

APPENDIX III

# GRI Content Index

**Statement of use:** Eurobank has reported in accordance with the GRI Standards for the period 01/01/2024 – 31/12/2024.

**GRI 1 used:** GRI 1: Foundation 2021

**Applicable GRI Sector Standard(s):** N/A

| GRI Standard/Other Source       | Disclosure                                                                       | Report Section/Direct Answer                                                                                                | Page(s)          | Omission                                      | External Assurance |
|---------------------------------|----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|------------------|-----------------------------------------------|--------------------|
| GRI 2: General Disclosures 2021 | 2-1 Organizational details                                                       | About Eurobank                                                                                                              | 15-16            |                                               | √                  |
|                                 | 2-2 Entities included in the organization’s sustainability reporting             | Business overview<br>Methodology                                                                                            | 20-39<br>144     |                                               | √                  |
|                                 | 2-3 Reporting period, frequency and contact point                                | Methodology                                                                                                                 | 144              |                                               | √                  |
|                                 | 2-4 Restatements of information                                                  | Methodology<br><a href="#">Sustainability Data Pack</a><br><a href="#">Environmental Report 2024</a>                        | 144              |                                               | √                  |
|                                 | 2-5 External assurance                                                           | Methodology<br>Independent Auditor’s Limited Assurance Report                                                               | 144<br>161       |                                               | √                  |
|                                 | 2-6 Activities, value chain and other business relationships                     | About Eurobank<br>Supplier relations<br>2-6 c - Not Applicable                                                              | 15-16<br>135-136 |                                               | √                  |
|                                 | 2-7 Employees                                                                    | Employer's Impact<br><a href="#">Sustainability Data Pack</a>                                                               | 103-113          |                                               | √                  |
|                                 | 2-8 Workers who are not employees                                                | N/A                                                                                                                         |                  | Entire disclosure - Information unavailable*  | √                  |
|                                 | 2-9 Governance structure and composition                                         | The Board of Directors and Committees<br><a href="#">Board Nomination Policy</a><br><a href="#">Annual Financial Report</a> | 40-42            | 2-9ciii - Information unavailable/incomplete* | √                  |
|                                 | 2-10 Nomination and selection of the highest governance body                     | Nomination, Remuneration, Evaluation<br><a href="#">Corporate Governance Statement</a>                                      | 42-43            |                                               | √                  |
|                                 | 2-11 Chair of the highest governance body                                        | The Board of Directors and Committees                                                                                       | 40-42            |                                               | √                  |
|                                 | 2-12 Role of the highest governance body in overseeing the management of impacts | Sustainability Governance<br><a href="#">Corporate Governance Statement</a>                                                 | 58-60            |                                               | √                  |
|                                 | 2-13 Delegation of responsibility for managing impacts                           | Sustainability Governance                                                                                                   | 58-60            |                                               | √                  |
|                                 | 2-14 Role of the highest governance body in sustainability reporting             | Sustainability Governance<br>Stakeholder engagement and double materiality assessment                                       | 58-60<br>61-65   |                                               | √                  |
|                                 | 2-15 Conflicts of interest                                                       | Operating with ethical integrity<br><a href="#">Corporate Governance Statement</a>                                          | 129-131          | 2-15 b - Information unavailable/incomplete*  | √                  |
|                                 | 2-16 Communication of critical concerns                                          | N/A                                                                                                                         |                  | Entire disclosure- Information unavailable*   | √                  |
|                                 | 2-17 Collective knowledge of the highest governance body                         | Corporate Governance<br><a href="#">Corporate Governance Statement</a><br><a href="#">Sustainability Statement</a>          | 40-43            |                                               | √                  |
|                                 | 2-18 Evaluation of the performance of the highest governance body                | N/A                                                                                                                         |                  | Entire disclosure - Information unavailable*  | √                  |

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| GRI Standard/Other Source       | Disclosure                                              | Report Section/Direct Answer                                                          | Page(s)    | Omission                                          | External Assurance |
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| GRI 2: General Disclosures 2021 | 2-19 Remuneration policies                              | Nomination, Remuneration, Evaluation<br><a href="#">Sustainability Statement</a>      | 42         |                                                   | √                  |
|                                 | 2-20 Process to determine remuneration                  | <a href="#">Board of Director's Remuneration Policy Annual Financial Report</a>       |            |                                                   | √                  |
|                                 | 2-21 Annual total compensation ratio                    | Nomination, Remuneration, Evaluation<br><a href="#">Sustainability Data Pack</a>      | 42         |                                                   | √                  |
|                                 | 2-22 Statement on sustainable development strategy      | Letter to stakeholders                                                                | 5-9        |                                                   | √                  |
|                                 | 2-23 Policy commitments                                 | <a href="#">Code of Conduct and Ethics</a>                                            |            | 2-23 ai-iii - Information unavailable/incomplete* | √                  |
|                                 | 2-24 Embedding policy commitments                       | N/A                                                                                   |            | Entire disclosure - Information unavailable*      | √                  |
|                                 | 2-25 Processes to remediate negative impacts            | Code of Conduct and Ethics<br><a href="#">Sustainability Statement</a>                | 129        |                                                   | √                  |
|                                 | 2-26 Mechanisms for seeking advice and raising concerns | Whistleblowing mechanism<br>Complaint management and responsible customer information | 130<br>132 |                                                   | √                  |
|                                 | 2-27 Compliance with laws and regulations               | Operating with ethical integrity                                                      | 129-131    |                                                   | √                  |
|                                 | 2-28 Membership associations                            | Memberships and Awards                                                                | 50         |                                                   | √                  |
|                                 | 2-29 Approach to stakeholder engagement                 | Stakeholder engagement and double materiality assessment                              | 61-65      |                                                   | √                  |
|                                 | 2-30 Collective bargaining agreements                   | Labour unions<br><a href="#">Sustainability Data Pack</a>                             | 113        | 2-30b - Information unavailable/incomplete*       | √                  |

**\*Omissions reported**

The new GRI 2021 Standards include comprehensive governance disclosures for which Eurobank reported certain omissions for its Annual Report 2024 Business & Sustainability owing to the processes described being under development. We believe that our reporting can be further enhanced with respect to the description and embedding of our Sustainability Governance disclosures and therefore we aim to fulfil these disclosures with the implementation of operational policies and processes within next years’ reports.

| Material topics             |                                               |                                                                                                                   |        |  |   |
|-----------------------------|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------|--------|--|---|
| GRI 3: Material Topics 2021 | 3-1 Process to determine material topics      | Double materiality assessment                                                                                     | 61     |  | √ |
|                             | 3-2 List of material topics                   | Double materiality assessment                                                                                     | 61     |  | √ |
| Climate change adaptation   |                                               |                                                                                                                   |        |  |   |
| GRI 3: Material Topics 2021 | 3-3 Management of material topics             | Stakeholder engagement and double materiality assessment                                                          | 61-65  |  | √ |
|                             |                                               | Environment                                                                                                       | 95-101 |  |   |
| GRI 305: Emissions 2016     | 305-1 Direct (Scope 1) GHG emissions          | Greenhouse gas emissions<br><a href="#">Sustainability Data Pack</a><br><a href="#">Environmental Report 2024</a> | 97     |  | √ |
|                             | 305-2 Energy indirect (Scope 2) GHG emissions | Greenhouse gas emissions<br><a href="#">Sustainability Data Pack</a><br><a href="#">Environmental Report 2024</a> | 97     |  | √ |
|                             | 305-3 Other indirect (Scope 3) GHG emissions  | Greenhouse gas emissions<br><a href="#">Sustainability Data Pack</a>                                              | 97     |  |   |
|                             | 305-4 GHG emissions intensity                 | Greenhouse gas emissions<br><a href="#">Sustainability Data Pack</a>                                              | 97     |  |   |

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| GRI 305: Emissions 2016                                          | 305-5 Reduction of GHG emissions                                                                          | Greenhouse gas emissions<br><a href="#">Sustainability Data Pack</a>                                               | 97              |          |                    |
|                                                                  | 305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions                     | Greenhouse gas emissions<br><a href="#">Sustainability Data Pack</a>                                               | 97              |          |                    |
| Climate Change mitigation                                        |                                                                                                           |                                                                                                                    |                 |          |                    |
| GRI 3: Material Topics 2021                                      | 3-3 Management of material topics                                                                         | Stakeholder engagement and double materiality analysis<br>Financed emissions and the net zero pathway              | 61-65<br>78-85  |          | √                  |
| Eurobank Internal Metric                                         | Financed emissions from sectors highly contributing to climate change                                     | Financed emissions and the net zero pathway                                                                        | 78-85           |          |                    |
| Energy                                                           |                                                                                                           |                                                                                                                    |                 |          |                    |
| GRI 3: Material Topics 2021                                      | 3-3 Management of material topics                                                                         | Stakeholder engagement and double materiality assessment<br>Environment                                            | 61-65<br>95-101 |          | √                  |
| GRI 302: Energy 2016                                             | 302-1 Energy consumption within the organization                                                          | Energy consumption<br><a href="#">Sustainability Data Pack</a><br><a href="#">Environmental Report 2024</a>        | 96-97           |          | √                  |
|                                                                  | 302-3 Energy intensity                                                                                    | Energy consumption<br><a href="#">Sustainability Data Pack</a><br><a href="#">Environmental Report 2024</a>        | 96-97           |          | √                  |
|                                                                  | 302-4 Reduction of energy consumption                                                                     | Energy consumption<br><a href="#">Sustainability Data Pack</a><br><a href="#">Environmental Report 2024</a>        | 96-97           |          | √                  |
| Direct impact drivers of biodiversity loss                       |                                                                                                           |                                                                                                                    |                 |          |                    |
| GRI 3: Material Topics 2021                                      | 3-3 Management of material topics                                                                         | Stakeholder engagement and double materiality assessment<br>Biodiversity                                           | 61-65<br>86     |          | √                  |
| Eurobank Internal Metric                                         | Direct impact drivers of biodiversity loss                                                                | Biodiversity                                                                                                       | 86              |          |                    |
| Own workforce and working conditions / Other work-related rights |                                                                                                           |                                                                                                                    |                 |          |                    |
| GRI 3: Material Topics 2021                                      | 3-3 Management of material topics                                                                         | Stakeholder engagement and double materiality assessment                                                           | 61-65           |          | √                  |
| GRI 401: Employment 2016                                         | 401-1 New employee hires and employee turnover                                                            | Attracting and retaining talent<br><a href="#">Sustainability Data Pack</a>                                        | 103             |          | √                  |
|                                                                  | 401-2 Benefits provided to full-time employees that are not provided to temporary or part- time employees | Offering a diverse, inclusive and safeworkplace<br>Rewarding, entertaining and fostering employee family relations | 109<br>110      |          |                    |
| GRI 403: Occupational Health and Safety 2018                     | 403-1 Occupational health and safety management system                                                    | Occupational health, safety and wellbeing                                                                          | 108             |          |                    |
|                                                                  | 403-2 Hazard identification, risk assessment, and incident investigation                                  | Occupational health, safety and wellbeing                                                                          | 108             |          |                    |
|                                                                  | 403-4 Worker participation, consultation, and communication on occupational health and safety             | Occupational health, safety and wellbeing                                                                          | 108             |          |                    |
|                                                                  | 403-5 Worker training on occupational health and safety                                                   | Occupational health, safety and wellbeing                                                                          | 108             |          |                    |
|                                                                  | 403-6 Promotion of worker health                                                                          | Occupational health, safety and wellbeing                                                                          | 108             |          |                    |

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| GRI 403: Occupational Health and Safety 2018                        | 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships                                                                                                                                   | Occupational health, safety and wellbeing                                                    | 108              |                                                  |                    |
|                                                                     | 403-8 Workers covered by an occupational health and safety management system                                                                                                                                                                          | Occupational health, safety and wellbeing                                                    | 108              | 403-8 b, c - Information unavailable/incomplete* |                    |
| GRI 404: Training and Education 2016                                | 404-1 Average hours of training per year per employee                                                                                                                                                                                                 | Learning and development<br><a href="#">Sustainability Data Pack</a>                         | 104              |                                                  | √                  |
|                                                                     | 404-2 Programs for upgrading employee skills and transition assistance                                                                                                                                                                                | Learning and development                                                                     | 104              |                                                  |                    |
|                                                                     | 404-3 Percentage of employees receiving regular performance and career development reviews                                                                                                                                                            | <a href="#">Sustainability Data Pack</a>                                                     |                  |                                                  | √                  |
| Eurobank Internal Metric                                            | Absenteeism rate                                                                                                                                                                                                                                      | <a href="#">Sustainability Data Pack</a>                                                     |                  |                                                  | √                  |
| Equal Treatment and Opportunities for All                           |                                                                                                                                                                                                                                                       |                                                                                              |                  |                                                  |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                                                                                                                                     | Stakeholder engagement and double materiality assessment<br>Diversity, equity and inclusion  | 61-65<br>110-111 |                                                  | √                  |
| GRI 405: Diversity and Equal Opportunity 2016                       | 405-1 Diversity of governance bodies and employees                                                                                                                                                                                                    | Diversity, equity and inclusion<br><a href="#">Sustainability Data Pack</a>                  | 110-111          | 405-1b,ii - Information unavailable/incomplete   |                    |
| Information related impacts for Consumers and/or End-users          |                                                                                                                                                                                                                                                       |                                                                                              |                  |                                                  |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                                                                                                                                     | Stakeholder engagement and double materiality assessment<br>Diversity, equity and inclusion  | 61-65<br>110-111 |                                                  | √                  |
| GRI 417: Marketing and Labeling 2016                                | 417-2 Incidents of non-compliance concerning product and service information and labeling                                                                                                                                                             | Responsible marketing and communication                                                      | 133              |                                                  |                    |
|                                                                     | 417-3 Incidents of non-compliance concerning marketing communications                                                                                                                                                                                 | Responsible marketing and communication                                                      | 133              |                                                  | √                  |
| Corruption and bribery                                              |                                                                                                                                                                                                                                                       |                                                                                              |                  |                                                  |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                                                                                                                                     | Stakeholder engagement and double materiality assessment<br>Operating with ethical integrity | 61-65<br>129-131 |                                                  | √                  |
| GRI 205: Anti-corruption 2016                                       | 205-3 Confirmed incidents of corruption and actions taken                                                                                                                                                                                             | Conflicts of interest<br>Anti-bribery and corruption                                         | 130<br>131       |                                                  |                    |
| Eurobank Internal Metric                                            | Percentage of staff trained on conflict of interest                                                                                                                                                                                                   | Operating with ethical integrity                                                             | 129-131          |                                                  | √                  |
| Corporate culture                                                   |                                                                                                                                                                                                                                                       |                                                                                              |                  |                                                  |                    |
| GRI 3: Material Topics                                              | 3-3 Management of material topics                                                                                                                                                                                                                     | Stakeholder engagement and double materiality assessment<br>Code of Conduct and Ethics       | 61-65<br>129     |                                                  | √                  |
| Eurobank Internal Metric                                            | Percentage of staff and executives accepted the updated Code of Conduct and Ethics                                                                                                                                                                    | Operating with ethical integrity                                                             | 129-131          |                                                  |                    |
| Protection of whistleblowers                                        |                                                                                                                                                                                                                                                       |                                                                                              |                  |                                                  |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                                                                                                                                     | Stakeholder engagement and double materiality assessment                                     | 61-65            |                                                  | √                  |
| Sustainability Accounting Standards Board (SASB)   Commercial Banks | FN-CB-510a.1 Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anticompetitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations | Code of Conduct and Ethics                                                                   | 129              |                                                  |                    |
|                                                                     | FN-CB-510a.2 Description of whistleblower policies and procedures                                                                                                                                                                                     | Whistleblowing mechanism                                                                     | 130              |                                                  |                    |

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| Data security and customer privacy                                  |                                                                                                                                             |                                                                                                                           |                  |          |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                           | Stakeholder engagement and double materiality assessment<br>Customer Privacy and Information Protection                   | 61-65<br>127-128 |          | √                  |
| GRI 418: Customer Privacy 2016                                      | 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data                                          | Personal data protection                                                                                                  | 128              |          |                    |
| Sustainability Accounting Standards Board (SASB)   Commercial Banks | FN-CB-230a.1 Number of data breaches, percentage involving personally identifiable information (PII) and number of account holders affected | Cybersecurity                                                                                                             | 127              |          |                    |
| Integration of Sustainability in risk management                    |                                                                                                                                             |                                                                                                                           |                  |          |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                           | Stakeholder engagement and double materiality assessment<br>Integration of sustainability in risk management              | 61-65<br>68-71   |          | √                  |
| GRI 201: Economic performance 2016                                  | 201-2 Financial implications and other risks and opportunities due to climate change                                                        | Integration of sustainability in risk management                                                                          | 68-71            |          |                    |
| Fostering innovation                                                |                                                                                                                                             |                                                                                                                           |                  |          |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                           | Stakeholder engagement and double materiality assessment<br>Fostering and stimulating an innovative environment           | 61-65<br>113-114 |          | √                  |
| Eurobank Internal Metric                                            | Increase in the value of digital transactions                                                                                               | Digital Banking<br><a href="#">Sustainability Data Pack</a>                                                               | 29-32            |          | √                  |
|                                                                     | Increase in the volume of digital transactions                                                                                              | Digital Banking<br><a href="#">Sustainability Data Pack</a>                                                               | 29-32            |          | √                  |
| Sustainable financing and investment offerings                      |                                                                                                                                             |                                                                                                                           |                  |          |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                           | Stakeholder engagement and double materiality assessment<br>Sustainable finance, services, and portfolio green transition | 61-65<br>72-89   |          |                    |
| Eurobank Internal Metric                                            | Sustainable financing approaches                                                                                                            | Sustainable finance, services, and portfolio green transition                                                             | 72-89            |          |                    |
| Financial inclusion                                                 |                                                                                                                                             |                                                                                                                           |                  |          |                    |
| GRI 3: Material Topics 2021                                         | 3-3 Management of material topics                                                                                                           | Stakeholder engagement and double materiality assessment<br>Supporting small businesses and social finance                | 61-65<br>90      |          | √                  |
| GRI Financial Services Sector Supplement                            | FS 13 Access points in low-populated or economically disadvantaged areas by type.                                                           | Making banking accessible                                                                                                 | 90-92            |          |                    |
| Eurobank Internal Metric                                            | Percentage of ATMs adapted to accessibility requirements                                                                                    | Making banking accessible                                                                                                 | 90-92            |          | √                  |

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| GRI Standard/Other Source                                                   | Disclosure                                                                                      | Report Section/Direct Answer                                                                                                  | Page(s) | Omission | External Assurance |
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| Other sustainability topics                                                 |                                                                                                 |                                                                                                                               |         |          |                    |
| Waste                                                                       |                                                                                                 |                                                                                                                               |         |          |                    |
| GRI 306: Waste                                                              | 306-3 Waste generated                                                                           | Solid waste management and recycling<br><a href="#">Sustainability Data Pack</a><br><a href="#">Environmental Report 2024</a> | 98      |          |                    |
| Communities’ economic, social and cultural rights                           |                                                                                                 |                                                                                                                               |         |          |                    |
| GRI 203: Indirect Economic Impacts 2016                                     | 203-1 Infrastructure investments and services supported                                         | Corporate Social Responsibility                                                                                               | 117-118 |          |                    |
|                                                                             | 203-2 Significant indirect economic impacts                                                     | Corporate Social Responsibility                                                                                               | 117-118 |          |                    |
| Social inclusion of Consumers and/ or End-users                             |                                                                                                 |                                                                                                                               |         |          |                    |
| Eurobank Internal Metric                                                    | Banking products aiming to address social issues and promote social inclusion                   | Products and services with positive social and environmental impact                                                           | 87-88   |          |                    |
| Engagement with clients to support their sustainability transition          |                                                                                                 |                                                                                                                               |         |          |                    |
| Eurobank Internal Metric                                                    | Digital Academy workshops and participants                                                      | Sustainability engagement and awareness- External                                                                             |         |          |                    |
| Accessibility                                                               |                                                                                                 |                                                                                                                               |         |          |                    |
| Eurobank Internal Metric                                                    | Measures of commitment to ensure accessibility across all services for people with disabilities | Making banking accessible                                                                                                     | 90-92   |          |                    |
| Capacity Building to promote sustainability issues to external stakeholders |                                                                                                 |                                                                                                                               |         |          |                    |
| Eurobank Internal Metric                                                    | Measures to promote awareness to external stakeholders on sustainability issues                 | Sustainability engagement and awareness                                                                                       | 115-116 |          |                    |
| Other GRI topics                                                            |                                                                                                 |                                                                                                                               |         |          |                    |
| GRI 201: Economic Performance 2016                                          | 201-1 Direct economic value generated and distributed                                           | Direct economic value                                                                                                         | 19      |          | √                  |
| GRI 204: Procurement Practices 2016                                         | 204-1 Proportion of spending on local suppliers                                                 | Supplier relations                                                                                                            | 135-136 |          | √                  |
| GRI 301: Materials 2016                                                     | 301-1 Materials used by weight or volume                                                        | Paper use<br><a href="#">Sustainability Data Pack</a>                                                                         | 98      |          |                    |