Piraeus

Taskforce on Nature-related Financial Disclosures

2025 Report

Forewords

Climate change, water scarcity, wildfires, pollution, biodiversity loss are already disrupting economies and local communities. Notwithstanding that climate and nature risks may affect Piraeus client's business operations and their viability, Piraeus realizes that there are business opportunities in tackling climate change and protecting or restoring nature. To this end Piraeus is developing strategies to monitor nature risks of our clients especially in agriculture and provide solutions. Piraeus supports the government in restoring nature after extreme events like wildfires and seeks to identify business opportunities exploring the nexus of climate and nature whilst leveraging on national priorities.

Christos Megalou
CEO of Piraeus

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Executive Summary

Piraeus Bank recognises that a healthy natural environment is fundamental to economic stability and the long-term prosperity of both the Greek economy and the Bank itself. The loss of nature, encompassing degradation of ecosystems, loss of biodiversity, and depletion of natural resources, presents material financial risks and opportunities for Piraeus' operations and clients.

In line with Piraeus' commitment to the UN Principles for Responsible Banking and Piraeus' priority to integrate sustainability across its business, Piraeus Group is seeking ways to place nature at the heart of its sustainability strategy. Piraeus' ambition is to integrate climate, environment & nature issues into its business model and risk management, by strengthening the measurement and monitoring of impacts and risks and expanding Piraeus' activities towards climate and nature positive projects, sectors and initiatives.

Piraeus' nature approach builds on existing climate and sustainability strategies, recognizing that climate change and biodiversity loss are deeply interconnected. It is guided by Piraeus' Sustainable Development Policy and builds from existing work on climate impacts and risks. Piraeus is continuously learning and supporting the development of a nature positive banking sector through its alignment with UNEP FI Principles for Responsible Banking, commitment under the Finance for Biodiversity Pledge, and active memberships of Partnership for Biodiversity Accounting Financials (PBAF), and the EU Business @ Biodiversity Platform.

In 2024, Piraeus identified biodiversity as a material issue through a double materiality assessment and started reporting on Piraeus' activities interface with nature and biodiversity. Piraeus is exploring appropriate approaches to measure the Dependencies, Impacts, Risks and Opportunities of nature in its portfolios, following best practice guidelines from the TNFD and aligning with the Corporate Sustainability Reporting Directive (CSRD) ESRS E4 requirements and European Central Bank (ECB) expectations on environmental risks. Piraeus Group has already taken concrete measures in that direction; this year Piraeus Group has:

- Updated Piraeus' portfolio-wide assessments of impacts and dependencies using international best practice tools such as the Exploring Natural Capital Opportunities, Risks and Exposure (ENCORE) tool and the Biodiversity Footprint for Financial Institutions (BFFI) approach.
- Conducted a deeper analysis of Piraeus agricultural portfolios, including a qualitative scenario analysis of nature-related risks in the short, medium and long-term. This analysis is guiding future developments on sustainable financing for farmers.
- Screened sites' locations in Piraeus Energy and Accommodation portfolios, identifying sites located near sensitive ecosystems. Piraeus Group is also currently building a Geographic Information System (GIS) tool to embed geospatial nature and climate information regarding risks screening in its credit processes.

Piraeus Group is also working on enhancing sustainable finance offerings through frameworks for sustainable finance, green bonds, and sustainability-linked loans, to support clients in their transition to a more sustainable and nature-positive business model. Looking forward, Piraeus' key priorities are:

- to expand and deepen measurement of nature impacts, dependencies and risks in Piraeus' portfolios,
- to identify the opportunities arising from the nature positive transition in Piraeus' key sectors of exposure including Energy, Tourism, Agriculture and Transport and start structuring targeting offering,
- to further integrate nature and climate nexus in Piraeus' strategic frameworks for risk management and business development, as well as in reporting effort and engagement.

Introduction

Piraeus Bank defines nature in its broadest sense, encompassing all components of the natural world, including land, freshwater and marine ecosystems, and the services they provide. The ongoing decline in biodiversity and the degradation of ecosystem services pose significant threats to global and local economies, including major sectors of the Greek economy (Bank of Greece, 2024). The ECB estimates that in 2021 80% of loan portfolios in Greece were highly dependent on nature and its services to a functioning economy (*ECB, 2024*). Piraeus understands that nature covers many environmental issues that are already under management and consideration from Piraeus' customers and stakeholders, such as water scarcity and quality, pollution to air, water and land, the use of land, and extraction of natural resources. Yet, increasing environmental pressures combined with climate effects is expected to continue degrading ecosystems. For Greece, a country with rich biodiversity and an economy heavily reliant on sectors like agriculture, tourism, and fishing (wild and farmed) these impacts and risks are particularly pronounced. These sectors are not only major contributors to the economy but also a constituent of local, regional and natural culture for generations, as well as a mirror of Greece's profile to the rest of the world. That is why developing a more informed understanding of how nature contributes to a thriving Greece is becoming a central part of Piraeus' sustainability efforts.

Piraeus' commitment to sustainability is reflected in the alignment with the United Nations Sustainable Development Goals (UN SDGs), and the UN Principles for Responsible Banking with particular focus on protecting the environment and using natural resources responsibly. In 2024, Piraeus Group conducted its first double materiality assessment in line with the CSRD requirements and identified biodiversity as a material topic for Piraeus' business. Nature is therefore becoming a central part of Piraeus' sustainability efforts moving forward. Piraeus Group aligns with best practice standards including ECB guidance, CSRD, SFDR (Sustainable Finance Disclosure Regulation), and is a proud TNFD Early Adopter.

This report marks Piraeus' initial TNFD-aligned disclosure and reflects a strategic step toward integrating nature into the Groups' strategic priorities for sustainability.

Governance

Sustainability Governance at Board Level

Piraeus has established a governance structure for ESG (Environmental, Social and Governance) that integrates comprehensive oversight and management practices into its operational and business model. This governance approach ensures that all aspects of its business are managed with a focus on long-term value creation and responsible operations regarding ESG. The key components of Piraeus' ESG governance framework includes committees and units dedicated to upholding the Group's ethical conduct, while focusing on strategic oversight, effective risk management, and its commitment to sustainability.

Board of Directors (BoD) has the general oversight of policies, strategies, initiatives and programs of the Group with respect to sustainability and ESG matters. The BoD is supported by the Board Committees, which report regularly to the BoD on issues related to their responsibilities.

Audit Committee is responsible for overseeing the integrity of the Group's financial and non-financial/ESG disclosures within the Annual Report. It monitors the adequacy and effectiveness of the internal control and risk management systems and of the Internal Audit function, also with respect to ESG-related issues (e.g., fraud, whistleblowing, violence and harassment, greenwashing, etc.).

Risk Committee maintains appropriate and thorough monitoring, guidance, and control over all critical risks, including climate and environmental material risk indicators, and key exposures associated with the Group. It is responsible for advising and supporting the BoD regarding the monitoring of the Group's overall actual and future risk strategy and risk appetite, considering all types of risks (including climate and ESG risks), to ensure that they are in line with the business strategy, objectives, corporate culture, and values of the Group.

Remuneration Committee (RemCo) is responsible for ensuring that the Group remuneration policy is consistent with the objectives of the Group's business and risk strategy, including ESG risk-related objectives, corporate culture and values, and long-term interests of the Group. The Committee has responsibility for aligning executive directors' and senior management's remuneration with strategic priorities, including in relation to climate and sustainability matters.

Strategy Committee determines the targets of the Bank's Strategic Plan and provides the guidelines for the Bank's Action Plan which shall be developed by the Managing Director and the Executive Committee in order to be approved by the BoD.

Sustainability Governance at Management Level

ESG and Corporate Responsibility Committee monitors and coordinates management commitment on ESG issues. The Committee is chaired by the Group's CEO and is composed of all members of the Bank's Executive Committee, and two additional members, the Group General Counsel and the Head of Group Cultural and Social Initiatives. The composition of the Committee, reflects the prominent role the management of the Group is expected to play in shaping the Group's approach to managing sustainability issues and integrating the Climate & ESG criteria into the Bank's strategy, recognizing that this is a key factor in ensuring long-term success and reflecting the fact that these issues are becoming materially relevant to the Group as well as to key stakeholders, such as clients and regulators.

The ESG and Corporate Responsibility Committee is supported by two key steering committees, each with distinct mandates and reporting lines:

CSRD Implementation Project Steering Committee is tasked with overseeing the implementation of the Corporate Sustainability Reporting Directive (CSRD) across the organization. It plays a central role in ensuring compliance with evolving EU sustainability reporting standards and is responsible for guiding the double materiality assessment process, aligning disclosures with ESRS requirements, and embedding sustainability into the management report structure.

Climate & Environmental Risks Steering Committee focuses on aligning the organization with regulatory expectations concerning climate and ESG risk management and disclosure. It supports the integration of climate and environmental risk into the broader risk management framework and ensures that sustainability considerations are embedded in strategic planning and governance structures.

Both steering committees report directly to the ESG and Corporate Responsibility Committee, reinforcing a governance model that integrates sustainability oversight into the highest levels of corporate decision-making.

Strategy

Where Piraeus is on nature

Ambition statement

At Piraeus Group, the ambition is to integrate climate and nature considerations into key aspects of the business model and risk management, acknowledging the nexus between climate and nature risks. This will require stronger measuring and monitoring infrastructure of nature impacts, and risks, and multi-year action to support the sectors in which Piraeus operates to transition to sustainable and resilient business models.

Piraeus' strategic direction on nature builds upon Piraeus Sustainability Policy and aims to align with the Kunming-Montreal Global Biodiversity Framework goal of halting biodiversity loss by 2030.

Piraeus Sustainability Policy articulates the Group's commitment to fostering a sustainable and resilient economy. This commitment is supported by a set of key principles, including:

- Protecting the environment through the responsible use of natural resources.
- Promoting environmentally and socially beneficial business activities.
- Aligning business strategies with the SDGs and the Paris Agreement, recognizing that climate and nature are inextricably linked.

Piraeus is continuously demonstrating its commitment to a nature positive banking sector through Piraeus' alignment with UNEP FI Principles for Responsible Banking, Piraeus' commitment under the Finance for Biodiversity Pledge, and Piraeus' active

memberships of Partnership for Biodiversity Accounting Financials (PBAF), and the EU Business @ Biodiversity Platform. As a result, Piraeus Bank is engaging in multiple internal and external initiatives to:

- Collaborate and share knowledge with other financial institutions on nature-related risks and opportunities.
- Engage with companies to reduce negative impacts on biodiversity and support business models that protect ecosystems.
- Assess and disclose biodiversity impacts and dependencies in Piraeus financing and investment activities.
- Set nature targets to support activities that protect and enhance the natural environment, contributing to the global goal of halting and reversing biodiversity loss.

Piraeus has already taken a significant first step towards these commitments.

As a Bank that holds a leading position in Greece's agricultural lending market, Piraeus understands that nature is a key factor for the resilience of its clients, and thus its business model. Piraeus is working towards better understanding the risks and opportunities related to nature for agriculture and other sectors such as energy and tourism accommodation.

Piraeus has started to build a consistent approach in enhancing the resilience of its counterparties to nature physical and transition risks, by conducting a set of assessments of its portfolios and integrating these into annual disclosure and reporting process.

See next section "Nature in Piraeus' portfolios"

This work has been crucial in establishing a baseline understanding of Piraeus' exposure to nature and will inform its strategy development on environmental risks in the coming years. Piraeus is working to further develop nature-specific targets following the results of ongoing impact, dependency, risk and opportunity analyses.

See "Metrics and Targets" section

Additionally, Piraeus has already put in place measures to reduce its exposure to activities with harmful nature impacts. Piraeus credit policy currently excludes any financing of the following activities:

- Companies whose operations impact the UNESCO World Heritage Sites in Greece.
- Companies that operate within nature protected areas (e.g. Natura 2000, Ramsar Convention wetlands) without complying with all legal and regulatory restrictions.
- Fishers that use drift nets over 2.5 km.
- Companies producing or trading wood or other forest products that are not derived from sustainable managed forests.
- New investments in energy production from coal/lignite.
- Companies with revenues from energy production from coal/lignite unless they have credible and time bound transition plans to sustainable fuels and managed phaseout plans from coal/lignite production.

Nature in Piraeus' portfolios

Piraeus Group provides a wide range of services and financial products to all key actors of the Greek economy, including sectors with large direct and indirect interactions with nature. Using a range of best-in-class tools, Piraeus has performed multiple analyses of its portfolios, to understand where nature is material both from an impact and a risk perspective.

Piraeus' impact and dependency analysis enabled the Bank to identify key "double

materiality" sectors to which Piraeus have notable financial exposure. This means that they are both negatively degrading nature and could be financially affected by nature degradation. These sectors are Tourism (Accommodation), Water transport, Agriculture and Food (production and processing), Energy (electricity production), Wholesale and Retail Trade, and Manufacture of petroleum products. These sectors depend on critical ecosystem services such as water supply, flow and purification, protection against storm and floods, climate regulation and soil retention, and soil fertility related services. They are also driving impacts on biodiversity with highest impacts on nature being driven by land use, pollution and GHG emissions.

Overall Portfolio

Summary dependencies and impacts in Piraeus' corporate loans, equities and bonds portfolios (scope: Pillar III coverage, total exposure of €24.6 bn)

	Approach	Key Learnings
Dependencies	ENCORE tool (Exploring Natural Capital Opportunities, Risks and Exposure)	About two thirds of Piraeus credit exposure (about 66% of Pillar III 2024 portfolio or €16.2 bn) is dependent on at least one ecosystem service, and a quarter on at least two ecosystem services. Top dependencies across portfolio: water-related services (40-60% of Piraeus' financial exposure shows a medium or higher dependency on water purification, water supply, and water flow regulation). Piraeus' largest exposure to nature-dependent sectors is in "Trade", "Accommodation", "Construction", "Food and beverage activities" and "Agriculture, forestry and fishing".
Impacts	BFFI methodology (Biodiversity Footprint for Financial Institutions)	The sectors identified as the ones with highest potential impacts are: - Sea and coastal water transport - Energy (electricity and petroleum processing) - Agriculture (especially dairy and meat production, food processing and crop farming) - Wholesale trade - Petroleum refinery - Hotels and restaurants - Construction The main drivers of biodiversity loss, according to the BFFI footprint, are Pollution (through marine ecotoxicity, terrestrial acidification, photochemical ozone formation), Land/sea-use change (land use/transformation), and Climate change (GHG emissions).

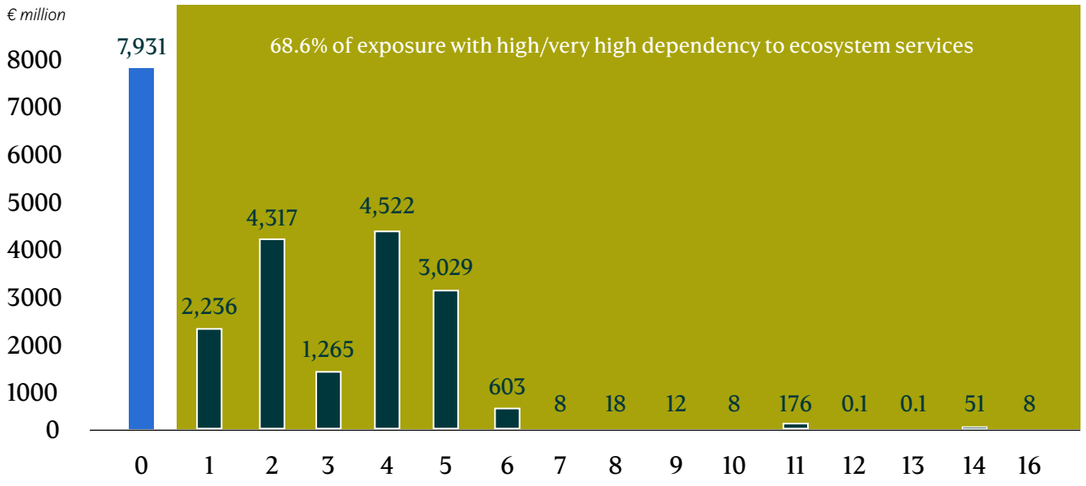
Dependencies

16% (~€4 bn) of Piraeus portfolio is exposed to sectors with more than 5 critical dependencies on nature. These sectors (mainly agriculture, forestry and fishing and energy) are more likely to face nature physical risks due to the wide range of nature services contributing to their resilience and growth. About 27% (~€6.5 bn) of the 2024 portfolio is exposed to sectors with 1 or 2 high or very high dependencies on nature, and 33% (~€8 bn) has no critical dependency on nature.

Definition:

Dependencies reflect the contribution of nature and its ecosystem services to the functioning of economic sectors. A high dependency means that if nature degrades and the relevant ecosystem service disappears, the dependent economic activity could be significantly affected.

Figure 1: Exposure to high and very high dependencies scores, total € million by number of high/very high dependencies



Water related services, which relate to ecosystem services delivering a clean, plentiful, and resilient supply of water, are the most widespread critical dependencies in Piraeus' portfolios. About 60% (~€15 bn) of Piraeus' portfolio has medium to high dependency on water flow regulation and 40% (~€10 bn) on water supply. The second ecosystem service most important across portfolios is mitigation of storms and floods by natural infrastructure. Most sectors are vulnerable to damage from extreme events, which could be worsened if natural protections are degraded. Sectors with medium and high dependency on these services represent approximately 53% and 59% of Piraeus portfolio, respectively.

Across sectors with one or more critical dependencies on nature, Piraeus' largest exposure is in Wholesale Trade, Accommodation, Construction activities, Food and beverage activities, Agriculture, forestry and fishing, Transport, Food products, and Electricity, gas and steam supply sectors. Together, these sectors account for 69% of Piraeus overall portfolio dependency score.

Impacts

Definition:

The TNFD defines five main drivers of nature change: Climate change, Land/Freshwater/Ocean use change, Resource use, Pollution, Invasive Species. These are broad categories that encompass all the different ways in which economic activities can degrade or improve nature and biodiversity and the service they provide to our economy.

The biodiversity footprint analysis covers terrestrial, freshwater, and marine ecosystems. The main drivers of biodiversity loss relevant to the portfolio are climate change, pollution, land and sea-use change. The estimates are based on the Biodiversity Footprint for Financial Institutions (BFFI) methodology, incorporating the EXIOBASE3 database and the ReCiPe pressure-impact model. This approach quantifies the total impact on biodiversity, whether positive or negative, using the metric of Potentially Disappeared Fraction (PDF) of species over area and time (PDF/m^2 yr). It should be noted that this metric represents a modelled-potential impact and is not location-specific nor adjusted for local/national management practices.

More detail on the approach is available in the "Metrics and Targets" section

Three main drivers impacting terrestrial ecosystems

Drivers of impact on terrestrial ecosystems	**% of total footprint (2024)**	**% of total footprint (2023)**
Land use/transformation	17.9%	32.3%
Climate change (Global warming)	23.7%	23.4%
Terrestrial acidification (soil pollution)	30.4%	21.6%

Other contributing environmental pressure categories include photochemical ozone formation (12.8% of total footprint 2024, 10.5% in 2023) and terrestrial ecotoxicity (13.2% of total footprint 2024, 8.8% of total footprint 2023). Sea and Coastal Water transport along with electricity production is expected to be the major contributor to degradation of terrestrial ecosystems in this portfolio, mostly through GHG emissions, while exposure to meat and dairy processing sectors largely contributes to degradation through land use.

The impact on freshwater ecosystems is almost entirely attributed to pollution effects. In 2024, freshwater eutrophication caused almost the entirety of the biodiversity loss, accounting for 93.4% of the total footprint. This is mostly driven by exposure to meat, dairy and food processing sectors.

The impact on marine ecosystems is overwhelmingly dominated by toxic pollution (marine ecotoxicity). In both 2023 and 2024, the biodiversity loss caused to marine ecosystems almost 100% originated from the marine ecotoxicity effect of the investees in the Sea and Coastal Water transport sector through the pollution from fuel use and waste discharge into the sea.

Agricultural portfolio impacts and risks analysis

Agriculture critically depends on a large array of ecosystem services and is among the top 5 sectors contributing to Piraeus' estimated nature footprint. Piraeus Group is a leader in the agricultural lending market in Greece and consequently Piraeus' strategy and practices aim to continuously support farmers and agri-food businesses. Piraeus therefore has a significant role to play in helping the sector to transition towards a sustainable and nature-positive path.

In 2025, Piraeus conducted a detailed LEAP-aligned assessment (Locate, Evaluate, Assess, Prepare guidance from the TNFD) of impacts, dependencies and risks related to nature on Piraeus' agricultural portfolios. This analysis gave a better understanding of the main drivers of impacts and risks for Piraeus' agricultural counterparties, taking into consideration national and regional characteristics, such as water use intensity per product, regional soil salinity and erosion conditions, and number of sensitive species and protected areas per region. The analysis highlighted the overwhelming importance of water-related issues for the Agricultural sector in Greece, constituting a major source of physical risks in the short-term and potentially driving significant physical and transition risks to Piraeus' counterparties in the long-term. It also raised concerns about potential risks related to degrading soil which could affect Piraeus' counterparties financially. Finally, it highlighted the opportunity for Piraeus' programmes to support more efficient farming practices to reduce water and pollution impacts across portfolios.

This directly supports the development of Piraeus' programmes and offerings to farmers, helping them mitigate their risks and reap the opportunities of the nature transition.

The main learnings from Piraeus LEAP analysis of its agricultural portfolio are presented below (Total exposure assessed: €862.7 million across private and legal entities).

Impacts

- More than 75% (~€680 million) of the agricultural portfolio is likely to be driving a very high impact on nature – primarily driven by water use and land use.

  See Figure 2 below

- Livestock farmers (€179 million), especially sheep and goat farmers, as well as cereal growers (€175 million) are likely to have higher impacts because of high water impact as well as air, water and soil pollution through the use of pesticides and fertilizers, and discharge of waste.
- Central Macedonia is likely to be the region most affected by these impacts, and concentrates around €222 million in exposure across counterparties.

Figure 2: Share (%) of exposure by impact driver and impact scores, Agricultural loan book 2024. Scores: level of concern of intensity and gravity of impact on nature.

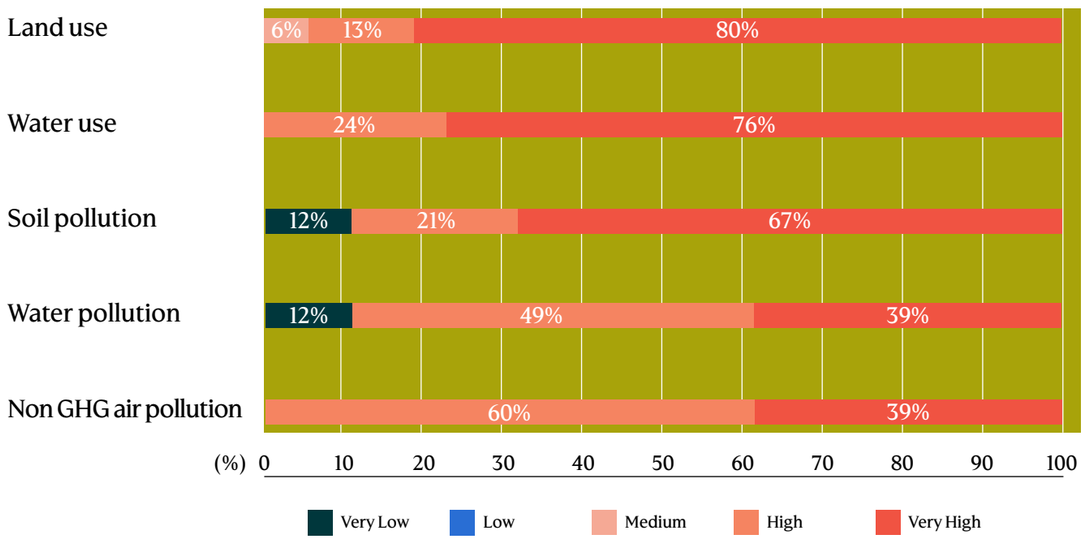


Figure 3: Total Agricultural portfolio exposure (€ million) by NACE sector, exposed to High or Very High dependency on water supply

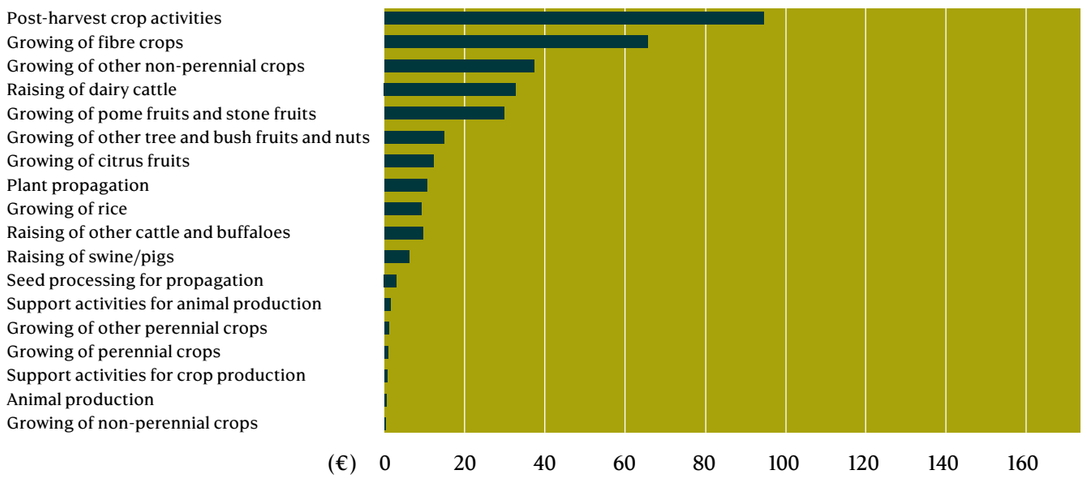
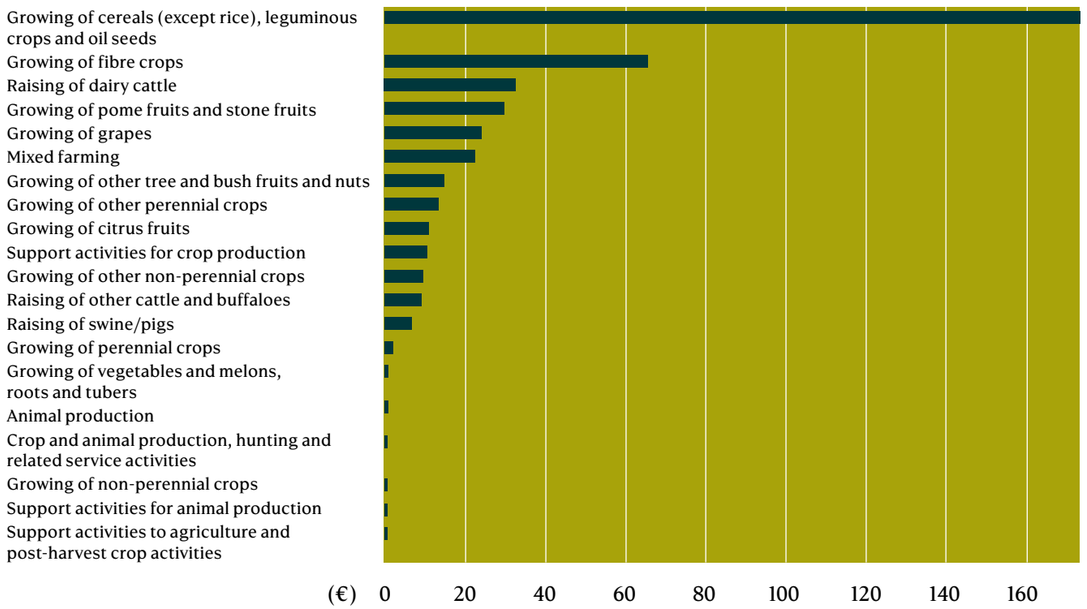


Figure 4: Total Agricultural portfolio exposure (€ million) by NACE sector, exposed to High or Very High dependency on soil quality



Dependencies

Almost two-thirds (€530 million) of Piraeus agricultural portfolio value is highly sensitive to global climatic change, and about half (€429 million) is highly sensitive to water supply. Nearly 9,000 of Piraeus' clients (€334 million) grow crops and raise livestock that are particularly sensitive to water stress and drought.

See Figure 3

Degradation of soil quality could be a material issue for more than 19,000 of Piraeus' clients (€429 million), especially for cotton producers for which yields are very sensitive to levels of nutrients in soil.

See Figure 4

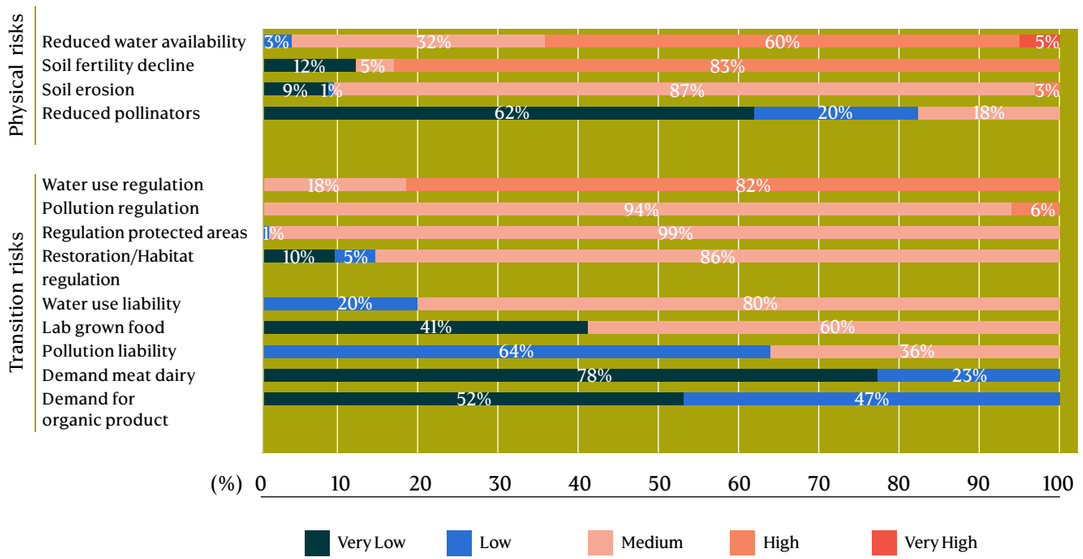
Risks

For this portfolio, Piraeus assessed 4 physical risks and 9 transition risks in the short-term (2025), medium-term (2030), and long-term (2050). This was conducted to inform future actions and risk management of Piraeus agricultural counterparties. For future risks Piraeus has used qualitative climate+nature scenario narratives aligned with climate scenarios already used by the Bank and best practice on nature scenarios. The two scenarios chosen were extreme scenarios mirroring stress-test exercises required for risk analyses. One scenario (Low Ambition) focused on high physical risks, in a Low Ambition future where climate and nature actions stall and degradation accelerates. The other scenario (Integrated Transition) focused on high transition risks, where significant action is taken to tackle the climate and nature crisis in an integrated manner following the Paris Agreement and the Global Biodiversity Framework goals.

More detail on approach is available in the "Metrics and Targets" section

This analysis highlighted that in the short-term Piraeus' Agriculture portfolio is mostly exposed to physical risks, while transition risks are relatively low. The main physical risks to counterparties are likely to be driven by water availability and soil quality degradation which could expose counterparties representing up to €700 million of Piraeus 2024 Agriculture portfolio value. Piraeus' main exposure to transition risks in this portfolio relates to regulations on water use which could affect a large share of counterparties (€711 million in exposure) by increasing their cost of production or decreasing their production capacity. Especially for counterparties growing cereals, olives, cotton and vegetables.

Figure 5: Share (%) of exposure by risk score, short-term risks, across 13 risks assessed Agricultural loan book 2024



This could increase to almost all of Piraeus Agricultural portfolio value by 2050 under scenarios of both low and high-action on nature if no risk mitigation measures are put in place by counterparties. This is mostly because water-related risks are likely to remain high in both scenarios if counterparties don't invest in water efficiency measures and resilient crops, exposing up to €850 million (~98%) of Piraeus' Agricultural portfolio in 2050. Physical risks related to soil however could be reduced to a medium concern by 2050 if restoration measures are put in place.

In an Integrated Transition scenario, increasing stringency of regulations and potential legal actions on pollution may drive medium to high transition risks in the long term. This could expose companies and private entities in Piraeus' agricultural portfolio to significant costs, if they cannot meet high transition requirements of this scenario such as switching to low inputs agriculture, introducing natural lands in growing areas and using water efficient practices.

Figure 6: Long-term risk (2050), share (%) of exposure for the low ambition scenario of the Agricultural loan book 2024

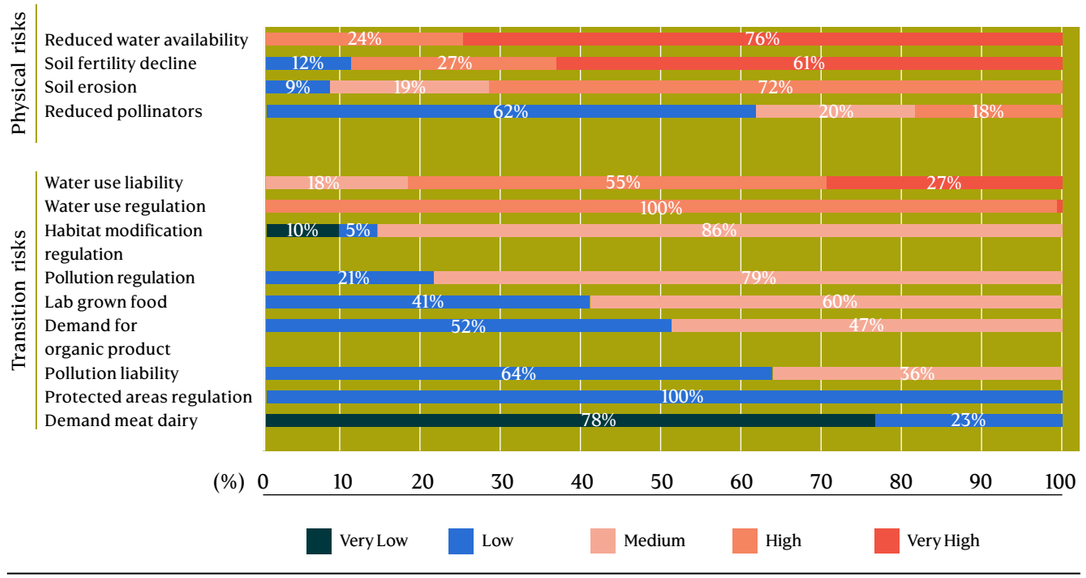
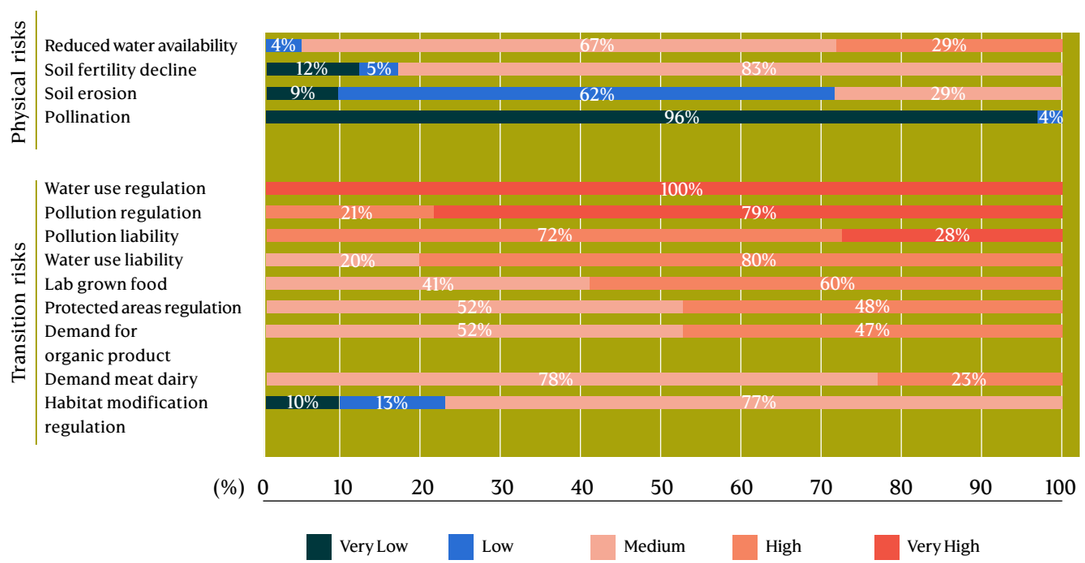


Figure 7: Long-term risk (2050), share (%) of exposure for the integrated transition scenario of the Agricultural loan book 2024



Site level screening of sensitive locations in Piraeus energy and accommodation portfolios

Piraeus is currently collecting location data across key sectors in Piraeus portfolios to increase the accuracy and depth of nature risk assessments. Using the Natcap dashboard –a nature analysis tool developed by Natcap using best in class global state of nature datasets to evaluate sensitivity of biodiversity by location– Piraeus has screened 2,708 operational sites from its Energy and Accommodation portfolios. Piraeus has identified that all sites could be located in or near sensitive areas according to TNFD's definition.

This is driven by the high number of sites located in areas of high-water stress and close proximity to key biodiversity areas. Sensitive locations are defined by TNFD as any activities affecting areas with one or more of the characteristics listed in the table below.

TNFD sensitive location indicator	Geospatial analysis results
Areas important for biodiversity (eg. Natura 2000 protected areas, Key Biodiversity Areas)	2,348 sites in or near protected areas of Key Biodiversity Areas
Areas of high ecosystem integrity or of rapid decline in ecosystem integrity	377 sites in areas with high ecosystem integrity, no sites in area of rapid decline
Areas of high physical water risks	2,676 sites in areas of high or very high water stress, 40 sites in areas of high drought risk, 5 sites in areas of high nutrient pollution in surface water
Areas of importance for ecosystem service provision to local communities	349 sites in areas where provision of ecosystem services to local communities is high

This analysis was a preliminary exercise. It is the first step towards integrating location-specific nature considerations into Piraeus' crediting process and will help the Bank further integrate these considerations into its direct engagement with clients. Piraeus is currently building an internal GIS platform to perform these screenings across more of Piraeus operations and portfolios.

Further in-depth analyses of these portfolios will be conducted within the framework of the next TNFD report.

Investing in Nature: Piraeus' actions on Nature

Piraeus is actively mobilizing capital to support the transition to a sustainable economy through a suite of sustainable finance products. While the initial focus of Piraeus' offering was climate change and social issues, many are also contributing to a nature positive transition, especially for products and initiatives targeting the agricultural sector. Piraeus is working to integrate additional nature-specific considerations into its offerings in the coming years. Piraeus has put the following frameworks in place to ensure that these products drive effective positive impacts.

Sustainable Finance Framework (SFF)

This framework guides the classification and allocation of capital towards green projects, ensuring alignment with the EU Taxonomy. It also establishes Piraeus' approach for performance monitoring of sustainability-related strategic goals. The SFF aims to identify types of financing that address climate change mitigation, adaptation and energy transition, which can also contribute to slowing nature loss.

Green Bond Framework

Through the issuance of Green Bonds, the Bank finances eligible projects that contribute to climate change mitigation and adaptation, with a focus on renewable energy and sustainable building, which have indirect positive effects on nature by reducing GHG emissions and other associated pollution.

Sustainability-Linked Loans (SLLs)

Piraeus established its SLL framework in 2024 with the aim of supporting borrowers in their transition to a low-carbon economy and advancing positive social impact. The SLL framework links the interest rate of a loan to the client's achievement of specific sustainability targets, such as reducing water usage, improving waste management, or obtaining environmental certifications. Provisions are made to ensure that the sustainability targets of these loans remain relevant and ambitious.

Agriculture support programmes

Piraeus Bank provides dedicated support to the Agricultural sector by offering financial products and advisory services to help farmers adopt environmentally friendly practices and improve resource efficiency. This includes water-related loans to support investment into more efficient irrigation systems and water reuse. To enhance this focus, the Bank has established the Agri-Food Center of Excellence, a dedicated team for sector analysis, market monitoring, and the development of innovative, tailored solutions. These include consulting, financing, and guarantee programs that support the agri-food value chain through two flagship initiatives: Protected Cultivations (Greenhouses) and Livestock & Dairy Modernization.

Piraeus supports local and national initiatives promoting ecological consciousness and building resilient communities across Greece. Currently Piraeus is:

Financing >€15 million in anti-flood and anti-erosion projects in regions affected by extreme weather events.

Involved in the funding of two projects that aim to manage sustainably the waters of two river basins in Greece while providing farmers with the necessary inputs for their crops. The projects are located in the areas of Xanthi (river Nestos) and Lasithi (Chochlaki) (total credit limit exposure circa €260 million). Both projects are expected to promote sustainable water use in the respective areas while protecting the local ecosystems.

Supporting the expansion of the education network "Eco-schools" from 517 to 800 school units across Greece.

Covering the expenses of selected graduates of the first MBA specializing in Sustainable Development at the University of Piraeus.

Risk and Impact Management

Environmental risk identification, assessment and management at Piraeus

Piraeus overarching environmental risk management framework

The management of nature-related risks and impacts at Piraeus Bank is integrated into the existing risk management framework (RMF). The Climate and Environmental Risks Management Policy serves as the overarching document, outlining the principles for the identification, assessment, and management of all environmental risks. This policy supports the integration of these risks into the Bank's broader risk management and risk appetite frameworks, ensuring they are considered at all levels of decision-making.

A core component of this framework is the Environmental and Social Management System (ESMS), which is embedded in the credit granting process. The ESMS ensures that environmental and social risks are systematically assessed before financing is approved. For projects and counterparties, this process involves a detailed questionnaire that includes specific questions to identify potential risks. A key element of this is the assessment of proximity to sensitive biodiversity areas, such as those designated under the Natura 2000 network or as Ramsar Wetlands, which helps to identify projects with a higher potential for direct negative impacts on biodiversity and ecosystems.

Ongoing work on nature impacts, dependencies and risk assessment

Piraeus Bank is continuously enhancing its approach to nature-related risk assessment and management through ongoing work and the adoption of advanced analytical tools. This work is designed to increase the accuracy and tailoring of Piraeus risk assessment and management approach to nature-related topics.

Since 2023, Piraeus has been carrying annual assessments of its impacts and dependencies on nature using ENCORE and the Biodiversity Footprint for Financial Institutions (BFFI) approach. The results from the portfolio-wide impact and dependency assessments are also used to inform and prioritize sectors for enhanced due diligence and tailored policy considerations.

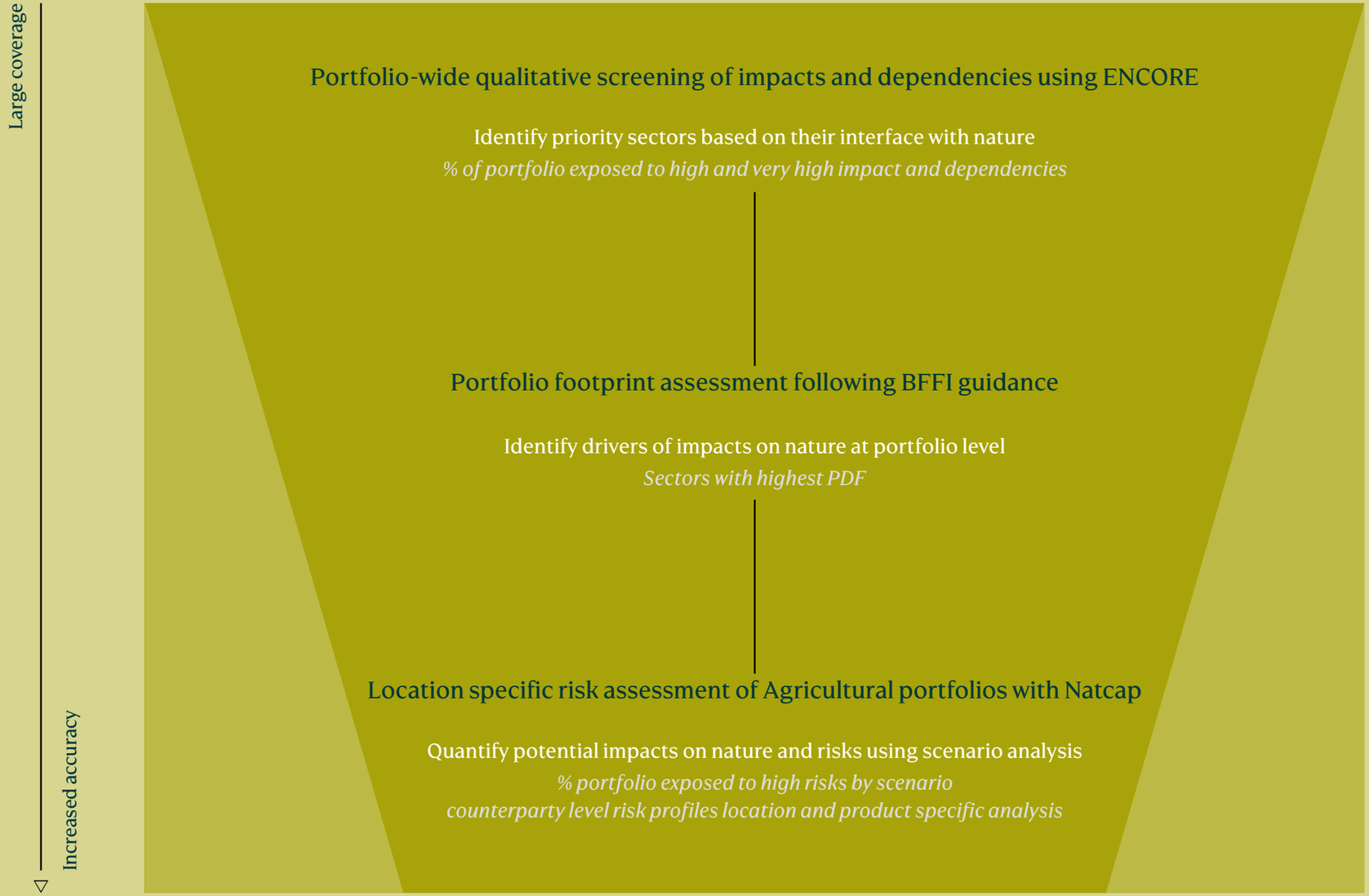
Results from the portfolio-wide impact and dependency assessments

1	**Dependency assessment** Piraeus conducts an annual screening of its loans, equities and bonds portfolios to identify exposure to impacts and dependencies on nature using the ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) tool. This helps identify which sectors within Piraeus portfolio have the highest interface with nature, guiding effort for more in-depth assessment, and monitor Piraeus' exposure to high impact and high dependencies sectors across years.
2	**Biodiversity footprint assessment** Using the Biodiversity Footprint for Financial Institutions (BFFI) methodology, Piraeus performs a quantitative analysis of its portfolios impacts on biodiversity. This assessment has provided a baseline for understanding the main drivers of biodiversity loss linked to the bank's financing, which includes land use, climate change, and pollution. *See section "Nature in Piraeus portfolios: Overall portfolio"*

This year Piraeus also conducted its first LEAP-aligned nature risk assessment, focusing on its lending activities to the agricultural sector.

3	**Location-specific risk assessment of agricultural portfolios** Piraeus has developed a specific approach for its agricultural portfolio to assess nature-related risks and opportunities in partnership with Natcap. This includes a detailed analysis of impacts and dependencies by agricultural product and region of Greece, integrating state of nature considerations to inform materiality of impact on nature and inform physical risks. This analysis assessed short, medium and long-term risks for Piraeus' agricultural counterparties using a combination of quantitative datasets, qualitative forward-looking scenarios, and financial risk pathways. The assessment covered four physical risks and nine transition risks highly relevant to the resilience of the sector in Greece. *See section "Nature in Piraeus portfolios: Agricultural portfolio analysis"*

Piraeus process for identifying, assessing, and prioritizing nature-related dependencies, impacts, risks, and opportunities



Piraeus is also developing a Geographical Information System (GIS) tool for site-level screening of sensitive locations. This allows for the identification of physical risks, biodiversity sensitivity for all Piraeus Banks' own used buildings and collaterals as well as for its business borrowers, providing more granular data than sector and regional-level assessments.

Piraeus acknowledges that these analyses represent a first step towards effective portfolio management in relation to nature-related risks and opportunities. The Group is continuously monitoring developments in regulatory requirements and industry practices to enhance its understanding and management of these risks. Further effort on Piraeus' risk and impact management will include:

- Expanding nature risk analysis to other sectors beyond Agriculture
- Increasing the granularity of portfolio data to better understand the actual impacts and risks at counterparty-level and define targeted actions
- Integrate nature considerations in Piraeus' loan origination process via the ESMS, including through the use of a GIS tool for screening sensitive nature locations.
- Enhance KPIs for Sustainability-Linked loans, by 2026, to include nature (e.g. water, natural resource use) aspects, where applicable.

Reducing environmental impacts in Piraeus Bank's administration buildings and branches

Piraeus' commitment to nature also extends to its own operations.

Piraeus has implemented an Environmental and Energy Management System that is fully certified according to the provisions of EMAS (European Eco-Management and Audit Scheme) Regulation and the International Standards ISO 14001:2015 and ISO 50001:2018. This System provides an integrated framework to record, monitor, and ultimately reduce the environmental impacts and energy consumption associated with the operation of the facilities and the activities of the Bank. It governs the Bank's efforts to reduce its operational footprint, directly mitigating impacts on nature. Key initiatives include:

- Energy use reduction: Piraeus designs and implements energy efficiency measures across its administration buildings and branches, resulting in a 14% reduction in electricity consumption over the past 3 years.
- Paper use reduction: A digital-first approach and a policy of minimizing paper use are in place to reduce resource consumption, leading to 42% paper use reduction in the last 3 years.
- Waste management: Piraeus has implemented a waste management policy focused on recycling and responsible disposal. In 2024, Piraeus Bank carried out over 2,300 recycling material collection rounds across its entire network of branches and administration buildings. In 2024, more than 1,036 tonnes of paper were recycled up from 138 in 2022, and over 6,500 items of printing consumables were sent for reuse/recycling.
- Water use reduction: Piraeus monitors and implements measures to reduce water consumption in its buildings . The average water consumption per employee was 7.08m^3 in 2024.

These actions, while related to Piraeus Bank's own operations, contribute to broader environmental protection and demonstrate the Group's commitment to minimizing direct impacts on the natural world.

Metrics and Targets

Metrics on impacts, dependencies, risks and opportunities related to nature

Piraeus believes that robust metrics and data are essential for understanding its interface with nature, assessing risks and opportunities, and ultimately steering its portfolio toward a more sustainable future. This section provides an overview of the metrics used to start assessing nature-related impacts and dependencies, in line with the Taskforce on Nature-related Financial Disclosures (TNFD) framework.

Piraeus' key assessment metric is portfolio's exposure to high (nature-related) impact, high dependencies, and high-risk sectors and sub-sectors (NACE codes), as well as locations and counterparties. In addition to this, Piraeus is exploring a wide range of potential metrics to measure its portfolio's impacts, dependencies, and risks. Below are the methods and metrics used for:

- portfolio-wide impact and dependency assessments,
- agricultural portfolio risk assessment, and
- sensitive location assessment of energy and accommodation portfolios.

Portfolio-wide impact and dependency assessments

Piraeus used the Biodiversity Footprint for Financial Institutions (BFFI) framework to assess the biodiversity impact of its financed activities. The key metric is the biodiversity footprint in Potentially Disappeared Fraction of species per square kilometer per year (PDF/km²/year) –the potential species loss within a specific area over a given time period due to environmental pressures.

Primary tools and databases used as part of the assessment and impact categories

1	**BFFI** An industry-led initiative enabling financial institutions to transparently measure and report their biodiversity impacts and dependencies
2	**EXIOBASE 3.0** A global database with information on the production, consumption, and trade of goods and services, as well as associated environmental emissions and resource consumption
3	**ReCiPe model** A widely recognized pressure-impact model that translates environmental inputs and outputs into environmental pressures (midpoint categories like climate change) and then aggregates these into three endpoint categories: human health, biodiversity, and resource scarcity

Using these tools, Piraeus was able to assess the PDF/km²/year across three categories by aggregating the impacts of their relevant impact drivers

1	**Terrestrial impacts** Global Warming, Photochemical Ozone formation, Terrestrial acidification and ecotoxicity, Land use, Water use
2	**Freshwater impacts** Global warming, freshwater eutrophication and ecotoxicity, water use
3	**Marine impacts** Marine eutrophication and ecotoxicity

Piraeus assessed its portfolio's dependencies using the ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) knowledge base. This links economic activities to 25 ecosystem services, assigning a qualitative rating from "very low" to "very high" to indicate dependency levels. Piraeus uses exposure in Euros to high and very high scores to measure the level of dependency of its portfolio and identify the most sensitive sectors for its activities.

Agriculture portfolios

Piraeus partnered with Natcap to conduct a science-based LEAP analysis of our agriculture portfolio

natcap

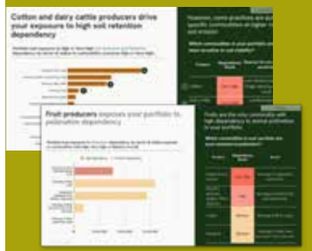
Assessment of state of nature in farmland

Geolocation mapping of crop-land overlaid with state of the art nature data such as water stress, land cover change, and protected areas and threatened species

Feed into materiality of impacts and likelihood of physical risks

Product level assessment for better accuracy

Impacts, dependencies and risks are measured for specific crops and livestock providing a more accurate view of our counterparties impact and risk profiles



Provides robust insights usable for engagement

Scenario analysis of nature risks

Nature and transition risks are assessed combining qualitative and quantitative data on short, medium and long-term horizons, following best practice on scenario definitions using TNFD guidance

Builds our approach to environmental risks assessment

For the Agricultural portfolio, which has been identified as a priority sector due to its high likelihood of nature-related impacts and dependencies, Piraeus collaborated with a nature intelligence provider, Natcap, to perform a more detailed analysis. Piraeus has followed TNFD's LEAP guidance to measure impacts and dependencies and assess nature-related risks for this portfolio.

This analysis focuses on Piraeus' agriculture portfolio (NACE A.01), encompassing both legal and private entities, with a total exposure of €1,062 million across 35,530 counterparties. The analysis specifically targets terrestrial agriculture, which accounts for 49% of legal entities' and 99% of private entities' Agricultural, Fishing and Forestry (NACE sector A) portfolios exposure respectively.

Impacts and dependencies

The tools and metrics Piraeus used for this in-depth assessment include state of nature indicators measured in crop fields and livestock grazing areas and impact evaluation. Using these data, Piraeus was able to assess the size and impact materiality of the land-use change, water use, non-GHG air pollution, water pollution, soil pollution impact drivers. Additionally, the analysis identified key dependencies relevant to the agricultural portfolio by enhancing the ENCORE tool with scientific literature to measure scores at product-level.

Impacts and dependencies

Tools and metrics

State of nature indicators measured in crop fields and livestock grazing areas
Metrics such as Water Stress, Soil Erosion, Soil Salinity, Species Extinction Risk and Ecosystem Integrity Index (EII) were used to measure the state of nature in major farm areas (using CROPGRIDS for mapping farm areas

See detailed list of metrics in table p. 38

Impact evaluation
Piraeus' analysis also incorporated data from EXIOBASE 3.0, along with scientific literature to estimate country-specific impact intensities of agricultural products in its portfolio, focusing on the farming stages of production

Impact drivers

Land-use change
Land footprint and deforestation

Water use
Total water use and blue water use

Non-GHG air pollution
NOx, SOx, PM10, PM2.5

Water pollution
Nutrients, Toxins

Soil pollution
Nitrogen, Phosphorous, Toxins

Key dependencies

Global climate regulation

Soil quality regulation

Water supply

Soil sediment retention

Pollination

Biological control

Risks and Opportunities

The LEAP analysis of Piraeus' agricultural portfolio includes an assessment of nature-related risks. This analysis uses two nature+climate scenarios to estimate the potential financial materiality of key physical and transition risks. A key output is the percentage of the portfolio's value exposed to high and very high risks over the short, medium, and long term. The analysis assesses risks that, if materialized, could affect the Bank, categorizing them into physical, transition, and reputational risks.

These risks are transmitted through various channels, leading to financial risks for the client (e.g. increased probability of default, asset value depreciation, increased transition costs) and ultimately for the Bank (e.g., Liquidity & Funding Risk, Operational Risk, Reputation & Litigation Risk, Business & Strategic Risk). The focus is on assessing risks at the product, sector, and region level where Piraeus' counterparties operate. The analysis was conducted in four steps.

Four steps analysis

1	**Prioritization of risks** A shortlist of risks most relevant to the agricultural portfolio based on the impacts and dependencies analysis
2	**Short-term assessment** The likelihood and qualitative financial implications (magnitude) of these risks were measured for agricultural commodities, resulting in a risk score by commodity-region
3	**Medium and long-term assessment** Expected changes in key risk drivers were scored for medium and long-term horizons across two scenarios, leveraging existing scenarios and academic literature to adjust short-term risk scores
4	**Evaluation and reporting** The analysis concludes with an assessment of results and a final report

A shortlist of risks was prioritized based on their expected likelihood and materiality for agricultural producers, informed by impact-dependency results and desk research, and validated with relevant teams.

Risk selected for agricultural portfolio scenario analysis

Risk type	Risk transmission	Expected financial implications to counterparty
Physical risks		
Chronic	*Water stress and drought risk* *Soil fertility risk* *Soil erosion risk* *Pollinators decline*	*Loss of revenue from decreased productivity* *Increased cost of production to substitute nature service*
Transition risks		
Regulatory	*Strict regulations on water use* *Strict regulations on pesticides and fertilisers use (air, soil, water pollution)* *Strict regulations on agricultural practices near protected areas* *Strict regulations on land restoration*	*Increased cost to comply* *Increased cost due to fines*
Market	*Reduced demand for non-organic product* *Reduced demand for meat and dairy*	*Loss of revenue for non-organic or meat and dairy producers*
Liability	*Lawsuits related to water use* *Lawsuits related to water and soil pollution*	*Increased cost due to legal costs* *Reputational risk*
Technology	*Lab-grown food products*	*Loss of revenue*

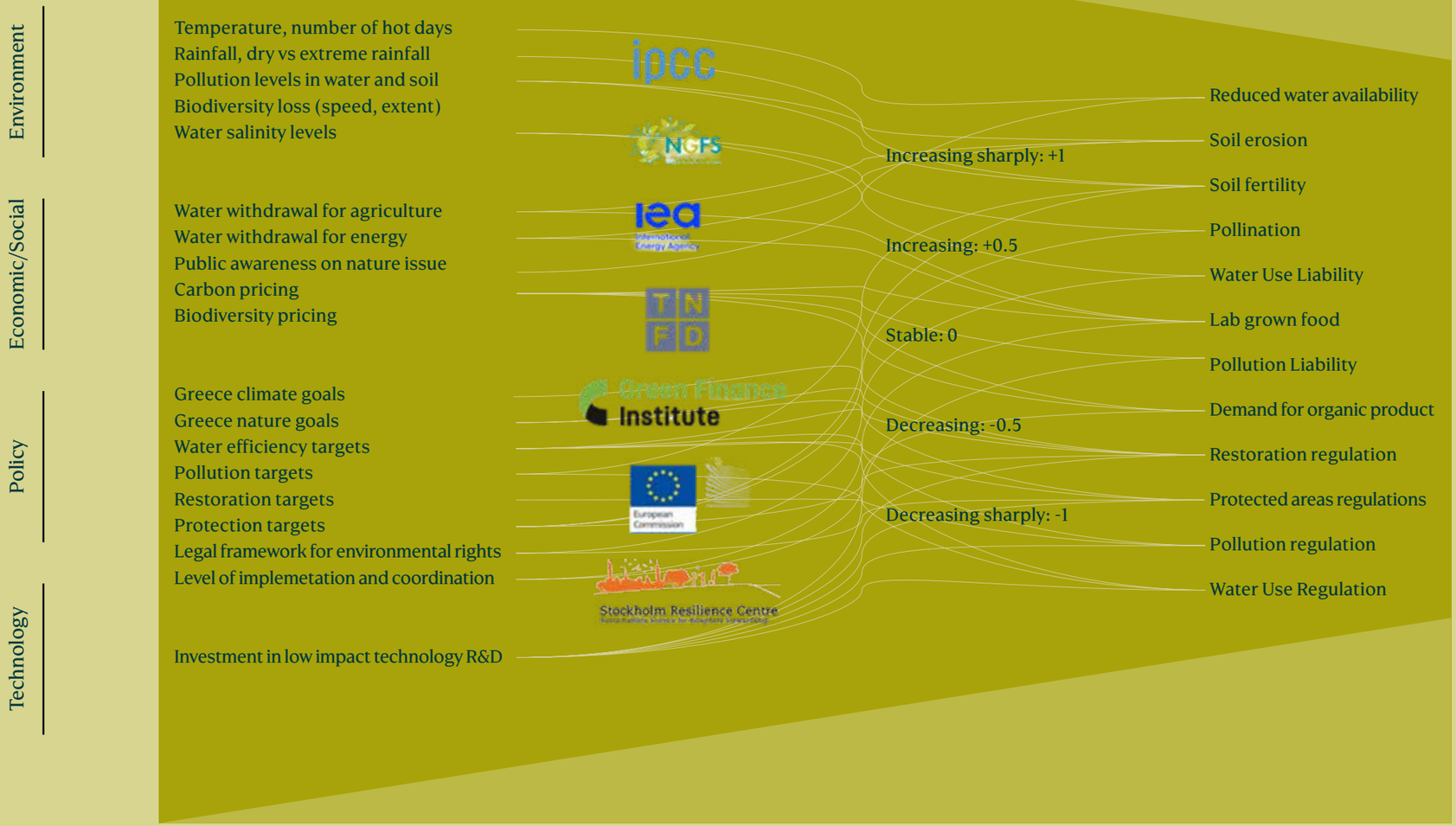
Two scenarios were selected by the working group during a dedicated workshop. Scenarios were chosen with the aim to focus on extreme cases and reflect stress-test exercises, aligning with existing risk analysis within Piraeus.

The two selected scenarios

Scenario 1	**Low ambition** Characterized by rapid climate and nature degradation, with Paris Agreement and CBD goals failing. This scenario is aligned with trends estimated for the following climate scenarios IPCC's RCP8.5 and SSP5, INCAF Too Little Too Late (EUROCordex estimations and IPCC AR6 were used where relevant)
Scenario 4	**Integrated transition** Involves significant climate and nature transition efforts. This scenario is aligned with trends estimated for the following climate scenarios: IPCC's RCP2.6 and SSP1.9, and emerging nature scenarios: PBL restoration scenario, Stockholm Resilience Center Sustainability Scenario, UN PRI Climate + Nature

Scenario narratives were then developed using publicly available climate and nature scenarios from leading scientific research and industry best practices, including TNFD guidance on scenario analysis. Scenario narratives development consisted in the identification of main drivers of change relevant to the risk short-listed ("driving forces" as defined by the TNFD). Each driver of change was linked to its relevant risks, and its trend in the medium and long term was scored based on a combination of climate scenarios, nature scenarios and additional desk research on policy developments and country commitments.

List of driving force and sources used to develop scenario narratives



** Cumulative between 2030 and 2050, average across driving force by risk*

The assessment of shortlisted risks starts with the measurement of likelihood and magnitude of each risk in the short-term. Likelihood considers the counterparty's exposure to a risk source and the probability of a change occurring (transmission channel). Likelihood is informed by state of nature datasets (see state of nature metrics below) and policy and market research. Magnitude is defined as the expected scale of financial impact if a risk occurs to the counterpart. It is scored based on expected cost increase, fines/penalties, productivity loss, and operational disruptions. This involves identifying relevant business impacts, conducting desk-based research to determine expected financial shocks, and defining indicators and thresholds for rating. See below an example of financial magnitude thresholds for agricultural counterparties.

Indicative financial impact scoring thresholds for agricultural counterparties

	Very Low	Low	Medium	High	Very High
Cost difference	No change	Increase by 1% to 5%	Increase by 5% to 10%	Increase by 10% to 20%	Increase by >20%
Yield loss acute	0%	<25%	-25% -50%	-50% -75%	>75%
Revenue loss	0%	<2%	2% – 5%	5% – 10%	>10%

The likelihood and magnitude scores are then combined to generate an overall risk concern score (across a 5 points scale). Risk scores are then adjusted over time by applying trends for each risk driver by 2030 and 2050 to the short-term (baseline) risk concern score, considering how likelihood and magnitude change based on scenario narratives. Data points and qualitative information from existing publicly available scenarios and academic literature were collected to score these trends.

Sensitive locations in Piraeus energy and accommodation portfolios

Set of indicators meeting TNFD's requirement on priority locations used to measure the biodiversity sensitivity across locations of operations in Piraeus' energy and accommodation portfolios

TNFD sensitive location indicator		
Areas important for biodiversity (e.g. Natura 2000 protected areas, Key Biodiversity Areas)	Description	This indicator calculates the distance of a site to a protected areas (by IUCN category) and to Key Biodiversity Areas
	Data source	Protected Area and Key Biodiversity Area, reproduced and incorporated under licence from the Integrated Biodiversity Assessment Tool (IBAT) (www.ibat-alliance.org/). IBAT is provided by the BirdLife International, Conservation International, IUCN and UNEP-WCMC.
Areas of high ecosystem integrity or of rapid decline in ecosystem integrity	Description	Biodiversity Intactness is used as a proxy for Ecological Integrity. The Biodiversity Intactness Index (BII) published by Impact Observatory and Vizzuality, summarises changes in ecological communities in response to human pressures. Biodiversity intactness is estimated as a combination of two metrics: Abundance, the quantity of individuals, and Compositional Similarity, how similar the composition of species is to a near-undisturbed baseline habitat.
	Data source	BII data generated by the Impact Observatory, in collaboration with Vizzuality.
Areas of high physical water risks	Description	Areas of High Physical Water Risk, including areas of limited water availability, drought risk and poor surface water quality were identified. Three indicators were used to determine areas of high physical water risk: Water Stress and Drought Risk from WRI Aqueduct 3.0 and Surface Water Quality Index from the World Bank. Each dataset is scored between 1 (very low concern) and 5 (very high concern). Physical Water Risk is calculated as the maximum of each of the three scores in each location.
	Data source	• WRI Aqueduct 3.0 on Water Stress and Drought Risk • Global Nitrate-Nitrite in Surface Water • Damania, Richard; Desbureaux, Sébastien; Rodella, Aude-Sophie; Russ, Jason; Zaveri, Esha. 2019. *Quality Unknown: The Invisible Water Crisis*. World Bank. hdl.handle.net/10986/32245
Areas of importance for ecosystem service provision to local communities	Description	This metric identifies areas of importance for ecosystem services, or Nature's Contributions to Peoples (NCPs) globally. Areas important for delivery of ecosystem service benefits are those in which healthy ecosystems and biodiversity support local livelihoods, help in the realisation of human rights, and are areas of biocultural importance. Published data was used from Chaplin-Kramer et al. (2023) that mapped critical natural assets globally, assessing 14 types of nature's contributions to people: 12 primarily with local benefits and two providing benefits at continental scales or globally.
	Data source	Chaplin-Kramer, R., Neugarten, R.A., Sharp, R.P. et al. *Mapping the planet's critical natural assets.* Nat Ecol Evol (2022). doi.org/10.1038/s41559-022-01934-5

Summary of metrics

Category	Metric	Sources	Relevant TNFD metric
Nature-related impacts and dependencies	***Overall portfolio*** • Exposure of portfolio to ENCORE dependency scores • Potentially Disappeared Fraction of species per square kilometer per year (PDF/km²/year)	• EXIOBASE • ReCiPe • ENCORE • Scientific literature	C1.0 - C2.2 C2.4 C3.0
	Deep-dive on agriculture portfolio analysis Impacts - scores based on intensity of impacts per tonne of production across the following indicators: • Land footprint • Deforestation • Total water use • Blue water use • PM10, PM2.5 • SOx and NOx emissions • Eutrophication (kg PO4) • Marine ecotoxicity (kg) • Nitrogen (kg)		
	Dependencies • Qualitative scores across 21 ecosystem services (6 product-specific scores)		
State of nature	***Deep-dive on agriculture portfolio analysis*** • Proximity to Biodiversity Sensitive Areas • Water Stress • Ecosystem Integrity - Terrestrial • Change in Percentage of Natural Vegetation • Connectivity of Natural Lands Change • Fragmentation of Natural Lands Change • Change in Percentage of Forests • Connectivity of Natural Forests	• IBAT • WRI Aqueduct 3.0 • Global Nitrate-Nitrite in Surface Water World Bank • Vizzuality - Impact Observatory • Google Dynamic World (satellite data processed by Natcap)	C5.0
	Energy and accommodation site screening • Proximity to Protected Areas • Proximity to Key Biodiversity Areas • Water Stress • Drought Risk • Nutrient levels in surface water • Areas of importance for Ecosystem provision • Biodiversity Intactness Index		
Risk	***Deep-dive on agriculture portfolio analysis*** • Percentage of portfolio value exposed to high and very high nature-related transition and physical risks over the short, medium, and long term, at product-region level • Likelihood and magnitude scores of risks to counterparties in the short-term, and risk concern scores in the medium and long-term	• Natcap risk library •WRI Aqueduct • Vizzuality - Impact Observatory • ESDAC JRC soil datasets • Wuepper, D., et al. (2024). • IBAT • Scientific literature	C7.0-7.1

Targets and Goals

Piraeus Bank Climate targets	**Become a Net Zero Bank by 2050** **Scope 1 and 2 Emissions Reduction** SBTi validated target (1.5 °C aligned) to reduce emissions from operations by 73% (from a 2019 baseline) by 2030 **SBTi validate targets for nine asset classes (well-below 2 °C)** 9% of Piraeus total investments and lending activities, representing 56% of financed emissions from a 2019 baseline between 2027 and 2030
Sustainable financing target (Climate focus)	**Green Asset Ratio (GAR)** 2.57% in 2024 Target for 5.0% by 2028 **New Sustainable Financing** €1.4 bn new disbursements per year in 2024 Target for €1.6 bn in 2028 **Sustainable Financing volumes (outstanding balance)** €3.8 bn in 2024 Target for €5.7 bn by 2028

Piraeus has already set the above targets for climate, which is one of the drivers of biodiversity loss. Mitigating climate change is central to building a sustainable and nature positive future. Piraeus' future actions will aim to further integrate the climate and nature nexus by ensuring synergies between climate and nature targets. It is worth mentioning that in collaboration with the Ministry of Environment and Energy Piraeus has funded the restoration of selected natural sites following wildfires.

Climate and nature considerations are included in the Piraeus Group Sustainability Policy, the Piraeus Group Sustainability Linked Loans Framework and the Piraeus Group Sustainable Finance Framework. These documents include provisions that highlight climate and nature parameters in the characterisation of loans as sustainable and promote relevant business opportunities and nature-oriented investments.

Piraeus is working to further develop nature-specific targets following the results of ongoing impact, dependency, risk and opportunity analyses.

Nature policies and assessments

Piraeus will:

Continue to monitor annually biodiversity impacts and dependencies of business portfolios and disclosing in accordance with CSRD and TNFD recommendations to make informed business decisions.

Continue to screen climate and nature issues during obligor assessment process in line with existing processes.

Enhance KPIs for Sustainability-Linked loans to include nature (e.g. water, natural resource use) aspects, where applicable.

Enhance engagement by 2027 and assess sectors with the largest impact and dependencies on nature.

Nature exclusion list

Piraeus has identified nature impactful activities that are part of its exclusion list, as currently prescribed in its Credit Policy:

Companies whose operations impact the UNESCO World Heritage Sites in Greece .

Companies that operate within nature protected areas (e.g. Natura 2000, Ramsar Convention wetlands) without verifying their compliance with all legal and regulatory restrictions.

Fishers that use drift nets over 2.5 km.

Companies producing or trading wood or other forest products that are not included in the Timber Merchants Registry of the competent Chamber of Commerce.

New investments in energy production from coal/lignite.

Companies with revenues from energy production from coal/lignite unless they have credible and time bound transition plans to sustainable fuels and managed phaseout plans from coal/lignite production.

Sustainable Finance and impact

Piraeus holds a leading position in Greece's agricultural lending market. To support actions beneficial to nature Piraeus will engage with official sector, local authorities and businesses in the agricultural sector:

Specifically, Piraeus targets approximately €0.4 bn in total disbursements by 2028 to finance Protected Cultivations (Hi-tech Greenhouses). To deliver this ambition, Piraeus supports investments including:
- the installation of new greenhouse units,
- the modernisation and upgrading of existing greenhouse units through new equipment, and
- the integration of renewable energy solutions through specialized products that can strengthen energy autonomy.

Through these actions, Piraeus aims to support the expansion of greenhouse cultivation in Greece, where the greenhouse base is currently estimated at approximately 8,300 greenhouse units and to contribute to improved resource efficiency and operational resilience in protected cultivations.

Lessons Learned and Way Forward

Piraeus' initial journey in assessing and managing nature-related risks has provided valuable insights and highlighted key challenges: data limitations, the nascent stage of methodologies for quantifying nature impacts and risks, and the difficulty in translating these impacts into a clear financial management framework.

Deepening Assessments

Piraeus will continue to build on the baseline assessments by seeking more granular data and expanding Piraeus analysis to more specific sub-sectors and clients. Next year Piraeus aims to conduct a full dependencies, impacts and risks assessment of the Energy and Accommodation portfolios. Piraeus will keep refining its approach to impacts assessments and scenario analysis.

Enhancing Piraeus contribution to a nature positive future

Piraeus aims to explore and develop a framework to identify and invest into nature opportunities across its key sectors of exposure. Working with business units in key sectors Piraeus will identify nature positive finance opportunities including sustainable agricultural practices and new technologies to reduce environmental impacts and risks. Furthermore, where feasible Piraeus will continue to support government initiatives to restore natural sites after extreme physical events (e.g. wildfires, floods).

Enhancing integration between climate and nature

Piraeus will work to more fully integrate its actions on nature, from assessment to risk management and investments, with Piraeus' climate effort. Identifying synergies and combining Piraeus' initiatives and assessment where relevant.

Appendix

TNFD Recommended Disclosures Correspondence Table

Pillar	Disclosure Description	Report section	External Reference
Governance	Describe the Board's oversight of nature-related dependencies, impacts, risks, and opportunities	Governance (p. 8-9)	Annual Financial Report 2024 (p. 159-168) Sustainability Blueprint p. 32-34, 36-44
	Describe management's role in assessing and managing nature-related dependencies, impacts, risks, and opportunities	Governance (p. 8-9)	Capital Adequacy and Risk Management Regulatory Disclosures on a Consolidated Basis for the Year 2024 (30/6/2025 Pillar III p. 81) Annual Financial Report 2024 (p. 159-168, 569) Sustainability Blueprint p. 32-34, 36-44
	Describe the organization's human rights policies and engagement activities with respect to Indigenous Peoples, Local Communities, affected, and other stakeholders, in the organization's assessment of, and response to nature-related dependencies, impacts, risks, and opportunities	Governance (p. 8-9)	Annual Financial Report 2024, (p.224-226) Sustainability Blueprint p. 27
Strategy	Describe the nature-related dependencies, impacts, risks, and opportunities the organization has identified over the short, medium, and long term	Strategy: Nature in Piraeus portfolios (p. 11-20)	Annual Financial Report 2024 (p.213-214) Capital Adequacy and Risk Management Regulatory Disclosures on a Consolidated Basis for the Year 2024 (30/6/2025 Pillar III p. 52-82) Sustainability Blueprint p. 32-34
	Describe the effect nature-related dependencies, impacts, risks, and opportunities have had on the organization's business model, value chain, strategy, and financial planning, as well as any transition plans or analysis in place	Strategy: Where Piraeus is on nature and Investing in Nature (p. 10-11, 20-21)	Annual Financial Report 2024 (p. 157-159) Capital Adequacy and Risk Management Regulatory Disclosures on a Consolidated Basis for the Year 2024 (30/6/2025 Pillar III p. 52-82) Sustainability Blueprint p. 32-34
	Describe the resilience of the organization's strategy to nature-related risks and opportunities, taking into consideration different scenarios	Strategy: Nature in Piraeus portfolios (p. 11-20)	Annual Financial Report 2024 (p. 172-173) Sustainability Blueprint p. 32-34
	Disclose the locations of assets and/or activities in the organization's direct operations and, where possible, upstream and downstream value chain(s) that meet the criteria for priority locations	Strategy: Nature in Piraeus portfolios (p. 11-20)	Annual Financial Report 2024 (p. 216) Sustainability Blueprint p. 32-34
Risk and Impact Management	Describe the organization's processes for identifying, assessing, and prioritizing nature-related dependencies, impacts, risks, and opportunities in its direct operations and value chains.	Risk and Impact Management: Environmental risk identification, assessment and management at Piraeus (p. 22-26) Metrics and Targets (methodology p. 28-41)	Annual Financial Report 2024 (p.143 - 149) Capital Adequacy and Risk Management Regulatory Disclosures on a Consolidated Basis for the Year 2024 (30/6/2025 Pillar III p. 52-82) Sustainability Blueprint p. 32-34
	Describe the organization's processes for managing nature-related dependencies, impacts, risks and opportunities.	Risk and Impact Management (p. 22-26)	Piraeus Sustainable Development Policy Capital Adequacy and Risk Management Regulatory Disclosures on a Consolidated Basis for the Year 2024 (30/6/2025 Pillar III p. 52-82) Sustainability Blueprint p. 32-34
	Describe how processes for identifying, assessing, prioritizing, and monitoring nature-related risks are integrated into and inform the organization's overall risk management processes.	Risk and Impact Management (p. 22-26)	Annual Financial Report 2024 (p. 164) Sustainability Blueprint p. 32-34
Metrics and Targets	Disclose the metrics used by the organization to assess and manage material nature-related risks and opportunities in line with its strategy and risk management process	Metrics and Targets: Metrics on impacts, dependencies, risks and opportunities (p. 28-38)	
	Disclose the metrics used by the organization to assess and manage dependencies and impacts on nature	Metrics and Targets: Metrics on impacts, dependencies, risks and opportunities (p. 28-38)	
	Describe the targets and goals used by the organization to manage nature-related dependencies, impacts, risks and opportunities and its performance against these	Metrics and Targets: Targets and Goals (p. 39)	Annual Financial Report 2024 (p. 216)