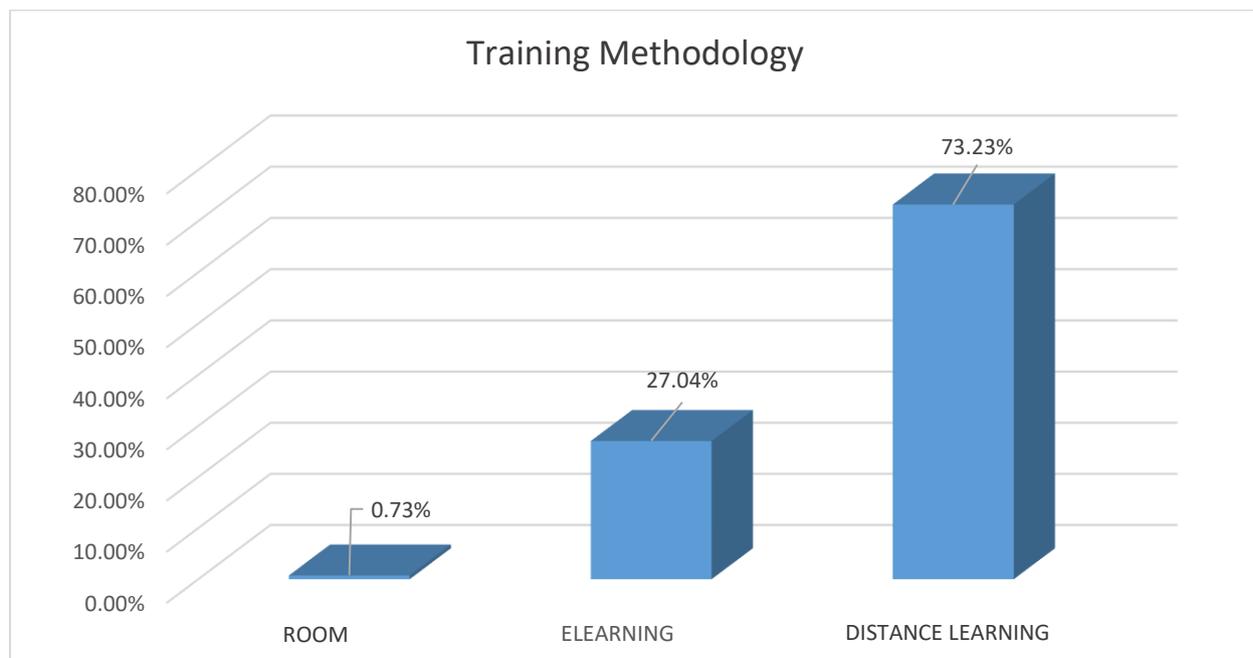
Training concerns all human resources and is continuous and proportionate to the needs of each employee.

In 2021, training activity was carried out mostly through remote training or e-learning with an average number of training man-hours per employee being 38 hours.

The training topics which were covered are analyzed as follows:



The following is a picture of the educational activity per methodology used:



The training activity also concerns the assurance of the level of competence required for obtaining the Certificates of Professional Competence, based on the framework provided by the Bank of Greece. More specifically, the coverage of professional competence certifications in the roles of service units is ensured, the subject of which is the provision of Investment Advice, or concerns the Distribution of Insurance and Reinsurance Products or Products of Housing Loyalty. Furthermore, Attica Bank encourages the acquisition of professional certifications in other disciplines, such as Auditing, Fraud, IT, Accounting, Regulatory Compliance, etc. The commitment to invest in knowledge is confirmed for another year, in 2021, by the institution of the postgraduate subsidy for employees, which was launched in 2000. In particular, scholarships are awarded for courses in Banking and Finance, or in topics that are necessary to support banking operations (e.g. administration, statistics, risk management, IT, marketing, etc.).

In addition, the Training and professional development policy for the members of the Board of Directors has been established, through which the members of the Board of Directors are given the opportunity to enrich their knowledge in the business model of the Group and further develop their professional skills, with the ultimate objective of making a substantial contribution to the administration.

Health and safety

By applying the applicable legal framework, Attica Bank has staffed all its facilities with an Occupational Physician and a Safety Technician in order to protect the health and safety of its employees.

In particular, emphasis is placed on preventing and continuously improving the occupational health and safety of its employees by:

- implementing training programs for employee's health and safety;
- building evacuation drills on a regular basis, preparing for the cases of fire, earthquake, terrorist acts, etc. For this purpose, a Circular has been issued regarding the "Emergency Response and Building Evacuation Plan";
- planning visits by the Safety Technician and the Occupational Physician in accordance with the applicable laws.

Associations

As defined in the Staff Regulations, in the industry and business Collective Work Contracts, in national and EU laws, as well as in international protocols, Attica Bank respects the constitutional right of every employee to participate in trade unions.

Attica Bank has set up and operates the Bank of Attica Employees Association (SYTA), which is the single statutory trade union representing 640 registered members, i.e. more than 91.4% of the total regular staff of the Bank, which acts institutionally for the progress of the employees and the robust course of the Bank, in the clearly defined framework that governs the relations of the social partners of the company.

E. Relationships with Customers and Suppliers

Attica Bank, in the context of its responsible operation, has established policies and procedures which define the principles and rules for the effective management of procurement and the outsourcing of activities to third parties. In particular, it has enacted a Cost Approval Policy and an Outsourcing Policy, which promote transparency and impartiality and ensure proper risk management through the establishment of specific criteria and procedures. Also, based on the Outsourcing Policy, regular inspections of the relations with the providers are carried out regularly, while the risks arising from such relations are also evaluated based on predetermined criteria and are monitored on a regular basis.

The main suppliers of Attica Bank are computer service providers, customer service and network support companies. According to the Code of Conduct and Ethics, staff members must comply with all procedures provided for the examination, evaluation and selection of suppliers on behalf of Attica Bank, applying objective criteria, thus safeguarding the Group's reputation and interests.

In order to manage the risk of breach of the existing legislation by third parties to whom the execution of projects has been outsourced, the contracts include terms regarding the obligation of third parties to comply with the provisions of labor and insurance legislation, legislation for the health and safety of employees and legislation for the prevention of occupational risk.

F. Fight against corruption

Attica Bank's Management adopts a policy of zero tolerance for fraudulent, and generally illegal, actions. These actions are contrary to the fundamental values and principles (which are mentioned in Attica Bank's Code of Conduct and Ethics) that govern Attica Bank's business activities and pose a significant risk to it, with a serious impact on its reputation and the interests of customers, shareholders and employees.

In this context, and taking into account the guidelines of the Organization for Economic Co-operation and Development (OECD) for businesses, Attica Bank has established the following policies to prevent and tackle corruption and bribery.

Please note that no cases of corruption were recorded in Attica Bank in 2021.

Code of Conduct and Ethics

The Code of Conduct and Ethics establishes values and principles and sets standards of conduct and rules for tackling corruption and bribery, phenomena which could jeopardize Attica Bank's reputation and interests. According to the Code of Conduct and Ethics, no member of the staff of Attica Bank or first-degree relatives thereof may be involved in bribery / money laundering in any form, either directly or indirectly.

Conflict of Interest Policy

Attica Bank acknowledges the risk of conflict of interest when conducting business and providing investment and banking services. In this context, it has established the Policy for Conflict of Interest and the Policy for the Prevention of Conflict of Interest for the Members of the Board of Directors and the top executives of the Bank, defining a series of organizational measures, procedures and systems for preventing and/or managing real or potential cases of conflict of interest.

Anti-Money Laundering and Terrorist Financing Revenue Policy

The Anti-Money Laundering and Terrorist Financing Revenue Policy defines due diligence procedures regarding customers, in full compliance with the Financial Action Task Force (Financial Action Task Force) and its recommendations. The due diligence measures include the certification and verification of the identity of the customer and the actual beneficiary, the exercise of continuous supervision over the business relationship, the thorough examination of transactions and the immediate notification of the competent Commission and the Bank of Greece, when there are serious indications or suspicions that money laundering or financing of terrorism is being committed or attempted, has been committed or attempted.

Fraud Prevention Policy

To ensure effective and safe operation and to prevent fraud, Attica Bank is going to introduce the Anti-Fraud Policy in 2022, which defines the concept of fraud, describes the organization and the structures to deal with it. It also defines the obligations of all staff and the responsibilities and actions to be followed when fraud or attempted fraud is detected or suspected, as well as the relevant actions of the competent authorities.

In order to raise awareness among the staff and to formulate a unified behavior for preventing and tackling corruption and bribery, educational programs are carried out on a regular basis, related to the legal framework and including training on Preventing and Tacking Money Laundering & Terrorist Financing.

Complaints Management Policy

Attica Bank has established a Complaints Management Policy which sets out the rules for the effective management of customer complaints / complaints / grievances / complaints regarding the services offered to them.

Policy against violence and harassment

With a relevant Circular, the Policy against Violence and Harassment in the Workplace was notified to the entire Human Resources of the Bank on 30 March 2022, under a Business Collective Bargaining Agreement, which is an integral part of the Staff Regulations as an Annex. In addition, a special thematic section has been created on the INTRANET → Policy against violence and harassment in which the aforementioned Circular was posted and will be periodically updated with anything new on the subject.

The Bank supports the right of all employees to work without being the target of any form of violence in their workplace. In accordance with its values and work culture, it ensures the health and safety of its employees, adopting a policy of zero tolerance towards unethical behaviors and incidents of violence, harassment and intimidation inside or outside its workplace.

The Policy provides guidelines to the Bank's Management and Human Resources for preventing and intervening in cases of violence, harassment, and intimidation in the workplace.

The Bank expressly commits itself to a work environment free from violence, harassment and intimidation, prohibits and condemns any form of discrimination and violence that violates the individual's right to personality, health and safety. More specifically:

- ✓ The Bank will investigate in detail any complaints/grievances that may arise in connection with the violation of this policy.
- ✓ Any breach or attempt to breach this policy is considered unacceptable and is subject to the appropriate consequences.

This Policy is drafted in accordance with the European Directives and the National Institutional Framework based, in particular, on the following:

- ✓ Law 4808/2021 on the protection of work, which prohibits all forms of violence and harassment during work, whether related to it or arising from it, including violence and harassment due to sex and sexual harassment
- ✓ The Bank's Code of Conduct and Ethics
- ✓ The Bank's Staff Regulations
- ✓ The Bank's Occupational Risk Assessment regarding violence and harassment.

The main purpose of the development of a Policy and Procedure against Violence & Harassment is to immediately prevent and handle all incidents of violence and harassment or intimidation, before, during, and after their occurrence, as well as to highlight the Bank's responsibility and commitment towards the protection of the health, safety and diversity of all its employees, regardless of factors such as gender, age, religious beliefs, etc.

The Policy and Procedure Policy against Violence and Harassment is addressed to and binding on the members of Management and all the Human Resources of the Bank under a full-time, part-time, temporary or permanent employment contract, including apprentices, subcontractors (including their employees), volunteers, external partners and individuals who have joined the Bank under existing and future employment grant programs. - The Bank will ensure that persons who are not subject to the Staff Regulations will sign a contract to ensure

their compliance with this Policy, and in case of violation, all appropriate measures will be taken for the proportional application of the terms hereof (such as, among others, removal/replacement, termination of the contract, etc.).

By act of the Bank's Management, a Committee for the Evaluation of Eponymous and Anonymous Reports of Violence and Harassment will be established.

The task of the Committee is to evaluate the eponymous and anonymous complaints/reports received by the Head of Complaints and Grievances, as well as their accompanying material.

The Committee evaluates the eponymous and anonymous complaints/reports received and decides whether they are credible and worth to be investigated or not.

Reports/Complaints

Attica Bank has set up a confidential communication channel, which provides an opportunity for the staff to report anonymously serious irregularities, omissions, criminal acts and illegal practices that came to their notice during the performance of their duties. All reports are evaluated and investigated by the Internal Audit Division in complete confidentiality, and the Division immediately informs the Management and the Audit Committee.

G. Dealing with emergencies

Measures to address the spread of Covid-19 - Group Human Resources

Value creation for financial institutions is directly related to the level of economic activity of the countries in which they operate, as well as to the overall economic circumstances. It is therefore inevitable that unexpected events, such as the current Covid-19 pandemic, which are putting severe pressure on individual businesses and the economy, will also have a significant impact on financial institutions. The slowdown in economic activity caused by the pandemic has had a number of consequences, including a reduction in business turnover and profits and/or a loss of income for Employees in the affected sectors. These effects, in turn, have affected the ability of both businesses and individuals to meet their debt repayment obligations.

However, there are some factors that ensure that financial institutions are resilient to these effects.

The European Banking Authority has taken decisive action to help Banks continue to support their Customers during the Covid-19 pandemic. The guidelines on the implementation of the suspension of payments for Customers affected by the crisis, provided an effective framework for Banks to support their Customers, without suffering serious losses. In addition, a temporary easing of capital requirements has been implemented, thus giving Banks another opportunity to support businesses and households to recover financially.

More specifically, the unprecedented conditions caused by the appearance of Covid-19, required immediate and drastic measures in order to ensure the health and safety of the Bank's employees - customers - associates and to achieve business continuity. The Bank's Management immediately implemented an action plan to deal with the pandemic, ensuring the smooth implementation of the central framework for crisis and emergency management. Protecting Human Resources is a top priority for the Bank. In this context, the following actions are listed, which were put in place in 2020 and are still implemented:

- a HELP LINE hotline (for the Group's employees and with the assistance of the Human Resources Department), staffed by associated physicians and scientific advisors in order to address all issues related to Covid-19;
- 24/7 Psychological Support hotline service with specialized psychological counselors for the entire Human Resources;
- a special thematic section on INTRANET in which all announcements and information material on issues related to Covid-19, are posted;
- conducting in-service meetings and trainings through teleconferencing;
- Promoting the institution of teleworking;
- special care for employees belonging to vulnerable groups;
- carrying out polymerase chain reaction (PCR) tests at the expense of the Bank;
- implementing all measures, instructions and recommendations which are announced by the competent bodies.