



**Public Disclosure**  
**Pillar III**

Data as at 31 March 2026

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) 2021/637<sup>1</sup>;
- 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 Italy, the common regulations are implemented by the Bank of Italy in Circular no. 285 of 17 December 2013 "Supervisory Provisions for Banks".

In addition, pursuant to Article 434 of the CRR, the European Banking Authority has been mandated to publish on its website the public disclosures of the Institutions ("Pillar 3 Data Hub" or "P3DH"), in order to centralise prudential information into a single platform and enhance data comparability through a standardised format, leveraging on interactive tools for data visualisation. In line with the Final Draft ITS (EBA/ITS/2025/01<sup>2</sup>), the Banco BPM Group sent the EBA the Pillar 3 disclosures published starting from the semi-annual disclosure referring to 30 June 2025. These disclosures are available on the European Data Access Portal ([EDAP](#)) platform.

This public disclosure has been prepared on the basis of the following elements:

- the external reference regulations listed above, lastly amended with the updates introduced by Regulation (EU) 2024/1623 of 31 May 2024 (CRR3) which entered into force on 1 January 2025;

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<sup>1</sup> 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

<sup>2</sup> Final Draft Implementing Technical Standards on IT solutions for public disclosures by institutions, other than small and non-complex institutions, of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013

- the “Modello di Informativa al Pubblico” 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;
- the consolidated figures (prudential scope) as at 31 March 2026, in national currency.

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 investments representing 35% of the share capital of PiùVera Assicurazioni S.p.A.<sup>3</sup>, as well as, from 11 April 2025 the controlling interest in Anima Holding equal to 89.949% of the latter's capital and, through it, of 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 the Anima Group).

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 exposure and is included in the risk-weighted assets for credit risk<sup>4</sup>. The aforementioned treatment is not extended to Anima Holding and to the asset management companies controlled by the latter, which are instead consolidated line-by-line, also from a prudential perspective in compliance with that recently confirmed by the EBA in the “Report on prudential consolidation” published on 9 January 2026<sup>5</sup>.

### **The prudential scope of consolidation**

There were no changes in the prudential scope of consolidation compared to 31 December 2025.

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<sup>3</sup> New name assumed from 1 September 2025 by the investment in Vera Assicurazioni, which from 1 November 2025 incorporated the company Banco BPM Assicurazioni, also 35% owned by Banco BPM Vita

<sup>4</sup> In compliance with the provisions of the CRR, the weighting percentage is 100%

<sup>5</sup> EBA/REP/2026/01 of 9 January 2026 (“EBA Report on the completeness and appropriateness of the definitions and provisions on consolidation under article 18(10) of the CRR”). 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 were consequently 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

## Structure of the Banco BPM Group Public Disclosure

The following 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, as domestic systemically important "Large listed Institution" (O-SII<sup>6</sup>).

It should be noted that all quantitative data reported in the templates and in the comments are expressed in millions of euro, unless otherwise indicated.

| 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  | Applicable   |
|   | Template EU CMS1 - Comparison of modelled and standardised risk weighted exposure amounts at risk level   | Applicable   |
|   | Template EU CMS2 - Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level                                  | Applicable   |
| Section 4 - Disclosure of own funds   | Template EU ILAC - Internal loss absorbing capacity - internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs | Not applicable as the Group is not a G-SII                           |
| 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   | Applicable   |
| 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 |

<sup>6</sup> Other Systemically Important Institutions

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

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

Pursuant to Article 438 (d) of the CRR, 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

In line with the instructions for completion provided in Annex II, rows 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 credit risk), which constitutes 73.5% of the TREA.

The TREA recorded an increase of 589 million compared to 31 December 2025, mainly due to the rise in the credit risk component (+235 million), exposures to securitisations (+181 million) and counterparty credit risk (+290 million). The other risk items recorded a slight decrease.

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

|               |   | Total risk exposure amounts (TREA) |               | Total own funds requirements |
|---------------|---|------------------------------------|---------------|------------------------------|
|               |   | a                                  | b             | c                            |
|               |   | 31/03/2026                         | 31/12/2025    | 31/03/2026                   |
| <b>1</b>      | <b>Credit risk (excluding CCR)</b>  | <b>48,415</b>                      | <b>48,180</b> | <b>3,873</b>                 |
| 2             | Of which standardised approach  | 20,150                             | 20,133        | 1,612                        |
| 3             | Of which the Foundation IRB (F-IRB) approach                                    | 7,996                              | 7,414         | 640                          |
| 4             | Of which slotting approach  | 2,780                              | 2,810         | 222                          |
| EU 4a         | Of which equities under the simple risk-weighted approach                       | -                                  | -             | -                            |
| 5             | Of which the Advanced IRB (A-IRB) approach                                      | 16,682                             | 16,679        | 1,335                        |
| <b>6</b>      | <b>Counterparty credit risk - CCR</b>   | <b>1,484</b>                       | <b>1,194</b>  | <b>119</b>                   |
| 7             | Of which standardised approach  | 538                                | 578           | 43                           |
| 8             | Of which internal model method (IMM)  | -                                  | -             | -                            |
| EU 8a         | Of which exposures to a CCP   | 146                                | 111           | 12                           |
| 9             | Of which other CCR  | 800                                | 506           | 64                           |
| <b>10</b>     | <b>Credit valuation adjustment risk - CVA risk</b>                              | <b>258</b>                         | <b>332</b>    | <b>21</b>                    |
| EU 10a        | Of which standardised approach (SA)   | -                                  | -             | -                            |
| EU 10b        | Of which basic approach (F-BA and R-BA)   | 258                                | 332           | 21                           |
| EU 10c        | Of which simplified approach  | -                                  | -             | -                            |
| 11            | Not applicable  |                                    |               |                              |
| 12            | Not applicable  |                                    |               |                              |
| 13            | Not applicable  |                                    |               |                              |
| 14            | Not applicable  |                                    |               |                              |
| <b>15</b>     | <b>Settlement risk</b>  | <b>4</b>                           | <b>4</b>      | <b>0</b>                     |
| <b>16</b>     | <b>Securitisation exposures in the non-trading book (after the cap)</b>         | <b>1,974</b>                       | <b>1,793</b>  | <b>158</b>                   |
| 17            | Of which SEC-IRBA approach  | 1,723                              | 1,558         | 138                          |
| 18            | Of which SEC-ERBA approach (including IAA)                                      | 13                                 | 15            | 1                            |
| 19            | Of which SEC-SA approach  | 238                                | 220           | 19                           |
| EU 19a        | Of which 1250% / deduction  | -                                  | -             | -                            |
| <b>20</b>     | <b>Position, foreign exchange and commodities risks (Market risk)</b>           | <b>1,165</b>                       | <b>1,209</b>  | <b>93</b>                    |
| 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)                            | -                                  | -             | -                            |
| <b>EU 22a</b> | <b>Large exposures</b>  | -                                  | -             | -                            |
| <b>23</b>     | <b>Reclassifications between trading and non-trading books</b>                  | -                                  | -             | -                            |
| <b>24</b>     | <b>Operational risk</b>   | <b>12,566</b>                      | <b>12,566</b> | <b>1,005</b>                 |
| <b>EU 24a</b> | <b>Exposures to crypto-assets</b>   | -                                  | -             | -                            |
| <b>25</b>     | <b>Amounts below the thresholds for deduction (subject to 250% risk weight)</b> | <b>3,403</b>                       | <b>3,376</b>  | <b>272</b>                   |
| <b>26</b>     | <b>Output floor applied (%)</b>   | <b>55.00%</b>                      | <b>50.00%</b> |                              |
| <b>27</b>     | <b>Floor adjustment (before application of transitional cap)</b>                | -                                  | -             |                              |
| <b>28</b>     | <b>Floor adjustment (after application of transitional cap)</b>                 | -                                  | -             |                              |
| <b>29</b>     | <b>Total</b>  | <b>65,867</b>                      | <b>65,278</b> | <b>5,269</b>                 |

The data reported in the template in row 1 include 807 million of additional risk-weighted assets entered voluntarily pursuant to the option permitted by Art. 3 of Regulation (EU) no. 575/2013 of 26 June 2013 and subsequent amendments.

## Template EU KM1 - Key metrics template (1 of 4)

Pursuant to point (b) of Article 438 and points (a) to (g) of Article 447 of the CRR, 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 March 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 models 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 2026 to 31 December 2026, the applicable threshold is reduced to 55% and will gradually increase in subsequent years until it reaches the level of 72.5%.

As a result of this change, since 31 March 2025, rows that provide information on the impacts of the application of the aforementioned floor have been introduced in the template in question. In greater detail, the total risk exposure amount (row 4) and the relative capital ratios (rows 5, 6 and 7) are calculated taking this mechanism into account and are also shown excluding the impact of the same (in the new rows 4a, 5b, 6b and 7b, respectively). 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 31 March 2026.

As at 31 March 2026, Own Funds totalled 12,549 million euro against weighted assets of 65,867 million euro, mostly arising from credit and counterparty risks and, to a lesser extent, operational and market risks.

The Total Capital Ratio stood at 19.05%; the Group Tier 1 Ratio (Tier 1 Capital to total RWAs) stood at 15.70%. The Common Equity Tier 1 Ratio (Common Equity Tier 1 to RWAs) was 13.59%.

### Clarifications on the method of calculating the ratios

Please note that the capital data and ratios shown include the interim profit as at 31 March 2026, resulting from the Group's consolidated balance sheet and income statement approved by the Board of Directors on 5 May 2026, net of the portion that is expected to be distributed as a dividend<sup>7</sup> and other profit allocations. The inclusion was authorised by the European Central Bank.

### Minimum requirements to be met

With a communication dated 22 October 2025, the Bank of Italy confirmed Banco BPM Banking Group as an Other Systemically Important Institution (O-SII), envisaging, also for 2026, the obligation to maintain an O-SII reserve equal to 0.50% of the regulatory requirements.

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<sup>7</sup> Pursuant to the provisions of Article 5 of European Central Bank Decision (EU) 2015/656 of 4 February 2015, the dividends deducted from the amount of the profit of the first quarter included in own funds are equal to 80% of the profit of the first quarter.

## Template EU KM1 - Key metrics template (2 of 4)

With its communication of 19 December 2025, the Bank of Italy confirmed the Countercyclical Capital Buffer ratio for exposures to Italian counterparties at zero percent also for the first quarter of 2026.

On 30 October 2025, Banco BPM received a notification from the European Central Bank (ECB) of the new SREP decision, containing the results of the annual Supervisory Review and Evaluation Process (SREP). On the basis of the analyses and assessments conducted, the ECB determined an overall "Pillar 2 Requirement (P2R)" for 2026 of 2.25%, confirming the value applied to 2025.

Also taking into account the updates based on the data as at 31 March 2026 of the capital buffer against systemic risk of 0.664%, and the countercyclical capital buffer against exposures to foreign counterparties of 0.082%, the minimum requirements to be met on a consolidated basis as at 31 March 2026 are as follows<sup>8</sup>:

- CET 1 ratio: 9.51%;
- Tier 1 ratio: 11.43%;
- Total Capital ratio: 14.00%.

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<sup>8</sup> These requirements, updated as at 31 March 2026, are determined as follows:

- the Pillar I minimum requirement equal to 8% (of which 4.5% CET 1, 1.5% in terms of AT 1 and 2% in terms of Tier 2);
- the P2R requirement communicated by the ECB equal to 2.25% to be met: (i) with CET 1 for 1.266%, (ii) with AT 1 for 0.422% and (iii) with Tier 2 for 0.563%;
- a capital conservation buffer equal to 2.50%, to be met entirely by CET 1;
- the O-SII buffer equal to 0.50% to be met entirely by CET 1;
- the countercyclical capital buffer equal to 0.082% to be met entirely by CET 1;
- the capital buffer against systemic risk (Syrb) equal to 0.664% to be met entirely by CET 1.

It should be noted that the countercyclical capital buffer and the capital buffer against systemic risk are recalculated on a quarterly basis based on the evolution of the exposures considered in the respective calculation bases

Template EU KM1 - Key metrics template (3 of 4)

|   |  | a          | b          | c          | d          | e          |
|---|--|------------|------------|------------|------------|------------|
|   |  | 31/03/2026 | 31/12/2025 | 30/09/2025 | 30/06/2025 | 31/03/2025 |
| <b>Available own funds (amounts)</b>  |  |            |            |            |            |            |
| 1   | Common Equity Tier 1 (CET1) capital  | 8,950      | 9,351      | 9,269      | 9,099      | 10,380     |
| 2   | Tier 1 capital   | 10,340     | 10,740     | 10,659     | 10,488     | 11,770     |
| 3   | Total capital  | 12,549     | 12,963     | 13,133     | 12,362     | 13,654     |
| <b>Risk-weighted exposure amounts</b>   |  |            |            |            |            |            |
| 4   | Total risk exposure amount   | 65,867     | 65,278     | 64,547     | 64,280     | 65,138     |
| 4a  | Total risk exposure pre-floor  | 65,867     | 65,278     | 64,547     | 64,280     | 65,138     |
| <b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>  |  |            |            |            |            |            |
| 5   | Common Equity Tier 1 ratio (%)   | 13.59%     | 14.33%     | 14.36%     | 14.16%     | 15.94%     |
| 5a  | Not applicable   |            |            |            |            |            |
| 5b  | Common Equity Tier 1 ratio considering unfloored TREA (%)  | 13.59%     | 14.33%     | 14.36%     | 14.16%     | 15.94%     |
| 6   | Tier 1 ratio (%)   | 15.70%     | 16.45%     | 16.51%     | 16.32%     | 18.07%     |
| 6a  | Not applicable   |            |            |            |            |            |
| 6b  | Tier 1 ratio considering unfloored TREA (%)  | 15.70%     | 16.45%     | 16.51%     | 16.32%     | 18.07%     |
| 7   | Total capital ratio (%)  | 19.05%     | 19.86%     | 20.35%     | 19.23%     | 20.96%     |
| 7a  | Not applicable   |            |            |            |            |            |
| 7b  | Total capital ratio considering unfloored TREA (%)   | 19.05%     | 19.86%     | 20.35%     | 19.23%     | 20.96%     |
| <b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a % of risk-weighted exposure amount)</b> |  |            |            |            |            |            |
| EU 7d   | Additional own funds requirements to address risks other than the risk of excessive leverage (%)           | 2.25%      | 2.25%      | 2.25%      | 2.25%      | 2.25%      |
| EU 7e   | of which: to be made up of CET1 capital (percentage points)  | 1.27%      | 1.27%      | 1.27%      | 1.27%      | 1.27%      |
| EU 7f   | of which: to be made up of Tier 1 capital (percentage points)  | 1.69%      | 1.69%      | 1.69%      | 1.69%      | 1.69%      |
| EU 7g   | Total SREP own funds requirements (%)  | 10.25%     | 10.25%     | 10.25%     | 10.25%     | 10.25%     |
| <b>Combined buffer and overall capital requirement (as a % of risk-weighted exposure amount)</b>  |  |            |            |            |            |            |
| 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 (%)  | 0.082%     | 0.071%     | 0.057%     | 0.056%     | 0.048%     |
| EU 9a   | Systemic risk buffer (%)   | 0.66%      | 0.66%      | 0.68%      | 0.69%      | 0.36%      |
| 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 (%)  | 3.75%      | 3.74%      | 3.74%      | 3.74%      | 3.40%      |
| EU 11a  | Overall capital requirements (%)   | 14.00%     | 13.99%     | 13.99%     | 14.00%     | 13.66%     |
| 12  | CET1 available after meeting the total SREP own funds requirements (%)                                     | 7.82%      | 8.56%      | 8.60%      | 8.39%      | 10.17%     |

Template EU KM1 - Key metrics template (4 of 4)

|  |   | a          | b          | c          | d          | e          |
|--|---|------------|------------|------------|------------|------------|
|  |   | 31/03/2026 | 31/12/2025 | 30/09/2025 | 30/06/2025 | 31/03/2025 |
| <b>Leverage ratio</b>  |   |            |            |            |            |            |
| 13   | Total exposure measure  | 218,029    | 204,304    | 219,498    | 214,804    | 214,286    |
| 14   | Leverage ratio (%)  | 4.74%      | 5.26%      | 4.86%      | 4.88%      | 5.49%      |
| <b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b> |   |            |            |            |            |            |
| 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%      |
| <b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>                |   |            |            |            |            |            |
| EU 14d   | Leverage ratio buffer requirement (%)   | -          | -          | -          | -          | -          |
| EU 14e   | Overall leverage ratio requirement (%)  | 3.00%      | 3.00%      | 3.00%      | 3.00%      | 3.00%      |
| <b>Liquidity Coverage Ratio</b>  |   |            |            |            |            |            |
| 15   | Total high-quality liquid assets (HQLA) (weighted value - average)              | 30,350     | 29,602     | 28,381     | 27,287     | 26,821     |
| EU 16a   | Cash outflows - Total weighted value  | 25,835     | 25,046     | 24,279     | 23,566     | 23,110     |
| EU 16b   | Cash inflows - Total weighted value   | 4,988      | 4,802      | 4,589      | 4,553      | 4,564      |
| 16   | Total net cash outflows (adjusted value)  | 20,847     | 20,244     | 19,690     | 19,013     | 18,546     |
| 17   | Liquidity coverage ratio (%)  | 145.83%    | 146.25%    | 144.10%    | 143.73%    | 145.00%    |
| <b>Net Stable Funding Ratio</b>  |   |            |            |            |            |            |
| 18   | Total available stable funding  | 118,292    | 120,901    | 120,149    | 122,310    | 120,306    |
| 19   | Total required stable funding   | 94,608     | 95,184     | 94,291     | 96,466     | 97,299     |
| 20   | NSFR ratio (%)  | 125.03%    | 127.02%    | 127.42%    | 126.79%    | 123.65%    |

## Template EU CMS1 - Comparison of modelled and standardised risk weighted exposure amounts at risk level (1 of 2)

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, pursuant to Article 438 (d) and (da) of the CRR, the template provides evidence in columns (a) and (b) respectively of the amount of risk-weighted assets (RWEA) calculated by applying the internal models 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 31 March 2026.

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 applying the transitional arrangements pursuant to Article 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 31 March 2026, as the actual capital requirements are higher than the minimum level, obtained by applying the multiplication factor of 55%<sup>9</sup> to the amount of risk-weighted assets calculated by applying the standard approach to all portfolios (column EU d).

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<sup>9</sup> Article 465 of the CRR, "Transitional arrangement for the output floor" provides that, by way of derogation from the first paragraph of Article 92 (3) and without prejudice to the derogation provided for in the second paragraph of Article 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 of 2)

|          |  | <b>a</b>   | <b>b</b>   | <b>c</b>                          | <b>d</b>   | <b>EU d</b>                                       |
|----------|--|--|--|-----------------------------------|--|---|
|          |  | <b>RWEAs for modelled approaches that banks have supervisory approval to use</b> | <b>RWEAs for portfolios where standardised approaches are used</b> | <b>Total actual RWEAs (a + b)</b> | <b>RWEAs calculated using full standardised approach</b> | <b>RWEAs that is the base of the output floor</b> |
| 1        | Credit risk (excluding counterparty credit risk) | 27,458   | 20,150   | 47,608                            | 65,774   | 62,960  |
| 2        | Counterparty credit risk                         | 121  | 1,363  | 1,484                             | 1,569  | 1,569   |
| 3        | Credit valuation adjustment                      |  | 258  | 258                               | 258  | 258   |
| 4        | Securitisation exposures in the banking book     | 1,723  | 251  | 1,974                             | 8,621  | 3,887   |
| 5        | Market risk                                      | 1,136  | 30   | 1,165                             | 875  | 875   |
| 6        | Operational risk                                 |  | 12,566   | 12,566                            | 12,566   | 12,566  |
| 7        | Other risk-weighted exposure amounts             |  | 812  | 812                               | 812  | 812   |
| <b>8</b> | <b>Total</b>                                     | <b>30,438</b>  | <b>35,430</b>  | <b>65,867</b>                     | <b>90,475</b>  | <b>82,928</b>                                     |

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

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

Pursuant to Article 438 (d) and (da) of the CRR, 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 models.

The template provides evidence of the RWAs calculated on internal models (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 models 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 models (IRB), where possible and in line with the disclosure requirements, were excluded from the respective exposure classes and were reclassified to the corresponding exposure 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                        | Categorised as secured by immovable property and ADC exposures in SA |
| 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 |  |

The actual Total RWEA of this template does not include the 807 million of additional risk-weighted assets entered voluntarily pursuant to the option permitted by Art. 3 of Regulation (EU) no. 575/2013 of 26 June 2013 and subsequent amendments.

Template EU CMS2 - Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level (2 of 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  | -  | 15  | 2,750              | 2,764   | 2,764                                      |
| EU 1a   | Regional governments and local authorities   | -  | 0   | 82                 | 82  | 82   |
| EU 1b   | Public sector entities   | -  | -   | 303                | 303   | 303  |
| EU 1c   | Categorised as Multilateral Development Banks in SA  | -  | -   | -                  | -   | -  |
| EU 1d   | Categorised as International organisations in SA   | -  | -   | -                  | -   | -  |
| 2       | Institutions   | -  | 22  | 2,198              | 2,219   | 2,219                                      |
| 3       | Equity   | -  | -   | 3,990              | 3,990   | 3,990                                      |
| 4       | Not applicable   |  |   |                    |   |  |
| 5       | <b>Corporates</b>  | <b>16,032</b>  | <b>22,995</b>   | <b>19,043</b>      | <b>28,820</b>                                     | <b>26,006</b>                              |
| 5.1     | Of which: F-IRB is applied   | 7,400  | 12,223  | 7,400              | 13,049  | 12,223                                     |
| 5.2     | Of which: A-IRB is applied   | 8,632  | 17,679  | 8,632              | 19,666  | 17,679                                     |
| EU 5a   | Of which: Corporates - General   | 14,797   | 21,631  | 14,797             | 24,445  | 21,631                                     |
| EU 5b   | Of which: Corporates - Specialised lending   | 1,100  | 1,364   | 1,112              | 1,376   | 1,376                                      |
| EU 5c   | Of which: Corporates - Purchased receivables   | 134  | 331   | 134                | 347   | 331  |
| 6       | <b>Retail</b>  | <b>1,954</b>   | <b>4,222</b>  | <b>2,285</b>       | <b>4,552</b>                                      | <b>4,552</b>                               |
| 6.1     | Of which: Retail - Qualifying revolving  | 62   | 112   | 62                 | 112   | 112  |
| EU 6.1a | Of which: Retail - Purchased receivables   | 0  | 1   | 0                  | 1   | 1  |
| EU 6.1b | Of which: Retail - Other   | 1,892  | 4,109   | 1,892              | 4,109   | 4,109                                      |
| 6.2     | Of which: Retail - Secured by residential real estate  | -  | -   | -                  | -   | -  |
| 7       | Not applicable   |  |   |                    |   |  |
| EU 7a   | Categorised as secured by immovable property and ADC exposures in SA                           | 7,996  | 14,126  | 8,207              | 14,337  | 14,337                                     |
| EU 7b   | Collective investment undertakings (CIU)   | 467  | 586   | 3,748              | 3,866   | 3,866                                      |
| EU 7c   | Categorised as exposures in default in SA  | 1,009  | 846   | 1,148              | 985   | 985  |
| EU 7d   | Categorised as subordinated debt exposures in SA   | -  | -   | 623                | 623   | 623  |
| EU 7e   | Categorised as covered bonds in SA   | -  | -   | 43                 | 43  | 43   |
| EU 7f   | Categorised as claims on institutions and corporates with a short-term credit assessment in SA | -  | -   | -                  | -   | -  |
| 8       | Other non-credit obligation assets   | -  | -   | 3,189              | 3,189   | 3,189                                      |
| 9       | <b>Total</b>   | <b>27,458</b>  | <b>42,811</b>   | <b>47,608</b>      | <b>65,774</b>                                     | <b>62,960</b>                              |

## Section 7 - Disclosure of liquidity requirements

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

|                                   |   | a                                | b             | c             | d             |
|-----------------------------------|---|----------------------------------|---------------|---------------|---------------|
|                                   |   | Total unweighted value (average) |               |               |               |
| EU 1a                             | Quarter ending on 31/03/2026  | 31/03/2026                       | 31/12/2025    | 30/09/2025    | 30/06/2025    |
| EU 1b                             | Number of data points used in the calculation of averages   | 12                               | 12            | 12            | 12            |
| <b>HIGH-QUALITY LIQUID ASSETS</b> |   |                                  |               |               |               |
| <b>1</b>                          | <b>Total high-quality liquid assets (HQLA)</b>  |                                  |               |               |               |
| <b>CASH OUTFLOWS</b>              |   |                                  |               |               |               |
| 2                                 | Retail deposits and deposits from small business customers, of which:   | 70,619                           | 70,170        | 69,975        | 69,684        |
| 3                                 | <i>Stable deposits</i>  | 52,171                           | 52,011        | 51,994        | 51,952        |
| 4                                 | <i>Less stable deposits</i>   | 18,415                           | 18,128        | 17,949        | 17,701        |
| 5                                 | Unsecured wholesale funding   | 33,883                           | 32,590        | 31,212        | 30,182        |
| 6                                 | <i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>  | 8,024                            | 7,902         | 7,875         | 7,747         |
| 7                                 | <i>Non-operational deposits (all counterparties)</i>  | 25,593                           | 24,356        | 23,049        | 22,167        |
| 8                                 | <i>Unsecured debt</i>   | 266                              | 332           | 287           | 269           |
| 9                                 | <i>Secured wholesale funding</i>  |                                  |               |               |               |
| 10                                | Additional requirements   | 13,823                           | 14,176        | 14,208        | 13,937        |
| 11                                | <i>Outflows related to derivative exposures and other collateral requirements</i>   | 990                              | 1,190         | 1,328         | 1,359         |
| 12                                | <i>Outflows related to loss of funding on debt products</i>   | -                                | -             | -             | -             |
| 13                                | <i>Credit and liquidity facilities</i>  | 12,833                           | 12,986        | 12,880        | 12,579        |
| 14                                | Other contractual funding obligations   | 1,674                            | 1,230         | 979           | 694           |
| 15                                | Other contingent funding obligations  | 45,003                           | 44,485        | 43,775        | 42,821        |
| <b>16</b>                         | <b>TOTAL CASH OUTFLOWS</b>  |                                  |               |               |               |
| <b>CASH INFLOWS</b>               |   |                                  |               |               |               |
| 17                                | Secured lending (e.g. reverse repos)  | 10,754                           | 8,591         | 7,842         | 7,427         |
| 18                                | Inflows from fully performing exposures   | 1,677                            | 1,663         | 1,629         | 1,697         |
| 19                                | Other cash inflows  | 13,274                           | 13,558        | 13,598        | 13,508        |
| 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)  |                                  |               |               |               |
| <b>20</b>                         | <b>TOTAL CASH INFLOWS</b>   | <b>25,705</b>                    | <b>23,812</b> | <b>23,070</b> | <b>22,631</b> |
| 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>   | 23,902                           | 21,931        | 21,156        | 19,893        |
| <b>TOTAL ADJUSTED VALUE</b>       |   |                                  |               |               |               |
| <b>EU-21</b>                      | <b>LIQUIDITY BUFFER</b>   |                                  |               |               |               |
| <b>22</b>                         | <b>TOTAL NET CASH OUTFLOWS</b>  |                                  |               |               |               |
| <b>23</b>                         | <b>LIQUIDITY COVERAGE RATIO</b>   |                                  |               |               |               |

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

|                                   |   | e                              | f              | g              | h              |
|-----------------------------------|---|--------------------------------|----------------|----------------|----------------|
|                                   |   | Total weighted value (average) |                |                |                |
| EU 1a                             | Quarter ending on 31/03/2026  | 31/03/2026                     | 31/12/2025     | 30/09/2025     | 30/06/2025     |
| EU 1b                             | Number of data points used in the calculation of averages   | 12                             | 12             | 12             | 12             |
| <b>HIGH-QUALITY LIQUID ASSETS</b> |   |                                |                |                |                |
| <b>1</b>                          | <b>Total high-quality liquid assets (HQLA)</b>  | <b>30,350</b>                  | <b>29,602</b>  | <b>28,381</b>  | <b>27,287</b>  |
| <b>CASH OUTFLOWS</b>              |   |                                |                |                |                |
| 2                                 | Retail deposits and deposits from small business customers, of which:   | 4,982                          | 4,935          | 4,911          | 4,875          |
| 3                                 | <i>Stable deposits</i>  | 2,609                          | 2,601          | 2,600          | 2,598          |
| 4                                 | <i>Less stable deposits</i>   | 2,342                          | 2,303          | 2,280          | 2,247          |
| 5                                 | Unsecured wholesale funding   | 14,327                         | 13,707         | 12,966         | 12,498         |
| 6                                 | <i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>  | 1,886                          | 1,857          | 1,845          | 1,815          |
| 7                                 | <i>Non-operational deposits (all counterparties)</i>  | 12,175                         | 11,519         | 10,834         | 10,415         |
| 8                                 | Unsecured debt  | 266                            | 332            | 287            | 269            |
| 9                                 | Secured wholesale funding   | 974                            | 728            | 721            | 636            |
| 10                                | Additional requirements   | 3,299                          | 3,526          | 3,587          | 3,505          |
| 11                                | <i>Outflows related to derivative exposures and other collateral requirements</i>   | 990                            | 1,190          | 1,328          | 1,359          |
| 12                                | <i>Outflows related to loss of funding on debt products</i>   | -                              | -              | -              | -              |
| 13                                | <i>Credit and liquidity facilities</i>  | 2,309                          | 2,337          | 2,259          | 2,146          |
| 14                                | Other contractual funding obligations   | 138                            | 125            | 92             | 81             |
| 15                                | Other contingent funding obligations  | 2,115                          | 2,024          | 2,002          | 1,971          |
| <b>16</b>                         | <b>TOTAL CASH OUTFLOWS</b>  | <b>25,835</b>                  | <b>25,046</b>  | <b>24,279</b>  | <b>23,566</b>  |
| <b>CASH INFLOWS</b>               |   |                                |                |                |                |
| 17                                | Secured lending (e.g. reverse repos)  | 710                            | 488            | 331            | 346            |
| 18                                | Inflows from fully performing exposures   | 1,184                          | 1,165          | 1,123          | 1,182          |
| 19                                | Other cash inflows  | 3,094                          | 3,149          | 3,135          | 3,026          |
| 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)  | -                              | -              | -              | -              |
| <b>20</b>                         | <b>TOTAL CASH INFLOWS</b>   | <b>4,988</b>                   | <b>4,802</b>   | <b>4,589</b>   | <b>4,553</b>   |
| 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>   | 4,988                          | 4,802          | 4,589          | 4,553          |
| <b>TOTAL ADJUSTED VALUE</b>       |   |                                |                |                |                |
| <b>EU-21</b>                      | <b>LIQUIDITY BUFFER</b>   | <b>30,350</b>                  | <b>29,602</b>  | <b>28,381</b>  | <b>27,287</b>  |
| <b>22</b>                         | <b>TOTAL NET CASH OUTFLOWS</b>  | <b>20,847</b>                  | <b>20,244</b>  | <b>19,690</b>  | <b>19,013</b>  |
| <b>23</b>                         | <b>LIQUIDITY COVERAGE RATIO</b>   | <b>145.83%</b>                 | <b>146.25%</b> | <b>144.10%</b> | <b>143.73%</b> |

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

in accordance with Article 451a(2) CRR

### **a) Explanations on the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time**

As highlighted in the EU LIQ1 template, in the last twelve months, Banco BPM Group has maintained an average liquidity coverage ratio (LCR) of 146% (12-month average, as at 31/03/2026), 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 LCR average trend over 12 months is substantially stable and reflects the stability of the Group's liquidity profile.

The components that contribute to the calculation of net liquidity outflows consist mainly of wholesale and retail deposits as well as the potential drawdowns of irrevocable credit lines.

### **b) Explanations on the changes in the LCR over time**

During the first quarter of 2026, 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.

### **c) Explanations on the actual concentration of funding sources**

The adequacy of the structure and cost of funding of the Banco BPM Group is ensured through constant diversification of funding sources.

To mitigate concentration risk, the Group constantly monitors the management and regulatory concentration metrics.

The main sources of funding for the Group include: customer deposits, funding from institutional customers and Eurosystem refinancing transactions.

### **d) High-level description of the composition of the institution's liquidity buffer**

The EU LIQ1 template shows, as at 31 March 2026, a 12-month average level of high-quality liquid assets available of 30.4 billion (weighted value).

As at 31 March 2026, 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 89% of the total liquidity buffer.

In addition to the reserves calculated in the LCR buffer, the Group holds allocable reserves mainly represented by ABACO credits and self-withholding issues.

### **e) Derivative exposures and potential collateral calls**

The Banco BPM Group negotiates derivatives both with central counterparties and bilaterally (OTC).

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.

## **f) Currency mismatch in the LCR**

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.

The Banco BPM Group periodically monitors foreign currency exposure, with a prudential operational threshold of 4%. As at 31 March 2026, the Group had no significant exposures in foreign currencies and the internal operational limit was respected for each foreign currency.

## **g) 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**

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.

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.

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.

The intraday liquidity risk is measured on a monthly basis through the monitoring of five indicators inspired by the Monitoring Tools defined by BCBS<sup>10</sup> and the performance of intraday stress tests on a combined stress scenario (Sovereign Scenario, Counterparty Scenario and Own-name Scenario) with differentiated intra-day and end-of-day impact.

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.

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<sup>10</sup> 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

The template in question 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                             |
| <b>1</b> | <b>Risk weighted exposure amount as at the end of the previous reporting period</b> | <b>26,903</b>                 |
| 2        | Asset size (+/-)  | 1,688                         |
| 3        | Asset quality (+/-)   | (430)                         |
| 4        | Model updates (+/-)   | 28                            |
| 5        | Methodology and policy (+/-)  | 355                           |
| 6        | Acquisitions and disposals (+/-)  | (1,083)                       |
| 7        | Foreign exchange movements (+/-)  | -                             |
| 8        | Other (+/-)   | (3)                           |
| <b>9</b> | <b>Risk weighted exposure amount as at the end of the reporting period</b>          | <b>27,458</b>                 |

Net of the RWEA deltas indicated in the items "Asset size" and "Asset quality", depending on the quarterly trends of the portfolio subject to credit risk, the change in the amount of RWEAs compared to the previous quarter is mainly attributable to the following factors:

1. in the first quarter of 2026, Banco BPM completed two synthetic securitisation transactions called Marcello and Tranched Cover 2011, respectively.  
In the Marcello transaction, a guarantee was issued on the Mezzanine tranche through the subscription by investors of securities issued by a securitisation company pursuant to Law no. 130/99. The notional value is equal to the guaranteed tranche and, with the revenue obtained, the vehicle granted a limited recourse loan to Banco BPM on 26 March, the effective date of the guarantee.  
The Tranched Cover 2011 transaction envisages hedging of the Junior tranche through a direct personal guarantee released by the Guarantee Fund for Small and Medium-sized Enterprises (FGPMI) and a counter-guarantee from the State starting from 30 March;
2. in January 2026, the transaction called Greta, finalised in 2022, was closed, with the Bank exercising the early termination option;
3. between December and March, a number of single-name and massive sales (Sophia, Nebbiolo), relating to non-performing loans were completed, in part already approved in the previous half year.

These transactions led to a reduction in RWEAs compared to the previous quarter of approximately €1 billion ("Acquisitions and disposals"), attributable to a reduction in exposures subject to credit risk based on the IRB approach.

In addition, in February 2026, a software change was introduced that automated the calculation of RWEAs relating to "non-operating credit lines". This update makes it possible to trace, within the IT procedures, all the contractual agreements which, according to the

provisions of Article 111, paragraph 4 of the CRR3, are now classified as commitments<sup>11</sup> ("Methodology and policy").

Lastly, during the reference quarter, the usual update of the time series was completed, which include the default data observed up to December 2024 in the calibration of the PD, LGD and CCF risk parameters, as required by internal regulations. The evidence was reported in terms of RWEA in row 4 ("Model updates").

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<sup>11</sup> During 2025, the effects were instead considered in aggregate form through the application of Article 3 CRR3

## Section 15 - Disclosure of market risk

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

The MR2-B template was completed in accordance with Implementing Regulation 2021/637, applicable until the entry into force of the "Fundamental Review of the Trading Book (FRTB)" framework.

|          |  | a          | b          | c          | d                          | e        | f            | g                            |
|----------|--|------------|------------|------------|----------------------------|----------|--------------|------------------------------|
|          |  | VaR        | SVaR       | IRC        | Comprehensive risk measure | Other    | Total RWEAs  | Total own funds requirements |
| <b>1</b> | <b>RWEAs at previous period end</b>                        | <b>142</b> | <b>550</b> | <b>507</b> | <b>-</b>                   | <b>-</b> | <b>1,199</b> | <b>96</b>                    |
| 1a       | Regulatory adjustment                                      | (109)      | (365)      | (31)       | -                          | -        | (506)        | (40)                         |
| 1b       | RWEAs at the previous quarter-end (end of the day)         | 32         | 185        | 476        | -                          | -        | 694          | 55                           |
| 2        | Movement in risk levels                                    | 21         | 16         | 38         | -                          | -        | 75           | 6                            |
| 3        | Model updates/changes                                      | -          | -          | -          | -                          | -        | -            | -                            |
| 4        | Methodology and policy                                     | -          | -          | -          | -                          | -        | -            | -                            |
| 5        | Acquisitions and disposals                                 | -          | -          | -          | -                          | -        | -            | -                            |
| 6        | Foreign exchange movements                                 | (19)       | (67)       | -          | -                          | -        | (87)         | (7)                          |
| 7        | Other  | -          | -          | -          | -                          | -        | -            | -                            |
| 8a       | RWEAs at the end of the disclosure period (end of the day) | 34         | 134        | 514        | -                          | -        | 682          | 55                           |
| 8b       | Regulatory adjustment                                      | 87         | 366        | -          | -                          | -        | 453          | 36                           |
| <b>8</b> | <b>RWEAs at the end of the disclosure period</b>           | <b>122</b> | <b>500</b> | <b>514</b> | <b>-</b>                   | <b>-</b> | <b>1,136</b> | <b>91</b>                    |

The decrease in RWEAs for exposures subject to market risk is mainly attributable to the Stressed VaR component, due above all to the decrease in the overall long vega share position, in particular with respect to the European (Ftse Mib, SelDiv30, Smi, Stoxx50e) and US (S&P 500) indexes, against scenarios characterised by negative volatility shocks.

# 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 31 March 2026 has been prepared in accordance with the reference regulations (EU Regulation no. 575/2013 and subsequent amendments), the formal policy and the processes, systems and internal controls, as expressly envisaged by Article 431 of the CRR.

Milan, 26 May 2026

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, 26 May 2026



Il Dirigente Preposto alla redazione dei documenti  
contabili societari  
Gianpietro Val