



Public Disclosure
Pillar III

Data as at 30 September 2025

This document is an accurate translation into English of the document in Italian approved by the Board of Directors. In case of any discrepancies or doubts between the English and the Italian versions of the Report, the Italian version prevails.

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Introduction

Banco BPM Group Public Disclosure

The Basel Committee accords ("Basel III") require that banks fulfil specific disclosure obligations on their capital adequacy, exposure to risks and the characteristics of the systems for the relative identification, measurement and management as well as remuneration practices and policies.

Within the EU, public disclosure is governed by the following regulatory acts:

- Directive 2013/36/EU of 26 June 2013 ("CRD") and subsequent amendments, on access to the activity of credit institutions and the prudential supervision of credit institutions;
- Regulation (EU) no. 575/2013 of 26 June 2013 ("CRR") and subsequent amendments, on prudential requirements for credit institutions and public disclosure, Pillar 3 (Part Eight "Disclosure by Institutions");
- Directive 2014/59/EU of 15 May 2014 ("BRRD") and subsequent amendments, establishing a framework for the recovery and resolution of credit institutions and investment firms.

The regulatory framework is further supplemented by the implementing measures that transpose the regulatory and/or implementing technical standards (RTS or ITS), adopted by the European Commission on the proposal of the European Banking Authority (EBA), in accordance with the mandate set out in Article 434a of the CRR, "Uniform disclosure formats". In particular, public disclosure is governed by:

- Implementing Regulation (EU) 2024/3172 and subsequent amendments, laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of Regulation (EU) no. 575/2013 and repealing Implementing Regulation (EU) 2021/637¹;
- Implementing Regulation (EU) 2021/763 and subsequent amendments, laying down implementing technical standards with regard to the supervisory reporting and public disclosure on the minimum requirement for own funds and eligible liabilities.

In addition, the Banco BPM Group is found to apply the *EBA/GL/2020/12* guidelines following the decision to exercise the option envisaged by art. 468 of EU Regulation no. 575 (CRR), in the period from 31 March 2025 to 31 December 2025 (end of the transitional period).

In Italy, the common regulations are implemented by the Bank of Italy in Circular no. 285 of 17 December 2013 "Supervisory Provisions for Banks".

This Banco BPM Group Public disclosure, published on the website www.gruppo.bancobpm.it in the *Investor Relations* section, was prepared on the basis of the following elements:

- the external reference regulations listed above, as a result of the amendments introduced by Regulation (EU) 2024/1623 of 31 May (CRR3) which entered into force on 1 January 2025;
- the "*Modello di Informativa al Pubblico*" (Public Disclosure Template) policy, approved annually by the Board of Directors of Banco BPM, which defines the structure and content of the disclosure in accordance with the aforementioned external reference regulations and with the Group characteristics;

¹ It should be noted that Article 15 and Annexes XXIX and XXX of Implementing Regulation (EU) 2021/637 continue to apply until the entry into force of the FRTB (Fundamental Review of the Trading Book) framework

- the consolidated figures (prudential scope) as at 30 September 2025, in national currency. The main changes in the scope of consolidation compared to the end of the previous year are attributable to the acquisition in April of the control of Anima Holding S.p.A. (the Banco BPM Group held an interest of 89.949% in the share capital of the latter as at 30 September 2025) and, through it, Anima SGR S.p.A., Anima Alternative SGR S.p.A., Kairos Partners SGR S.p.A., Castello SGR S.p.A. and Vita s.r.l. (hereinafter also Anima Group). The acquisition of Anima Holding was completed by the subsidiary insurance company Banco BPM Vita S.p.A., creating a corporate structure whose prudential treatment is not explicitly governed by current regulations². In compliance with the indications provided by the European Central Bank³, Anima Holding and the asset management companies controlled by the latter were subject to line-by-line consolidation, also from a prudential perspective.

It is also reported that after gaining full control of the insurance company Banco BPM Vita S.p.A. on 7 March 2023, the Banco BPM Group was designated as a financial conglomerate under Article 3 of Italian Legislative Decree no. 142 of 30 May 2005. As a result, it is now subject to the supplementary supervision outlined in Directive 2002/87/EC.

Banco BPM Vita serves as the insurance sub-holding company within the Banco BPM Group's financial conglomerate. It holds full ownership of the insurance companies Vera Vita S.p.A. and BBPM Life dac, along with a 35% stake in Banco BPM Assicurazioni S.p.A. and PiùVera Assicurazioni S.p.A.⁴, as well as the controlling interest in Anima Holding described above.

On 3 November 2023, the Banco BPM Group received authorisation from the European Central Bank, pursuant to Article 49(1) of Regulation (EU) 575/2013, not to deduct the book value of the equity investment in Banco BPM Vita S.p.A. from Common Equity Tier 1 Capital (CET1). As a result of the authorisation obtained, the equity investment not deducted from own funds is considered an equity instrument exposure and is included in the risk-weighted assets for credit risk⁵.

² Regulation (EU) no. 575 does not explicitly regulate the prudential treatment to be applied to financial institutions (such as the asset management companies of the Anima Group), controlled by an insurance company (Banco BPM Vita S.p.A.) which is in controlled by a bank (Banco BPM S.p.A.) within a financial conglomerate

³ The ECB notified Banco BPM S.p.A. that, although Anima Holding and the asset management companies controlled by the same are controlling interests held by an insurance company, the aforementioned companies are also subsidiaries of Banco BPM S.p.A. pursuant to Article 4 paragraph (1) (16) of the CRR. Considering also that pursuant to art. 4 (1) (26) (b) (ii) of the CRR, Anima Holding is a financial institution, Anima Holding itself and the asset management companies controlled by the same must be consolidated on a line-by-line basis pursuant to art. 18 (1) of the CRR. The goodwill and intangible assets deriving from the aforementioned line-by-line consolidation must consequently be deducted from the Common Equity Tier 1 capital of the Banco BPM Group in compliance with the provisions of Articles 36 (1) (b) and 37 of the CRR

⁴ New name of the Vera Assicurazioni investee as from 1 September 2025. In this regard, it should be noted that from 1 November 2025, Banco BPM Assicurazioni was merged into PiùVera Assicurazioni

⁵ In compliance with the provisions of the CRR, the weighting percentage is 100%

Structure of the Banco BPM Group Public Disclosure

Below is a list of the sections, tables and templates subject to quarterly disclosure, in line with Regulation (EU) no. 575/2013 and Implementing Regulation (EU) 2024/3172, with an indication of its applicability to the Banco BPM Group.

It should be noted that all quantitative data reported in the templates are expressed in millions of units.

Section of the Document	Qualitative (table) and quantitative (template) disclosure	Applicability to the Banco BPM Group
Section 1 - Disclosure of overview of risk management, key prudential metrics and RWA	Template EU OV1 - Overview of total risk exposure amounts	Applicable
	Template EU KM1 - Key metrics template	
	Template IFRS 9/art. 468-FL: Annex I - Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR	
	Template EU CMS1 - Comparison of modelled and standardised risk weighted exposure amounts at risk level	
	Template EU CMS2 - Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level	
Section 7 - Disclosure of liquidity requirements	Template EU LIQ1 - Quantitative information of LCR	Applicable
	Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1	
Section 11 - Disclosure of credit risk IRB	Template EU CR8 - RWEA flow statements of credit risk exposures under the IRB approach	Applicable
Section 13 - Disclosure of counterparty credit risk	Template EU CCR7 - RWEA flow statements of CCR exposures under the IMM	Not applicable as the Group does not adopt the IMM approach
Section 15 - Disclosure of market risk	Template EU MR2-B - RWEA flow statements of market risk exposures under the IMA	Applicable
Section 16 - Disclosure of credit valuation adjustment	Template EU CVA4 - RWEA flow statements of credit valuation adjustment risk based under the Standardised Approach	Not applicable as the Group does not adopt the Standardised Approach

Section 1 - Disclosure of overview of risk management, key prudential metrics and RWA

Template EU OV1 - Overview of total risk exposure amounts (1/2)

The template shows the total risk exposure amounts (Total Risk Exposure Amount - TREA) and the corresponding requirements for own funds, broken down by different types of risk.

As Implementing Regulation (EU) 2024/3172 does not envisage a specific line to indicate amounts related to transactions that fall within the new classification category "Specific treatment for senior tranches of qualifying NPE securitisations", these transactions are included in line 19, "Of which SEC-SA approach".

In line with the instructions for completion provided in Annex II, lines 21, EU 21a and 22 relating to market risk were not completed as they pertain to the Fundamental Review of the Trading Book framework not yet in force.

The main component of the exposures is represented by credit risk (excluding counterparty risk), which constitutes 76% of the TREA.

The TREA recorded an increase of 267 million compared to the previous quarter, mainly due to the rise in the credit risk component, partly offset by the decrease in other risk items.

Template EU OV1 - Overview of total risk exposure amounts (2/2)

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		30/09/2025	30/06/2025	30/09/2025
1	Credit risk (excluding CCR)	48,812	48,215	3,905
2	Of which standardised approach	19,472	19,608	1,558
3	Of which the Foundation IRB (F-IRB) approach	7,956	7,991	636
4	Of which slotting approach	2,644	2,489	212
EU 4a	Of which equities under the simple risk-weighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	17,500	17,379	1,400
6	Counterparty credit risk - CCR	967	1,073	77
7	Of which standardised approach	623	681	50
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	138	117	11
9	Of which other CCR	205	275	16
10	Credit valuation adjustment risk - CVA risk	251	302	20
EU 10a	Of which standardised approach (SA)	-	-	-
EU 10b	Of which basic approach (F-BA and R-BA)	251	302	20
EU 10c	Of which simplified approach	-	-	-
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			
15	Settlement risk	3	2	0
16	Securitisation exposures in the non-trading book (after the cap)	1,506	1,645	120
17	Of which SEC-IRBA approach	1,268	1,331	101
18	Of which SEC-ERBA approach (including IAA)	18	20	1
19	Of which SEC-SA approach	220	294	18
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	1,466	1,503	117
21	Of which Alternative standardised approach (A-SA)	-	-	-
EU 21a	Of which Simplified standardised approach (S-SA)	-	-	-
22	Of which Alternative Internal Model Approach (A-IMA)	-	-	-
EU 22a	Large exposures	-	-	-
23	Reclassifications between trading and non-trading books	-	-	-
24	Operational risk	11,541	11,541	923
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	3,310	3,249	265
26	Output floor applied (%)	50.00%	50.00%	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	Total	64,547	64,280	5,164

Template EU KM1 - Key metrics template (1/3)

The template shows the main indicators of the Group, relating to own funds and risk-weighted exposures, leverage and liquidity.

Following the entry into force of the amendments of Regulation (EU) no. 575/2013 (CRR3) and the related disclosure requirements, as at 31/03/2025 an output floor was introduced with the aim of counteracting the possible effect of underestimation of the calculated own funds requirements, using internal models related to their weaknesses. Specifically, Banks that adopt internal templates to calculate risk-weighted exposures at the end of the transitional period will not be able to represent their total weighted exposures (Unfloored Total Risk Exposure Amount, U-TREA) for an amount under 72.5% of risk-weighted exposures that would have been obtained using only standardised approaches (Standardised Total Risk Exposure Amount, S-TREA). In the transitional period from 1 January 2025 to 31 December 2025, the applicable threshold is reduced to 50% and will gradually increase in subsequent years until it reaches the level of 72.5%.

As a result of this change, since 31/03/2025, lines that provide information on the impacts of the application of the aforementioned floor have been introduced in the template in question. In this regard, it should be noted that for the Banco BPM Group the introduction of the floor did not have any impact on the equity ratios as at 30 September 2025.

As at 30 September 2025, Own Funds totalled 13,133 million euro against weighted assets of 64,547 million euro, mostly arising from credit and counterparty risks and, to a lesser extent, operational and market risks.

The Total Capital Ratio stood at 20.35%; the Group Tier 1 Ratio (Tier 1 Capital to total RWEAs) stood at 16.51%. The Common Equity Tier 1 Ratio (Common Equity Tier 1 to RWEAs) was 14.36%.

Please note that the capital data and ratios shown include the interim profit as at 30 September 2025, resulting from the Group's consolidated balance sheet and income statement approved by the Board of Directors on 6 November 2025, net of the portion that is expected to be distributed as a dividend⁶ and other profit allocations. The inclusion was authorised by the European Central Bank.

⁶ Pursuant to the provisions of Article 5 of European Central Bank Decision (EU) 2015/656 of 4 February 2015, the dividends to be deducted from the amount of the profit of the first nine months included in own funds are equal to 80% of the share of profit for the period that the Board of Directors intends to distribute

Template EU KM1 - Key metrics template (2/3)

		a	b	c	d	e
		30/09/2025	30/06/2025	31/03/2025	31/12/2024	30/09/2024
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	9,269	9,099	10,380	9,275	9,583
2	Tier 1 capital	10,659	10,488	11,770	10,665	10,972
3	Total capital	13,133	12,362	13,654	12,530	12,822
Risk-weighted exposure amounts						
4	Total risk exposure amount	64,547	64,280	65,138	61,639	61,887
4a	Total risk exposure pre-floor	64,547	64,280	65,138	-	-
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	14.36%	14.16%	15.94%	15.05%	15.48%
5a	Not applicable					
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	14.36%	14.16%	15.94%	-	-
6	Tier 1 ratio (%)	16.51%	16.32%	18.07%	17.30%	17.73%
6a	Not applicable					
6b	Tier 1 ratio considering unfloored TREA (%)	16.51%	16.32%	18.07%	-	-
7	Total capital ratio (%)	20.35%	19.23%	20.96%	20.33%	20.72%
7a	Not applicable					
7b	Total capital ratio considering unfloored TREA (%)	20.35%	19.23%	20.96%	-	-
Additional own funds requirements to address risks other than the risk of excessive leverage (as a % of risk-weighted exposure amount)						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.25%	2.25%	2.25%	2.52%	2.52%
EU 7e	Of which: to be made up of CET1 capital (percentage points)	1.27%	1.27%	1.27%	1.54%	1.54%
EU 7f	Of which: to be made up of Tier 1 capital (percentage points)	1.69%	1.69%	1.69%	1.96%	1.96%
EU 7g	Total SREP own funds requirements (%)	10.25%	10.25%	10.25%	10.52%	10.52%
Combined buffer and overall capital requirement (as a % of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-	-	-
9	Institution-specific countercyclical capital buffer (%)	0.057%	0.056%	0.048%	0.038%	0.039%
EU 9a	Systemic risk buffer (%)	0.68%	0.69%	0.36%	0.37%	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer (%)	0.50%	0.50%	0.50%	0.50%	0.50%
11	Combined buffer requirement (%)	3.74%	3.74%	3.40%	3.41%	3.04%
EU 11a	Overall capital requirements (%)	13.99%	14.00%	13.66%	13.93%	13.56%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.60%	8.39%	10.17%	9.01%	9.45%

Template EU KM1 - Key metrics template (3/3)

		a	b	c	d	e
		30/09/2025	30/06/2025	31/03/2025	31/12/2024	30/09/2024
Leverage ratio						
13	Total exposure measure	219,498	214,804	214,286	204,755	195,664
14	Leverage ratio (%)	4.86%	4.88%	5.49%	5.21%	5.61%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-	-	-	-
EU 14b	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (weighted value - average)	28,381	27,287	26,821	28,453	29,902
EU 16a	Cash outflows - Total weighted value	24,279	23,566	23,110	22,590	22,261
EU 16b	Cash inflows - Total weighted value	4,589	4,553	4,564	4,520	4,516
16	Total net cash outflows (adjusted value)	19,690	19,013	18,546	18,071	17,745
17	Liquidity coverage ratio (%)	144.10%	143.73%	145.00%	158.16%	168.73%
Net Stable Funding Ratio						
18	Total available stable funding	120,149	122,310	120,306	120,526	118,777
19	Total required stable funding	94,291	96,466	97,299	96,013	95,035
20	NSFR ratio (%)	127.42%	126.79%	123.65%	125.53%	124.98%

Template IFRS 9/art. 468-FL: Annex I - Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR (1/2)

With the entry into force of the amendments to Regulation (EU) no. 575/2013 (CRR3), from the first quarter of 2025, the Banco BPM Group exercised the option envisaged by art. 468 of this Regulation, which makes it possible to sterilise in the calculation of Common Equity Tier 1 (CET 1) the unrealised gains and losses deriving from the Fair Value through Other Comprehensive Income (OCI) measurement of debt securities issued by General Governments and classified under the item "Financial assets measured at fair value through other comprehensive income". This option is granted by the regulations until the end of the transitional period, i.e. 31 December 2025.

As at 30 September 2025, the Common Equity Tier 1 ratio (CET 1 ratio) stood at 14.36%, against 14.16% as at 30 June 2025. The CET 1 ratio calculated without applying the aforementioned transitional rules (fully phased CET 1 ratio) is 13.52%. The phased-in Tier 1 ratio is 16.51% (15.67% fully phased) compared to 16.32% as at 30 June 2025, while the phased-in Total Capital ratio is equal to 20.35% (19.51% fully phased) compared to 19.23% as at 30 June 2025.

For details, please refer to the underlying template, prepared in line with the "EBA/GL/2020/12" guidelines. The template does not show the columns relating to previous periods as the option for the transitional treatment allowed by art. 468 was exercised from 31 March 2025.

		a	b	c
		30/09/2025	30/06/2025	31/03/2025
Available capital (amounts)				
1	Common Equity Tier 1 (CET1) capital	9,269	9,099	10,380
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	9,269	9,099	10,380
2a	CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied	8,714	8,552	9,599
3	Tier 1 capital	10,659	10,488	11,770
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	10,659	10,488	11,770
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	10,104	9,942	10,989
5	Total capital	13,133	12,362	13,654
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	13,133	12,362	13,654
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	12,578	11,816	12,873
7	Total risk-weighted assets	64,547	64,280	65,138
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	64,470	64,204	65,031

Template IFRS 9/art. 468-FL: Annex I - Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR (2/2)

		a	b	c
		30/09/2025	30/06/2025	31/03/2025
Capital ratios				
9	CET1 (as a percentage of risk exposure amount)	14.36%	14.16%	15.94%
10	CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.36%	14.16%	15.94%
10a	CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	13.52%	13.32%	14.76%
11	Tier 1 (as a percentage of risk exposure amount)	16.51%	16.32%	18.07%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.51%	16.32%	18.07%
12a	Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	15.67%	15.49%	16.90%
13	Total capital (as a percentage of risk exposure amount)	20.35%	19.23%	20.96%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	20.35%	19.23%	20.96%
14a	Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	19.51%	18.40%	19.79%
15	Leverage ratio total exposure measure	219,498	214,804	214,286
16	Leverage ratio	4.86%	4.88%	5.49%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	4.86%	4.88%	5.49%
17a	Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	4.62%	4.64%	5.15%

Template EU CMS1 - Comparison of modelled and standardised risk weighted exposure amounts at risk level (1/1)

The template in question was introduced following the amendments to Regulation (EU) no. 575/2013 (CRR3) regarding the introduction of the Output-floor already illustrated above. In particular, the template provides evidence in columns (a) and (b) respectively of the amount of risk-weighted assets (RWEA) calculated by applying the internal templates to the authorised portfolios and of the amount of risk-weighted assets calculated by applying the standard approach to the remaining portfolios. The sum of these first two columns shown in column (c) corresponds to the actual risk-weighted assets as at 30 September 2025.

Columns (d) and (EUd) instead provide evidence of the amount of risk-weighted assets if they had been calculated by applying the standard approach to all portfolios, respectively applying the rules that will be in force at the end of the transitional period (column d) and the transitional arrangements pursuant to art. 465 of CRR3 (column EUd).

As previously highlighted, for the Banco BPM Group the introduction of the output floor did not have any impact on the equity ratios referring to 30 September 2025, as the actual capital requirements are higher than the minimum level, obtained by applying the multiplication factor of 50%⁷ to the amount of risk-weighted assets calculated by applying the standard approach to all portfolios (column EUd).

⁷ Art. 465 "Transitional arrangements for the output floor" provides that, by way of derogation from the first paragraph of art. 92 (3) and without prejudice to the derogation provided for in the second paragraph of art. 92 (3), institutions may apply the following factor "x" for the calculation of the TREA:

- 50% in the period between 1 January 2025 and 31 December 2025;
- 55% in the period between 1 January 2026 and 31 December 2026;
- 60% in the period between 1 January 2027 and 31 December 2027;
- 65% in the period between 1 January 2028 and 31 December 2028;
- 70% in the period between 1 January 2029 and 31 December 2029

Template EU CMS1 - Comparison of modelled and standardised risk weighted exposure amounts at risk level (2/2)

		a	b	c	d	EU d
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	28,100	19,472	47,572	65,421	62,564
2	Counterparty credit risk	192	775	967	1,073	1,073
3	Credit valuation adjustment		251	251	251	251
4	Securitisation exposures in the banking book	1,268	238	1,506	6,202	2,703
5	Market risk	1,457	10	1,466	936	936
6	Operational risk		11,541	11,541	11,541	11,541
7	Other risk-weighted exposure amounts		1,243	1,243	1,243	1,243
8	Total	31,016	33,530	64,547	86,666	80,311

Template EU CMS2 - Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level (1/2)

The CMS2 template was introduced following the amendments to Regulation (EU) no. 575/2013 (CRR3) already illustrated above.

The template provides additional disclosure with specific reference to exposures subject to credit risk for which the Group has been authorised to use the internal templates.

The template provides evidence of the RWAs calculated on internal templates (column a), of the RWAs recalculated according to the standardised approach (column b), of the RWAs reported as actual requirements for credit risk both for portfolios calculated on internal templates and for those subject to the standardised approach (column c). Columns (d) and (EU d) instead provide evidence of the amount of risk-weighted assets if they had been calculated by applying the standardised approach to all portfolios, respectively applying the transitional arrangements pursuant to art. 465 of CRR3 (column EU d) and the rules that will be in force at the end of the transitional period (column d).

The exposures for which the bank is authorised to apply the internal templates (IRB), where possible and in line with the disclosure requirements, were excluded from the respective exposures classes and were reclassified to the corresponding exposures classes according to the standardised approach as shown in the following table.

IRB class and sub-class (art. 147 CRR)	STD class (art. 112 CRR)
Corporates - General	Exposures classified as secured by real estate and ADC exposures according to the Standardised Approach
Corporates - Specialised lending	
Retail - Other	
Retail - Secured by residential real estate	
Corporates - Specialised lending	Collective investment undertakings (CIU)
Corporates - General	Categorised as exposures in default in SA
Corporates - Specialised lending	
Retail - Qualifying revolving	
Retail - Purchased receivables	
Retail - Other	
Retail - Secured by residential real estate	

Template EU CMS2 - Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level (2/2)

		a	b	c	d	EU d
		Risk-weighted exposure amounts (RWEAs)				
		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Central governments and central banks	-	8	2,608	2,616	2,616
EU 1a	Regional governments or local authorities	-	0	89	89	89
EU 1b	Public sector entities	-	-	454	454	454
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	-	-	-
EU 1d	Categorised as International organisations in SA	-	-	-	-	-
2	Institutions	-	28	2,108	2,136	2,136
3	Equity	-	-	3,824	3,824	3,824
4	Not applicable					
5	Corporates	16,460	23,414	19,464	29,275	26,418
5.1	Of which: F-IRB is applied	7,411	11,680	7,411	12,352	11,680
5.2	Of which: A-IRB is applied	9,049	18,363	9,049	20,534	18,363
EU 5a	Of which: Corporates - General	15,239	22,090	15,239	24,947	22,090
EU 5b	Of which: Corporates - Specialised lending	1,062	1,324	1,073	1,335	1,335
EU 5c	Of which: Corporates - Purchased receivables	158	362	158	375	362
6	Retail	2,087	4,380	2,437	4,731	4,731
6.1	Of which Retail - Qualifying revolving	75	122	75	122	122
EU 6.1a	Of which: Retail - Purchased receivables	0	2	0	2	2
EU 6.1b	Of which: Retail - Other	2,011	4,256	2,011	4,256	4,256
6.2	Of which: Retail - Secured by residential real estate	-	-	-	-	-
7	Not applicable					
EU 7a	Categorised as secured by immovable properties and ADC exposures in SA	8,088	13,515	8,291	13,717	13,717
EU 7b	Collective investment undertakings (CIU)	454	530	3,525	3,601	3,601
EU 7c	Categorised as exposures in default in SA	1,011	1,217	1,129	1,334	1,334
EU 7d	Categorised as subordinated debt exposures in SA	-	-	421	421	421
EU 7e	Categorised as covered bonds in SA	-	-	61	61	61
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	-	-	-	-	-
8	Other non-credit obligation assets	-	-	3,162	3,162	3,162
9	Total	28,100	43,092	47,572	65,421	62,564

Section 7 - Disclosure of liquidity requirements

Template EU LIQ1 - Quantitative information of LCR (1/3)

The Liquidity Coverage Ratio - LCR seeks to promote the short-term resilience of the bank's liquidity risk profile, by ensuring that it has sufficient high-quality liquid reserves to cover cash outflows for 30 days in the event of a severe stress scenario.

The ratio is monitored internally on a daily basis and is also reported on a monthly basis to the Supervisory Authority through supervisory reporting.

In compliance with the regulatory provisions (Article 451a (2) CRR), for each of the four quarters, the template below shows the average data in the previous 12 months relating to the main aggregates underlying the LCR calculation.

Template EU LIQ1 - Quantitative information of LCR (2/3)

		a	b	c	d
		Total unweighted value (average)			
EU 1a	Quarter ending on 30/09/2025	30/09/2025	30/06/2025	31/03/2025	31/12/2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12
HIGH-QUALITY LIQUID ASSETS					
1	Total high-quality liquid assets (HQLA)				
CASH OUTFLOWS					
2	Retail deposits and deposits from small business customers, of which:	69,975	69,684	69,598	69,814
3	<i>Stable deposits</i>	51,994	51,952	51,970	52,241
4	<i>Less stable deposits</i>	17,949	17,701	17,596	17,540
5	Unsecured wholesale funding	31,212	30,182	29,849	29,404
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	7,875	7,747	7,784	7,692
7	<i>Non-operational deposits (all counterparties)</i>	23,049	22,167	21,751	21,464
8	<i>Unsecured debt</i>	287	269	314	248
9	<i>Secured wholesale funding</i>				
10	Additional requirements	14,208	13,937	13,542	13,298
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	1,328	1,359	1,280	1,213
12	<i>Outflows related to loss of funding on debt products</i>	-	-	-	-
13	<i>Credit and liquidity facilities</i>	12,880	12,579	12,262	12,085
14	Other contractual funding obligations	979	694	461	321
15	Other contingent funding obligations	43,775	42,821	41,895	41,052
16	TOTAL CASH OUTFLOWS				
CASH INFLOWS					
17	Secured lending (e.g. reverse repos)	7,842	7,427	6,195	5,445
18	Inflows from fully performing exposures	1,629	1,697	1,764	1,887
19	Other cash inflows	13,598	13,508	13,264	12,943
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)				
EU-19b	(Excess inflows from a related specialised credit institution)				
20	TOTAL CASH INFLOWS	23,070	22,631	21,224	20,275
EU-20a	<i>Fully exempt inflows</i>	-	-	-	-
EU-20b	<i>Inflows subject to 90% cap</i>	-	-	-	-
EU-20c	<i>Inflows subject to 75% cap</i>	21,156	19,893	17,998	17,553
TOTAL ADJUSTED VALUE					
EU-21	LIQUIDITY BUFFER				
22	TOTAL NET CASH OUTFLOWS				
23	LIQUIDITY COVERAGE RATIO				

Template EU LIQ1 - Quantitative information of LCR (3/3)

		e	f	g	h
		Total weighted value (average)			
EU 1a	Quarter ending on 30/09/2025	30/09/2025	30/06/2025	31/03/2025	31/12/2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12
HIGH-QUALITY LIQUID ASSETS					
1	Total high-quality liquid assets (HQLA)	28,381	27,287	26,821	28,453
CASH OUTFLOWS					
2	Retail deposits and deposits from small business customers, of which:	4,911	4,875	4,866	4,860
3	<i>Stable deposits</i>	2,600	2,598	2,598	2,612
4	<i>Less stable deposits</i>	2,280	2,247	2,235	2,216
5	Unsecured wholesale funding	12,966	12,498	12,284	11,948
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	1,845	1,815	1,827	1,806
7	<i>Non-operational deposits (all counterparties)</i>	10,834	10,415	10,144	9,894
8	Unsecured debt	287	269	314	248
9	Secured wholesale funding	721	636	571	584
10	Additional requirements	3,587	3,505	3,356	3,197
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	1,328	1,359	1,280	1,213
12	<i>Outflows related to loss of funding on debt products</i>	-	-	-	-
13	<i>Credit and liquidity facilities</i>	2,259	2,146	2,076	1,985
14	Other contractual funding obligations	92	81	88	76
15	Other contingent funding obligations	2,002	1,971	1,945	1,926
16	TOTAL CASH OUTFLOWS	24,279	23,566	23,110	22,590
CASH INFLOWS					
17	Secured lending (e.g. reverse repos)	331	346	404	346
18	Inflows from fully performing exposures	1,123	1,182	1,242	1,356
19	Other cash inflows	3,135	3,026	2,918	2,817
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)	-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)	-	-	-	-
20	TOTAL CASH INFLOWS	4,589	4,553	4,564	4,520
EU-20a	<i>Fully exempt inflows</i>	-	-	-	-
EU-20b	<i>Inflows subject to 90% cap</i>	-	-	-	-
EU-20c	<i>Inflows subject to 75% cap</i>	4,589	4,553	4,564	4,520
TOTAL ADJUSTED VALUE					
EU-21	LIQUIDITY BUFFER	28,381	27,287	26,821	28,453
22	TOTAL NET CASH OUTFLOWS	19,690	19,013	18,546	18,071
23	LIQUIDITY COVERAGE RATIO	144.10%	143.73%	145.00%	158.16%

Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1

in accordance with Article 451a(2) CRR

Row number	Qualitative information - Free format
a)	<p>Explanations on the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time</p> <p>As highlighted in the EU LIQ1 template, in the last twelve months, the Banco BPM Group has maintained an average liquidity coverage ratio (LCR) of 144% (12-month average, as at 30/09/2025), well above the minimum regulatory requirement of 100%. This level was supported by the efficient management of liquidity buffers and the orientation towards stable forms of funding. The downward trend of the 12-month average LCR indicator is mainly influenced by the reduction in ECB funding (repayment of TLTROs and subsequent use of MRO/LTRO for lower amounts), partly offset by institutional bond issues.</p> <p>The components that contribute to the calculation of net liquidity outflows consist mainly of wholesale and retail deposits as well as the potential uses of non-revocable credit lines.</p>
b)	<p>Explanations on the changes in the LCR over time</p> <p>During the third quarter of 2025, no changes were made in the representation of the LCR indicator, calculated in accordance with Commission Delegated Regulation (EU) 2015/61 of 10 October 2014 and subsequent amendments.</p>
c)	<p>Explanations on the actual concentration of funding sources</p> <p>The adequacy of the structure and cost of funding of the Banco BPM Group is ensured through constant diversification of funding sources.</p> <p>To mitigate concentration risk, the Group constantly monitors the management and regulatory concentration metrics.</p> <p>The main sources of funding for the Group include: customer deposits, funding from institutional customers and Eurosystem refinancing transactions.</p>
d)	<p>High-level description of the composition of the institution's liquidity buffer</p> <p>The EU LIQ1 template shows, as at 30 September 2025, a 12-month average level of high-quality liquid assets available of 28.3 billion (weighted value).</p> <p>As at 30 September 2025, the punctual liquidity buffer (weighted value) consists mainly of free reserves and other assets deposited with the Central Banks and government bonds, which jointly represent approximately 92% of the total liquidity buffer.</p> <p>In addition to the reserves calculated in the LCR buffer, the Group holds allocable reserves mainly represented by ABACO credits and self-withholding issues.</p>
e)	<p>Derivative exposures and potential collateral calls</p> <p>The Banco BPM Group negotiates derivatives both with central counterparties and bilaterally (OTC).</p> <p>The financial risks linked to these contracts, in the event of adverse movements in the underlying market factors, may increase future exposures and generate requests for collateral payments from counterparties (in cash or other liquid forms). This need to pay additional guarantees may impact the Group's liquidity position. To quantify this potential absorption of liquidity, the Banco BPM Group analyses the historical performance of the net collateral paid, using a model on the derivatives margin under CSA, which estimates the maximum outflow of liquidity deriving from an adverse market scenario.</p>
f)	<p>Currency mismatch in the LCR</p>

Row number	Qualitative information - Free format
	<p>European regulatory legislation defines the obligation of monitoring and reporting for the relevant currencies. Currencies are considered relevant when the aggregate liabilities held in a given foreign currency are equal to or greater than 5% of the total financial liabilities held by the institution.</p> <p>The Banco BPM Group periodically monitors foreign currency exposure, with a prudential operational threshold of 4%. As at 30 September 2025, the Group had no significant exposures in foreign currencies and the internal operational limit was also respected for each foreign currency.</p>
g)	<p>Other items in the LCR calculation that are not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile</p> <p>The intraday liquidity risk represents the risk that the bank may not be able to promptly fulfil its payment obligations during the day, both under normal business conditions and under stress conditions.</p> <p>The management of intraday and short-term liquidity aims to ensure the ability to meet expected or unexpected cash payment commitments, also through efficient collateral management.</p> <p>According to the internal procedure, intraday liquidity is managed by the Group Treasury function and monitored on a daily and monthly basis by the Risk Function.</p> <p>The intraday liquidity risk is measured on a monthly basis through the monitoring of five indicators inspired by the Monitoring Tools defined by BCBS⁸ and the performance of intra-day stress tests on a combined stress scenario (Sovereign Scenario, Counterparty Scenario and Own-name Scenario) with differentiated intra-day and end-of-day impact.</p> <p>To cover the intraday liquidity risk, an immediately available liquidity buffer is envisaged to cover both expected and unexpected payments due on an ongoing basis.</p>

⁸ See "Basel Committee on Banking Supervision - Monitoring tools for intraday liquidity management - April 2013"

Section 11 - Disclosure of credit risk IRB

Template EU CR8 - RWEA flow statements of credit risk exposures under the IRB approach

Template CR8 shows the variations in the risk-weighted exposure amounts of the current disclosure period compared to the immediately preceding disclosure period that result from the use of internal models, including an outline of the key drivers explaining those variations, in accordance with Article 438 (h) of the CRR.

		Risk weighted exposure amount
		a
1	Risk weighted exposure amount as at the end of the previous reporting period	27,859
2	Asset size (+/-)	1,036
3	Asset quality (+/-)	(545)
4	Model updates (+/-)	-
5	Methodology and policy (+/-)	-
6	Acquisitions and disposals (+/-)	(248)
7	Foreign exchange movements (+/-)	-
8	Other (+/-)	(1)
9	Risk weighted exposure amount as at the end of the reporting period	28,100

The Group reports that the change in the RWEA amount compared to the previous quarter is mainly due to the following factors:

- during the third quarter of 2025, Banco BPM completed two synthetic securitisation transactions called Tranché Cover 2007 and Tranché Cover 2008. Both transactions envisage hedging of the Junior tranche through a direct personal guarantee issued by the Guarantee Fund for Small and Medium Enterprises ("FGPMI") from 29 July and a counter-guarantee from the State from 29 September;
- between July and September, a number of single-name and massive sales relating to non-performing loans were completed, part of which had already been approved during the previous half year.

Section 15 - Disclosure of market risk

The templates relating to market risk were completed in accordance with Implementing Regulation 2021/637, in force until the entry into force of the "Fundamental Review of the Trading Book (FRTB)" framework.

Template EU MR2-B - RWEA flow statements of market risk exposures under the IMA

		a	b	c	d	e	f	g
		VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWEAs	Total own funds requirements
1	RWEAs at previous period end	204	527	762	-	-	1,493	119
1a	Regulatory adjustment	(136)	(325)	(31)	-	-	(492)	(39)
1b	RWEAs at the previous quarter-end (end of the day)	68	202	731	-	-	1,001	80
2	Movement in risk levels	(31)	(23)	(216)	-	-	(270)	(22)
3	Model updates/changes	-	-	-	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-	-
6	Foreign exchange movements	4	36	-	-	-	40	3
7	Other	-	-	-	-	-	-	-
8a	RWEAs at the end of the disclosure period (end of the day)	41	215	515	-	-	772	62
8b	Regulatory adjustment	171	417	97	-	-	685	55
8	RWEAs at the end of the disclosure period	212	632	612	-	-	1,457	117

The decrease in RWEAs for exposures subject to market risk is mainly attributable to the IRC component, determined by the lower exposure to Italian financial and government securities.

Declaration of the Chief Risk Officer

The undersigned Edoardo Faletti, in his capacity as Chief Risk Officer of the Parent Company Banco BPM spa, hereby declares that the Public Disclosure (Pillar 3) as at 30/09/2025 has been prepared in accordance with the reference regulations (EU Regulation no. 575/2013 and subsequent amendments), the formal policy and internal processes, systems and controls, as expressly envisaged by art. 431 of the CRR.

Milan, 25 November 2025

Chief Risk Officer
Edoardo Faletti



Declaration of the Financial Reporting Manager

The undersigned, Gianpietro Val, in his capacity as Financial Reporting Manager of Banco BPM S.p.A, hereby declares, in compliance with the provisions of Article 154-bis, paragraph 2 of Italian Legislative Decree no. 58 of 24 February 1998, that the accounting information contained in this document is consistent with the corporate documents, books and accounting records.

Milan, 25 November 2025



Il Dirigente Preposto alla redazione dei documenti
contabili societari
Gianpietro Val