

ESG Sustainability at Banco BPM

Presentation for investors and analysts



August 2025

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ESG Sustainability Highlights

Governance, Ambitions, Strategy and Achievements



ESG Sustainability Governance

INTEGRATED ESG SUSTAINABILITY GOVERNANCE: FROM THE BOARD OF DIRECTORS TO TRANSITION & SUSTAINABILITY UNIT

Responsible for ESG strategy and policies

It approves the Consolidated Non-Financial report

Board sub-committee which supports the BoDs on sustainability strategy, initiatives and, in coordination with IC&RC, ESG risks

ESG Management Committee (chaired by the CEO and with the two Co-General Managers as permanent members) acts the ESG strategy leveraging on ESG internal initiatives

Transition & Sustainability unit

- directly reporting to the Co-General Manager CFO
- organized into two functions called "ESG Strategy" and "ESG Business Advisory"
- coordinates all the activities performed by internal functions
- Responsible for ESG approaches, methodologies, metrics, KPIs and disclosure
- Responsible for supporting business functions and Group's subsidiaries in implementing our ESG strategy

ESG TARGETS INCLUDED IN SHORT & LONG-TERM INCENTIVE PLANS FOR CEO & TOP MANAGEMENT SINCE 2021

- Our remuneration policy is **gender neutral**
- Within this policy:
 - ✓ variable remuneration is correlated with strategic actions addressing environmental and human resource management issues → ESG Targets consistent with Strategic Plan and monitored at RAF level
 - ✓ ESG KPIs are included also in variable remuneration of the commercial network since 2023



BoDs

SUSTAINABILITY

COMMITTEE ¹

ESG

COMMITTEE

TRANSITION &

SUSTAINABILITY UNIT

ESG STRATEGY FUNCTION

ESG BUSINESS ADVISORY

FUNCTION

Notes: 1. Established in April 2023; it is composed of 3 non-executive and independent board members (2 women, 1 man). Its activity was previously carried out by the Internal Control, Risk and Sustainability Committee now renamed the Internal Control and Risk Committee

ESG Sustainability Track record

2018 - 2020

- Internal Control and Risk Committee¹ in charge of overseeing ESG sustainability topics
- · Energy Manager & Mobility Manager appointed
- Released the rules for the environmental policy, the Workplace health and safety guidelines and the Guidelines on the integration of sustainable risks in the provision of investment services
- 100% of electricity consumption from certified renewable sources
- Extraordinary measures for local communities and social projects in response to Covid-19 pandemic
- First ESG lending product (Plafond for ESG investments)
- ISO 45001 Occupational Health and Safety, ISO 50001 Energy and ISO 14001 Environmental certifications obtained









2021 - 2022

2021

- Activation of the first "ESG Action Plan" to fully integrate ESG into our operating model
- ESG targets integrated within ST & LT incentive plans for CEO & Top Management
- Green, Social and Sustainability Bonds Framework published, and first bond (social) issued under the framework
- Integration of lending policies and Risk Management
 with ESG factors started
- Enlarged ESG products offering and integration of ESG risk in Advisory and Wealth Management
- 2021-2024 Strategic Plan: ESG as key foundation stone

United Nations

Global Compact

• Banco BPM joined the **UNGC** and became a supporter of the **TCFD**



2022

- First ECB Climate Stress test performed
- Fundraising and other support measures for people from Ukraine, in cooperation with Caritas
- Update of the Code of Ethics
- 2022 CNFS wins "Oscar di Bilancio"
- #1 Green bond issuer among Italian banks

2023 - 2025

2023

- Banco BPM joins the NZBA and identifies 5 priority sectors identification
 (Oil & Gas, Power generation, Cement, Automotive and Coal) in March
- New Sustainability Committee established at Board level in April
- Fundraising and other support measures for people from Emilia
 Romagna
- NEW GS&S Bonds Framework aligned with Taxonomy in November
- #2 Green bond issuer among Italian banks in 2023
- Banco Bpm wins in 2023 the prestigious Award for Impact Reporting by Environmental Finance
- 2023-2026 Strategic Plan: Sustainability strategy ambitions fully integrated

2024 - Aug. 2025

- Environmental Finance IMPACT Awards 2023 Winner Award for impact reporting (issuer)
- New "Transition & Sustainability" unit officially started in July 2024, directly reporting to the Co-General Manager – CFO
- New structure within Finance department dedicated to sustainable funding & new structure within the IR Department with focus also on ESG Investors
- NZBA: Carbon intensity reduction targets by 2030 for 5 priority sectors approved and published; Transition Plans published in May 2025



- #1 Green bond issuer among Italian banks in 2024
- Update of the Strategic Plan with ESG target extended to 2027
- ESG RATINGS UPGRADED: ISS rating at C and MSCI at AA





ESG Sustainability Ambitions

Included in our Strategic Plan



- Supporting our clients in their transition path through advisory and commercial offering, consistently with our ESG Strategy
- Confirming our strong position in financing renewable energy projects
- Strengthening the C&E risk drivers' identification and treatment
- Continuing on the path of reducing our own energy consumptions and GHG emissions



- Further enhancing our strategy for People, Generational change and Women empowerment
- Strengthening our leadership position as third sector lender
- Confirming as a top Community bank with strong impact on our local communities (school and education-driven)
- Improving our customers' accessibility (physical and technological) to the products and services offered by the bank
- Supporting our Digital transformation with a strong Privacy & Cybersecurity management



- Confirming the use of ESG targets in our Short and Long-term incentive plans for managers & employees
- Keep improving the **inclusion of ESG sustainability drivers** in our operating processes, ensuring consistency among businesses the Group is involved in
- Strengthening our Risks Materiality assessment and Transition Plans development frameworks



ESG Sustainability <u>Strategy</u>

Key initiatives and targets of our Strategic Plan



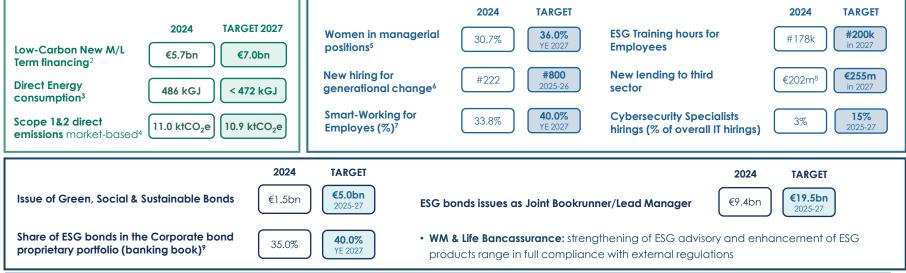
ENVIRONMENT

- ESG Factory: becoming a reference partner for Corporate & SME clients in their sustainable transition (ESG Training, Advisory & Offering)
- Run-off in coal-based sectors confirmed¹
- 100% of electricity supply from renewable sources to be maintained throughout the Plan



SOCIAL & GOVERNANCE

- New training Academy structure to uphold an improved standard in skills development
- Involvement of our employees in corporate community services
- Promoting activities to spread financial education and ESG engagement
- Material investments on cyber-attack prevention, leveraging on Cybersecurity specialists hirings





Notes: 1. Direct exposure run-off by 2026. 2. Managerial data. New lending to Households, Corporate and Enterprises with original maturity > 18 months, including green lending products (finalized loans, project financing and SLLs) and ordinary loans granted to sectors classified as "green" or with a low exposure to transition climate risk drivers. 3. Excluding properties rented to third parties. 4. HFC gas leaks excluded, 5. Share on total managerial positions. 6. New hiring finalized to generational change; fixed-term contracts not included. 7. Limited to headquarters 8. Normalised. 9. Share on the Corporate and Financial securities managed by the Finance department (managerial data based on nominal amount).

ESG Factory as key driver of our ESG & Net-Zero business strategy





Net-Zero Banking Alliance



environment programme

EMISSION INTENSITY REDUCTION FOR THE MOST CARBON INTENSIVE SECTORS FOR BBPM:

Targets for 2030 approved in August 2024

Status at YE 2024 published in May 2025

TARGETS IN TERMS OF CARBON INTENSITY REDUCTION BY 2030 FOR 5 PRIORITY SECTORS¹

Representing ~70% of the overall financed emissions of the high-intensity emission sectors identified by NZBA

Sector	Metric	STARTING POINT (31/12/2022)	ACTUAL (31/12/24)	TARGET FOR 2030	TARGETED REDUCTION FROM STARTING POINT
AUTOMOTIVE ² (Scope 1, 2 & 3)	Million tons of CO ₂ e per billion passenger-kilometres travelled by vehicles sold	0.45	0.45	0.24	-48%
CEMENT (Scope 1 & 2)	Tons of CO ₂ e per ton of cement products	0.50	0.45	0.39	-23%
OIL & GAS (Scope 1, 2 & 3)	Grams of CO ₂ e per megajoule of oil product/natural gas produced or distributed	60.72	59.8	52.47	-14%
POWER GENERATION (Scope 1 & 2)	Tons of CO ₂ e per megawatt- hour of energy produced	0.17	0.12	0.07	-56%
COAL	RUN OFF OF THE EXPOSURE BY 2026				

METHODOLOGY APPLIED

- Physical Weighted Average Carbon Intensity at sectoral level
 → single debtor emission out of typical sectoral output weighted by drawn amount
- Projections based on top standard scenarios (International Energy Agency)

N.B. Targets set for 2030 could be updated due to i) the evolution in the methodology for emissions quantification purposes, ii) any updates requested by NZBA, iii) material changes in projections elaborated by International Energy Agency and iv) new guidelines on such a matter

Data based on Emission Intensity



finance initiative

Net-Zero Banking Alliance

net-zero banking alliance UN 💮

environment programme

TRANSITION PLANS PUBLISHED IN MAY 2025:

 the plans outline the short-term actions already in place and the medium-long term actions that may need to be activated to achieve the targets

Banco BPM's business strategy includes targets to achieve Net-Zero by 2050, in line with the EU Green Deal

FOUNDATIONS OF THE TRANSITION PLANS

Scope	IMPLEMENTATION STRATEGY	ENGAGEMENT STRATEGY	METRICS & TARGETS	GOVERNANCE
Sc	Processes, products and services	Stakeholder involvement	Metrics & Targets	ESG Roles, Responsibilities and Culture
Key Actions	<u>Sustainability-Linked Loan</u> Financing <u>Project Financing</u>	Fostering the ESG culture	Identification of metrics and monitoring of targets	Assignment of specific roles and responsibilities and use in processes
Description	Banco BPM's Net-Zero strategy , reflected in its main business processes, is based on the development of a commercial proposal and investment decisions that are able to fully meet the needs of customers who have to decarbonise their production processes and improve the efficiency of their energy consumption , thereby contributing to the decarbonisation of Banco BPM's loan and securities portfolios	Banco BPM has created a specific initiative (ESG Factory) which, with the support of the ESG Business Advisory structure, deals with involving the Group's main stakeholders (customers, suppliers, employees, etc.) with training courses aimed at spreading the ESG culture, also through specific agreements with qualified partners	Within the NZBA, Banco BPM has created a specific internal programme aimed at identifying the metrics that, for each of the most emissive sectors, best summarise the progress made by its customers to achieve emission levels consistent with the EU Green Deal. The path towards the achievement of the intermediate targets to 2030 is monitored monthly , with automated reports	Corporate bodies and functions actively participate in the implementation of strategy and of operational levers , aimed at achieving the identified targets. To this end, all the main governance processes (Strategic Plan, RAF, Credit Policies, Budget, Remuneration Policies) have been developed coherently



Growing offering of "Green" loan products

ſ	Green Taxonomy Loan	Loans with Green Transition Target	Loans with SACE Guarantee	Loans for "Beni Strumentali - Nuova Sabatini"	Financing energy production and efficiency	Green Residential Nortgages
	 Loan aimed at supporting clients' investments to increase the alignment of their economic activities with EU Taxonomy criteria Subject to a due diligence of the "green" project by an independent third party with expertise on ESG issues in order to assess the correspondence with the regulatory principles set forth in the EU Taxonomy 	 Loan that enables companies to implement their "low carbon" investment plans, in line with EU environmental objectives Summary report by the client regarding the green project for which the financing is requested, with an objective that can be traced to one of those included in the EU Taxonomy 	 Loan with public guarantee from SACE (after verification of the "green" purpose requirements) 	 Subsidised Loans for companies (SMEs) that want to move towards a low- carbon economy (improving the eco- sustainability of products/processes production) 	 energy production plants from renewable sources Financial solutions to support companies in the process towards an efficient, sustainable and renewable energy model We offer also Leasing for <u>RES plants</u> in partnership with Alba Leasing 	 Initiatives for high-efficiency property buyers with a discount on mortgage conditions. Mortgages for purchase, construction or renovation with green factor¹: a clause that allows for a 10 bps saving on the contracted rate and that can be activated throughout the life of the loan provided that: a reduction in consumption of at least 30% is achieved or the energy rating of the home is improved by two classes
	Sustainability Linked Loans • Sustainability Linked	AT THE BEGINNING OF 2025	J			HOUSEHOLDS
	Loans granted to corporate with KSI ESG (if chosen "E" KSI)	<u>ENTERPRISE</u>	S AND CORPORAT			We offer also a <u>Green Consumer</u> <u>Finance product</u> in partnership with Agos Ducato



FINALISED LOANS

SLL

(4/4)

Financial Inclusion initiatives

FINANCE TO THIRD SECTOR

- Ad hoc organizational structures, products, services and expertise developed for no-profit clients
- The funding provided is aimed at supporting both short-term needs and specific investment projects, many with ESG connotations

SUBSIDISED FINANCE

 Loans for SMEs assisted by the Guarantee Fund for Small and Medium-Sized Enterprises (FGPMI)

FINANCIAL SOLUTIONS FOR YOUNG PEOPLE & STUDENTS

- Mortgages for people <36 years with dedicated terms and conditions, assisted by CONSAP guarantee
- Loans for helping students to realize their educational projects, assisted by CONSAP guarantee

CLIENTS AFFECTED BY CALAMITOUS EVENTS

Measures aimed at supporting individuals or enterprises damaged by calamitous events:

- Suspension of the installments of mortgages and loans
- Plafonds dedicated to supporting local territories affected adversely by natural disasters (Households and Enterprises and Corporate clients)

WOMEN

Measures aimed at **supporting women victims of violence** and in **temporary economic difficulty:**

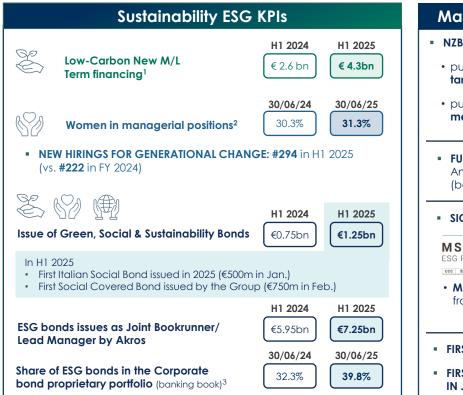
• Suspension of the payment of the principal amount for mortgages and loans for up to 18 months

ANTI-USURY

Financial support, in cooperation with various foundations and antiusury associations, to prevent usury cases of families in serious debt situations by facilitating their access to bank credit



Sustainability ESG Update – Key results in H1 2025



Main Sustainability ESG Achievements



NZBA:

- publication of the status of achievement as of 31/12/24 of our decarbonization targets on most carbon intensive sectors (May 2025)
- publication of the Transition Plans: short-term actions already in place and medium-long term actions to be activated to achieve the targets (May 2025)
- FURTHER IMPROVEMENT OF ESG ANALYSIS WITHIN LENDING POLICIES: Analysis of the transition plans of the companies belonging to NZBA sectors (based on their Sustainability Reports), compared to the Bank's NZBA targets

SIGNIFICANT UPGRADES IN ESG RATINGS:



- FIRST SUSTAINABILITY STATEMENT PUBLISHED IN MARCH 2025
- FIRST PAI (PRINCIPAL ADVERSE IMPACT) STATEMENT PUBLISHED BY BANCA ALETTI **IN JUNE 2025**



Notes: 1. Managerial data, New lending to Households, Corporate and Enterprises with original maturity > 18 months, including areen lending products (finalized loans, project financing and SLLs) and ordinary loans aranted to sectors classified as "areen" or with a low exposure to transition climate risk drivers. For comparison purposes, the figure for the first half of 2024 has been estimated using the current calculation method. 2. Share on total managerial positions. 3. Share on the Corporate and Financial securities managed by the Finance department (managerial data based on nominal amount). 4. The use by Banco bpm of any MSCI ESG research LLC or its affiliates ('MSCI') data, and the use of MSCI logos, trademarks, service marks or index names herein, do not constitute a sponsorship, endorsement, recommendation, or promotion of Banco BPM by MSCI. MSCI services and data are the property of MSCI or its information providers are provided 'as-is' and without warranty. MSCI names and logos are trademarks or service marks of MSCI.

Focus on Green, Social & Sustainability Bonds

FUNDING:

€7.3bn Social & Green bonds issued since 2021 SOCIAL & GREEN BONDS ISSUED UNDER THE GS&S BONDS FRAMEWORK @ €7BN €bn Additional €300m Green SP bond issued as a private placement in July 2022 Second Green SOCIAL SNP issued in Italy GREEN 0.75 0.75 0.75 0.75 0.75 0.75 0.5 0.5 0.5 0.5 0.5 Jul-21 Mar-22 Sep-22 Nov-22 Jan-23 Jun-23 Nov-23 Jan-24 Sep-24 Jan-25 Feb-25 SP CB SNP SP SNP SP SP CB SNP SNP SNP First Green CB issued in Italy in 2022 and the First Social Covered Bond of second ever for an Italian bank BBPM and first in Italy in 2025

USE OF PROCEEDS:

 Social SNP&SP Bonds and Covered Bonds: refinance existing Eligible Social Loans as defined in the GS&S Bonds Framework (such as SME loans guaranteed by the State granted in response to the Covid-19 pandemic, loans granted to SMEs in low GDP areas and residential mortgages to disadvantaged people)

 Green SNP&SP Bonds and Covered bonds: refinance existing Eligible Green Loans as defined in the GS&S Bonds Framework (such as green residential mortgages and loans for renewable energy). Refinance a portfolio of green mortgages granted to households for the purchase of energy efficient houses as defined in the GSS Bonds Framework.

Banco BPM Green bond issuer among Italian banks #1 in 2022 and #2 in 2023 and #1 in 2024

NEW GS&S BONDS FRAMEWORK ALIGNED WITH TAXONOMY RELEASED IN NOV. 2023

• The new Framework, that updates the inaugural July 2021 Framework, is aligned with best market practices¹, cover a broader range of activities and include EU taxonomy alignment for some eligible assets²

#3 GREEN, SOCIAL AND SUSTAINABILITY BOND REPORTS RELEASED SINCE 2022



reporting (issuer

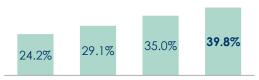
See Appendix 3 for details on our Green, Social and Sustainability Bonds Framework



Note: 1. ICMA's Green Bond Principles (June 2021 with June 2022 appendix). ICMA's Social Bond Principles (June 2023). ICMA's Sustainability Bond Guidelines (June 2021) and the EU Green Taxonomy. 2. European taxonomy alignment covers Real Estate activities, Renewable Energy and Manufacture of organic basic chemicals.

INVESTMENTS: Increase in ESG Corporate bonds

ESG CORPORATE BONDS IN THE **PROPRIETARY PORTFOLIO**



31/12/22 31/12/23 31/12/24 30/06/25

Share on the Corporate and Financial securities managed by the Finance department (managerial data based on nominal amount).

ESG CORPORATE BONDS MORE THAN **DOUBLED SINCE YE 2022**

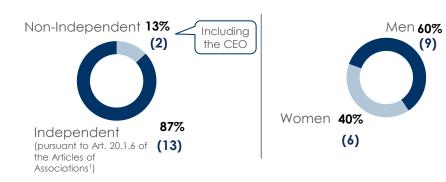
ESG Sustainability Highlights

Corporate Bodies and Key Policies



Composition of the main Corporate Bodies

COMPOSITION OF THE BOD: 15 MEMBERS



Composition of the 5 Board Sub-Committees

Board Sub- Committees	Internal Control and Risk	Remuneration	Appointments	Related Parties	Sustainability
No. of Directors	5	3	3	3	3
o/w Non-executive	5	3	3	3	3
o/w Independent ¹	5	2	3	3	3
o/w Women	1	1	2	2	2
o/w Men	4	2	1	1	1

DIRECTORS DIVIDED BY AREA OF EXPERTISE	#
ESG/social and environmental sustainability	10
Financial and/or banking markets	15
Banking and financial activities and products	13
Domestic and international economic & financial system, trends and prospects of banking, financial and insurance sectors	15
Internal control systems and other operational mechanisms	11
Risk management	13
Accounting and financial reporting	15
Guidance and strategic planning	14
Information technology	5
Regulation in the banking, financial and insurance sector	15
Organisational and corporate governance structures	15
Human resources and remuneration systems and policies	9
(

BoDs ESG activities in 202441 ESG topics covered in 20 meetings

Board of Statutory Auditors

Composition of the Board of Statutory Auditors				
8				
5				
3				
50%				
100%				



Notes: 1. Takes into account the provisions of Art. 148, par. 3, of T.U.F., of the Ministerial Decree 169/2020 as well as the recommendation contained in the Corporate Governance Code. For further details see the Banco BPM's Corporate Governance Report: https://gruppo.bancobpm.it/corporate-governance/relazioni-sul-governo-societario/

Key Policies and Business Conduct data

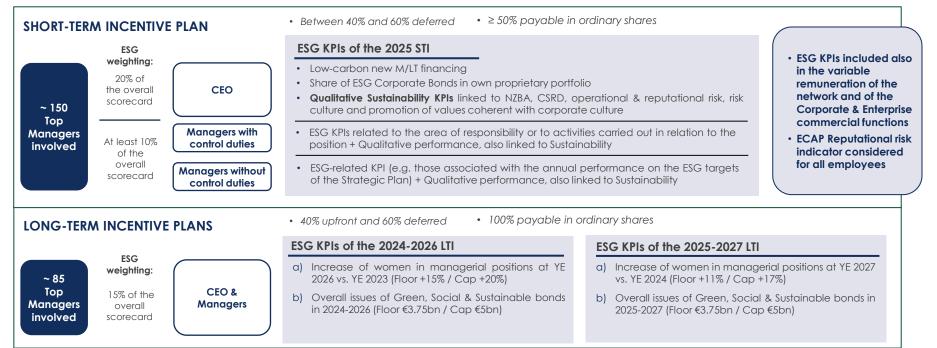
OUR POLICIES

(All	DVERNANCE AND BUSINESS CONDUCT documents published on Banco BPM's website)	Key Business		(All	VIRONMENT, HEALTH & SAFETY and HUMAN RIGHTS documents published on Banco BPM's website) Guidelines regarding the management of environmental and energy
1.	Articles of Association	data in	2024		issues and the fight against climate change
2.	Code of ethics			2.	Guidelines on workplace health and safety
3.	Organisational, management and control model pursuant to Italian legislative decree	ANTI-CORRUPTION	for 18,093	BU	Guidelines on respecting and safeguarding human rights SINESS
	231/01		Employees	1.	Lending policies integrated with ESG factors
4.	Code of Corporate Governance and Reports on Corporate Governance and	66,135 Training		2.	Guidelines on operations in the sector of weapon materials and systems (published on Banco BPM's website)
	Ownership structure	hours	0 dismissals related to	3.	Guidelines on the integration of sustainability risks in the provision of investment services (published on Banco BPM's website)
5.	Anti-corruption regulation		corruption events	4.	Green Social & Sustainability Bonds Framework (published on Banco BPM's website)
6.	Anti-money laundering regulation			5.	Guidelines on the integration of sustainability factors into the proprietary portfolio investment strategies (published on Banco BPM's website)
7.	Regulation and procedures governing	\sim		PR	VACY, DATA GOVERNANCE, IT & BUSINESS CONTINUITY
	related party transactions	ANTI-MONEY LAUNDERING	÷	1.	Cybersecurity and Privacy Statement (published on Banco BPM's website)
8.	Regulation on Internal Dealing			2.	Regulation on information security - in line with PSD2 ¹
9.	Regulation on the management of Inside	57,466	for	3.	Regulations on ICT Risk and Security - in line with Bol Circular No. 285
	Information	Training	12,157	4.	Regulations on privacy, processing and protection of personal data
10	. Remuneration Policy	hours	Employees	5.	Business continuity plan and related regulations
11.	. Shareholder-Director Engagement Policy			6.	Guidelines on IT incident management
	Regulation on tax management			7.	Methodological manuals on cyber risk analysis
	. Whistleblowing Statement			8.	Process standards on: business impact analysis and cyber risk management; IT fraud prevention and management; security incident management and data breach; management of digital certificates



Remuneration Policy

ESG Targets included in STI and LTI plans



• Variable Remuneration limit of 2:1 for the ratio between the variable and fixed component of the remuneration for selected positions (incl. CEO)

ESG QUANTITATIVE TARGETS CONSISTENT WITH STRATEGIC PLAN AND MONITORED AT RAF LEVEL



Source: 2025 Policy-on-remuneration report and payouts awarded of Banco BPM Group's staff, available at the following link: https://gruppo.bancobpm.it/en/corporate-governance/remuneration-policy/

Annex 1

2024 Key ESG Results:

- Clients & Business
- Risks & Credit
- Own Environmental Impact
- People
- Community



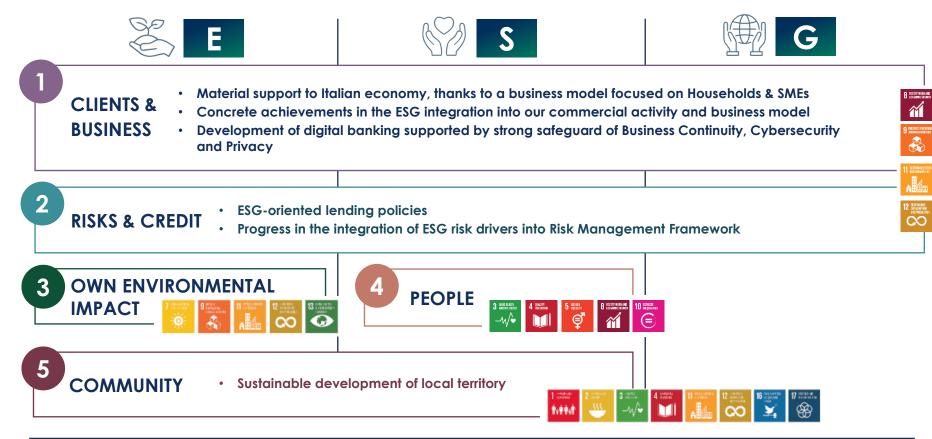
Key Sustainability ESG results in 2024 in a nutshell

ENV	IRONMENT		SO	CIAL & G	OVERNANCE
• Low-Carbon New M/L Terr (vs. €5bn FY 2024 target) ¹	n financing: €5.7bn in 2024	Women in managerial positions ⁵	2023 29.7%	2024	 New "Transition & Sustainability" unit officially started in July 2024, directly reporting to the Co- General Manager – CFO;
	n terms of intensity emission iority sectors ²	New young hiring ⁶	#123	#133	furthermore, new structure within Finance department dedicated to sustainable funding
 Use of an internally develor risk assessment and provi 		ESG Training hours for Employees	~ #164K	~ #178K	PAI indicators included into the "Guidelines on the integration of
 Scope 1&2 direct emission below 11K tCO2e³ 		New lending to third sector	€169m	€202m ⁷	sustainability factors in the provision of investment services"
Direct Energy consumption	2023 2024 498K GJ 486K GJ	Donations and contributions for S & E projects ESG Training hours for companies (ESG factory)	€5.8m ~ #1.3K	€6.3m ~#1.8K	 "Policy on the integration of sustainability factors in the provision of investment services" approved also for our subsidiary Banco BPM Invest SGR



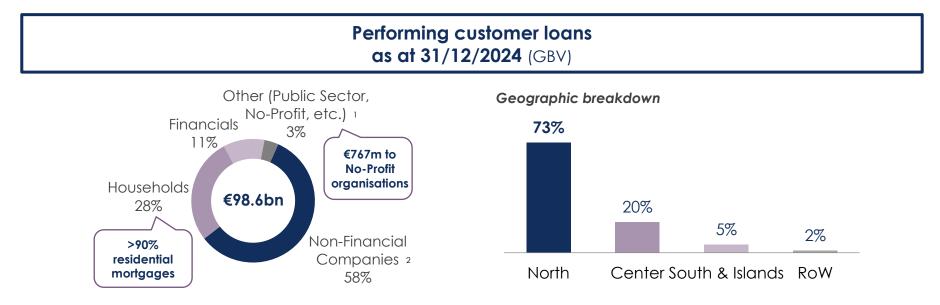
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Our ESG focus areas





Material support to Italian economy thanks to a business model focused on Households & SMEs



€21.5bn New Lending to Italian economy in 2024





Concrete achievements in the ESG integration into our commercial and business model: Credit & Wealth Management



WEALTH MANAGEMENT	 GUIDELINES FOR SUSTAINABILITY RISK INTEGRATION IN THE PROVISION OF INVESTMENT SERVICES: Collection of <u>client's Sustainability preferences</u> In-house <u>ESG Due Diligence</u> of products manufacturers Proprietary <u>ESG Product Classification Model</u> Verification of <u>coherence</u> between <u>client's sustainability preferences</u> and <u>ESG characteristic of product</u> Some <u>ESG metrics included in the information report</u> for clients Integration of <u>PAIs</u> on sustainability factors into investment decisions Launch of Art.8 Discretionary Mandates in 2025
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Managerial figures



Notes: 1. Managerial data. New lending to Households, Corporate and Enterprises with original maturity > 18 months, including green lending products (finalized loans, project financing and SLLs) and ordinary loans granted to sectors classified as "green" or with a low exposure to transition climate risk drivers. 2. Normalised.

Concrete achievements in the ESG integration into our commercial and business model: Finance & CIB



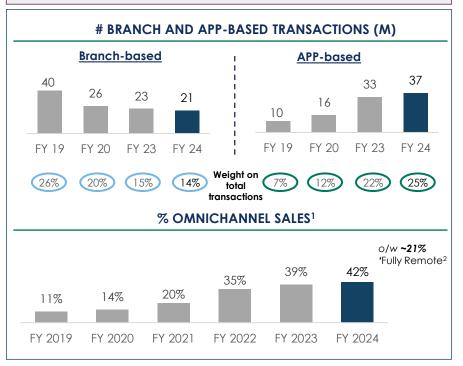


Successfully continuing our digitalization path

MAIN ACHIEVEMENTS IN 2024

- Wider digitalized customer base: >1.6m individual customers with Digital Identity (2/3 of active customers) and >45% of Small Business customers with APP Mobile
- Increased product range available for digital sales (e.g. time deposits and personal loans on mobile APP)
- Enhanced digital platforms with expanded web banking capabilities; development already underway for a new SME-focused web banking solution
- More flexible digital onboarding capability (24% of overall acquired clients) thanks to BBPM and Webank different and distinctive market position
- Stronger and more effective Digital Branch contribution to retail sales (almost 5%, including 23,000 direct sales and 65,000 indirect sales¹), with growing focus on business clients (>41% of Digital Branch commercial effort)

DIGITAL BANKING KPIs





Notes: 1. Digital Branch Indirect Sales: branch sales generated by Digital Branch commercial leads; 2. Omnichannel Sales: significantly digital channels-contributed branch sales (e.g., online price quotation and product selection/request) and Remote Sales (Self or Remotely-assisted full digital Sales); Fully Remote sales = Self, Webank, Remote and Digital Branch.

Cybersecurity and Privacy

	DATA GOVERNANCE & CYBERSECURITY	PRIVACY
GOVERNANCE	 The Chief Innovation Officer (CIO)¹, directly reporting to CEO: is responsible for Information Technology & Security and for Data Governance sits in key managerial committees (Risk, Coordination System of Internal Controls, Crisis, Investment, New Products and Markets) through the Security Operation Center, ensures the intake and triage of cybersecurity alerts 	 The Data Protection Officer (Head of Compliance Department) reports directly to the CEO and: has direct access to corporate bodies is supported by a dedicated organisational unit evaluates new products and services
	OTHER KEY FUNCTIONS INVOL The Audit department, which makes the Annual Rep The CRO area, through the ICT & Security Risk Function² and the mage 	port on Information Security
KEY POLICIES & GUIDELINES	1. Regulation on information security 3. Business continuity plan and related 2. Regulations on ICT Risk and Security 4. Guidelines on IT incident management	 Regulation on privacy, processing and protection of personal data
EDUCATION	 ~21.4K training hours dedicated to cybersecurity in 2024 #2.3m of customers reached by our cybersecurity education pills in 2023 	~28.7K training hours dedicated to privacy in 2024
 PARTNERSHIPS: CERTFin³ OF2CEN⁴ EU Payment Council⁵ 	 Preservation service Information system compliant with EU & IT mandatory standards, but also with key external Information system per compliant with event and the system per compliant with event and the system per complexity of the system	r assessed on a regular basis, in line with the NIST rork ct Assessment carried out whenever required riodically audited by the Audit department (including ts), via on-site audits conducted by senior ICT auditors



Notes: 1. Appointed in 2023. 2. Created in 2023. 3. Italian Financial CERT. 4. Online Fraud Cyber Centre Expert Network. 5. Based on the use of the Malware Information Sharing Platform

2 Progress in ESG-oriented lending policies

ESG-oriented lending policies since 2022

- 1. EVALUATION OF ESG AND CLIMATE CHANGE RISK DRIVERS (ESG ANALYSIS) INTEGRATED WITHIN LENDING POLICIES BY MEANS OF:
- Transition risk analysis: based on the sector of the debtor
- Physical risk analysis base on the geolocation of productive assets and collaterals
- ESG Questionnaire → quali-quantitative diagnostic tool (differentiated on the basis of the size of the company) aimed at evaluating the ESG profile of a debtor

THE RESULTING ESG SCORE IS CONSIDERED WITHIN THE OVERALL CREDIT POLICY STRATEGY

- 2. SPECIFIC CREDIT STRATEGIES FOR NZBA PRIORITY SECTORS¹
- 3. RUN-OFF FOR COAL-RELATED SECTORS STRONGLY AFFECTED BY CLIMATE TRANSITION
- 4. SPECIFIC APPROACH FOR CONSTRUCTION AND REAL ESTATE SECTORS TO EVALUATE THE ENVIRONMENTAL SUSTAINABILITY OF A SPECIFIC ASSETS (e.g. considering the energy efficiency class of the asset)
- 5. TRANSITION-FINALISED TRANSACTIONS, FOR SUPPORTING SPECIFIC INVESTMENTS

KEY ELEMENTS OF THE ESG QUESTIONNAIRE

- ✓ Collection of quantitative ESG data of the company
- ✓ Assessment of sustainability elements that can contribute to mitigate the ESG risks, leveraging on questions about:
 - the <u>Transition path</u> of the client (e.g. emission reduction plans & targets)
 - the presence of mitigating factors for <u>Physical risk</u> (presence of a business continuity plan and/or of insurance policies)
 - specific <u>Social and Governance</u> <u>aspects</u> (existence of any pending litigations and/or litigations with negative outcomes concerning "S" & "G" matters)



BANCO BPM

- FURTHER UPGRADE
- In 2024 ESG Analysis integrated into the Financial Sustainability Assessment (evaluation of the ability to financially support the investments for de-carbonization and use of a tool for assessing prospective KRIs)
- In 2025, the analysis of the transition plans of the companies belonging to NZBA priority sectors (based on their Sustainability Reports), compared to the Bank's NZBA targets, has been integrated

2 Progress in the integration of ESG into Risk Management

RISK IDENTIFICATION

- Climate-related & Environmental risks
- Governance & Social sustainability risk¹

TRANSITION RISK IMPACTS IDENTIFIED: Legislative, Technological, Market-related and Reputational PHYSICAL RISK IMPACTS IDENTIFIED: Acute and Chronic and related sub-risks

TIME HORIZONS IDENTIFIED: Short Term: up to 1Y Mid Term: up to 3-5Y Long Term >5Y

IDENTIFIED IMPACTS ON BUSINESS MODEL, COMPETITIVE FRAMEWORK, TARGETS & STRATEGY

Risk Appetite Framework

- Integration of ESG risks within RAF since 2021
- 2024 RAF ESG indicators evolved, in line with the targets of the Strategic Plan
- New "ESG Specific" area included in 2025 RAF framework for monitoring the short-to-medium term ESG KPI/KRI linked to the Strategic Plan and the longer-term targets linked to NZBA

ICLAAP

- Climate scenarios identified and sensitivity analysis already included in ICAAP and ILAAP frameworks
- The comprehensive process of integrating climate-related risk drivers into capital & liquidity adequacy assessments has been further tightened and completed in 2024

Credit risk

- "C&E" risk scoring calculated for Credit Risk purposes, considering: sectorial information, geographic data and additional info provided by clients
- Integration of Climate risks in the main processes of credit risk quantification (IFRS 9 and ICAAP):
 - New Satellite Models to incorporate the use of financial KPIs to estimate the effects on risk exposure
- Definition of a framework aimed at including climate risks in internal ratings for managerial purposes

Starting from 2024, use of an internally developed rating "Climate" for risk assessment and provisioning purposes

Other risks

- Climate-related risk potential impacts are also evaluated in the Market, Operational and Liquidity risk frameworks
- Inclusion of ESG risks also in the Reputational², Strategic, Real Estate and Equity risk frameworks
- New ICT & Security Risk Function created in July 2023 within the Enterprise Risk Management Area

29

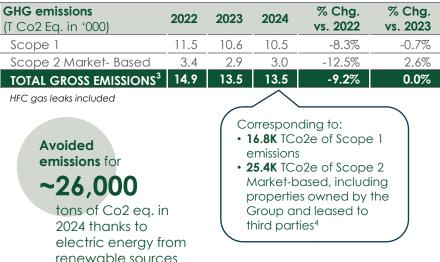




Notes: 1. Capacity to steer effectively the planning, management and reporting of these issues, fully integrating the components related to the social and governance spheres within our business operations. 2. The Risk function is a permanent member of the New Products and Markets Committee and provide ex-ante technical opinions on new products submitted to the Committee, assessing the reputational risk profile as well.

KEY FIGURES





OTHER 2024 ACHIEVEMENTS:

Maintenance of the ISO Environmental, Energy and Occupational Health and Safety certifications (ISO 14001, ISO 50001 and ISO 45001)



Notes: 1. Includes Consumption of natural gas for independent heating, Consumption of diesel oil for independent heating and Consumption of diesel oil and gasoline for the fleet of cars (personal + business use). 2. Includes Consumption from district heating systems and Consumption of natural gas for building heating systems. 3. Excludes properties owned by the Group and leased to third parties. 4. Considering the conversion factors of the ABI LAB Guidelines on the application of ESRS. See the 2024 Sustainability Statement for more details.

Human Resources

Composition, gender diversity and focus on young hires

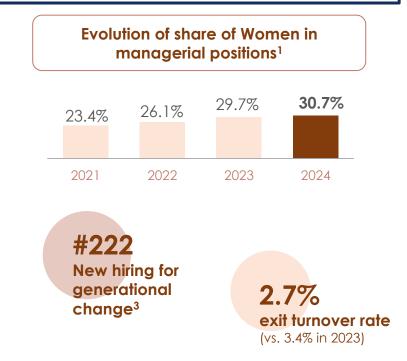
KEY	FIGURES		
GROUP EMPLOYEES	2022	2023	2024
Total employees	20,156	19,761	19,490
of which women	46%	46%	47%
Part-time employees	3,408	3,357	3,335
of which women	93%	94%	93%

- 99% of employees with permanent contracts
- ~100% employees covered by workers' representatives

PAY GAP @ 16.6% (raw gap)²

Considering the implications of EU Directive 2023/970 on pay transparency, Banco BPM has defined a process for establishing and measuring Equal Pay for Equal Work, based on a new skills-based professional architecture.

WOMEN DEVELOPMENT & GENERATIONAL CHANGE







Notes: 1. 2021 and 2022 data exclude insurance companies, consolidated in H2 2022 (the share at YE 2022 including also the insurance companies is 26.0%). 2. Raw gap calculated as difference between the average hourly remuneration levels paid to female and male workers expressed as a percentage of the hourly remuneration level of the average hourly remuneration of male workers. 3. New hiring finalized to generational change, o/w 133 up to 30 years old; fixed-term contracts not included.

4 Training, Safety, Work-Life Balance and Wellbeing

TRAINING & PEOPLE DEVELOPMENT PROGRAMS

KEY TRAINING AREAS

- Inclusion and professional growth of young people;
- Programmes aimed at spreading a leadership style based on trust, respect and cooperation;
- Training by business segment to increase customisation and effectiveness
- Support for all internal initiatives in the field of **ESG**, **Digital**, **Privacy & Cybersecurity**.

KEY DEVELOPMENT PROGRAMS

#140.319

Days of training

for employees

- ESG training for all employees: >177,000 hours
- #Respect Project confirming commitment to promote a respectful culture and create an inclusive and accessible environment. 150 people involved in the first two legs of #Respect Tour
- Disability Management: 1.134 disabled people involved, 12 certified Diversity Manager and 213 trained people manager.



- Youth Program (train, engage and accompany young people in their first years of experience): 550 people involved
- Mentoring program: 140 young people involved
- Talent Program (skill strengthening for future new roles): involved 630 people

SAFETY MANAGEMENT

~62.400

training hours on health & safety

UNI ISO 45001:2018 CERTIFICATION FOR OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

Since 2020

• Injury rate¹: 6.3 (vs. 6.5 in 2023)

WORK-LIFE BALANCE AND WELLBEING

- Smart work: 33.8% of total working hours²
- >3,300 people in part-time
- 2,044 people involved in the initiatives dedicated to families and caregivers
- 2,139 people involved in initiatives dedicated to wellbeing

~62,300 people with coverage of medical expenses³

~24,000 supplementary pension arrangements with company contribution



Our contribution to the sustainable development of local territory





Annex 2

Details on Climate Risks



Details on total Emissions of Banco BPM Group in 2024

Total GHG Emissions (In '000 of tCO2e)		in %	
Scope 1	17	0.03%	46% covered by guarantees of origin contracted in the electricity supply
Scope 2 (Market-based)	25	0.03%	Methodology based on GHG Protocol, Technical Guidance implemented by the ABI LAB Guidelines on the application in the Bank of the ESRSs
Scope 3 cat. 1, 2, 6, 7	16	0.03%	by the Abi LAB Goldelines of the dppication in the bank of the Eskss
Scope 3 cat. 15	58,082	99.9 %	SCOPE 3 OF FINANCED EMISSIONS
- o/w Banking Business - o/w Insurance Business	56,598 1,484	97.3% 2.6%	METHODOLOGY
TOTAL (Market-based)	58,140	100%	 Compliant with the Global GHG Accounting and Reporting Standard developed by PCAF Sources: precise data published by counterparties estimated starting from official data obtained from public sources
111 Accelerations 12 EXTINGUE Amount COO			 <u>PERIMETER FOR THE CALCULATION OF THE EMISSIONS</u>: 74.9% of total Gross Carrying Amount <u>COVERAGE OF SPECIFIC DATA</u>: 42.8% <u>COVERAGRE OF ESTIMATED DATA</u>: 57.2%



Green Asset Ratio as at 31/12/2024 (stock)

Banking business perimeter

2.52% GAR Turnover-based (vs. 2.28% in 2023)

(vs. 2.02% in 2023)

- Total covered assets: €130.4bn
 - └→ Coverage of total assets = 71.6%
- Total eligible assets at >€35bn

ANALYSIS OF TOTAL ENVIRONMENTALLY SUSTAINABLE ASSETS

BASED ON THE <u>TURNOVER</u> KPI OF THE DEBTOR		
€m	Total environmentally sustainable assets	3,293
	- o/w Residential Mortgages	2,556
	- o/w NFC with Sustainability Reporting	695
	- o/w Financial Corporates	41

BASED ON THE <u>CAPEX</u> KPI OF THE DEBTOR			
€m	Total environmentally sustainable assets	3,703	
	- o/w Residential Mortgages	2,556	
	- o/w NFC with Sustainability Reporting	1,096	
	- o/w Financial Corporates	50	



Disclosure of **GAR** on economic activities for **Climate change Mitigation & Adaptation** (<u>considering only non-financial corporates with</u> <u>sustainability reporting as per NFRD</u>, financial corporates, household mortgages, local governments, RE collateral obtained by repossession). **Including both banking and insurance business.**



Source: Sustainability Statement 2024.

Note: The information contained in this slide refers to the banking business perimeter of Banco BPM Group. Considering also the insurance business perimeter, the GAR Turnover stands at 2.4% and the GAR Capex stands at 2.74%.

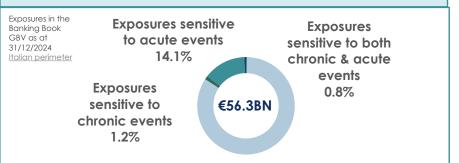
Exposure to Physical Risk as at 31/12/2024

METHODOLOGY

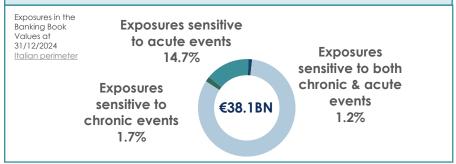
- The analysis is based on:
 - Mapping of the Italian territory according to exposure to the different risk events considered;
 - Geo-location of the property, through its address and positioning within the maps of risk;
 - Identification of a risk event score based on the exposure level of the property
 - Calculation of the synthetic physical risk exposure score of the property (from 0 "Very Low" to 4 "Very High") through aggregation
- Sources used: public data¹ and third-party proprietary data
- For the purpose of compiling this analysis, Banco BPM Group considers only exposures with a "High" or "Very High" risk score to be subject to significant physical risk (acute and/or chronic)
- Physical risk assessment on collaterals and on counterparty operations included in the evaluation of credit risk
- ESG questionnaire integrated with **questions regarding the presence of mitigating factors of physical risk** (business continuity plan and/or insurance policies)



EXPOSURE TO PHYSICAL RISKS OF THE NON-FINANCIAL CORPORATE PORTFOLIO (IN RELATION TO THEIR OPERATING ASSETS)



EXPOSURES TO PHYSICAL RISKS OF THE RE COLLATERALS UNDERLYING LOANS TOWARDS HOUSEHOLDS AND CORPORATES





Notes: 1. For example: Istituto Superiore per la Protezione e la Ricerca Ambientale (ISPRA), Copernicus, European Space Agency, European Soil Data Centre (ESDAC).

Annex 3

Green, Social and Sustainability Bonds Framework



GS&S Bonds Framework: Detailed description (1/2)

- On 7th November Banco BPM published its NEW Green, Social & Sustainability Bond Framework and SPO provided by ISS ESG.
- The development of a Green, Social and Sustainability Bonds Framework is fully complementary with Banco BPM commitment and strategy to address climate change and to provide a positive social outcome in its business conduct.
- The Framework is an umbrella document that enables Banco BPM to issue Green Bonds, Social Bonds and Sustainability Bonds; either unsecured, such as Senior Unsecured Bonds, or secured instruments, such as Covered Bonds.
- The Framework has been developed according to the following latest market standards: ICMA's Green Bond Principles (June 2021 with June 2022 appendix), ICMA's Social Bond Principles (June 2023), ICMA's Sustainability Bond Guidelines (June 2021) and the EU Taxonomy for some category of assets in the following activities: Green Buildings, Renewable Energy (Wind, Solar, Hydro and Bioenergy) and Manufacture of organic basic chemicals.

Framework update

Banco BPM published its inaugural Green, Social & Sustainability Bond Framework in 2021. The aim of the 2023 update was to be aligned with best market practices, cover a broader range of its activities and include EU Taxonomy alignment for some categories of eligible assets. New eligible loans categories have also been added:

New eligible Green Loans categories	New eligible Social Loans categories	
Manufacture of organic basic chemicals	Sustainability-linked loans for SMEs Residential Mortgages	
Green Guarantee		
Sustainable Agriculture		



External review ISS ESG

- The Framework has received an external verification by ISS ESG.
- ✓ The Framework is aligned with Green Bond Principles, Social Bond Principles and Sustainability Bond Guidelines.
- ✓ ISS ESG confirms that Banco BPM has the processes in place to assure that some assets are aligned with the Technical Screening Criteria of the EU Green Taxonomy.



GS&S Bonds Framework: Detailed description (2/2)

The Green, Social and Sustainability Bond Reporting for year 2023 was published in July 2024: ttps://gruppo.bancobpm.it/media/dlm_uploads/Gree n-Social-Sustainability-Bonds-Reporting-2024.pd

REPORTING



Reports available for investors on its website



basic chemicals, Energy Efficiency, Pollution Prevention and Control. Sustainable Water Infrastructure, Low Carbon Transportation, Green Guarantee, Sustainable aariculture **Eligible Social Loan** Categories: Financing SMEs, Third and Public Sector. Healthcare, Sustainabilitylinked loans for SMEs. **********

USE OF

PROCEEDS

Categories: Green Buildings,

Eligible Green Logn

Renewable Energies,

Manufacture of organic

Residential Mortgages

PROJECT EVALUATION & SELECTION

- An appointed Funding ESG Working Group is in charge of reviewing, monitoring and updating the Eligible Portfolios
- Its scope includes the addition of new Eligible Categories and/or the alianment of the eliaibility criteria with the latest best market practices, subject to obtaining an updated Second Party Opinion

MANAGEMENT OF PROCEEDS

Implementations on internal systems have been made to identify Eligible Loans

......

The Funding ESG Working Group will manage the balance of the Eliaible Portfolio with the net proceeds of the Green, Social and Sustainability **Bonds** issued under this framework on a portfolio approach

EXTERNAL REVIEW

ISS ESG ▷

- ISS ESG has reviewed and certified the alignment of the Framework with ICMA's Green Bond Principles, Social Bond Principles or Sustainable Bond Guidelines
- Banco BPM will mandate on annual basis an independent auditor in order to verify the compliance of the Eligible Portfolio with the Framework and the reporting metrics as published in the annual Report



Green, Social & Sustainability Bonds Framework: Use of Proceeds

Eligible Green Loans categories		Eligibility Criteria		
		For assets aligned with the Substantial Contribution Criteria of the EU Taxonomy	For assets aligned with other green Eligibility Criteria	
Residential		 Renovation of existing buildings (7.2) Acquisition and ownership of buildings (7.7) 	 Renovation of existing buildings Acquisition and ownership of buildings New construction 	
Green Buildings	Commercial	 New construction (7.1) Renovation of existing buildings (7.2) Acquisition and ownership of buildings (7.7) 	 New construction or acquisition, or renovation and ownership of buildings 	
Renewable Energies		 Loans to finance the construction, acquisition, development, and maintenance of facilities generating and/or distributing energy from renewable sources such as: Solar energy (4.1); Wind energy (4.3); Hydro power (4.5): Bio energy (4.8) 	 Loans to finance the construction, acquisition, development, and maintenance of facilities generating and/or distributing energy from renewable sources (geothermal energy & electricity transmission and distribution infrastructure) 	
Manufacture of organic	basic chemicals	Manufacture of organic basic chemicals (3.14)	-	
	Assets aligned with other green Eligibility Criteria			
Energy Efficie	ency	• Loans to finance the development and distribution of and/or upgrades to equipment or technology such as smart grid, district heating cooling, energy storage for low carbon energy, LED lighting		
Pollution Prevention	and Control	Loans to finance the development, construction, maintenance or consulting and advisory of waste management activities		
Sustainable Water Infrastructure • Loans to finance the development, construction and maintenance of water infrastructures that contribute to GHG emissions so		res that contribute to GHG emissions savings		
Low Carbon Transportation • Loans financing public land transport and clean transportation loans such as: public transport, electric vehicles, sea and coas freight or passenger water transport, vessels for port operations		transport, electric vehicles, sea and coastal or inland		
Green Guard	antee	SACE's green guarantee with clear eligibility criteria		
Sustainable agi	iculture	Loans to finance sustainable agriculture project		



Green, Social & Sustainability Bonds Framework: Use of Proceeds

Banco BPM intends to align some of the eligible green categories with the EU Taxonomy. Some parts of the following Eligible Green Loans categories will be aligned with the Substantial Contribution Criteria (SCC) to Climate Change Mitigation, the Do No Significant Harm (DNSH) criteria and the Minimum Social Safeguards (MSS) criteria.

- Green Residential Buildings
- Green Commercial Buildings
- Renewable Energy (wind, solar, hydropower and bioenergy)
- Manufacture of organic basic chemicals

For following activities, Banco BPM can have two types of eligible loans:

- Loans aligned with the criteria (SCC, DNSH, MSS) of the EU Taxonomy Climate Change Mitigation objective:
 - 3.14 Manufacture of organic basic chemicals
 - 4.1 Electricity generation using solar photovoltaic technology
 - 4.3 Electricity generation from wind power
 - 4.5 Electricity generation from hydropower
 - 4.8 Electricity generation from bioenergy
 - 7.1 Construction of new buildings
 - 7.2 Renovation of existing buildings
 - 7.7 Acquisition and ownership of buildings
- · Loans aligned only with the Substantial Contribution Criteria of the EU taxonomy or with Other Green Eligibility Criteria

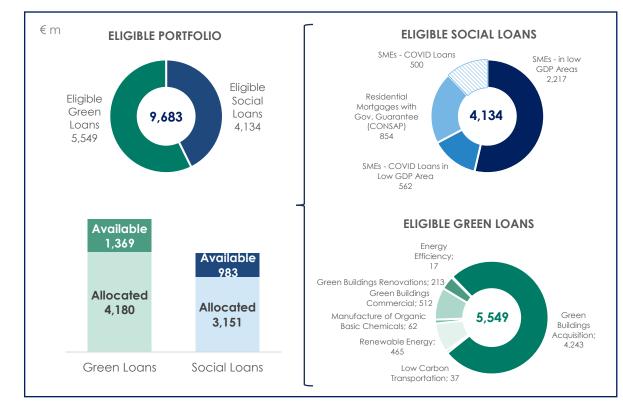


Green, Social & Sustainability Bonds Framework: Use of Proceeds

Eligible Social Loans category	Eligibility Criteria	Target population
SMEs	 Loans to SMEs: located in provinces with a GDP per capita below the national average under the government's Covid-19 borrower guarantee 	 Maintaining the jobs & creating new jobs for employees working in SMEs
Third and public sector	 Loans to the third sector & partly state-owned corporates to finance projects with a positive social impact (Education, Healthcare) 	 People benefiting from positive socio-economic outcomes (including youth, elderly people & those with disabilities)
Healthcare	 Loans to finance the construction/ development/ renovation of activities in the healthcare sector 	• Aiming to benefit all
Sustainability-Linked Loans	Sustainability-Linked Loans to SMEs with common guidelines	• Aiming to benefit all (but focus on those working in SMEs)
Residential Mortgages	 Residential Mortgages granted to disadvantaged people with government guarantee to help access to housing¹ 	 People with an ISEE under a certain threshold; People with age under 36 years; Lone parents; People who live in a social house; Married couples (at least two years of marriage) with one of them with age under 36 years.



GSS Bonds Framework – Eligible Green & Social Portfolio as at 30/06/2025



Assets readily refinanceable or refinanced in accordance with the eligibility criteria of the GSS Bonds Framework at **€9.7 billion**:

- €5.6 billion in Eligible Green Loans
- €4.1 billion in Eligible Social Loans¹

Outstanding Green and Social Bond issues amount to **€7 billion**, with green assets refinanced for approximately **€4 billion** and social assets for approximately **€3 billion**

The readily available portfolio allows for the issuance of Green Bonds for approximately €1.25 billion and Social Bonds for approximately €0.75 billion.

It should be noted that the eligibility of the loans has been verified, for the asset classes for which automatic execution is possible, using the SPV-ESG application, in which part of the implementations planned for 2025 (Phase 1 and Phase 2) have been carried out



Note: 1. With regard to Social Loans, it should be noted that, as in the previous representation as at 30 April 2025, the following have not been included:

- € 2.5 billion of Covid Loans to SMEs that are no longer refinanceable because they are not attractive to investors;
- €0.8 billion disbursed to the Third Sector, as data recovery activities are underway that will allow for the selection of eligible assets.

Contacts for Investors and Financial Analysts



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